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Chairman - Transport and Air Quality Committee
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Dear Mr Bonomi

Richmond Council welcomes the invitation to comment on the Royal Parks Movement Strategy. Our response is focused on the measured and potential transport and air quality impacts of the proposed changes to Bushy and Richmond Parks.

As a borough we have recently adopted a Climate Change and Sustainability Strategy and ambitious targets for increasing rates of walking, cycling and public transport amongst residents as part of our Local Implementation Plan. As such we broadly support the ambitions of the Royal Parks to reduce traffic and improve air quality within their parks.

We recognise that while the roads within the parks are private and under the jurisdiction of the Royal Parks. We also recognise that the roads within the parks have long been utilised for through-traffic to reduce local journey times, and their presence improves the resilience of the local highway network. This historic fluidity in route choice means that any changes to the roads within the parks will also impact on local roads. Before any of the trial measures are made permanent, we want to ensure that we fully understand the extent of these impacts and have found a sustainable outcome that benefits both park users and local residents.

It remains unclear as to how the success of the traffic trial will be assessed by all stakeholders. The ongoing pandemic and corresponding lockdowns have resulted not only in unprecedented changes to traffic behaviour, but also in how we use our parks and open spaces. The combination of these changes has meant that we are unable to fully assess the impacts of the current trial measures and we would urge the Royal Parks to extend the trial period for a further twelve months to enable for a robust assessment to be completed. We would like to work closely with Royal Parks in carrying out this assessment, and for it to focus on the net impact on local traffic levels, parking impacts and air quality levels.

We have had previous discussions with Royal Parks on how the Council may be able to assist with the issues of commercial vehicles illegally accessing the

parks and would be happy to discuss potential options around this further, should it be of interest.

The impact of traffic travelling to, from, and through the parks varies by area within the borough, and our response to the consultation is thus nuanced to reflect these differences. Richmond Council has been undertaking some traffic monitoring in various locations around both parks in late 2020 and compared to previous traffic counts (generally September 2018). While some assessment of these counts has been included within our response, we believe the 2020 traffic counts are also impacted by wider pandemic-related traffic changes and are not necessarily reflective of normal.

Please find our detailed comments below.

Bushy Park

Chestnut Avenue provides a north-south link between Teddington and Hampton Court, enabling drivers to avoid the travelling via Hampton Wick Roundabout. This roundabout has long been recognised as a collision hotspot within the borough, particularly for cyclists. We have some concern that increased traffic levels through the roundabout will exacerbate the current safety issues and possibly lead to higher levels of cyclists casualties. As traffic levels are expected to remain low for the short-term future, we reiterate our previously stated support for increasing the length of the trial for a further twelve months to February 2022, to enable the full impact of the proposed changes to be properly evaluated. Traffic counts have not yet been undertaken at this location and we hope to do so in the future, once the majority of lockdown restrictions have been lifted.

Traffic counts have been undertaken on the A311 Hampton Hill, where traffic volumes have increased by approximately 10% during the AM & PM peak periods (7-10 am & 4-7pm Monday to Friday). This corresponds to an overall decrease in traffic levels on Queen's Road and Park Road, adjacent to the Teddington Gate to the park, of approximately 20%.

As part of the borough's initial response to the pandemic, we have improved cycle facilities between Hampton Court Roundabout and the Hampton Court Gate to the park. We would like to work with Royal Parks to further support this link and would welcome improved access for pedestrians and cyclists at this gate. The queues of traffic waiting to exit the park limit the space for cyclists and we would welcome changes to the existing pedestrian gate to make it easier for cyclists and pedestrians with limited mobility and/or wheelchair and pushchair users to safely access the park away from traffic.

We recognise that the Royal Parks are experiencing high numbers of visitors throughout the pandemic, resulting in both high levels of demand within the car parks and overspill parking into the surrounding area. Within Bushy Park this means there are queues of idling cars backing up onto Chestnut Avenue waiting to access the car parks, as well as queues of cars waiting to leave the parks. In

the short term we urge the Royal Parks to introduce measures to help manage this demand, such as the introduction of a pre-booking system, additional signage to tell visitors that car parks are full before they access the parks, or stewards to help move vehicles more efficiently within the park.

