

Amending the Royal Parks Regulations: Public Consultation

Report on findings

July 2009

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1 Background and Summary Findings

This report presents the findings of The Royal Parks' consultation on proposed changes to the Royal Parks Regulations. This section of the report sets out:

1. The background to the consultation
2. The scope of this report
3. Questions posed in the consultation
4. A summary of key findings.

1.1 Background to the consultation

The Royal Parks launched a formal 13 week consultation on 30 January 2009. The consultation paper outlined proposed changes to the Royal Parks Regulations and asked for views around the following five areas:

1. Introduction of Parking Charges in Richmond Park and/or Bushy Park
2. Allowing Private Hire Vehicles (PHVs) into the Parks
3. Lowering the speed limit on the roads in Greenwich and Bushy Parks
4. Clarification of the existing animal faeces regulations relating to horses
5. General comments directly related to the proposals.

1.2 Scope of this report

This report presents findings from the responses received up to the close of the consultation on 1st May 2009.

In addition to the overall consultation findings, the views of local MPs, councillors and local authorities have been included in section 3.1 of this document. Views of stakeholder groups are reflected at appropriate points throughout the report.

A summary of petitions and other responses relating to the consultation exercise which were not directly responding to the consultation questions have been included at Appendix A.

This report has been prepared by PA Consulting Group for The Royal Parks and, as such, is an independent review of the responses to the questions posed in the consultation document.

I.3 Questions posed in the consultation

The consultation proposals were framed around 14 questions which are set out below:

Section 1. Introduction of Parking Charges in Richmond and Bushy Parks	<p>Q1: Do you support the introduction of parking charges in Richmond and/or Bushy Park?</p> <p>Q2: If you accept the introduction of parking charges in principle, do you consider that the rates we propose are about right, too high or too low?</p> <p>Q3: Do you agree that there should be a maximum stay for parking in Richmond and/or Bushy Park?</p> <p>Q4: If you agree that there should be a maximum stay, do you think that 6 hours is about right, too long or too short?</p> <p>Q5: Do you have any further comments about our proposal to introduce parking charges?</p>
Section 2. Allowing Private Hire Vehicles (PHVs) into the Parks	<p>Q6: Do you support our proposal to allow Private Hire Vehicles that are licensed by the Public Carriage Office to enter the Royal Parks on the same terms as are already allowed in law for black cabs? If not, please give your reasons.</p> <p>Q7: Do you agree with our proposal to give express statutory force to the already accepted practice that black cabs are allowed to enter the Royal Parks even if they are bearing advertisements?</p> <p>Q8: Do you agree that we should make identical provision in respect of PHVs (provided that we implement our proposal to allow them to enter the Royal Parks)?</p>
Section 3. Lowering the speed limit on the roads in Greenwich and Bushy Parks	<p>Q9: Do you agree with our proposal to reduce the speed limit in Greenwich Park from 30mph to 20mph?</p> <p>Q10: If you do not agree with our proposal to reduce the speed limit in Greenwich Park to 20mph, please explain why.</p> <p>Q11: Do you agree with our proposal to reduce the speed limit in Bushy Park to 20mph?</p> <p>Q12: If you do not agree with our proposal to reduce the speed limit in Bushy Park to 20mph, please explain why.</p>
Section 4. Clarification of regulations	<p>Q13: Do you agree that the regulations should make clear that horse owners are not required to clean up after their animals?</p>
Section 5. General comments directly related to the proposals	<p>Q14: Do you have any other comments which relate directly to any of our proposals?</p>

1.4 Summary of key findings

A summary of the key findings across the five sections of the consultation can be seen below:

Introduction of parking charges in Richmond and Bushy Parks

- 84% of respondents were against the introduction of charges, and 16% in favour.
- Of those who responded in favour of a charge, the majority (56%) said that the charging structure outlined in the consultation paper was 'about right'. 37% of respondents thought they were too high and 7% felt that they were in fact too low.
- When questioned on whether there should be a maximum stay for parking, 59% of respondents disagreed, with 41% in support.
- Of those who agreed with the principle of a maximum stay, the majority agreed that the proposed 6 hours would be 'about right' (62%); 23% thought it would be too short, and the remaining 15% too long.

Allowing Private Hire Vehicles (PHVs) into the Parks

- When questioned on whether private hire vehicles (PHVs) should be allowed to access the parks on the same terms as black cabs, the majority (82%) of respondents agreed. 18% disagreed.
- 83% of respondents agreed that express statutory force should be given to the already accepted practice of allowing black cabs to access the parks even if they are bearing advertisements. 17% disagreed.
- In response to whether an identical provision should be made for PHVs bearing advertisements, the majority (79%) of respondents agreed. 21% disagreed.

Lowering the speed limit on the roads in Greenwich and Bushy Parks

- When questioned on whether the speed limit in Greenwich Park should be reduced, the majority of respondents (83%) were in favour of the proposal with 17% not agreeing with the change.
- When questioned on whether the speed limit in Bushy Park should be reduced, the majority of respondents (79%) were again in favour, with 21% against a reduction.

Clarification of the animal faeces regulations relating to horses

- The majority of respondents (87%) were in agreement that the clarification should be made.

General comments directly related to the proposals

- A range of common themes emerged from responses to this question. These included suggestions that TRP should explore alternative means of revenue generation (such as road tolls), that certain existing park regulations are poorly enforced and that public transport to the parks is not good enough.

A more detailed question by question analysis can be found in section 3 of this report.

2 Responses to the consultation

The consultation was open for 13 weeks from 30th January 2009 to 1st May 2009. This section sets out how the consultation was publicised and the number of responses received.

2.1 How the consultation was publicised

Following the launch of the formal consultation on 30th January, The Royal Parks wrote 150 letters to groups and individuals informing them about the process and advising them how to take part. These letters went to representative bodies and key individuals who could reach, and/or speak for, a cross-section of those likely to have an interest in the proposals. A dedicated webpage was set up to allow access to the consultation documents online and paper copies were available from The Royal Parks headquarters in Hyde Park and from each Royal Park office.

A wide range of publicity was generated through a press release which was issued to the local and London wide media. The parking charge proposals in particular were covered in a mixture of editorials and letters in the local press as well as a radio debate. Notices were displayed on the main Park notice boards and within each park office. In acknowledgement of the fact that the proposed introduction of parking charges would be of particular interest around Richmond and Bushy Parks, additional publicity was carried out in those areas, including sending notices to 20 libraries in the vicinity. A summary of the publicity generated can be found at Appendix B of this document. The consultation was discussed at a number of meetings including those with local MPs and stakeholder groups. In addition, the parking charge proposals for Richmond Park were discussed in a Westminster Hall Adjournment Debate.

