London's Royal Parks

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October 2024



LONDONASSEMBLY

Research Unit

Overview

There are nine Royal Parks in London. They are owned by the Crown and eight are managed by the Royal Parks Limited (TRP). The Mayor of London is responsible for appointing some board members to TRP.

This paper provides an overview of how the TRP-managed Royal Parks are managed and funded, and challenges facing the parks. It also discusses key areas where responsibility for the Royal Parks overlaps with the work of the Greater London Authority (GLA) responsibilities, and a previous effort to devolve responsibility for them to the GLA.

About the Research Unit

The London Assembly Research Unit provides an impartial research and information service. We undertake research and analysis on key issues in London to inform the Assembly's work.

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Editing by Richard Berry, Najib Ahmed, Richard Clarke and Mark Mills

With thanks to the Royal Parks Limited, and the GLA's Green Infrastructure team

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1 Background

1.1 Overview and history of the Royal Parks

There are nine Royal Parks in London, eight of which are managed by the Royal Parks Limited (TRP). The parks are: Bushy Park, the Green Park, Greenwich Park, Hyde Park, Kensington Gardens, the Regent's Park including Primrose Hill, Richmond Park, and St. James's Park. The ninth park is Home Park at Hampton Court, which is managed by Historic Royal Palaces. This briefing is focused on the eight Royal Parks managed by TRP.

The Royal Parks are historic royal hunting grounds and pleasure gardens which have been opened for public use. They attract high numbers of local and tourist visitors, with over 77 million visits to the Royal Parks each year. The Royal Parks make up over 5000 acres of parkland. As well as open green space, the Royal Parks are home to protected wildlife habitats, and infrastructure including historic buildings, memorials, playgrounds, sports facilities, roads and cycle paths.

1.2 Ownership and management of the Royal Parks

The Royal Parks are part of the Crown Estate and are owned by the Monarch in right of the Crown.² Statutory responsibility for their management and upkeep sits with the Secretary of State for the Department for Culture, Media, and Sport (DCMS).³

Since 2017, the DCMS has contracted responsibility for management of the Royal Parks to The Royal Parks Limited (TRP), a company which is limited by guarantee by the Secretary of State for DCMS and has charitable status.⁴ The current contract runs until 2027.⁵

Prior to the establishment of TRP, the Royal Parks were managed by the Royal Parks Agency (RPA), which was an executive agency of DCMS and has since been disestablished. The Royal Parks Foundation Charity, also disestablished in 2017, had some fundraising responsibilities for the Royal Parks. TRP took over responsibilities from both organisations.

TRP is responsible for the maintenance and upkeep of all parts, including buildings, memorials and playgrounds, of the Royal Parks. TRP publishes an individual management strategy for each of the parks.⁶

TRP manages some other public spaces in London including Brompton Cemetery, Victoria Tower Gardens and Poet's Corner. TRP also manages the Longford River, which is 19km long, with 7km of it flowing through Bushy Park.

¹ TRP, About Us

² This means that while the Monarch owns the Royal Parks during their reign, the Parks are not their private property and they do not manage or make decisions about them.

³ As per the Crown Lands Act 1851

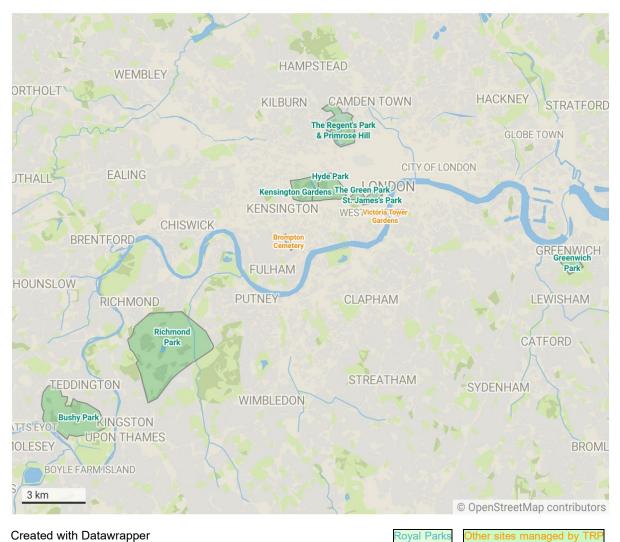
⁴ The Secretary of State for DCMS has, through the <u>Contracting Out (Functions relating to The Royal Parks)</u>
<u>Order 2016,</u> legislated the ability to delegate its responsibilities under the Crown Lands Act 1851 to maintain and manage the Parks.

⁵ TRP, Annual Report 2022-23, p62

⁶ TRP, The Royal Parks Management Plans

Figure One below shows where the eight Royal Parks managed by TRP are located in London. Four of these Royal Parks are wholly or mainly within the City of Westminster, which is shown in Figure Two.

