

27 April 2009

Dear Sirs

CONSULTATION - AMENDING THE ROYAL PARKS REGULATIONS

This is the response of The Friends of Richmond Park ("FoRP") to the proposals by The Royal Parks ("TRP") as set out in the consultation paper "*Amending The Royal Parks Regulations*" dated January 2009. Annex B to the paper is a draft Impact Assessment. FoRP's response relates solely to the proposals as they relate to Richmond Park.

The most contentious proposal is the introduction of charges for car parking in Richmond Park and in Bushy Park, and the bulk of our response relates to that proposal.

Summary of Conclusions

TRP's proposals, particularly those for parking charges, have created a great deal of debate among our members. Rather than composing an immediate response to the proposals, we sent a questionnaire to our 1,500 or so members, essentially following the questions posed by TRP in its consultation document. 388 people - a quarter of our membership - took the time and trouble to complete our questionnaire, with the majority adding comments and ideas.

The "headline" figures are:

- 43% of respondents support charges, 57% are against.
- of those who support charges, 68% think the proposed level is about right.
- 51% think there should be a maximum stay, with two-thirds of those saying 6 hours is about right.

It is clear that our members have a broad spread of views on the proposals; those in favour of them are expressing views that are seldom heard in the newspapers and petitions; those against them have well-considered reasons which are not always dependent on how the proposals will affect them personally.

Combining these views with our own analysis, we have reached a conclusion on the proposed car parking charges that we think answers the problems, minimises the impact on Park users and those around the Park, and is practical. In summary:

- FoRP does not object to the principle of car parking charges; charges are now common in places similar to Richmond Park and the ever increasing impact of cars on the Park needs to be tackled; in addition, if car parking charges mean additional money is available for conservation and ecology in the Park, it is a strong argument for supporting the charges
- But we think TRP's proposals are too wide-ranging, and will impact significantly on many people; if TRP still goes ahead with its proposals as published, it is critical that there is some arrangement for frequent users (e.g. a season ticket), action by councils on parking in the surrounding roads, and ring fencing of revenue or some other commitment to future spending on car parks and conservation
- We support a scheme of parking charges limited to peak periods (summer week-

ends and bank holidays) and between 09.30 or 10.00 and 18.00 or 18.30; this tackles directly the problem of congestion and reduces the impact on park users and those around the Park.

Concerning the proposals on PHVs, advertising on black cabs and PHVs, and horse riders picking up after their animals, 80% of our members supported TRP's proposals (although the remaining 20% raised some important objections).

Our Approach

Rather than responding immediately to TRP's proposals, we decided to do two things.

Firstly, we consulted our 1,500 or so members. We adapted the response form provided by TRP for its consultation so as to omit Questions 9, 10, 11 and 12 (which did not apply to Richmond Park), and sent it to members, either by e-mail for those members whose e-mail addresses we have, or by post for the remaining members.

388 members (26% of our membership) replied - a significant number for such an exercise, and a big commitment of time and effort on their part for which we are very grateful. Some FoRP members who responded to us will also have returned completed forms direct to TRP. We have analysed our members' responses in two ways:

- Quantitatively, i.e. the numbers and percentage of respondents ticking the different options in questions 1 to 4 and 6 to 13.
- Qualitatively, i.e. the comments submitted in response to the open-ended Questions 5, 6 and 14; we have summarised these to show the main points made and useful ideas.

Secondly, we analysed some of the main issues which were mentioned in TRP's documentation or by our members' comments, both to establish the facts and to set out clearly the relevant arguments. Examples include the funding of TRP (which seems to be the main driver of the proposal) and the contribution from car parking charges, congestion of the car parks, likely parking outside the Park to avoid paying the charges, availability of public transport and all-day parking/6 hour limit.

Combining these two inputs, we have developed a considered view on the proposals made by TRP. In doing so, we have been mindful of two further factors – firstly the status of Richmond Park as a National Nature Reserve and a Site of Special Scientific Interest, which impose obligations to manage it first and foremost in the interests of its nature and wildlife, and secondly FoRP's own objects, as stated in its Constitution, "To encourage the preservation of Richmond Park, .. its peace and natural beauties.... for the enjoyment of the public" and to "resist the urbanisation of the Park...".