2.2 Responses received

Over the 13 week consultation period, a total of 1986 responses to the formal consultation were received. The Royal Parks also received five petitions, containing approximately 13000 signatures, against the parking charge proposals for Richmond and Bushy Parks. And two petitions against the parking charge proposals, which were placed on the No10 website, received a total of 5759 signatures.

3 Findings from the consultation

This section of the report outlines the findings from the consultation question by question for each of the five sections set out in the consultation document.

3.1 Summary of responses from MPs and local authorities

The Royal Parks received formal representations on the proposals for introducing parking charges in Richmond and Bushy Parks from the three surrounding local authorities and from the MPs whose constituencies border the parks.

The proposals on car parking were not supported by local MPs. The concerns they expressed included the lack of public transport provision, potential impact on the roads surrounding the parks, the impact on those on low incomes, and the inconvenience factor.

The introduction of car parking charges was not supported by the Local Authorities bordering the Parks. Their concerns included: the impact of displacement parking onto neighbouring residential roads, many of which do not have controlled parking zones in place, causing inconvenience for local residents and traffic congestion; the lack of good public transport to the park; the proposed level of charge and impact on regular visitors.

3.2 Section I: Introduction of Parking Charges in Richmond and Bushy Parks

This section of the consultation asked five questions (Note: percentages may not total 100% due to rounding).

Question 1: Do you support the introduction of parking charges in Richmond and/or Bushy Park?

Responses: 1986

When asked whether respondents would support the introduction of charges in Richmond and/or Bushy Park, 84% said 'no', with the remaining 16% saying 'yes' to the proposal.

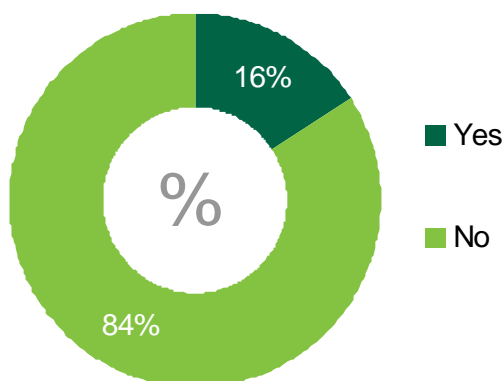


Figure 3.1: Introduction of parking charges

A series of common themes was identified from the responses of those who were both against and in support of the proposal. Amongst those opposing the proposals, the key concerns were that charging would deter visits to the parks, that public transport to access the parks is poor, the potential impact on the local area (in particular displacement parking and congestion) and the impact that charges would have on the atmosphere and experience of the park.

There were other park specific concerns. In Bushy Park, groups who use the park for organised sports were concerned about the impact that charging might have on members' ability to take part in activities. Responses focusing on Richmond Park highlighted the limited alternatives to driving, due to a lack of public transport to both reach and travel within the park.

Those supporting the proposal showed common themes in their reasons for support. These included an assertion that those using the parks should help fund their upkeep as well as those who noted the positive impact that charges could have on reducing the amount of traffic and congestion in the parks.

There was no consensus on this subject in the responses from Park Friends groups. Some Friends were against the principle of parking charges, citing very similar concerns to those set out above. Others were not against parking charges in principle, but would only support a scheme which was more limited in scope e.g. peak period charging, and included arrangements for frequent users, such as a season ticket, and a commitment for parking revenues to be ring fenced for future spending on car parks/conservation.

Other interest groups, including sports clubs and residents' associations, also showed mixed reactions to the parking charge proposals. Some were supportive, as they thought that it would be likely to encourage use of alternative means of accessing the parks. Opponents felt that the charges may impact certain park users disproportionately and as such would be a deterrent to regular park use, both due to the cost and ability to access the parks by alternative means.

Question 2: If you accept the introduction of parking charges in principle, do you consider that the rates we propose are about right, too high or too low?

Responses: 626

When questioned on the level of proposed charges, respondents were divided on the appropriateness of the proposed rates. 56% thought that the proposed rates were about right, whilst 37% thought they were too high. The remaining 7% of respondents felt that they were too low.

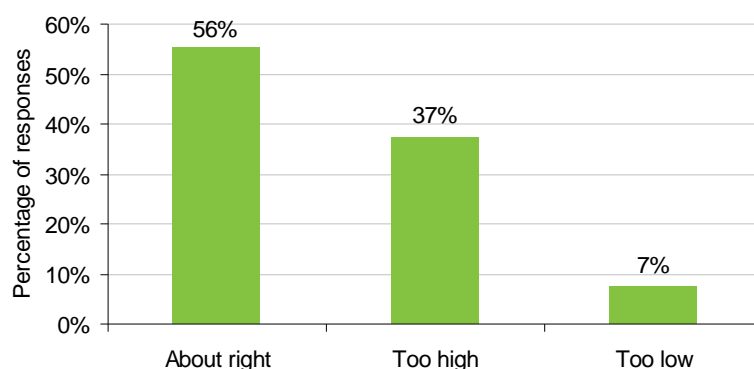


Figure 3.2: Proposed parking rates

Some respondents expressed concern that a fixed charging structure (all day, all year) would be too rigid. Some suggested that a peak/off peak system would be preferable and others proposed an initial free period to allow regular users who use the park for short times to avoid the charge. In addition, many regular park users (e.g. dog walkers) highlighted examples of the likely annual cost to daily users and proposed that a season ticket should be made available.

Respondents commenting on Richmond Park expressed concern over the different rates proposed for Bushy and Richmond Parks and suggested the rates should be set at the same (lower) level. Others, who responded that the rates were too high, suggested that parking charges on surrounding roads needed to be taken into account when setting the level of charge.

Within and between the Park Friends groups there were different views. The majority of the Friends of Richmond Park thought the proposed parking charges were 'about right', but suggested that a more flexible system for regular users (e.g. a season ticket) would be needed in addition to the fixed rates. An initial period of free parking for those using the car park for a short time was also proposed. The Friends of Bushy and Home Parks thought the charges were too high, particularly for more frequent visitors.

Some interest groups suggested that the charges proposed were in fact too low to discourage car use.

Question 3: Do you agree that there should be a maximum stay for parking in Richmond and/or Bushy Park?

Responses: 937

When questioned on whether there should be a maximum stay for parking, the majority (59%) of respondents disagreed. The remaining 41% were in favour.