Should the Royal Parks decide in the longer term to introduce car parking charges we expect this to further displace Royal Park visitor parking onto the public highway in the vicinity of vehicle and pedestrian gates. The following roads may be adversely affected:

- Teddington Gate, Park Road Teddington
- Shaef Pedestrian Gate, Sandy Lane, Teddington
- Sandy Lane Pedestrian Gate, Sandy Lane, Teddington
- Hampton Wick Pedestrian Gate, Park Road, Hampton Wick
- Church Grove Pedestrian Gate, Church Grove, Hampton Wick
- Hampton Court Gate, Hampton Court Road, Hampton Court
- Barrack Pedestrian Gate, Hampton Court Road, Hampton
- Hampton Pedestrian Gate, Hampton Court Road, Hampton
- Dukes Head Passage Pedestrian Gate, High Street, Hampton
- Hampton Hill Pedestrian Gate, High Street, Hampton Hill
- Hampton Hill New Pedestrian Gate, High Street, Hampton Hill
- Laurel Road Pedestrian Gate, Laurel Road, Hampton Hill
- Blandford Road Pedestrian Gate, Blandford Road, Hampton Hill
- Coleshill Road Pedestrian Gate, Coleshill Road, Teddington
- Clapperstile Pedestrian Gate, Dora Jordan Road, Teddington

As part of the assessment of the trial measures, and any longer-term charging, we urge the Royal Parks to include the impact of parking on these local roads as part of the wider assessment and we are keen to work closely with the Royal Parks in undertaking this assessment. This will require undertaking parking beat surveys at various times of day to fully understand the quantum of displaced parking. We expect that if high levels of overspill parking is recorded we will need to consult with local residents on the introduction of Controlled Parking Zones. The costs of these surveys should be met by Royal Parks.

Confusion around the changes to access through the park has been compounded by the lack of advance warning signage on the wider highway network, leading to some vehicles u-turning at the gates. This has been partially addressed with revised highway signage, in the vicinity of the entrances in Teddington and Hampton Court, erected in December 2020. The continuation of the traffic trial and any permanent measures must be supported by adequate advanced warning signage on both the highway and Crown Road (Royal Park) network. These costs should be met by Royal Parks.

Richmond Park

We broadly welcome 'relaxation' of the earlier full closures to through motor traffic introduced earlier in the year in response to Park overcrowding/congestion caused by the COVID 19 Lockdown.

Petersham Road (Queens Road within Richmond Park)

The retention of the Royal Parks traffic trial route between Richmond and Kingston gates, available Monday-Sunday, helps to significantly reduce congestion on the adjacent A307 Petersham Road. Petersham Road is the only road available at all times between Richmond and Kingston and is highly constrained through the sharp bends of Petersham.

Our traffic surveys indicate that approximately 50% of north-south traffic movements between Richmond and Kingston Gates use Richmond Park during the AM & PM peak periods (7-10 am & 4-7pm Monday to Friday). This capacity is vital to the local people in Ham and Petersham, and any further restrictions on through traffic using the Queen's Road would be strongly opposed on a local level. Any closures would also severely impact the reliability of buses using the A307, which are heavily relied on as the only public transport option in the area.

While the traffic impact within the area has been minimal, there have been reports of overspill parking into the local area, particularly around Ham Gate Avenue. Ham Gate Avenue runs through common land and as a result is narrow and lacks pavements. The increased rate of parking on the road creates a real safety hazard for pedestrians and cyclists wishing to access the park. As with the roads around Bushy Park, we would like to work with the Royal Parks to fully assess the impact and find a sustainable long-term solution.

A305 Sheen Road/ Upper Richmond Road West (Sawyers Hill within Richmond Park)

The retention of the Royal Parks traffic trial route between Richmond and Roehampton gates, available Monday-Friday, helps to reduce congestion/delays on the adjacent A305 Richmond Road/URRW & A205 South Circular classified roads. Due to the long-term closure of Hammersmith Bridge this important strategic corridor is very congested, particularly westbound on the approach to Clifford Avenue. Our traffic surveys indicate that approximately 35-40% of east-west traffic movements, between Richmond Gate & Roehampton Gate, use Richmond Park during the AM & PM peak periods (7-10 am & 4-7pm Monday to Friday), and much of this traffic will now be displaced on the highway network.

While we recognise that the current changes are only at the weekends when traffic levels are historically lighter, we believe it would be prudent to further assess the impact of the closure on borough roads and the TLRN, and as such would again welcome the extension of the trial period for a further twelve months. This is particularly relevant due to the ongoing pressures on the local highway network resulting from the Hammersmith Bridge closure.

Sheen Gate Closure

The original East Sheen traffic issue was north/south rat-running between Sheen Park Gate and South Circular. The closure of Sheen Gate to through traffic as part of the traffic trial means that this issue has been temporarily resolved.