Figure One: Location of the TRP-managed Royal Parks and other TRP-managed spaces in London



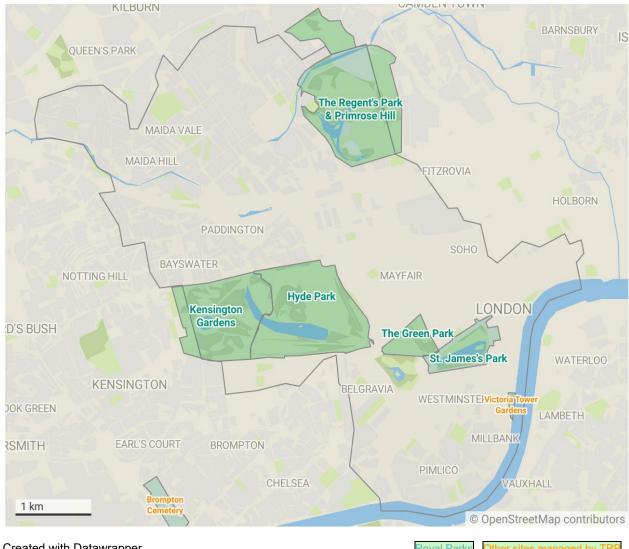


Figure Two: Location of the Royal Parks and TRP-managed spaces in Central London

Created with Datawrapper

1.3 Governance of the Royal Parks

TRP is led by a Board of Trustees. The Mayor of London is responsible for appointing up to six trustees. The Secretary of State for DCMS is responsible for appointing up to seven trustees, including the Chair. The Board also includes an ex-officio appointee representing the Royal Household.7

Loyd Grossman CBE was appointed as the interim Chair of TRP in September 2024, having previously served as Chair from 2016 to May 2024, completing two four-year terms. Dame Mary Archer was announced as the Chair ahead of the 2024 General Election,⁸ but this was

⁷ TRP, Articles of Association of the Royal Parks Limited

⁸ DCMS, TRP, Rt Hon Lucy Frazer KC, New Chair appointed to The Royal Parks Board, 24 May 2024

subject to review by the incoming Government.⁹ The Government decided to reappoint Loyd Grossman whilst a process was conducted to appoint a new permanent Chair. ¹⁰

As of October 2024, TRP's Board members are:

- Loyd Grossman CBE, Chair
- Aurora Antrim
- Heather Blackman
- Harris Bokhari OBE
- Richard Hamilton
- Bronwyn Hill CBE
- Councillor Adam Hug (London Councils nominee, City of Westminster)
- Jane Hurst
- Wesley Kerr OBE
- Councillor Anthony Okereke (London Councils nominee, Greenwich)
- Councillor Gareth Roberts (London Councils nominee, Richmond Upon Thames)¹¹
- Lt. Col. Michael Vernon (Royal Household ex-officio appointee).

The Board has seven sub-committees: Audit and Risk, Nominations, Remuneration, Investment, Greenwich Park Revealed Programme Board, Regent's Park Storeyard Programme Board, and the Richmond Park Projects Board. 12

Mayoral appointments

TRP's website does not include information on which Board members were appointed by the Secretary of State and which Board members were appointed by the Mayor of London. There are some press releases regarding individual appointments. For example, in July 2022, TRP issued a press release that the Mayor of London had appointed Harris Bokhari for a four-year term.¹³

The Mayor of London seeks three nominations from London Councils to represent London boroughs surrounding the parks.¹⁴ The Secretary of State and the Mayor of London must seek and have regard to the advice of TRP's Nominations Committee prior to appointing new trustees.¹⁵

The <u>GLA's Protocol on Mayoral Appointments</u> applies to the appointments the Mayor makes to the TRP board.

⁹ The Telegraph, <u>Lady Archer blocked from taking prestigious Royal Parks job</u>, 17 September 2024

¹⁰ DCMS, Royal Parks, Rt Hon Lisa Nandy MP, <u>Loyd Grossman CBE reappointed as Chair of the Royal Parks</u>, 17 September 2024

¹¹ Councillor Gareth Roberts is also a London Assembly Member. He was elected to this position in 2024.

¹² TRP, Annual Report 2022-2023, p60

¹³ TRP, New Trustee for the Royal Parks, 2 July 2022

¹⁴ TRP, Annual Report 2022-2023, p60

¹⁵ TRP, Articles of Association of the Royal Parks Limited

In 2022, London Councils made a request to TRP to be allowed four nominations for trustees representing London boroughs surrounding the parks, but to date this proposal has not been accepted. A meeting paper of London Council's Appointments Panel from 2022 states:

"We will continue to press for an additional nomination so we can have cross -party representation that also recognises the balance of political power across London." ¹⁶

TRP workforce

TRP's Chief Executive is Andrew Scattergood CBE, who has been in post since 2015. In 2022-23, TRP employed an average number of 244 staff, an increase of 70 from 2021-22 (174 staff). 17

TRP holds gardening and landscaping, maintenance, and cleaning contracts with a number of external providers who employ their own staff.

TRP also runs <u>volunteer gardening and ranger programmes</u> with 36,000 volunteer hours contributed in 2022-23.¹⁸

TRP charitable objectives

TRP has five charitable objectives:

- To protect, conserve, maintain and care for the Royal Parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historical, horticultural, environmental and architectural importance.
- To promote the use and enjoyment of the Royal Parks for public recreation, health and wellbeing, including through the provision of sporting and cultural activities and events which effectively advance the objects.
- To maintain and develop the biodiversity of the Royal Parks, including the protection
 of their wildlife and natural environment, together with promoting sustainability in the
 management and use of the Royal Parks.
- To support the advancement of education by promoting public understanding of the history, culture, heritage and natural environment of the Royal Parks and (by way of comparison) elsewhere.
- To promote national heritage including by hosting and facilitating ceremonies of state or of national importance within and in the vicinity of the Royal Parks.¹⁹

King Charles III is the patron of TRP. He was appointed, whilst still Prince of Wales, upon the TRP's establishment in 2017. He announced in May 2024 that he would remain the patron of TRP.²⁰

¹⁶ London Councils, Nominations to Outside Bodies, Meeting Paper, 8 November 2022, p21

¹⁷ TRP, Annual Report 2022-2023, p98

¹⁸ TRP, Annual Report 2022-2023, p36

¹⁹ TRP, Articles of Association of the Royal Parks Limited

²⁰ TRP, His Majesty the King will remain patron of the Royal Parks Charity, 20 May 2024

1.4 Funding, income and expenditure

It costs TRP around £60 million per year to manage the Royal Parks. DCMS pays an annual service fee to TRP which accounts for around 20 per cent of this and TRP must raise the remainder.²¹

Figures Three and Four below show a breakdown of TRP's income and expenditure in 2022-23. TRP manages the finances of the eight parks together and not on a park-by-park basis.