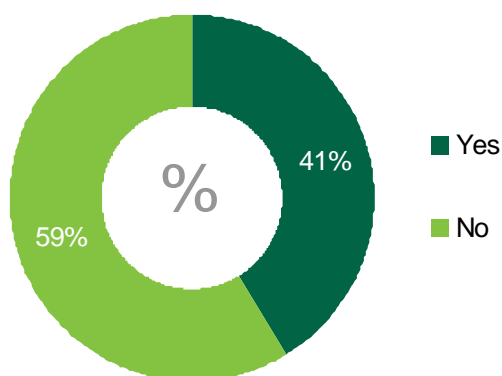


Figure 3.3: Maximum stay for parking

There was some concern amongst those against the proposal that a maximum stay may limit their ability to enjoy certain activities (e.g. angling, cricket, golf), in addition to the effect a maximum stay may have more widely on user experience of the park (e.g. introducing a need to watch the clock). In contrast, some supporters of the introduction of a maximum stay believe that it would help with the turnover of spaces and so reduce parking problems at times of peak demand.

Park Friends groups were divided over whether a maximum stay should be introduced. Some considered that the problems associated with commuter parking are not extensive, but accepted that a 6 hour maximum limit would ensure car parking spaces were exclusively used by park visitors. Others noted the problem that a maximum limit may pose for certain park activities.

Other interest groups supported a maximum stay, providing it was long enough for all those engaging in activities in the park. Some expressed concern that for special events the 6 hour maximum stay would not be long enough and exceptions should be made.

Question 4: If you agree that there should be a maximum stay, do you think that 6 hours is about right, too long or too short?

Responses: 676

When questioned on whether the proposed 6 hour maximum stay would be appropriate, the majority (62%) agreed that this would be 'about right'. 23% however thought that this would be too short and the remaining 15% too long.

Those against the 6 hour proposal again felt that it would limit their ability to enjoy certain activities and that the maximum stay should be longer.

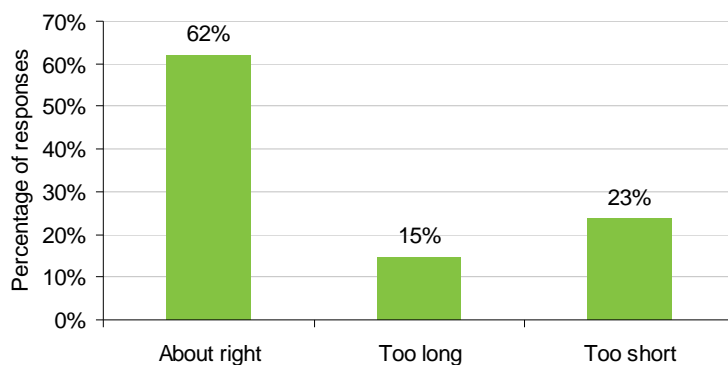


Figure 3.4: 6 hour maximum stay

Some supporters of the introduction of a 6 hour maximum stay suggested that it may help with the turnover of spaces and so reduce parking problems at times of peak demand. For this reason some respondents stated that it was too long and should be less than 6 hours.

One Park Friends group reported a majority who thought the proposed maximum was 'about right'. Both groups noted similar concerns to those set out above.

Question 5: Do you have any further comments about our proposal to introduce parking charges?

Responses: 1952

A range of themes emerged from the responses to this question and a summary and sample of relevant comments from respondents under each key theme is set out in the table below.

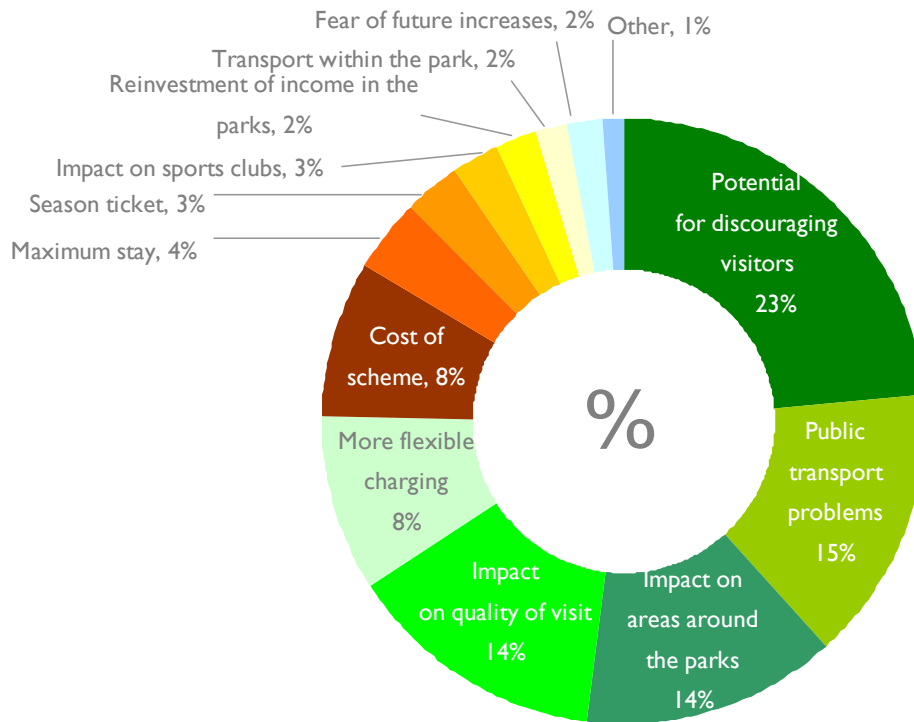


Figure 3.5: Comments about parking charge proposals

Theme	Summary and sample of comments
Potential for discouraging visitors e.g. the potential to discourage use of parks and the impact that this may have on enjoyment and health	<ul style="list-style-type: none"> 23% of all comments on this question were from respondents who felt that the introduction of parking charges may discourage use of the parks. Of the comments regarding the potential for discouraging park usage, respondents cited the adverse impact that discouraging use of the parks may have on health and suggested that parking charges may disproportionately discourage certain groups, in particular highlighting those on lower incomes, those with young children and the elderly. <ul style="list-style-type: none"> "The park is a beautiful facility for young children and I feel that making access more expensive would disproportionately discourage this group". "The Royal Parks should be encouraging, not discouraging, people to make use of the park - it is a marvelous resource that should be free to all". "I, and others like me, will simply stop going [to the park] as public transport is difficult and paying for parking irksome". "In the view of poor public transport links...I think that imposing parking charges would reduce the ability to visit the park regularly by many sectors of the community...". However, other respondents noted that in contrast the level of charging may not impact on visitor numbers:

