

The Royal Parks Regulations Consultation

RESPONSE

Consultation on Regulations Review

The Royal Parks the Old Police House, Hyde Park London W2 2UH

May 2009

Many thanks on behalf of the Licensed Private Hire Car Association (The LPHCA) for giving us the opportunity to comment on your excellent consultation,

The LPHCA is delighted that some of the anomalies raised by us when members complained they could potentially be ticketed or stopped when travelling legitimately about their business in the Royal Parks several years ago are now being addressed by this consultation.

The Association has published the consultation in Private Hire News Magazine and held a meeting early in April attended by over 100 Licensed Operator's representatives to get comments directly from our members.

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

YES

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?

About right

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

YES – Providing it's of sufficient length for genuine visitors

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?

About right

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

Only that they should be reasonable and fair

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 – But consideration should also be made for non PCO Licensed Vehicles by future proofing the legislation to enable provision for all legitimately licensed PHV's

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?

YES

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)?

YES

Q9 Do you agree with our proposal to reduce the speed limit in Greenwich Park from 30mph to 20mph?

YES

Q10 If you do not agree with our proposal to reduce the speed limit in Greenwich Park to 20mph, please explain why.

N/A

Q11 Do you agree with our proposal to reduce the speed limit in Bushy Park to 20mph?

YES

Q12 If you do not agree with our proposal to reduce the speed limit in Bushy Park to 20mph, please explain why.

N/A

Q13 Do you agree that the regulations should make clear that horse owners are not required to clean up after their animals?

YES

Q14 Do you have any other comments which relate directly to any of our proposals?

YES Licensed Private Hire is vital to the wellbeing and safety of London and the travelling public and we campaigned heavily for its Licensing. Unfortunately the last Royal Parks legislation came before the 98 Act, which covered Private Hire and it was not 'future proofed' to account for it.

The appropriate 'Mandating of Signage' on PHV's in London caused a freak situation where a Licensed PHV could technically fall foul of regulations and an illegal tout would not.

The Industry whilst having more vehicles than the black cab industry in London, demographically uses the Royal Parks much less than Black Cabs, so no adverse impact would occur. As Private Hire is the primary door to door accessible transport provider in London it is vital that it continues to have full access to the Royal Parks and that should be on the statute.

Steve Wright MBE, Chairman LPHCA