Members' response to introduction of parking charges

1. The figures

The FoRP membership is divided on the *principle* of charges (our question 1):

- 43.3% support them; and
- 56.7% oppose them.

As to the proposed *level* of charges (our question 2):

- 27% think they are too high;
- 5% think they are too low; and
- 68% think they are about right.

Some members answered question 2 although they oppose the principle of the charges.

As to whether there should be a maximum stay:

- 51% said yes; and
- 49% said no.

As to whether a 6 hour maximum is about right, too long or too short:

- 66% think it is about right; and
- of the remaining 34% half think it's too long, and half too short.

Some members answered question 4 even though they said "no" to question 3.

2. Main arguments cited by those supporting parking charges

The arguments made by supporters of charges dwelt mainly on the principle of them, and the problem of congestion they will address:

- it is right that Park users should contribute to its upkeep; this is particularly true of heavy users since otherwise everyone else is subsidising them;
- in the absence of a charge, money spent on the maintenance of roads and car parks has to be diverted from TRP's conservation and environmental projects;
- charges will reduce the amount of traffic, and general traffic congestion, in the Park; and
- at some times of day, and at some times of the year, congestion is a major problem in the car parks and charges will relieve that.

3. Main arguments cited by those opposing parking charges

The opposers of parking charges made a large number of practical points, including the impact on users and surrounding streets and availability of alternatives to the car:

- regular users could be hit very hard by the charges, particularly dog walkers who use the Park twice a day; also, poorer people will be hit disproportionately;
- the costs of installation and operation of the system may well exceed revenues, so generating no net financial benefit for the Park;
- congestion in the Park and its car parks only occurs at weekends;
- charging within the Park will cause unacceptable levels of congestion and parking demand outside it - particularly at Sheen, Roehampton and Ham Gates;
- with the exceptions of Richmond, Ladderstile and Robin Hood Gates, the Park is not well-served by public transport;
- contrary to TRP's assertions, car parks are not used by shoppers and commuters;
- ticket machines and notices will be unsightly and an undesirable "urban" feel;
- even if parking charges are appropriate in the Central London Parks, Richmond Park is quite unlike them, and each Park should be managed on its own merits; and
- TRP's aim to reduce visitor numbers is inconsistent with its objectives.

4. Other comments made by FoRP members

Certain observations about the operation of a charging scheme were made both by those who support the principle of charging and by those who oppose it:

- the main problems with traffic in the Park relate to through traffic, not the cars of people who come to spend time in, and enjoy, the Park; car parking is an easy target for charging, but TRP should be focusing on a system to levy a small charge on through traffic (20p or 40p were mentioned);
- season tickets should be available for local residents and/or frequent visitors; or local residents should have free or discounted parking;
- charging is only necessary at peak times – e.g. bank holidays and week-ends;

- the suggested "pay-and-display" system will cause stress because drivers will have to watch the clock and hurry back to the vehicle before the time is up; a simpler charging structure – e.g. £1-50 up to 3 hours, and £3 for 3 to 6 hours would reduce this stress; and
- an initial period should be free of charge; also parking should be free for the elderly and those with disabilities (in fact, the TRP proposal says that parking will be free for Blue Badge holders).

Analysis of some of the main issues

Most of the issues we analyse in this section are mentioned in TRP's Consultation Document and Impact Assessment. However, many of their assertions are questionable, few issues are adequately explored and little data is provided to support the arguments.

1. Funding of Richmond Park

One of the main reasons for TRP's proposal to introduce car parking charges is its financial constraints.

Over the last 10 years, TRP's budget has not kept up with inflation and the proportion funded directly by government has fallen. As a result, it has been forced to raise other funds through commercial activities (such as Hyde Park concerts), charitable donations and charges to users of the Parks. Today, such non-government income provides about a third of TRP's annual expenditure of £32 million.

