



## CROWN ESTATE PAVING COMMISSION

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15<sup>th</sup> January 2018

Val Shawcross CBE  
Deputy Mayor for Transport  
City Hall  
London SE1 2AA

Dear Val

Thank you for your letter of 3<sup>rd</sup> January about TfL's current plans for CS11. As a statutory maintenance organisation with some responsibilities for the roads in Regent's Park, the CEPC instinctively wants to be supportive of proposals whose aim is to improve road safety and the experience for the millions of pedestrian visitors wanting access to this remarkable park each year. After all, we strongly believe that the Outer Circle must not be relegated to being treated simply as a traffic short-cut on the way to the West End. Rather it is an integral part of one of London's greatest heritage assets and recreational public open spaces.

Most people will believe that a park ought to provide a safer place to cycle when compared to much of London's busy road network and the CEPC and Royal Parks are therefore both committed to making improvements to road safety. We have been working in close cooperation with TfL and many others since 2013 to develop viable CS11 proposals that will meet the Mayor's aspirations for increasing the levels of cycling London-wide, improve road safety in the park and, at the same time, meet the needs of the diverse range of park users and stakeholders.

The CEPC is still optimistic that TfL can arrive at workable proposals that will command wide support. It is not yet convinced however that the arrangements which TfL is currently proposing, arrangements that are designed to bring thousands more cyclists onto the park's roads, will actually achieve the levels of road safety desired, particularly without sufficient associated measures to reduce the very high levels of through traffic.

Although you say that Camden and Westminster are supportive of the latest proposals it is clear from ongoing press and other comment that there remains a wide range of views about the prospect of park gate closures and how the park's traffic environment can best be influenced by the introduction of speed tables and the redesign of junctions. In addition the prospect of increased congestion and pollution from standing traffic on the east side of the park and in Albany Street, exacerbated by the currently ongoing HS2 works, are also considerable concerns that need to be taken into account.

From the very start of discussions, the CEPC and Royal Parks have emphasised to TfL that any changes to traffic management in Regent's Park as significant as CS11 must be done on a trial basis so that the lessons learned month by month can be applied to finding the best arrangements and achieve the optimal results. The CEPC would therefore be very supportive of a genuine trial, however we believe that too many aspects in the current proposals will, in practical terms, end up being locked in place in perpetuity, making adjustments at a later date to achieve the desired road safety gains both too expensive and impractical.

In addition, as we have previously stated, in a situation where TfL's proposals are likely to generate entrenched opposition from some residents groups concerned by traffic congestion outside of the park, the CEPC, as a small organisation, needs to be appropriately cautious to avoid finding itself enmeshed in any long and costly legal process that might be required to resolve any contentious issues. We have yet to conclude our detailed consideration and planning for this eventuality which, as I am sure you will understand, it would be remiss of us not to consider in full.

You can be reassured that I and my fellow Commissioners have followed very closely the details of the long gestation of the CS11 plans and, after what has been such a considerable investment by our organisation in this process, we would very much regret being faced by an outcome to which we felt unable to lend our support.

At this stage, TfL is advocating a compromise set of proposals without the necessary wide level of consultation that is required and that has been a positive feature of the CS11 discussions to date. We would therefore encourage you to consider reconvening those CS11 working groups so that any resulting proposals can demonstrate the wide level of support that we feel a development for London of this significance should rightly have.

It is clear to us that the picture currently being painted by TfL of the existence of an agreed compromise that meets everyone's needs is more wishful thinking than fact. Thus I am less concerned that the CEPC alone is delaying progress on this issue in any way. But, likewise, I do understand your desire to find a positive way forward and we look forward to continuing discussions as alternatives are considered.

Yours sincerely

A black rectangular redaction box covering the signature of Loretta Balfour.

Loretta Balfour  
Commissioner & Chairman

# MAYOR OF LONDON

**Loretta Balfour**

Chair

Crown Estate Paving Commission

12 Park Square East

Regent's Park

London NW1 4LH

**Date:** 3<sup>rd</sup> January 2018

Dear Loretta

I am writing to express my disappointment that the Crown Estate Paving Commission (CEPC) is unable to support the measures proposed by the Mayor's Office and Transport for London (TfL) to reduce road danger for pedestrians and cyclists using Regents Park, as part of Cycle Superhighway 11.

As you will be aware, the Outer Circle is a road safety concern. The most recent data shows that it is significantly more dangerous than other comparable roads in London – with 100 collisions being reported in the 36 months to December 2016. This represents 7.4 injury collisions per km per year, compared with only 2.6 across comparable Inner London Borough roads.

TfL first consulted on Cycle Superhighway 11 in February 2016. 60 per cent of those who responded to the consultation – more than 6,000 people – supported the proposals. In December 2016 the Mayor confirmed that the route would go ahead, with construction due to start on the Swiss Cottage gyratory in autumn 2017. At that time, he also confirmed that we would continue talking with the Royal Parks and the Crown Estate Paving Commission about the options for addressing safety issues in Regent's Park and delivering substantial improvements for walking and cycling.

Since this announcement, TfL has been working on an alternative solution for the park which responds to the concerns raised during the consultation. TfL has been meeting regularly with Westminster City Council, Royal Parks, London Borough of Camden and the Crown Estate Paving Commission officers to discuss this work as it progressed.

The revised proposal is based on closing only two gates at certain times instead of the originally proposed four, introducing new features to make the Park safer for pedestrians and imposing a 20mph speed limit. These changes have been designed to address stakeholder concerns with the original proposals, while still creating a safe route for cyclists, with much less traffic on the western side of the Outer Circle without increasing traffic flows on the eastern side.

On 6<sup>th</sup> November 2017, the Mayor's Walking and Cycling Commissioner, Will Norman, organised a meeting with key stakeholders to discuss this work. An agreement was reached between TfL, Westminster City Council (represented by Cllr Robert Rigby) and the Royal Parks (represented by Andrew Scattergood) to implement the changes on a trial basis. Disappointingly, your Director, Max Jack, said that the CEPC would not support the trial, stating that the Commission preferred the original proposals. Subsequent to this meeting, Camden Council (represented by Cllr Adam Harrison) have also now confirmed that they have no objection to the principle of the revised proposal, making CEPC the only significant stakeholder now not supporting these improvements.

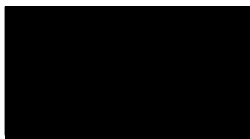
The revised proposals offer significant benefits to the Park and those who will walk and cycle within it, while allowing better access than the original proposals which was the biggest concern for many stakeholders. This is the only politically deliverable solution. The Commission's opposition to the trial, which other stakeholders are agreeing to, is delaying the much-needed road safety improvements for the area.

I would urge you to discuss this with your fellow Commissioners and hope that you can agree to support these revised proposals, on a trial basis, with success / failure criteria agreed between all parties.

The Mayor's Walking and Cycling Commissioner, Will Norman, and I would be happy to meet with you to help address any of your concerns.

I look forward to hearing from you.

Yours sincerely,



**Val Shawcross CBE**  
Deputy Mayor for Transport