In its 2022-23 Annual Report, TRP stated that its "business model depends on its ability to generate income from the parks."²²

TRP's largest source of income is generated by hosting commercial events, such as Winter Wonderland in Hyde Park. In 2022-23, events income (£26.7 million) made up 40.7 per cent of TRP's total income (£65.6 million).²³ Three million people attended organised events in the Parks in 2022-23. Hyde Park generates the most commercial income for TRP.²⁴

Events income in 2022-23 (£26.7 million) had doubled in cash terms compared to 2018-19 (£13.3 million). 25





Source: TRP Annual Report 2022-23 • Created with Datawrapper

²¹ TRP, Annual Report 2022-2023, p71

²² TRP, Annual Report 2022-2023 p70

²³ TRP, Annual Report 2022-2023 p72

²⁴ TRP, Hyde Park Management Plan 2022-2032,p22

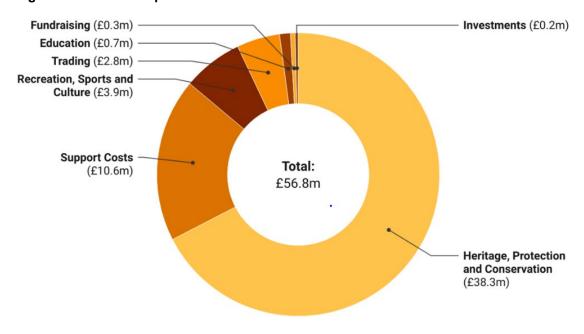
²⁵ TRP, Annual Report 2018-19, p33

There are seven 'Friends of the Park' charities which also help to fundraise for the Royal Parks and for TRP. These are:

- The Friends of Brompton Cemetery
- The Friends of Bushy and Home Parks
- The Friends of Greenwich Park
- The Friends of Hyde Park and Kensington Gardens
- The Friends of Regents Park and Primrose Hill
- The Friends of Richmond Park
- The Thorney Island Society (St. James's Park and The Green Park)²⁶

There is an independent charity incorporated in the United States, the Royal Parks Foundation (USA) which also fundraises for the Royal Parks.²⁷ The Foundation provides charitable donations towards TRP's <u>Schools Bursary Scheme</u>, which supports schools in Greater London that can demonstrate need, to arrange visits to the Parks.

Figure Four: TRP's expenditure 2022-23



Source: TRP Annual Report 2022-23 • Created with Datawrapper

1.5 Park regulations

The Secretary of State has powers under the Parks Regulations (Amendment) Act 1926 to make regulations to secure the proper management of the Royal Parks. The current principal regulations are The Royal Parks and Other Open Spaces Regulations 1997.

²⁶ TRP, <u>Our friends, The Guild and Partners</u>

²⁷ TRP, Annual Report 2022-2023, p28

These regulations cover a range of activities within the parks, including restrictions on cycling, vehicle use, public gathering, and commercial activities. They also address issues such as park opening and closing times, dog control, and protection of wildlife and park infrastructure.²⁸

The regulations are enforced by the Met Police, as discussed in section 3.1.

1.6 Nature and wildlife protections

The Royal Parks are recognised as being special places for nature and wildlife. Their key habitats are meadows, grasslands, ponds, lakes and wetlands, woodland, nature, trees and scrub, cultivated gardens, and soil. The Parks are home to over 170,000 trees, including thousands of veteran trees and hundreds of ancient trees. There has also been over 6,000 species recorded as being sighted in the Parks, including over 4,000 species of invertebrate.²⁹

All eight Royal Parks in London have been designated as Metropolitan-graded Sites of Importance for Nature Conservation (SINCs).³⁰ These are sites which are recognised by the Mayor and London boroughs as being special places for wildlife and nature. They are offered greater protection in the London Plan and in borough's Local Plans. Development that negatively impacts on a SINC may only be permitted in exceptional circumstances where mitigation can be proven. There are three grades of SINCs, with the highest being Sites of Metropolitan Importance.³¹ There are over 1600 SINCs in London.

Metropolitan-grade SINCs are described as:

"Sites which contain the best examples of London's habitats, including particularly rare species, rare assemblages of species or important populations of species, or sites which are of particular significance within otherwise heavily built-up areas of London. They are of the highest priority for protection".³²

In addition, Richmond Park and Bushy Parks have both been designated as <u>Sites of Specific Scientific Interest</u> (SSIIs) by <u>Natural England</u>.³³ Their designation primarily relates to their areas of low acid grasslands, ancient trees and dead wood habitats (for Bushy Park; its veteran trees) and populations of invertebrates.³⁴ Richmond Park has also been designated a <u>Special Area of Conservation</u>, in recognition of its population of stag beetles (a protected species), and a <u>National Nature Reserve</u>.