	<ul style="list-style-type: none"> – "People should pay for the privilege of parking in these lovely environs and the small fees proposed would not deter visitors to the park. People pay enormous car parking fees to use the town centres; to visit historical houses, palaces and castles".
<p>Public transport problems</p> <p>e.g. lack of transport options</p>	<ul style="list-style-type: none"> • 15% commented on the public transport network which serves the parks. For some, improvements are needed so that a viable alternative to driving is offered before a parking charge is to be introduced. Others suggested that public transport is not suitable, for transporting children, pets and sports equipment to the park for team activities. <ul style="list-style-type: none"> – "Bushy Park is not well served by buses passing the gates (except in Hampton Hill) and thus parking charges would discourage less able from being able to access the parks easily if at all". – "With 3 children under the age of 8, I cannot envisage getting a bus with scooters, balls and picnic paraphernalia etc and the children". – "Most people visit parks on Sundays when public transport [is] less frequent and resident permits do not apply in the surrounding areas".
<p>Impact on areas around the parks</p> <p>e.g. displacement parking and congestion</p>	<ul style="list-style-type: none"> • 14% of all comments related to the impact an introduction of charging is likely to have on local areas in particular increased street parking and congestion in nearby roads. <ul style="list-style-type: none"> – "As a resident who lives very close to an entrance to the park, I am extremely concerned about the number of extra cars that will inevitably be parked". – "Human nature will encourage people to park, at no charge, outside the gates, where there are no restrictions or resident permit zones".
<p>Impact on quality of visit</p> <p>e.g. park atmosphere and visitor experience</p>	<ul style="list-style-type: none"> • 14% of responses to this question highlighted concerns about how parking charges would impact on the parks themselves and change the experience of using the parks. Others also felt that formal car parking arrangements would make the parks feel more 'urban'. <ul style="list-style-type: none"> – "Introducing parking charges will change the whole ethos of Bushy and Richmond parks where people go to relax and unwind. It is practically impossible to know how long one will be in...one of the parks". – "If a fee was introduced this would take away some of the pleasure of the visit". – "Traffic in the car parks within Richmond Park is self regulating - only in the very best summer weather is there any issue with overcrowding". – "The meters need to be pay on exit as people should be free to take whatever time they like in the park and not have to return early if they are enjoying themselves".
<p>A more flexible charging structure</p> <p>e.g. only charging during peak periods</p>	<ul style="list-style-type: none"> • 8% of all comments on this question concerned the proposed structure of parking charges. Respondents proposed a variety of alternative charging approaches from contribution boxes to having a flat rate fee to charging at peak times only. <ul style="list-style-type: none"> – "I use the park regularly - often twice a day to walk my dog - and charging will make this a very expensive pastime". – "If additional funding is required, please encourage donations and voluntary contributions". – "When the V&A introduced an admission charge attendance and income declined. They have now abolished the admission charge and introduced a voluntary contribution scheme" – "[Prices] must reflect pricing in local controlled parking zones (so it might differ between Kingston Gate and Roehampton Gate for example)...It is critical that it links in with local controlled parking zones". – "If there has to be a charge, which I strongly oppose, then the proposals for Richmond Park seem a little on the high side. The Bushy Park charges are not

	<p>unreasonable...I think that free car parking outside peak hours should be considered (e.g. for early and late dog walkers)".</p> <ul style="list-style-type: none"> - "As an occasional visitor I am not necessarily against all forms of parking charges in Richmond Park but I consider £1 an hour to be punitively high".
<p>Cost of setting up the scheme e.g. cost of implementation / maintenance</p>	<ul style="list-style-type: none"> • The cost of setting up the parking scheme made up 8% of the comments received on this question. Some comments questioned the level of revenue which the proposed scheme would raise and whether the charges would cover costs. <ul style="list-style-type: none"> - "We doubt that the cost of meters, maintenance, traffic wardens and management will be covered by the extra income". - "If [charges] are to be introduced, it should only be at busy times - perhaps summer weekends only. Charges and the required supervision would never cover their costs if implemented all week, all year...". - "The demand is so elastic that I do not believe that any possible charging regime would cover the cost of its collection".
<p>Issues with a maximum stay e.g. limitations for certain pursuits</p>	<ul style="list-style-type: none"> • 4% of comments were around the introduction of a maximum stay and many focused on particular pursuits which may require longer than the proposed period (e.g. angling, golf, and cricket). However, some noted that the current policy of closing car parks at night already offered some regulation of the length users could stay. Others supported the 6 hour proposition noting that it would allow most users enough time to enjoy the park and still put off commuters. <ul style="list-style-type: none"> - "I am not in support of the maximum stay where it is less than the daylight hours of the day...The Parks are a great place for children to explore and the restriction proposed will create a time pressure to these activities". - "Richmond Park is 1.5 miles away from the nearest station at Richmond and a mile away from the nearest shopping centre, and this journey includes climbing up one of the steeper hills in South England. It is highly unlikely that any commuters or shoppers use the car park. Indeed in the winter the park closes at 4pm". - "[A maximum stay] will stop people leaving their cars there and going elsewhere. It shouldn't be prohibitive though and should allow for a long walk/picnic etc...I feel 6 hours may be too long. I would imagine 4 hours would be enough for most people". - "Why not 5/6 hours, that would allow walkers and families to get some fresh air and also have a picnic in the summer if they wanted. But would put off commuters if that is what this is all about and not just another tax in disguise".
<p>Season tickets e.g. reduced annual charge for regular users</p>	<ul style="list-style-type: none"> • Having the option to purchase a parking season ticket was highlighted in 3% of all comments. This was particularly the case for daily users with a number giving cost estimates for annual charges (estimates given were up to £1000 based on their personal annual usage) if there was no season ticket. <ul style="list-style-type: none"> - "I believe the proposed rates are acceptable, but believe there should be a season ticket available to benefit regular users and remove inconvenience of requiring the correct change". - "I believe that most local residents would happily pay for a permit / license if the charges were reasonable".
<p>Impact on sports clubs e.g. may impact participation levels</p>	<ul style="list-style-type: none"> • Sports clubs who use the parks noted that the proposed costs may impact on members' ability to travel to the parks in order to participate in team sports (with 3% of all comments relating to this theme). <ul style="list-style-type: none"> - "The cost of parking will substantially increase the cost of [sporting] activities (the

Reinvestment of income in the parks

e.g. investment of parking revenues would benefit visitors

option of cycling isn't always available with the amount of kit they need to carry, bad weather and dark nights). I am sure many families will reconsider sending their children to Bushy Park for such activities, thus depriving them of the opportunity to participate in sport, reducing the amount of exercise they take...and reducing the sense of community that has developed around the Bushy Parks sports clubs".

