

The Royal Parks comments

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THE ROYAL PARKS RESPONSE TO THE DRAFT LONDON PLAN PUBLISHED BY THE MAYOR OF LONDON ON 30th NOVEMBER 2017

The Royal Parks (TRP) is the charitable public body that manages 5000 acres of public space in London, including eight Royal Parks, Brompton Cemetery and Victoria Tower Gardens. The estate includes important international conservation designations, sites of special scientific interest, listed landscapes, rare habitats, historic buildings, unique features and vistas.

TRP also plays an important part in the health, sporting and cultural life of London by providing facilities for sport and wellbeing and hosting a range of varied events from State Ceremonials to summer concerts, The London Marathon and The Frieze Art Fair.

The estate receives 77 million visitors each year and makes a significant contribution to the London tourism economy.

TRP welcomes the strategic approach to addressing London's varied challenges and opportunities in particular embracing the concept of *Good Growth*. TRP has focused its response on the following areas.

GG2 Making the best use of land

TRP supports the aspiration in the Plan for 80% of journeys to be made by walking, cycling and public transport, which ties in with our aspiration of reducing the number of motor vehicles entering the parks. Parks are principally places of public recreation, where the pedestrian has priority and this should be acknowledged in transport planning and operational delivery.

TRP notes the target of increasing London's green cover from 47% to 50%. The Plan should place more emphasis on the quality and biodiversity of the additional green space and the public's access to it. While green roofs may have an important contribution to make, a growing population needs more amenity space.

TRP welcomes the Mayor's commitment to protecting London's open spaces, including Metropolitan Open Land. It is important that the cultural and historic value of such spaces is understood and their value to the local community. TRP is not alone in being put under continuing pressure to accommodate new structures in the parks – particularly public memorials – which reduces amenity space and can change the look, feel and environmental value of a park. TRP welcomes the Mayor's support in protecting the open spaces from such intrusions.

GG3 Creating a healthy city

TRP shares in the objective of promoting more active and healthy lifestyles. A consequence may be that more people use the parks and open spaces. This is welcome. However, some activities, such as organised park runs will need to be carefully managed to ensure the needs of other park users are accommodated and the impact on park environments is minimised.

Page: [Chapter 2 Spatial Development Patterns](#)

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SD4 The Central Activities Zone (CAZ)

TRP notes that the CAZ includes The Regent's Park, Hyde Park, Kensington Gardens, Green Park and St James's Park, all managed by TRP.

TRP strongly supports the aspiration to maintain and enhance the distinct environment and heritage of the CAZ. Developments outside the CAZ footprint that can have a detrimental impact on the ambience and setting of the CAZ and so should be a relevant consideration in planning decisions.

TRP agrees that traffic can have a detrimental impact on the CAZ and supports measures to mitigate this.

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D7 Public realm

The 5000 acres of the Royal Parks Estate are governed by Park Regulations developed over decades and agreed by Government following consultation. The Regulations govern behaviour and are there to protect visitors, the park environment and wildlife. It is important that the proposed 'Public London Charter' reflects the sometimes competing requirements that arise in the management of public spaces. The Charter should complement existing Bylaws and Regulations.

D8 Tall buildings

TRP considers that the proposed tall buildings policy does not offer enough protection for views into and out of the city, in particular, their impact on landscape and heritage assets.

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Page: [Policy S6 Public toilets](#)

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S6 Public toilets

Although there is no statutory obligation to provide public toilets, TRP has high quality provision across its estate. TRP agrees that providing such facilities across London is important. However, we disagree that this provision should be free (with some exceptions). Providing such facilities is costly and we impose a charge on their use and reinvest this into the upkeep of facilities. The charge makes an important contribution to the service but still does not cover costs. If there were no charges, the unintended consequence could be the closure of some facilities and the degrading of others. The focus should be increasing affordable provision.

Page: [Policy HC1 Heritage conservation and growth](#)

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HC1 Heritage conservation and growth

Inappropriate development can significantly dilute the look and feel of heritage assets and undermine their value to the public. Any policy which effectively addresses this is supported by TRP.

HC2 World Heritage Sites

TRP supports this proposal. It is pleased that the Plan advocates that development proposals in buffer zones to WHS should conserve, promote and enhance the value of the site.

HC3 Strategic and local views, HC4 London View Management Framework

TRP strongly supports the protection and enhancement of existing strategic views (some of which have been undermined in recent years by inappropriate developments), and the creation of new protected views.

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Page: [Policy HC3 Strategic and Local Views](#)

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Page: [Chapter 8 Green Infrastructure and Natural Environment](#)

Section: [N/A](#)

G1 Green infrastructure

TRP notes the target of increasing London's green cover from 47% to 50%. Guidance on achieving this target should focus on the quality and biodiversity of the additional green space and the public's access to it. While green roofs may have an important contribution to make, a growing population needs more publically accessible amenity space.

G3 Metropolitan Open Land

TRP strongly supports an increase in designated Metropolitan Open Land and enhancement and protection of existing additional spaces.

G4 Local green and open space

TRP agrees with the proposal to protect and enhance local green and open space and to improve access.

G5 Urban greening

More emphasis should be placed on the quality and diversity of the planting to ensure a range of bio-diverse habitats. Measures need to be introduced to ensure the long term upkeep of any improved habitats.

G6 Biodiversity and access to nature

This policy should include more focus on the role of green infrastructure and natural water systems in helping to make the city more resilient to impacts from climate change and other severe natural events.

We recommend that some spatial illustrations of the city's green space, including the Parks hierarchy and wildlife sites (SINCs) need inclusion.

We are concerned that delivering housing demand through multiple small-scale developments, primarily in the suburbs and in and around town centres may impact on existing green space connectivity and lead to intensification of use of existing parks and open spaces.

We believe that the policies regarding water use, water management and water bodies need to be strengthened. We are concerned that there is no reference to Heathrow's potential expansion, which will lead to significant impact on The Longford River (and Duke of Northumberland's River) in West London.

G7 Trees and woodlands

We recommend that tree and woodland strategies should include the management of pests and diseases, which present a serious threat to London's tree stock.

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

T1 Strategic approach to transport

TRP supports the aspiration of reducing London's dependency on motor cars and aim for 80% of journeys to be made by walking, cycling and public transport. This reflects our aim of reducing the number of motor vehicles entering the Royal Parks. The policy needs to acknowledge that a different approach may need to be taken in different areas. For example, parks are principally places of public recreation, where the pedestrian has priority and this should be reflected in transport planning and operational delivery.

T5 Cycling

TRP supports the enhancement of cycling provision but removing barriers to cyclists should not result in the introduction of new ones for pedestrians. In the Royal Parks, pedestrians will continue to have priority but we will seek to introduce provision that encourages peaceful co-existence between all visitors.

TRP recognises the need for cycling parking but new provision should be in keeping with environment in which they sit, for example, the historic listed landscapes of The Royal Parks may not be appropriate locations.