The roads in The Royal Parks, including Richmond Park, are not part of the national road network and the cost of them and the car parks has to be covered by TRP's budget. Over the last 5 years, TRP has spent about £1 million a year on major works for roads and car parks, of which Richmond Park accounts for about £100,000 a year. The figure is maybe 10% higher if small maintenance jobs are included. Car parking charges (in parks other than Richmond and Bushy) provide income of about £1.5 million a year, so that the current budget for roads and car parks is broadly met by income from parking charges.

However, there is a large backlog of work on roads and car parks in Richmond Park, of which the largest part is £0.8-1.0 m for upgrading the Pembroke Lodge car park, both to improve the surface for visitors and to improve its environmental situation (including recovering and treating run off water for recycling for use in the Park).

TRP's Impact Assessment is short on detail about the costs and revenue of car parking charges. It quotes one-off costs of £2.9m including "investing in car parks, pay-and-display machines, signage etc". We understand from TRP that the bulk of this figure is for upgrading the car parks in Richmond and Bushy Parks, including Pembroke Lodge, not for the machines and signage. The spending for upgrading will be spread over a number of years, and covered by the net annual revenue from the charges, which will also cover part of any required spending on roads, both regular maintenance and major works.

If this is the case (and it is a pity that TRP did not publish the break-down of their figures) it should mean that car parking charges will cover much of the costs of maintaining car parks and roads in the future. This would allow the money currently spent on car parks and roads - £100,000 or more - to be spent instead on environmental maintenance and projects in the Park, and provides a strong argument in favour of charges.

However, this is a big "if", given the possibility that government would divert the revenue from charges into its general coffers or simply reduce its contribution to TRP by an equivalent amount. To confirm their intentions, TRP should commit to using the revenue from charges for spending on roads and car parks, either by ring fencing it, or making a commitment to specific car park projects for at least the next 5 years. In addition, they

should say how much money will be freed up for spending on environmental work.

2. Congestion

There is (sometimes severe) congestion around the car parks on busy days and at busy times, especially fine summer week-ends and bank holidays. On these days, Pembroke Lodge and Roehampton Gate car parks in particular get congested, with cars waiting to enter Pembroke Lodge car park backed up as far as Richmond Gate and blocking the road. Recently the congestion has become so bad that the police have been turning cars away from the car park simply to keep traffic moving; but the expense of using the police means this is not a long-term solution. The problem is growing, and is likely to continue to grow, as Richmond Park gets featured more and more as a "great day out" (including, ironically, by TRP's own advertising).

Car parking charges would undoubtedly reduce or eliminate the congestion, either by dissuading people from coming at such times, by spreading the parking more evenly across the car parks or by forcing people to park in surrounding roads.

But to reduce the congestion, charges would only be needed at those busy times, and possibly only in some car parks, not generally as TRP propose. If such selective charges were the proposal, we are sure many more of our members would have been in favour.

The alternative for relieving congestion – of expanding the car parks – is unacceptable. Richmond Park is a National Nature Reserve and has to be protected and managed as such. The seven car parks, particularly Pembroke Lodge, Roehampton Gate and Broomfield Hill, already intrude on the Park in a considerable way and they should not be expanded simply to cater for the demands of a relatively few days a year.

3. Effects outside the Park

In its Impact Assessment, TRP argues that the parking charges will not cause drivers to park in surrounding streets to avoid paying the charges because "a number of locations around the parks already charge a similar or higher amount to that proposed here". However, this only applies to the roads outside Richmond and Kingston Gates. There are no parking charges in the roads outside Roehampton, Sheen and Ham Gates, and these are likely to be subjected to a lot of new parking if parking charges are levied within the Park. The situation outside these gates is already difficult at peak times, particularly at Ham Gate, where parking on one side of the road narrows it to one lane only.

This is a serious objection to TRP's proposals. It would be unfortunate if TRP's plan forces local councils to bring in residents-only parking on these roads, which would itself involve unsightly signs and road markings, as well as difficulties for residents.

4. Public transport:

TRP states that it hopes to "encourage visitors .. to travel to the park by public transport". Neither we, nor we assume TRP, know the originating points of visitors to the Park, and therefore we cannot estimate for how many people public transport would be a viable alternative. However we can say (and a large number of our members say) that public transport to Richmond Park is very poor and, without new services, is unlikely to replace much if any of the car traffic.