- "As the park is used at the weekend for rugby playing "minis" it is effectively a tax on sport participation".

- 2% of responses highlight the positive benefits that the money recovered from charging could have on the parks. Some respondents note that revenues should be spent directly on maintaining facilities or promoting ecological projects which would directly benefit park visitors.
 - "I enjoy using the two parks and appreciate that they are well maintained. I therefore accept the introduction of charges on the basis the number of available car spaces is not reduced".
 - "I am not in principle against the introduction of parking charges per se as it makes sense to encourage non-car visits wherever possible...I would have thought that a much better way to achieve this would be to introduce charging at peak times only ...and perhaps at a more expensive rate than you currently propose".
 - "Driving through and parking in the Royal Parks has a serious detrimental effect on these green spaces. Why not use some of the money you raise to reduce this impact, or make it easier for people to do this without cars? You suggest that charges will only balance costs so why not increase them and use the extra money as suggested? There is a strong argument for using the money this way given the impact of vehicles".
 - "I support the levying of parking charges in an effort to dissuade the use of cars and recover some revenue to fund the costs of maintaining the park ...The suggestion that voluntary charges would be effective is somewhat naive".

3.3 Section 2: Allowing Private Hire Vehicles (PHVs) into the Parks

This section of the consultation asked three questions:

Question 6: Do you support our proposal to allow Private Hire Vehicles that are licensed by the Public Carriage Office to enter the Royal Parks on the same terms as are already allowed in law for black cabs? If not, please give your reasons.

Responses: 788

When questioned on whether private hire vehicles (PHVs) should be allowed to access the parks on the same terms as black cabs, the majority (82%) of respondents agreed. The remaining 18% disagreed.

Common responses amongst those against the proposal included a concern that it may increase traffic levels in the park and cause PHVs to wait around in the parks for business, thus adding to congestion.

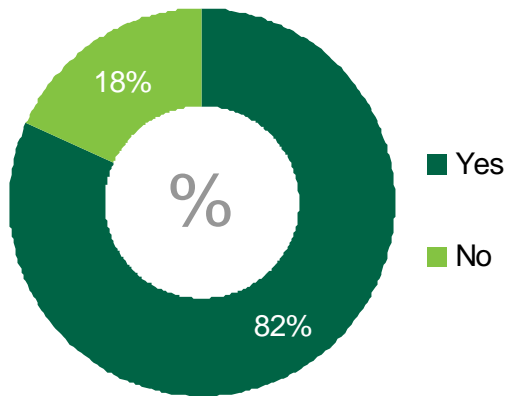


Figure 3.6: PHVs licensed by the PCO access to the parks

Park Friends groups generally expressed support for these proposals. However, there were concerns that allowing PHVs into the parks could increase traffic and congestion, which would be undesirable.

This was supported by groups including the Public Carriage Office and Licensed Private Hire Car Association. One group suggested that consideration should be made for non PCO licensed vehicles by future proofing the legislation to enable similar provision for all legitimately licensed PHVs. Another expressed concerns over the impact that the proposal may have on increasing traffic in the parks.

Question 7: Do you agree with our proposal to give express statutory force to the already accepted practice that black cabs are allowed to enter the Royal Parks even if they are bearing advertisements?

Responses: 785

When questioned on whether black cabs should be given express statutory force to access the parks even if they are bearing advertisements, the majority (83%) of respondents agreed, the remaining 17% disagreed.

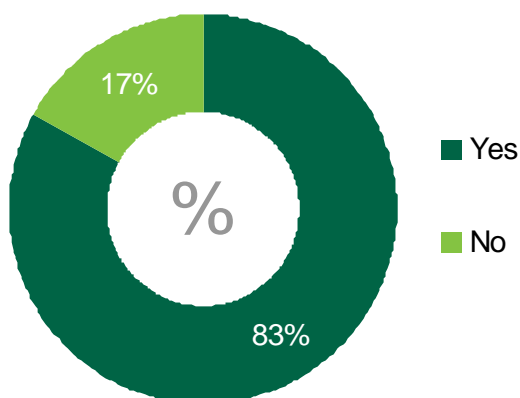


Figure 3.7: Express statutory force for black cabs bearing advertising to enter the parks

Those against the proposal felt that it may contribute to further traffic and congestion. Some suggested that advertising on vehicles may impact on visitor experience of the parks by affecting the atmosphere/character of the park.

Park Friends groups again supported the proposal, however, some had concerns that any vehicle bearing advertising may be at odds with the atmosphere and character of the park. Other interest groups including relevant trade bodies agreed with the proposal.

Question 8: Do you agree that we should make identical provision in respect of PHVs (provided that we implement our proposal to allow them to enter the Royal Parks)?

Responses: 767

In response to whether an identical provision should be made in relation to advertising for PHVs, the majority (79%) of respondents agreed that this should be implemented, the remaining 21% disagreed.

Of the 21% against the proposal, some felt that it may again contribute to non licensed taxis accessing the parks and add to congestion and numbers of cars waiting in the parks.

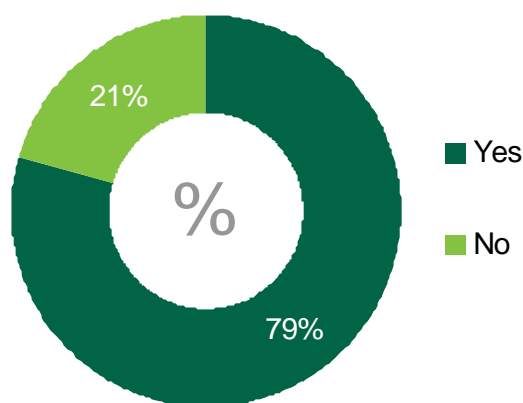


Figure 3.8: Identical provision for PHVs

Park Friends groups broadly supported the proposal; however, some had the same concern as for black cabs where any vehicle bearing advertising may be at odds with the atmosphere and character of the park. Other interest groups including relevant trade bodies supported the proposal.

3.4 Section 3: Lowering the speed limit on the roads in Greenwich and Bushy Parks

This section of the consultation asked four questions.

Question 9: Do you agree with our proposal to reduce the speed limit in Greenwich Park from 30mph to 20mph?

Question 10: If you do not agree with our proposal to reduce the speed limit in Greenwich Park to 20mph, please explain why.

Responses: 364

When questioned on whether the speed limit in Greenwich Park should be reduced, the majority of respondents (83%) were in favour of the proposal. 17% disagreed.