However, following the changes introduced as part of the trial, local residents have reported an increase in east/west traffic movements. The east/west through traffic movements between Sheen Road j/w Sheen Common Drive and South Circular j/w Hertford Avenue is potentially the most dominant. We started monitoring traffic in Hertford Avenue in September 2020 following the introduction of trial closures. We would like to undertake additional monitoring in the area, which will be dependent on most of the current lockdown restrictions being lifted.

East Sheen residents are also suffering from overspill parking onto the public highway when Sheen Gate carpark is full/overflowing, and we would like to work with Royal Parks to fully assess and resolve this issue.

General Comments

Traffic displacement

We disagree with the assumption that all traffic displacement, as a result of the traffic trial, will be reassigned to classified main roads, particularly through Sheen. The closure of Hammersmith Bridge means the wider classified road network is operating at capacity with residential roads regularly used as inappropriate rat runs. Experience shows that relatively small increases of traffic on local residential roads has a disproportionate detrimental effect on congestion, air quality and resident amenity. Awareness and acceptance that some impacts might transgress beyond desired displacement patterns is an important piece of recognition on the part of the Royal Parks. By recognising this, it underlines the need to work co-operatively with the local authority to address adverse impacts on roads ill-suited to high volumes.

Parking

We welcome that access to visitor car parks within the Richmond Park has been maintained. While it is recognised that some visitors may have to use roads outside the car park to access their preferred car park (before the trial they would probably have accessed via roads within the Park), we would expect that the overall impact of these movements would be minimal.

As with Bushy Park, it is unclear at this time if the current levels of parking demand are temporary or will continue past the end of the pandemic. In the short term we again urge the Royal Parks to introduce additional measures to further manage access to their car parks, either through signage, stewards or a pre-booking system.

Overspill parking is a real concern for nearby residents, and this will be greatly exacerbated should car parking charges be introduced. The following roads are thought to be the most adversely affected:

- Ham Gate, Ham Gate Avenue/Church Road Ham area
- Petersham Pedestrian Gate, Petersham Road, Petersham
- Richmond Gate, Richmond Hill/Queens Road, Richmond
- Bishops Pedestrian Gate, Chisholm Road, Richmond
- Cambrian Pedestrian Gate, Cambrian Road, Richmond
- Bog Pedestrian Gate, Upper Richmond Road/Sheen Common Drive, Richmond
- Sheen Pedestrian Gate, Sheen Lane/Fife Road, East Sheen

As with Bushy Park, we urge the Royal Parks to include the impact of parking on these local roads as part of the wider assessment and we are keen to work closely with the Royal Parks in undertaking this assessment. This will require undertaking parking beat surveys at various times of day to fully understand the quantum of displaced parking. We expect that if high levels of overspill parking is recorded we will need to consult with local residents on the introduction of Controlled Parking Zones.

We look forward to engaging constructively with Royal Parks and agreeing the funding for these additional costs.

Traffic signage & advance warning

It is not ideal that the operational days of the remaining through routes are not consistent. This may lead to misunderstanding by those unfamiliar with the area and create difficulties with signing alternative diversion routes. The lack of driver understanding has been compounded by the lack of highway advance warning signage of closures and restricted routes through the park.

The continuation of the traffic trial and any permanent measures must be supported by adequate advanced warning signage on both the public highway and within the park. The costs for the design and installation of signage should be met by Royal Parks.

Conclusion

We understand the motives of the Royal Parks in introducing the trial measures as part of their Movement Strategy, and in particular welcome the decision to promote more walking and cycling in the parks. We are also aware that the impact of these changes extends beyond the park gates and onto Richmond's roads. We urge the Royal Parks to think of this wider impact while assessing the trials, and to also consider that measures will likely need to be introduced outside of the parks in the form of additional parking restrictions, such as

Controlled Parking Zones, and possibly access restrictions to limit rat-running on inappropriate residential roads.

As noted, we would like to be able to carry out some additional traffic counts and parking surveys in the surrounding area and we hope that the traffic trial will be extended so it runs for at least an additional twelve months. This is particularly important as we have not seen a return to 'normal' traffic patterns within the initial six months of the trial. This extension should provide an opportunity for more robust data to be collected and for all stakeholders to be better engaged. This more collaborative approach may mean any permanent measures are likely to be more broadly supported.

We recognise that having two Royal Parks within our borough is a huge asset to our residents. We welcome the spirit of cooperation that we have had to date and hope to see this continuing as part of a robust assessment of the impact of the changes, and finding a long-term solution that is mutually beneficial to park users and local residents.

Yours sincerely

Councillor Alexander Ehmann
Deputy Leader of Richmond upon Thames Council & Chairman - Transport and Air Quality Committee