

Andrea Kitzberger-Smith
Spatial Planning and Design Team
London Borough of Richmond Upon Thames
Civic Centre
44 York Street
Twickenham
TW1 3BZ

24 July 2023

Dear [REDACTED]

**RE: London Borough of Richmond upon Thames – Local Plan Publication
(Regulation 19) Consultation 9 June to 24 July 2023**

Thank you for consulting The Royal Parks (TRP) on the above proposals.

Bushy Park is owned by the Crown, but TRP is responsible for its management on behalf of the Crown. The Park is Grade 1 listed on Historic England's Register of Historic Parks and Gardens, is a National Nature Reserve (NNR), a Site of Special Scientific Interest (SSSI), Conservation Area (CA) and a Special Area of Conservation (SAC). One of TRP's charitable objects is to protect and conserve the land under its management.

After viewing all the details submitted, The Royal Parks would like to make the following comments on the diagrams:

- Sawyer's Hill E3.3 – the view semi-circle should be twisted anticlockwise so indicates correct directions (N, E and SE mentioned in text – current diagram twisted too far to the south)
- White Lodge to Pen Ponds E3.5 – the point location needs to move to the south more in line with the south edge of White Lodge rather than the centre

TRP welcome in the document the inclusion of the following views:

Character Area Name:

Richmond Park

View Name and Reference:

Sawyer's Hill

(E3.3)

View Type:

Prospect

Description of View

Sequential open landscape view from Sawyer's Hill Road (Richmond Gate to Roehampton Gate) across Richmond Park, encompassing:

- Long-distance view (north, east and south-east) to the ever-changing city skyline; embracing a wide sweep of distant landscape and skyline from Brentford, Harrow, Hampstead and round to Highgate including the Wembley Stadium Arch;
- Long-distant view (south-east) across the Park and further to Wimbledon Common in which the windmill is still visible, and onwards to the North Downs; and,
- Medium-distant view to St Matthias' Church, Richmond and Alton West Estate tower blocks (Grade II).



View: E3.3



GIS Mapping: E3.3

Character Area Name:

Richmond Park

View Name and Reference:

White Lodge to Pen Ponds

(E3.5)

View Type:

Prospect

Description of View

View from White Lodge towards Pen Ponds, Richmond Park.

The Repton designed view: White Lodge sits in an elevated position, affording expansive view of the surrounding parkland and looking down into the valley of Pen Ponds; forming a coherent landscape setting between building and landscape. Repton impressed the importance of the advantage of view into the park from White Lodge. The view from White Lodge across Upper and lower Pen Ponds is a key view encapsulated in his designs for White Lodge.



View, E3.5



GIS Mapping: E3.5

Pantile Bridge:

Official

Local Views SPD – 2022 (DRAFT)

Character Area Name:
Hampton Hill Residential


View Name and Reference:
**Pantile Bridge (High Street)
(A4.1)**

View Type:
Prospect


Description of View

Scenic view from the Pantile Bridge, encompassing:

- a) (east) formal, framed tree avenue landscape towards Bushy Park Water Gardens; and,
- b) (west) riparian, natural river landscape; short view due to bend in river (view of actual bridge from the A312 lost due to overgrown vegetation).



View: A4.1



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Dean Road footbridge:

Official

Local Views SPD – 2022 (DRAFT)


Character Area Name:
Hampton Residential

View Name and Reference:
**Longford River
(A2.1)**


View Type:
Linear (elevated view)

Description of View

Framed river landscape view in both directions from the pedestrian footbridge along the Longford River, dominated by trees and vegetation with little development visible.



View: A2.1



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Hampton Court Gate:

Local Views SPD – 2022 (DRAFT)

Character Area Name:
Hampton Court and Bushy Park


View Name and Reference:
Chestnut Avenue (Bushy Park), southern leg (A5.8)

View Type:
Linear


Description of View

Structured view along the southern leg of Chestnut Avenue between the Diana Fountain (Grade I) and the Lion Gate, Hampton Court Gardens (designed by Christopher Wren); encompassing:

- a) (looking north) from the Lion Gate and gates of Bushy Park towards the Diana Fountain along the road; wide lawn landscape setting edged with consecutive tree avenues to frame view towards fountain and beyond towards Teddington (circa one mile); and,
- b) (looking south) reverse, terminating at Lion Gate and the cluster of buildings framing the Gate.



View: A5.8



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Local Views SPD – 2022 (DRAFT)


Character Area Name:
Hampton Court and Bushy Park

View Name and Reference:
Lime Avenue (Bushy Park) (A5.9)


View Type:
Linear

Description of View

Structured view looking west from the Diana Fountain terminating at the White Lodge (focal landmark); wide lawn landscape setting edged with double tree avenues to frame view (circa 0.8 mile) (designed by Christopher Wren). Informal parkland beyond avenue.



