



THE RICHMOND SOCIETY

5 Kelvin Court, Marlborough Road, Richmond, Surrey, TW10 6JS.
Telephone: 020 89408 0643 – Email: secretary@richmondsociety.co.uk

Consultation - Regulations Review
The Royal Parks
The Old Police House
Hyde Park
London
W2 2UH

29th April 2009

The Royal Parks Regulations Consultation: Amending the Royal Parks Regulations (January 2009)

Dear Sirs,

I am writing to present the Richmond Society's response to your consultation on parking charges and trade vehicles in the royal parks. The Richmond Society is a local amenity and conservation group with around 1000 members. We have worked for over fifty years to make Richmond a better place to live, work in and visit. Further information about us can be found at www.richmondsociety.co.uk.

Q1: Do you support the introduction of parking charges in Richmond and/or Bushy Park?

The Richmond Society does not support the introduction of parking charges in Richmond Park on the basis proposed.

The Richmond Society is not opposed in principle to the introduction of parking charges in Richmond Park. However the consultation does not explain why charging is necessary and does not provide a basis to set charge levels and establish conditions. We do not believe the case has been made.

The Royal Parks have not provided a justification for why charging is needed now. Paragraph 2.4 of the consultation document states that the money raised would be used for maintenance. An explanation is needed to justify why this maintenance can not, as at present, be funded from other sources.

The Royal Parks have not provided arguments which make it possible to set the structure and levels of charges for car parking. Paragraph 2.2 of the consultation document sets out two environmental criteria:

- ◇ Encouraging visitors to travel to the parks by means other than private car wherever possible

Most of the park gates are not served by public transport, so parking charges are more likely to discourage travel to Richmond Park than shift usage to public transport.

There is no public transport within the park, and so what older people and those with children could see would be restricted. For example, even in Richmond where the park gate is on a bus route, people wishing to visit the Isabella plantation would not be served by public transport.

- ◇ Discouraging displacement of parking into the parks as a result of the imposition of parking fees by authorities outside

None of the car parks in Richmond Park is sufficiently close to shops, stations or residential areas for external parking to be displaced into them. There does not appear to be any existing abuse of car parking in Richmond Park and it seems unlikely that this will be a future problem. We think it more likely that parking charges in Richmond Park will add to problems in neighbouring residential areas.

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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?

If charging is simply for the purposes of raising money, the Royal Parks should be able to determine the rates and structure which produce the greatest yield. Similarly, if charging arises from the principle that those who use an amenity should pay for it, it should be straightforward to set the rates and structure.

However, we believe there are also further considerations. These include turnover and availability of spaces, whether to encourage longer or shorter visits to the park, and whether or not parking charges should be levied on working days. If parking charges are to be introduced, the Richmond Society would prefer rates and a structure which encouraged availability of at least a few spaces at all times.

Q3: Do you agree that there should be a maximum stay for parking in Richmond and /or Bushy Park?

The Richmond Society believes that if parking charges are introduced, the maximum stay should be one day. However, depending on the further considerations in the answer to Q2 it may be appropriate to charge a premium for stays over six hours.

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?

See the answer to Q3.

Q5: Do you have any further comments about our proposal to introduce parking charges?

If parking charges are to be introduced, the Richmond Society would:

- ◇ Like a clear assurance that any money raised will be used solely for capital improvements and renovations in Richmond Park and not used to subsidise any other park or activity.
- ◇ Recommend that they be linked to an index such as the RPI to ensure that over time they do not increase materially above inflation without further public consultation.
- ◇ Recommend that consideration be given to providing discounts for residents of surrounding areas, including Richmond, using existing residents' parking badges to identify those eligible.
- ◇ Recommend that consideration be given to imposing charges only at weekends and bank holidays.

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.

Yes.

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?

No. The purpose of excluding trade vehicles from the Royal Parks is to delineate them as a place of rest and recreation. Vehicles with advertisements detract from this. Even if this law is not generally enforced it should remain to ensure the practice does not go any further.

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)?

No, for the same reason as Q7.

Yours faithfully,

Patricia Spaight
Secretary