Most supporters of the proposal stated the importance of reducing the speed of motor vehicles in all parks and the benefits in terms of increased safety for all park users that this would bring. It was also noted that it may reduce the number of motorists using the parks as a cut through (if enforced effectively). Of the 17% against the proposal, some again felt that the current speed limit should be effectively policed before a change is made. Others noted that in many vehicles the environmental impact of driving at 20mph can be worse than at 30mph.

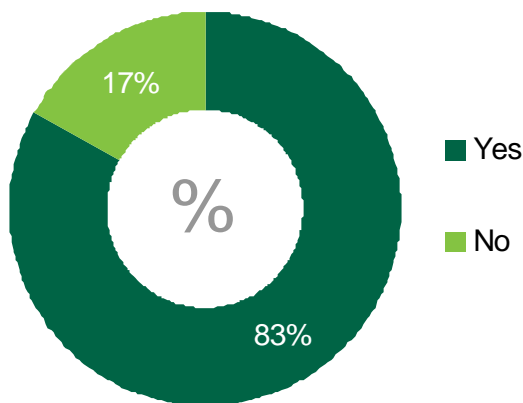


Figure 3.9: Reducing the speed limit in Greenwich Park to 20mph

The proposal was supported by the Friends of Greenwich Park group. Whilst the potential environmental impact of a 20mph limit was noted, the group felt that the limit would have safety benefits for park users which would outweigh these considerations.

Question 11: Do you agree with our proposal to reduce the speed limit in Bushy Park to 20mph?

Question 12: If you do not agree with our proposal to reduce the speed limit in Bushy Park to 20mph, please explain why.

Responses: 481

When questioned on whether the speed limit in Bushy Park should be reduced, the majority of respondents (79%) were again in favour of the proposal, with 21% against a reduction.

Most supporters of the proposal stated the importance of reducing the speed of motor vehicles in all parks and the benefits in terms of increased safety for all park users that this would bring. Some respondents also noted that it may reduce the number of motorists using the park as a cut through if the lower speed limit is enforced effectively.

Of the 21% against the proposal, some again felt that it may not be enforced and that the current speed limit should be effectively policed before a change is made. Others again expressed concerns over the potential increase in carbon emissions when driving at 20mph.

The proposal was broadly welcomed by the Friends of Bushy & Home Parks. However, they expressed some concern over the possibility of increased carbon emissions at 20mph, and the potential for the change to increase incidences of dangerous driving, for example, by encouraging overtaking.

Other interest groups expressed support for the proposal, largely due to the safety benefits that it would offer park users. Some suggested that if this measure were successfully implemented then it should be introduced more widely across the Royal Parks. The need for the limit to be designed to be self regulating through road engineering was also noted.

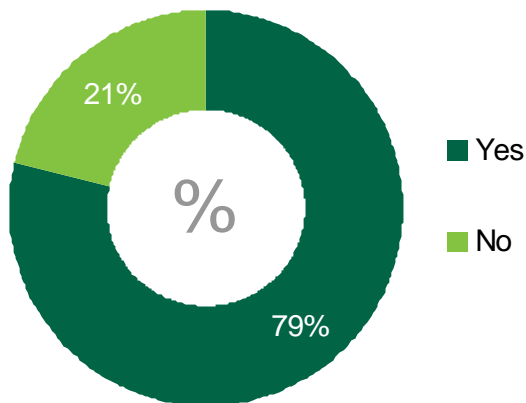


Figure 3.10: Reducing the speed limit in Bushy Park to 20mph

3.5 Section 4: Animal faeces regulation clarification

This section of the consultation asked one question:

Question 13: Do you agree that the regulations should make clear that horse owners are not required to clean up after their animals?

Responses: 714

The majority of respondents (87%) agreed that the proposed clarification should be made. 13% disagreed.

Some noted that as long as faeces was not in open mown areas of the park but kept to bridleways it should have limited impact on other park users.

Some respondents who were against the proposal stated the need to ensure all owners are responsible for clearing up after their animals.

The cost of the clean-up was noted by others who felt it was fair to share this with horse riders/riding schools.

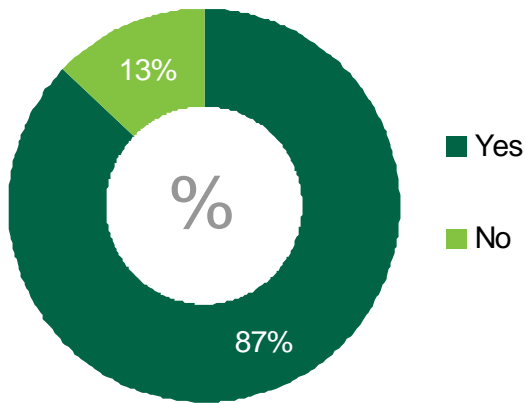


Figure 3.11: Making the regulations on horse faeces clearer

3.6 Section 5: Any other comments on the proposals

Question 14: Do you have any other comments which relate directly to any of our proposals?

Responses: 700

The consultation invited respondents to add any other comments directly related to the proposals. A range of common themes emerged from the responses and these are set out in figure 3.12 below. A summary and sample of relevant comments from respondents under each key theme is set out in the table overleaf.