1.7 Park awards

The <u>Green Flag Award</u> scheme is an international accreditation scheme for recreational outdoor spaces. In England, the scheme is managed by the charity Keep Britain Tidy, under licence from the Ministry of Housing, Communities and Local Government.³⁵ Awards are

²⁸ TRP, Regulations and legislation

²⁹ TRP, <u>Biodiversity Framework 2020-2030</u>, p6

³⁰ Information about SINCs is available on Greenspace Information for Greater London CIC (GiGL)

³¹ GLA, Biodiversity in London

³² The London Wildlife Sites Board, <u>Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London</u>, April 2019, p4

³³ SSSIs are designated by <u>Natural England</u> and protected under the <u>Wildlife and Countryside Act 1981</u> (as amended by the Countryside and Rights of Way Act 2000).

³⁴ Natural England, Bushy Park and Home Park SSII notification and supporting evidence, 5 September 2014

³⁵ Keep Britain Tidy, Green Flag Award

given on an annual basis and award winners must apply each year to renew their Green Flag status. All of London's Royal Parks retained their Green Flag Award in 2024.³⁶

All of London's Royal Parks have also been awarded with <u>Green Heritage Site Accreditation</u>. This is an award supported by Historic England.

TRP's 2022-23 Annual Report lists a key performance indicator as having all parks meet at least an 80 per cent Green Flag score and states that this was met.³⁷

1.8 Public engagement

In 2022, TRP established the <u>Royal Parks Research Panel</u>. Individuals that have signed up to the panel are invited to complete an annual survey and some smaller surveys each year. The panel is operated by research company trueology.

TRP's Corporate Strategy 2022-2027 includes a commitment to:

"Create a research and insight hub to help us better understand our different visitor groups, including those who don't visit, so we can improve their experience of the parks and encourage new visitors to come in." 38

TRP has also previously used market research company Ipsos to conduct visitor research. This was most recently done in 2017-18.³⁹

TRP has also held public consultations on a range of decisions. For example, in 2023 it held a <u>public survey</u> on proposals for a garden in the Regent's Park to celebrate the life of Queen Elizabeth II.

2 The GLA and the Royal Parks

2.1 2010 Mayoral proposal for devolution of the Royal Parks

In June 2010, the then Mayor of London Boris Johnson published <u>Proposals for Devolution</u>, outlining various powers and responsibilities that could be devolved to the Mayor of London and the GLA. This included a proposal to devolve responsibility for the Royal Parks to the GLA, with the Royal Parks Agency becoming an executive arm of the GLA.

The Mayor's proposal set out the rationale:

"The RPA currently answers to the Secretary of State for Culture, Olympics, Media and Sport, and represents a very small part of the overall budget of the DCMS. As such, it is completely unaccountable either to the Mayor or to Londoners. Decisions such as whether to hold an event in Hyde Park, to charge parking fees in Richmond

³⁶ Green Flag Award, <u>2024 UK Winners</u>, 16 July 2024, p23

³⁷ The Royal Parks Limited, Annual Report 2022-2023, p52

³⁸ The Royal Parks Limited, Corporate Strategy 2022-2027, p3

³⁹ Ipsos, The Royal Parks Visitor Research, April 2019

Park or to restore sporting facilities in Regent's Park are made by central government rather than at a local level.

This disconnection from London government means that the full benefits of the parks, environmentally and as an amenity for Londoners, are not being delivered. In line with the principle of decentralisation, the Agency needs to be accountable to Londoners."⁴⁰

In December 2010, the Mayor stated that he was "currently in discussion with the Government about the possibility of the responsibility for managing the Royal Parks being devolved from the DCMS to the GLA."⁴¹

In January 2011, the DCMS published a proposal to transfer management of the Royal Parks to the GLA. The proposal included that the Crown would retain ownership of the Royal Parks. It stated: "Managing the Royal Parks would also fit well with the Mayor's existing responsibility for tourism in London as well as his strategic responsibilities for the environment in London."

In July 2011, the Parliamentary Under-Secretary of State for Culture, Olympics, Media and Sport published a statement outlining a change in position by the Government, confirming that the Royal Parks would continue to be managed by the RPA, which would remain an executive agency of the DCMS. The statement announced plans to create a board, governing the RPA, to which the Mayor would be responsible for appointing the chair and trustees.⁴³

RPA's Board was established in 2011. In response to a Mayoral Question in November 2011 about the Board, the Mayor said:

"The main role of the Board is to safeguard the Parks for current and future generations. It will act as an advocate for the parks and help shape the strategic direction of The Royal Parks." 44

In 2013, the Chair of the RPA, the Hon Apurv Bagri, appeared at a London Assembly Plenary session. The Chair described having one official meeting and regular informal meetings with the Mayor each year, as well regular meetings with GLA officials. ⁴⁵ The issue of whether there should be further attempts to devolve the Royal Parks to the GLA was discussed and the GLA's then Head of Paid Service, Jeff Jacobs, stated: "There is an issue around if it is not broken, what are we trying to fix? As things stand at the moment, the operation of the park seems…to be working pretty effectively."