For Roehampton, Sheen, Kingston and Ham Gates, visitors have to walk at least half a mile from buses. Only at Richmond, Ladderstile, Petersham and Robin Hood Gates are there buses running next to, or close to, the gates. Rail service is worse. Richmond, Sheen and Kingston Gates are a mile or more from the nearest train station, with only Richmond having a good onward bus service that runs next to the Park.

Public transport to Richmond Park needs to be improved. In winter and during weekdays the rest of the year, there are relatively few non-local visitors to the Park and new public transport services are probably not viable without a massive subsidy. However, on weekends (particularly Sundays) and bank holidays during spring, summer and autumn, a bus service operating (say) in a circular route from Richmond station to Roehampton Gate and Barnes station, for people coming to the Park from central London in particular, might well be viable with only a small subsidy. TRP and TfL should investigate this.

5. All Day Parking and 6-hour limit

TRP's consultation document mentions "abuse (of the car parks) by commuters and shoppers ..." and many of our members have commented on this, saying that the problem does not exist because the car parks are far from Richmond or Kingston town centres.

Anecdotal evidence suggests that there is (very limited) all-day parking in Pembroke Lodge car park by people who then walk to work at the top of Richmond Hill or even in Petersham (not by people walking into Richmond town centre). It is probably a maximum of 5-10 people, although if anything it is likely to increase as more people become aware of what they can do. This is a small problem, but it takes up some car parking spaces. Also, as TRP says, the car parks are "a facility that is provided exclusively for park visitors". Therefore, it seems to make sense to have either a time limit on parking or a higher charge for periods over 6 hours.

A number of our members say that a time limit can cause problems for people who want to do a variety of things in the Park, or who decide after leaving their car that they want to stay more than six hours. If there is a higher charge for periods over 6 hours, this problem could be solved by a system for people to top up their payment by mobile phone.

FoRP's views on the introduction of parking charges

This section gives FoRP's considered view on the proposals made by TRP. As we have said already, we have been mindful of the needs of Richmond Park as a National Nature Reserve and FoRP's own objects to "encourage the preservation of Richmond Park, .. its peace and natural beauties...". Our views also try to balance the interests of the different users of the Park - members and non-members, regular and irregular visitors, local people and those from beyond walking and cycling distance of the Park, and local residents and non-residents.

1. Principle of car parking charges

We do not oppose the principle of car parking charges, for a variety of reasons:

- with the number of visitors to the Park increasing steadily, a way of limiting vehicle numbers at peak periods will have to be introduced at some time unless (a) the car parks were to be greatly increased in size (which we would strongly oppose) or (b) congestion were to be allowed to become worse and worse such that it spoils the visit for many people.
- it is a not unreasonable way of generating funds for the improvement of the car parks, some of which - notably at Pembroke Lodge - are in a very poor state; TRP indicates this is their intention, but has made no clear commitment.
- in particular, if car parking charges mean additional money is available for conservation and ecology in the Park, we support charges; we realise this is a big "if" but we will be pressing TRP to give a commitment on how much money will be freed up for spending on environmental work in the Park should charges be introduced.

- it seems fair that users of a purpose-built facility in the Park, such as the car parks, should pay for their use of it, and it should not be paid for by general funds, i.e. by all users through their taxes.
- many places comparable to Richmond Park make a charge for parking, including National Parks and National Trust premises, nearby nature parks such as Marble Hill House and Kew Gardens, and other Royal Parks such as Greenwich. People have generally accepted that car parking charges are a fair way to cover the costs of the roads and car parks and to generate revenue for the park concerned. Indeed, FoRP volunteers at the Visitor Centre are often asked by new visitors to the Park where they should pay for car parking, suggesting that many visitors expect to pay for car parking and would not be averse to doing so.