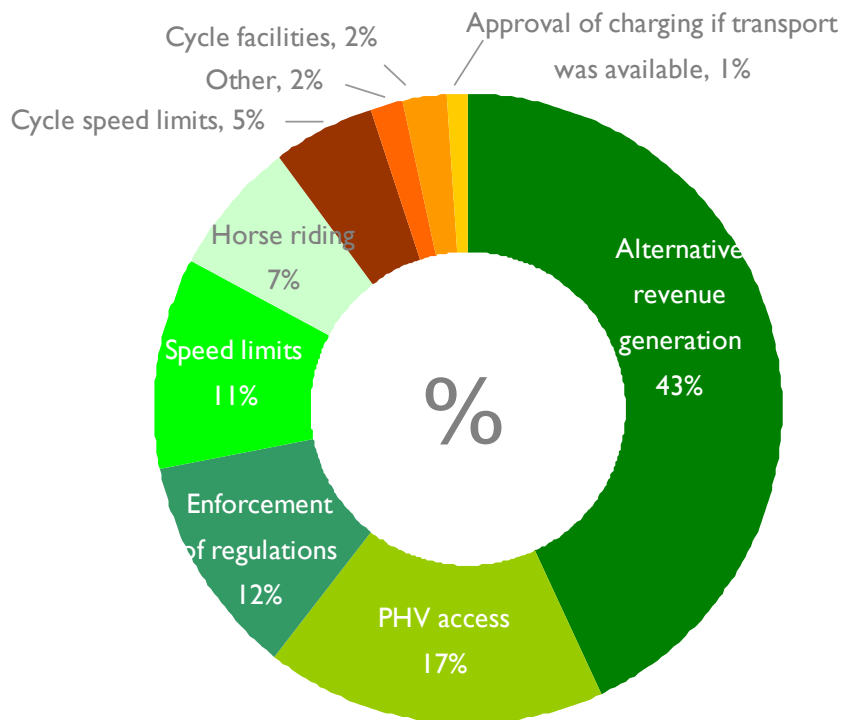


Figure 3.12: Comments on the proposals by theme

Theme	Summary and sample of comments
<p>Alternative revenue generation</p> <p>e.g. road tolls, donation boxes</p>	<ul style="list-style-type: none"> • 43% of all comments to this question suggested alternative methods of revenue generation in place of parking charges. The most commonly proposed alternative was the introduction of a road toll (with 5% of all consultation respondents suggesting alternative revenue generation by some form of toll). The introduction of a donation scheme in place of fixed charging was also a common suggestion (with 3% of all respondents to the consultation proposing this). <ul style="list-style-type: none"> – "... why don't you charge the cars who commute through the park?...After all these people are not using the park for anything other than a convenient cut through and the level of traffic at commuting times has a seriously negative visual impact on the park...it would become cost effective over time". – "People who don't use the car parks are using the parks as a useful cut through to save time on their way to work or taking the children to school. They will probably do the journey twice a day for a good many days a year. This constant traffic causes wear and tear on the roads and injury to wildlife". – "I wish to suggest that instead of parking charges, Royal Parks introduce voluntary donating boxes...notices should be displayed inviting drivers to donate towards the beautiful parks and their very useful car parks".
<p>The impact of PHV access to the parks</p> <p>e.g. increased through traffic and congestion</p>	<ul style="list-style-type: none"> • Although a majority of respondents expressed support for the proposals regarding PHV access, this issue also received the second largest number of comments in this section (17% of all comments to this question were related to this theme). Comments on the subject were divided and whilst some saw advantages of increasing access to the parks, some also highlighted the danger that this may increase traffic, congestion and non licensed taxis in the parks. <ul style="list-style-type: none"> – "I do not support the idea of allowing PHVs in royal parks, because this would lead to an increase in through traffic...Cars already use Royal Parks (especially Richmond and Greenwich) as rat-runs and this proposal would only exacerbate that". – "The parks are used as a ratrun and it would be much preferable to allow [PHV] access to the parks only for parking and not as a throughfare...".
<p>Enforcement of regulations</p> <p>e.g. speeding, dog fouling</p>	<ul style="list-style-type: none"> • 12% of comments given in response to this question related to a need for more effective enforcement of the existing park regulations, particularly those against speeding, dropping litter or leaving dog mess. <ul style="list-style-type: none"> – "[I] would reduce the speed limits in all parks to 20mph but would then also ensure that this is enforced! We regularly drive at the appropriate speed through Richmond, "causing" a tail back of between five and fifteen cars, many of which then seek to overtake at high speed to get past. More radars and more fines! Or drop all to 10mph to cut out the rat-run/commuting traffic". – "If you want to slow traffic down, just enforce the existing 30mph limit". – "[I] only agree with the speed limit change] if there are proposals to actually enforce it".
<p>Speed limits</p> <p>e.g. safety benefits, environmental impact</p>	<ul style="list-style-type: none"> • 11% of comments concerned the possible introduction of lower speed limits in the parks. Some related to the potential negative environmental impact due to higher CO2 emissions from some vehicles at lower speeds and others highlighted the safety benefits of the proposal. <ul style="list-style-type: none"> – "The existing speed limit of 30mph seems excessive at times, especially in the quieter periods where there are few cars on the road and no deer in close proximity to the

	<p>road. Perhaps a variable speed limit could work: 20mph from 7am to 9am and 4pm to 6pm, otherwise 40mph".</p> <ul style="list-style-type: none"> – "We would welcome the extension of the 20mph limit to all parks...reducing traffic speeds makes the parks much safer for walkers and cyclists, which should clearly take precedence over motorists taking a shortcut". – "I agree that the speed limit in the park should be reduced to 20mph. I regularly use the park and witness hundreds, if not thousands of cars speeding through the park at 30mph or faster". – "The lowering of the speed limit to 20 mph would not de-urbanise the park and would cause thousands of extra tonnes of CO2 to be discharged into the park affecting the trees and other vegetation and the health of users in the park. The present limit of 30 mph should be maintained [in Bushy Park] as the road is straight and there are no cars parked along the road creating safety problems".
<p>Horse riding in the parks e.g. horse faeces regulation</p>	<ul style="list-style-type: none"> • 7% of all comments to this question related to the clarification of regulations surrounding horse faeces in the parks. While the majority supported the proposal, some suggested that owners should clean up horse droppings (or contribute to the cost of this) in areas where other park users may come into contact with it. <ul style="list-style-type: none"> – "This is a sensible correction". – "Any regulations should be altered to improve their clarity and meaning to remove ambiguity". – "I would have thought it reasonable to expect stable/horse owners at the very least to contribute to the cost of cleaning if this is necessary". – "I believe the regulations in Richmond and Bushy Parks should be that owners of all pet animals should avoid allowing their charges to drop faeces on the pathways and mown grass areas". – "I agree, but dog faeces remain an issue despite the regulations".
<p>Cycle speed limits e.g. the need for cyclists to observe park speed limits</p>	<ul style="list-style-type: none"> • 5% of responses suggested a speed limit which would also apply to cyclists in the parks. <ul style="list-style-type: none"> – "I don't consider the reduction to 20mph in Richmond Park has enhanced safety in any way because of the behaviour of the many cyclists who use the park roads as a training circuit. They regularly exceed the 20mph and are often guilty of dangerous practices such as overtaking cars on the inside".
<p>Other e.g. the distinction between powered and non powered model boats</p>	<ul style="list-style-type: none"> • Other responses (2%) included that the proposal relating to the Model Boating Pond in Bushy Park was too restrictive and should only apply to model boats with an engine. <ul style="list-style-type: none"> – "In regard to where one is permitted to sail a model boat in Bushy Park, can I suggest that the restriction to the Model Boating Pond is limited to powered model boats, as the wind-driven variety are silent and don't cause any disturbance to wildlife".
<p>Cycle facilities e.g. safe storage facilities</p>	<ul style="list-style-type: none"> • Suggestions for additional cycling and cycle parking facilities within the parks made up 2% of the comments. <ul style="list-style-type: none"> – "Allowing cycling widens the catchment area for the park, encouraging more people to enjoy using the park more often, not just the fortunate few who live nearby". – "Can there also be more provision for cycle parking and safe locking of bikes".
<p>Approval of charging if transport was available e.g. happy with charging if</p>	<ul style="list-style-type: none"> • 1% of comments noted support for the parking charge proposals if sufficient public transport was in place, in order to make alternatives to driving to the parks a realistic option. <ul style="list-style-type: none"> – "I agree...that it should raise money for the park and be better for the environment

better services were in place

but in reality, I have two children under three years old and even though we live nearby...the public transport links are no good and the walk too long".