Other key items of discussion were:

- whether there was a need for some areas of park management to be shared with the GLA Group, for example whether Transport for London should manage roads within the Parks
- balancing the needs of local residents with commercial events in the Parks

⁴⁰ Mayor of London, Proposals for Devolution, June 2010, p9

⁴¹ Questions to the Mayor, Royal Parks Management, Reference: 2010/4122, 15 December 2010

⁴² DCMS, Transfer of the Royal Parks Statement, January 2011

⁴³ DCMS, Written Ministerial Statement on the Royal Parks Agency, 18 July 2011

⁴⁴ Questions to the Mayor, Royal Parks Board, Ref 2011/3403, 16 November 2011

⁴⁵ London Assembly, Plenary Meeting, Transcript- Agenda Item 4 Royal Parks, 6 November 2013, p11

⁴⁶ London Assembly, Plenary Meeting, <u>Transcript- Agenda Item 4 Royal Parks</u>, 6 November 2013, p11

• car parking and motor vehicle use in the Parks.

2.2 Establishment of the Royal Parks Limited

In 2017, the RPA was dissolved and the TRP was established as its successor, through the Contracting Out (Functions Relating to the Royal Parks Order) 2016. The Explanatory Memorandum to the Order set out the policy rationale for the decision, noting that when the RPA was established in 1993 it was largely reliant on government funding and "today this position is completely reversed and the organisation generates almost 70% of its own income."

The Explanatory Memorandum also stated:

"Changing the status of the organisation to a charitable public body better reflects the new financial realities and will deliver greater operational flexibility. The charitable status will allow the new organisation to better harness a wide range of opportunities such as attracting a greater number of volunteers, encouraging philanthropic giving and permitting a more effective use of its resources."

No formal public consultation was held on the disestablishment of the RPA. The Explanatory Memorandum stated that the DCMS had undertaken wide-ranging engagement activities on the proposal with the public and key stakeholders and found it was supported.⁴⁹

The House of Lords Secondary Legislation Scrutiny Committee raised concerns about the lack of formal public consultation, stating:

"Given that there has been no public consultation process, however, we question whether the changes in prospect are widely known among the large numbers of people who use the Royal Parks... we question whether it is appropriate to assume that the proposal will be readily welcomed by many users of the parks.⁵⁰

The then Mayor Boris Johnson was quoted in the media stating he "fully supports the creation of this new organisation, which will give the Parks a stronger financial footing".⁵¹

As set out in section 1.3, the Mayor is responsible for appointing up to six trustees of TRP's board.

2.3 How the Mayor oversees other parks and green spaces in London

The Mayor and GLA do not have direct responsibility for managing parks and green spaces in London, which are mostly managed by London boroughs. This is with the exception of a

⁴⁷ The Explanatory Memorandum to the Contracting Out (Functions Relating to the Royal Parks) Order 2016, 2016, No 1039, p2

⁴⁸ The Explanatory Memorandum to the Contracting Out (Functions Relating to the Royal Parks) Order 2016, 2016, No 1039, p2

⁴⁹ The Explanatory Memorandum to the Contracting Out (Functions Relating to the Royal Parks) Order 2016, 2016, No 1039, p3

⁵⁰ House of Lords Secondary Legislation Scrutiny Committee, <u>Draft Contracting Out (Functions relating to the Royal Parks) Order 2016 8th Report of Session 2016-17</u>, 8 September 2016, p1

⁵¹ The Guardian, <u>Leadership change threat to London's Royal Parks, say campaigners</u>, 5 March 2016

few prominent spaces in London which are managed by the GLA, including <u>Trafalgar Square</u> and <u>Parliament Square Garden.</u>

In 2019, the Mayor established the <u>London Green Spaces Commission</u> to review the city's green infrastructure and make recommendations for improvement. A <u>review of London's parks and green</u> spaces was prepared by Parks for London, a charity dedicated to London's green spaces, to inform the establishment of the Commission. This review did not cover the Royal Parks, although it did note that the Royal Parks have "high intensity of use by tourists". ⁵²

The Mayor also established another time limited advisory group, the <u>London Rewilding Taskforce</u>, as well as funding programmes such as the <u>Grow Back Greener Fund</u> and the <u>Rewild London Fund</u>.

Under the Environment Act 2021, the Mayor of London is the 'responsible authority' for the production of a <u>Local Nature Recovery Strategy for Greater London</u>. ⁵³ Responsible authorities must work with stakeholders to agree priorities for nature's recovery, map the most valuable existing areas for nature, and establish shared proposals for what action should be taken to recover nature.

The Mayor is responsible for publishing the London Plan, London's spatial development strategy. The current London Plan was published in March 2021 and includes protections for green spaces and heritage assets in London. The Mayor is also responsible for publishing an environment strategy for London. The current Environment Strategy was published in May 2018 and details the Mayor's priorities and objectives for London's green spaces.

Designation of Sites of Importance for Nature Conservation

The GLA also has a role to play in designating SINCs. As set out in section 1.6, all eight Royal Parks in London have been designated as Metropolitan-graded SINCs⁵⁴

The London Wildlife Sites Board, which is chaired by the GLA, provides guidance on selecting and confirming SINCs. However, the selection of SINCs is primarily the responsibility of individual London boroughs as part of the preparation and review of their Local Plans. The Mayor and the GLA also have a role in selecting and confirming Metropolitan-grade SINCs. Sites of Metropolitan Importance.

Although a non-statutory designation, SINCs are afforded a high level of protection within the planning system. Development that negatively impacts on a SINC may only be permitted in exceptional circumstances where mitigation can be proven.