2. General car parking charges

We do oppose the introduction of general car parking charges (i.e. all day and all year), since:

- it is only at peak periods, particularly summer week-ends and bank holidays, that demand for spaces exceeds the car parks' capacity and there is congestion on the roads from cars queuing to enter the car parks;
- the annual cost to many people will be prohibitive; this particularly applies to those who visit the Park frequently - twice per day is not uncommon among dog walkers; twice a day for (say) 1.5 hours each would be £3 a day or £1,100 a year;
- the introduction of charges will result in a large increase in parking in surrounding roads throughout the day and the year, which will cause major difficulties for local residents; we have seen no evidence that local councils have plans to tackle this;
- the reduction in the number of visitors to the Park which a blanket introduction of charges would undoubtedly bring about is contrary to FoRP's - and, we assume, TRP's - aims.

If TRP does introduce general car parking charges, it is critical that there is a season ticket available for regular users (where members give a figure it is of no more than £100); there is a review by councils of the impact on surrounding roads, and TRP and TfL investigate improved public transport (and publish the results of that review).

3. Peak period parking charges

We support the introduction of car parking charges at peak periods, e.g. summer week-ends and bank holidays, which is when the car park congestion occurs. The charges should be at all the car parks, although only some experience congestion, because otherwise traffic would simply be displaced, with more car miles being travelled within the Park.

Our support is based on a number of changes to the general system proposed by TRP:

- the charge should apply only between the hours of 09.30 to 18.00 or 10.00 to 18.30, so that regular users such as dog-walkers, and others who use the Park during relatively quiet hours, would not incur it; the alternative is a season ticket for regular users, but regular users will then be taking peak period capacity at a much discounted price to that paid by irregular users, which is both unfair to irregular users and results in much lower revenue to the Park;
- a simpler charging structure is adopted, e.g. £1.50 for the first 3 hours, then £3 for 3-6 hours: this reduces the stress on people who are unsure how long they will be in the Park;
- there is some system for people to extend their stay in the car park, other than walking back to it to get another ticket; it would make sense to have a system for topping up by mobile phone such as that used in some London councils; and

- instead of the length of stay being limited to six hours, there should be a third tier of (say) £6 for over six hours; this allows people to stay all day in the Park.

Limiting parking charges to peak periods also limits the effects on surrounding streets and residents to 50-75 days or 15-20% of the year.

One final point concerns the method of payment. In many parts of the country, payment of parking charges is moving from cash to credit card or even to mobile phone. Any charging system in Richmond Park should be by cash or have an option of cash payment. Many people will be carrying only cash (or relying on a purse of cash in their car) and many will not have a mobile phone with them (indeed we hope that they don't visit a nature reserve with one). Many older people do not possess a mobile phone (the profile of people parking in Richmond Park is very different from that in central London parks).

The remaining topics

Responses to the other questions, so far as they relate to Richmond Park, were as follows:

	<u>Yes</u>	<u>No</u>
Q6 (PHVs)	80%	20%
Q7 (Ads on cabs)	80%	20%
Q8 (Same for PHVs)	76%	24%
Q13 (Clean up after horses)	89%	11%

Despite the level of support for these proposals, some concerns and objections have been expressed, including:

- allowing PHVs into the Park would increase traffic, which is undesirable;
- PHVs tend to be driven inconsiderately, and at speed;
- any vehicle, whether a black cab or PHV or other commercial vehicle, which carries advertising would be at odds with the atmosphere and character of the Park; TRP does not allow advertising on its contractor vehicles for precisely this reason;
- why shouldn't horse riders pick up after their animals just as dog owners are required to do?

Although we recognise the concerns, on balance TRP's proposals are acceptable.

But there does seem to be a legitimate and well-founded concern about horses. TRP's documents are silent on the point, but FoRP is aware of the dangers which can arise from the droppings of horses which have been given worming agents: the manure from such horses can be harmful to earth worms and, presumably, other invertebrates, as well as to parasitic worms.

It would be a major step to require riders to "pick up", as would the banning of horses which have been given a worming agent. However, TRP should investigate the dangers from the dung of such animals, especially in the light of Richmond Park's status as a National Nature Reserve and SSSI. It may be that horses should be confined to the prepared bridleways rather than being permitted to range more widely, as at present.

We would welcome the opportunity to discuss FoRP's views with TRP and indeed any other interested parties.

Yours sincerely

Ron Crompton
Chairman, The Friends of Richmond Park