- "Richmond Park is in the main too remote from public transport to enable easy access to it. This is why the car parks are full...".
- "Public transport is not necessarily a feasible option for people who want to walk their dogs or for families with young children who want to cycle within the parks but do not wish to negotiate busy and dangerous roads to get there".

4 Conclusion

The Royal Park's consultation received a large response from a wide range of people with an interest in the proposed amendments to the Royal Parks Regulations. These ranged from individual visitors to MPs and local authorities and included Park Friends and residents groups, sports clubs, trade bodies and those who operate businesses in the parks.

Proposals relating to the introduction of parking charges generated the largest response of any section of the consultation. Analysis of these responses has shown that a majority of respondents are against the introduction of parking charges in Bushy and Richmond Parks. They consider that parking charges would discourage use of the parks, alter the atmosphere of the park and the nature of a park visit, and displace visitor parking to local residential areas. Respondents also cite problems with alternative methods of transport, suggest a more flexible charging scheme than that proposed, and raise questions about the cost of implementing the scheme.

The proposed changes to the regulations which would allow licensed private hire vehicles (PHVs) access to the parks on the same terms as black cabs, were supported by the majority of respondents. This was again the case for both black cabs and PHVs being given express statutory force allowing them to access the parks even if they are bearing advertisements.

The proposals for lowering the speed limits on the roads in Greenwich and Bushy Parks were supported by the majority of respondents.

The clarification of the regulations which state that horse owners' are not required to clear up after their animals was also supported by a majority of respondents to the consultation.

This report is presented to The Royal Parks, by PA Consulting and is purely an analysis of consultation responses. It does not draw out any implications or make judgements on the results.

Appendix A: Petitions relating to the consultation

A.1 Petitions posted on the No10 website

Two petitions relating to the proposals were posted on the Number 10 website (www.number10.gov.uk) during the consultation period. A description and the number of signatures for each can be seen below:

1. "We the undersigned petition the Prime Minister to take steps to ensure that the Royal Parks have regard to the Department of Health advice that people should take more exercise and reconsider the car parking arrangements in the Royal Deer Parks with a view to encouraging the widest use of the Parks, particularly during "off peak" times and give particular consideration to regular users of the Parks, for instance by offering a preferential season ticket scheme".

The petition received 2,057 signatures.

2. " We the undersigned petition the Prime Minister to take action against a proposal to charge for car parking in Richmond Park".

The petition received 3,702 signatures.

A.2 'Keep Richmond Park free for our Community' petition

A petition against the proposed car parking charges in Richmond Park was supported by Justine Greening MP. The petition asked respondents to support the following statement:

- I support the campaign against the proposed car park charges in Richmond Park, please keep me informed.

The petition received 1166 signatures.

A.3 'Stop the park tax' petition

A petition against the plan to introduce parking charges in Richmond Park was supported by Susan Kramer MP. The petition asked people to respond with their support for the following statement:

- I/we, the undersigned oppose the Royal Parks plans to introduce parking charges in Richmond Park.

The petition received 973 signatures.

A.4 'Car parking charges in Richmond Park' petition

A petition against the proposed parking charges in Richmond Park was organised by Zac Goldsmith (Conservative Party Candidate for Richmond Park). The petition asked respondents to support the following two statements:

- 'I/We, the undersigned are against the introduction of car parking charges in Richmond Park';
- 'As a Park user, I would make occasional contributions to the Park's upkeep'.

The petition received 1915 signatures.

A.5 'Keep Bushy Park free for everyone' petition

A petition against the proposed parking charges in Bushy Park was organised by the Keep Bushy Park Free Alliance, which included: the Friends of Bushy and Home Parks; Hampton Wick Association; Teddington Society; Hampton Hill Association; Hampton Society, and was supported by Vincent Cable MP. The petition asked for signatures of those supporting the following statement:

- 'We the undersigned believe that Bushy Park should be kept free for everyone and we oppose the introduction of parking charges'.

The petition received 6298 signatures.

A.6 'Richmond Park - car park charges' petition card (Wandsworth Council)

A petition card which asked for respondents' opposition or support for the introduction of parking charges in Richmond Park was organised by Wandsworth Council. The petition cards asked the questions below, including 3 sub questions to those in opposition (not directly related to the consultation questions):

- I am opposed in principle to the Royal Parks' proposals to introduce parking charges in Richmond Park;
 - I am concerned that this will be unfair to people who have no other means of getting to the park;
 - I would prefer that the Royal Parks concentrate on securing effective public transport links to the park so that visitors are less reliant on their cars;
 - I am worried that charges will lead to overspill parking problems on roads outside the park gates.
- I support the introduction of parking charges.

The Royal Parks received around 2500 of these cards.

Appendix B: Publicity related to the consultation

A range of publicity relating to the consultation was generated and examples of this are outlined below:

- Following the launch of the formal consultation on 30th January, The Royal Parks wrote 150 letters to groups and individuals including local MPs, local councillors, local authorities and Friends and residents groups for all the Royal Parks;
- A press release was issued to the local and London wide media, and the parking charge proposals in particular were covered in a mixture of editorials and letters in the press;
- In the first two weeks of February quarter page colour adverts about the consultation were placed in the Richmond and Twickenham Times, Richmond Informer, Wandsworth Guardian and Surrey Comet;
- Notices were displayed on the main Royal Park notice boards and within each park office and 20 libraries in the vicinity of Richmond and Bushy Parks were asked to display them too. The notices referred people to The Royal Parks website, where the consultation papers, and details of how to respond to them, were set out on a dedicated page;
- Paper copies of the consultation documents were available from The Royal Parks headquarters in Hyde Park and from each Royal Park office;
- The Deputy Chief Executive of The Royal Parks debated the parking charge proposal with the Deputy Leader of Richmond Council on BBC London Radio on 5 February;
- The Chief Executive of The Royal Parks held meetings with some local MPs to hear their views;
- Justine Greening MP secured an Adjournment Debate on 17 March 2009 on the subject of parking charge proposals for Richmond Park;
- Several Parliamentary Questions were tabled about the proposed changes.