2.4 Policing of the Royal Parks

The Metropolitan Police Service (the Met) are responsible for policing the Royal Parks and enforcing the Parks' regulations. The Met has a dedicated Royal Parks Operational

⁵² Parks for London, <u>A review of London's parks and green spaces: strategy, governance and value for the London's Green Spaces Commission, February 2019, p10</u>

⁵³ Environment Act 2021, section 105

⁵⁴ Information about SINCs is available on <u>Greenspace Information for Greater London CIC (GiGL)</u>

Command Unit (OCU). The Royal Parks have a memorandum of understanding with the Met, outlining policing priorities and responsibilities.⁵⁵

The Met have been responsible for policing the Parks since 2004. Prior to this, there was a Royal Parks Constabulary which reported directly to the DCMS.⁵⁶

3 Key issues

3.1 Royal Parks roads

There are 68 miles of roads within the Royal Parks and 68 miles of footpaths, bridleways and cycle lanes. These are maintained by TRP.⁵⁷

The <u>Highway Code</u> applies to roads within the Royal Parks. This is enforced under the Highways Act 1980. The speed limits set out in the Highway Code for vehicles to do not apply to cyclists.⁵⁸ Since 2010, Richmond, Bushy and Greenwich Parks had had a 20 miles per hour (mph) speed limit. In October 2020, TRP adopted a 20 mph speed limit for its other five parks.⁵⁹

The Road Traffic Regulation Act 1984 provides that the Secretary of State may make regulations to impose charges on vehicles in the Royal Parks.⁶⁰

A key focus of TRP on road activity in recent years has been on reducing traffic in the parks. TRP published a <u>Movement Strategy</u> in 2020 which is focused on how park visitors access, experience and move within the parks. The Strategy sets seven strategic outcomes:

- 1. Ensure no net loss of green space
- 2. Develop a visitor dispersal and signage plan for each park
- 3. Provide safe and enjoyable walking experiences for park visitors
- 4. Reduce speed throughout our parks
- 5. Promote considerate cycling in designate cycle areas
- 6. Reduce the amount of through traffic within our parks
- 7. Minimise the movement of operational vehicles within our parks.

TRP's consultation on the Movement Strategy received over 6500 responses. It found that:

• 73 per cent of respondents strongly agreed or agreed that walking should be the preferred and prioritised mode of transport within the Royal Parks

⁵⁵ The Royal Parks Limited, Annual Report 2022-23

⁵⁶ The Royal Parks Constabulary was formally abolished and its powers transferred to the Met Police by the Serious Organised Crime and Police Act 2005, <u>section 161</u>

⁵⁷ TRP, Movement Strategy: Discussion Paper, 2019, pp4-5

⁵⁸ Department for Transport, Highway Code, Rule 124, updated 17 September 2023

⁵⁹ TRP, 20mph speed limit adopted in central Royal Parks

⁶⁰ Road Traffic Regulation Act 1982, section 62

 79 per cent of respondents strongly agreed or agreed that Park roads should not be used as commuter routes for motor vehicles.⁶¹

Alongside the launch of the Movement Strategy in 2020, TRP announced five trials seeking to restrict cut-through motor traffic in the Parks. ⁶² TRP ran individual consultations, administered by the charity <u>Sustrans</u>, on these trials. All of the consultations found broad support for the proposals. ⁶³ In October 2022, TRP announced that it would make the measures that had been trialled in Richmond, Bushy and Greenwich Parks permanent. ⁶⁴

In 2021, London Cycling Campaign had criticised TRP for its delay in deciding whether to make the trialled schemes permanent.⁶⁵

The Mayor's 2021 election manifesto included a commitment for TfL to "support TRP to reduce polluting traffic rat-running through our city's most famous green spaces." In 2024, the Mayor was asked what progress had been made on this commitment. He responded:

"TfL is supportive of any plans to remove traffic from the Royal Parks, which should improve road safety and air quality within these important green spaces. TfL works collaboratively and has regular dialogue on a number of schemes with The Royal Parks..."

As of October 2024, TRP's decision on its trials in St James's and the Green Park, and Hyde Park is still pending. The Hyde Park trial, which began in 2020, initially involved closing South Carriage Drive to traffic on Saturdays in addition to the existing Sunday closures. At the same time, TfL introduced a new cycle lane on Park Lane that intersected with South Carriage Drive. Due to safety concerns about traffic and cyclists, TRP extended its trial closure of South Carriage Drive to traffic to seven days a week.⁶⁸ In 2024, it held a public consultation on whether this should be made permanent and as of October 2024, the findings have not been published.

In February 2024, the Mayor was asked what discussions he and TfL had ahead of TRP opening a consultation on closing South Carriage Drive to motorised vehicles. The Mayor responded that TfL would be responding to TRP's consultation.⁶⁹

3.2 Cycling in the Royal Parks

Cycling in the Parks has been an issue of contention and media coverage for TRP.

TRP published a <u>policy statement</u> on cycling in the Royal Parks in May 2023. It states: "while we welcome considerate cyclists, pedestrians have priority within the Royal Parks." ⁷⁰

⁶¹ TRP, Movement Survey Summary Report, November 2019

⁶² TRP, The Royal Parks launches movement strategy, 10 July 2020

⁶³ See: Hyde Park consultation report, Richmond Park consultation report, Bushy Park consultation report,

Greenwich Park consultation report, St James' Park and the Green Park consultation report

⁶⁴ TRP, The Royal Parks makes cut-through traffic reduction trials permanent in Richmond Park, Bushy Park and <u>Greenwich Park</u>, 11 October 2022

⁶⁵ London Cycling Campaign, Parks for People

⁶⁶ Sadiq Khan, <u>2021 Election Manifesto</u>, p57

⁶⁷ Questions to the Mayor, Reducing rat-running in the Royal Parks, Reference: 2024/1227, 15 March 2024,

⁶⁸ TRP, Consultation on permanent weekday road closure of South Carriage Drive

⁶⁹ Questions to the Mayor, South Carriage Road Consultation, Reference: 2024/0828, 22 February 2024

⁷⁰ TRP, Cycling in the Royal Parks Policy Statement, May 2023

It also states:

"We do ask that cyclists observe the motor vehicle speed limit for the park, the road or path in question. This varies from 5mph to 20mph."

The Policy also states that e-scooters are not permitted to be used in the Park.

In July 2022, a pedestrian in Regent's Park was suffered fatal injuries following a collision with a cyclist. The coroner determined, in 2024, that the collision was an accident and the pedestrian's death was recorded as an "accidental cycling collision death". ⁷¹ In 2024, a pedestrian was hit by a cyclist in the same spot in The Regent's Park. ⁷²

TRP issued a <u>press release</u> about both incidents in May 2024. The press release stated that TRP is working with the <u>Crown Estate Paving Commission</u> to review if there are additional measures it could put in place to encourage safe cycling in The Regent's Park. It also reiterated that its policy statement on cycling asks that cyclists observe motor vehicle speed limits.⁷³

In May 2024, it was reported that TRP had contacted Strava, a phone application commonly used to publicly record and compare cycle rides, as well as similar application, to ask that the Outer Circle of Regent's Park was removed as a "segment" from the applications.⁷⁴

It was also reported that TRP had written to a number of cycling clubs in London to remind them of TRP's policy on cycling in the Royal Parks.⁷⁵

In June 2024, TRP cancelled a time trial cycling event that was scheduled to take place in Richmond Park in July, citing concerns that cyclists might exceed the 20 mph speed limit. The event, organised by the London Dynamo Cycling Club, had been held annually for the past fifteen years. ⁷⁶

3.3 Commercial events in the Royal Parks

As set out in section 1.4, TRP's largest source of income is generated from holding commercial events. Around 30 major events and hundreds of smaller events are held in the Parks each year.⁷⁷ An estimated three million people attended events in the Parks in 2022.⁷⁸ In 2015, TRP published guidance on <u>Hosting Major Events in the Royal Parks</u> which sets out its guiding principles for how it considers event applications and manages events. It states that TRP has set "upper limits" on the number of major events it will host each year.⁷⁹

The Friends of Richmond Park have said that it sees "reduced public funding which threatens increased commercialisation" as a key threat to the Parks.⁸⁰ In 2016, following the

⁷¹ The Standard, <u>Speeding cyclist avoids conviction after crash that killed pensioner, 81, in Regent's Park,</u> 5 May 2024

⁷² The Telegraph, <u>Woman badly injured by cyclist at same spot in London where pensioner was killed</u>, 11 May 2024

⁷³ TRP, Statement: Cycling incidents in The Regent's Park, 13 May 2024

⁷⁴ Cycling Weekly, Strava urged to delete popular London cycling segment after deadly crash, 14 May 2024

⁷⁵ Cycling Weekly, <u>Strava urged to delete popular London cycling segment after deadly crash</u>, 14 May 2024

⁷⁶ Cycling Weekly, <u>Longstanding London park time trial cancelled over concerns of speed and 'cycling-related incidents'</u>, 14 June 2024

⁷⁷ TRP, Hold a Major Event

⁷⁸ TRP, Annual Report 2022-23, p26

⁷⁹ TRP, Hosting Major Events in the Royal Parks, May 2015

⁸⁰ Friends of Richmond Park, <u>The friends</u>

establishment of TRP, the Friends of Greenwich Park chairman told the media "they're going to be a funfair and a carnival before we know it" and spoke of his concerns of "a direct conflict between raising money and protecting wildlife".⁸¹

As well as commercial events, large-scale ceremonial events are also held in the Parks. For example, Trooping the Colour is held in St. James's Park each year to mark the King's birthday.

3.4 Staff pay

From 2020 to 2023, TRP was involved in legal action against it relating to a claim about pay and indirect race discrimination.

In 2020, a group of sixteen contract workers brought a set of claims against TRP to an employment tribunal. The workers were employed by Vinci Construction UK Ltd (Vinci), a third party, to provide cleaning services at the Royal Parks. In 2014, after a public procurement process, the RPA awarded a contract to Vinci. The contract, which included terms and conditions relating to the workers, did not specify that the workers would be paid the London Living Wage (LLW). This contract was novated to TRP and extended in 2019. In line with a policy decision taken by TRP's trustees, the contract extension included a requirement that the workers should be paid LLW with the additional cost funded by TRP.⁸²

Part of the group of workers' argument was that the majority of the contract workers were from ethnic minority backgrounds and that the majority of the staff directly employed by TRP were White and all of the directly employed staff were paid above the London Living Wage. The workers were seeking back pay for the years that they had not been paid the LLW.

In October 2021, an employment tribunal determined that the discrepancy in the minimum rates of pay between the contract workers and directly employed staff amounted to indirect race discrimination.⁸³

The other claims made against TRP by the group of workers were dismissed by the tribunal.

TRP lodged an appeal against the judgment in November 2021 and in May 2023, the Employment Appeal Tribunal overturned the original judgment.⁸⁴ The contract workers unsuccessfully appealed this in the Court of Appeal in 2024.⁸⁵

The legal action received significant media attention.86

In February 2024, gardeners at The Regent's Park went on strike in protest about their pay. It was reported in the Telegraph that the gardeners, employed by private company Idverde,

⁸¹ The Guardian, Leadership change threat to London's royal parks say campaigners, 5 March 2016

⁸² This information was provided by TRP to the Research Unit in October 2024. TRP also advised that the implementation of the pay increase was delayed due to the strike action by the workers.

⁸³ Boohene v The Royal Parks Ltd [2021] ET Case Nos: 2202211/2020, 2204440/2020 & 2205570/2020

⁸⁴ The Royal Parks Ltd v Boohene and Others [2023] EAT 69

⁸⁵ Boohene v The Royal Parks Ltd [2024] EWCA Civ 583

⁸⁶ See: Telegraph, <u>Royal Parks embroiled in £750,000 race discrimination legal battle</u>, 23 April 2020; Independent, <u>Royal Parks face high court battle over discrimination against Black cleaners</u>, 8 June 2021; Guardian, <u>Royal Parks workers bring landmark case over race and equal pay</u>, 20 February 2024

were paid a lower hourly rate than gardeners working at other Royal Parks.⁸⁷ In March 2024, the gardeners agreed to accept a new pay rate.88

3.5 Climate change impacts and promoting conservation

TRP declared a climate emergency in 202089 and have since stated:

"Climate change is having a profound effect on the natural environments and wildlife of the Royal Parks. We see damage and loss inflicted at almost every level, from breeding patterns of animals or species distributions, to soil erosion, flash flooding and tree loss."90

TRP's Sustainability Strategy 2015 to 2025 sets out four sustainability pillars:

- 1. Conserve and enhance the unique landscapes, built heritage and biodiversity
- 2. People, education, fairness and improving wellbeing
- 3. Mitigation and adapting to climate change
- 4. Sustainable growth providing environmentally excellent and financially viable green open spaces to the public.91

Its biodiversity framework 2020 to 2030 sets out a plan to address four key threats to the Parks' biodiversity: species extinction, habitat loss and damage, wildlife and tree pests and diseases, and pollution and contamination. TRP's Sustainability Strategy 2015 to 2025 also seeks to promote conservation in all aspects of TRP's management of the Parks.

TRP's two key conservation initiatives are Help Nature Thrive and Mission Invertebrate.92 TRP has also published a tree strategy for Kensington Gardens and committed to publishing tree strategies for each of the Parks.93

TRP is required to report annually on its energy and carbon emissions.⁹⁴ Its carbon emissions reduced by 33 per cent from 2022-2023 to 2018-19 (its baseline reporting year). TRP's 2022-23 Annual Report attributes this reduction to its efforts to electrify its transport fleet and use different and cleaner fuels. The highest sources of TRP's carbon emissions are from gas lighting in some of its parks and the fuel used to heat Hyde Park's plant nursery. 95

3.6 Richmond Park and Heathrow Airport concerns

The Friends of Richmond Park are currently running a campaign (Save Richmond Park) protesting against Heathrow Airport's plans for changes to flight paths as part of its Airspace Modernisation programme. It is concerned about an increase in flights and potential impacts

⁸⁷ The Telegraph, Regent's Park gardeners go on strike in row over which Royal Park pays most, 1 February 2024

⁸⁸ GMB Union, Regent's Park gardeners win dispute, 7 March 2024

⁸⁹ TRP, Climate and conservation

⁹⁰ TRP, The Royal Parks in a changing climate, 23 April 2023

 ⁹¹ TRP, Sustainability Strategy 2015-2025, p10
 92 TRP, How the Royal Parks helps nature thrive

⁹³ TRP, Tree Strategy

⁹⁴ The Streamlined Energy and Carbon Reporting requirements are in the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018

⁹⁵ TRP, Annual Report 2022-23, p46

on air pollution and noise, on the tranquillity of the Park, as well as negative impacts on Park wildlife.⁹⁶

In November 2023, the London Assembly passed a motion calling on the Civil Aviation Authority to reject the Heathrow Stage 2 Plan. The motion included recognition that the plans would have a negative impact on the tranquillity and biodiversity of Richmond Park. ⁹⁷ Heathrow Airport wrote to the London Assembly in response, noting that it would be seeking to reduce "potential overflight and/or impacts" to Richmond Park. It also stated:

"Decisions on the final design of the airspace and utilisation of routes will not be made until we have reached the appropriate stage (3) to undertake detailed environmental assessment and fully consult local communities on our proposals. Therefore, the reference to "60,000 aircraft flying only 1500-2000 feet above Richmond Park" is misleading." ⁹⁸

⁹⁶ Friends of Richmond Park, Flight paths threat

⁹⁷ London Assembly Plenary Meeting, Motions, 2 November 2023, p3

⁹⁸ Civil Aviation Authority, Letter to Andrew Boff AM London Assembly, not dated

Other formats and languages

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Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

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Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

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Arabic

الحصول على ملخص ل هذا المستند بل غتك، فسرجاء الاستصال برقم الهاسف أو الاستصال على المعدوان البريد العدي أو عنوان البريد اللكتروني أغلاه.

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંભર પર ફોન કરો અથવા ઉપર આપેલ ૮પાલ અથવા ઈ-મેઈલ સરનામા પર અમારો સંપર્ક કરો.

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Published by The London Assembly City Hall Kamal Chunchie Way London E16 1ZÉ Enquiries 020 7983 4000