View: A5.9



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Local Views SPD – 2022 (DRAFT)

Character Area Name:
Hampton Court and Bushy Park

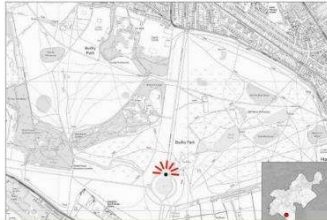
View Name and Reference:
Chestnut Avenue (Bushy Park), northern leg (A5.10)

View Type:
Linear

Description of View
Structured view looking north from the Diana Fountain (no terminating focal landmark); wide lawn landscape setting edged with consecutive tree avenues to frame view (circa 1 mile) (designed by Christopher Wren). Informal parkland beyond avenue.



View: A5.10



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Local Views SPD – 2022 (DRAFT)

Character Area Name:
Hampton Court and Bushy Park


View Name and Reference:
Water Gardens, Bushy Park (A5.11)

View Type:
Linear

Description of View
Structured view, encompassing:
a) (south) framed/ enclosed landscape view from Upper Lodge buildings (Grade II) looking across the lower level of the Water Gardens through to the park beyond; and,
b) (north-east) fragmented axial viewline of canal extended through Bushy Park towards National Physical Laboratory (no focal terminus).



View: A5.11



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In addition, we refer to our previous submission of 4 February 2022 (attached) and would be grateful if our comments, where not already incorporated in the final version of the Local Plan, could be considered again. In particular, we would urge you to reconsider a stand-alone Royal Parks policy, especially in light of TRP's status and designations.

We trust that you will take on board our comments, and welcome further discussion, and the opportunity to comment on any future proposals.

Yours sincerely

Katherine Drew
Estates Manager





THE
**ROYAL
PARKS**

Andrea Kitzberger-Smith
Spatial Planning and Design Team Manager
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44 York Street
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4 February 2022

Dear [REDACTED]

**London Borough of Richmond Upon Thames – Local Plan Pre-Publication
(Regulation 18) Consultation 10 December 2021 to 31 January 2022**

The Royal Parks is grateful for the opportunity to comment on the above proposals at this stage in the process.

Planning Overview

The Royal Parks acknowledges the inclusion of reference to the importance of Richmond Park and Bushy Park within the London Borough of Richmond upon Thames as set out within the Pre-Publication Draft Local Plan.

We note that the Royal Parks are highlighted within the document text in respect of: area context, place-based strategies, promoting jobs and local economy, views and vistas, green and blue infrastructure network, public open space, and biodiversity designations. The importance of the Parks in the context of these topic areas aligns with The Royal Parks' own objectives.

In addition to references in the supporting text, the Pre-Publication Draft Local Plan makes specific reference to The Royal Parks within a number of policies. Whilst this is acknowledged, we would like the London Borough of Richmond upon Thames to go further by including a stand-alone Royal Parks policy. We consider that the importance of the Parks - as demonstrated by relevant reference to them throughout the Draft Local Plan - would justify such an inclusion and The Royal Parks would be keen to work with the Council to achieve this.

The Royal Parks would also like to work with the Council to capture the value of development around the Parks, and for support in protecting, maintaining and enhancing these sites of key green infrastructure which represent a significant asset to the Borough. Both dense development directly on our Park boundaries and taller developments that impact on the sightline are potentially



detrimental to these listed landscapes and intrusive to our visitors. We would therefore like to see the Local Plan tie in with our own developing policy documents.

Draft Policy Review & Comments

We have considered all the draft policies set out within the Plan and have detailed comments under specific topic and policy headings. These are set out below:

Place-based strategy for Teddington

This is particularly relevant as it refers directly to Bushy Park. Specifically, an employment site is proposed on the edge of Bushy Park and three incremental intensification zones overlap with the Park. Whilst we agree with the inclusion of Bushy Park within the vision for Teddington and Hampton Wick, we would encourage the inclusion of specific mention of Bushy Park within the policy for future development to ensure that it is specifically considered when improving and creating connections between open spaces. We would emphasise that we would like to be involved further on in the plan process to ensure that any development around the Park is carried out with due care and consideration for it.

Place-based strategy for Ham, Petersham & Richmond Park:

This development area includes Richmond Park, so it is particularly relevant to The Royal Parks. Whilst we welcome the inclusion of Richmond Park within the vision, noting that it will be protected, there is no specific mention of it in the policy. The Park could be specifically mentioned when noting the network of green spaces. Furthermore, we would like to be involved further on in the plan process to ensure that any development around Richmond Park is carried out with due care and consideration for it.

Policy 10 New Housing

We note that the Borough's ten-year housing target is 4,110 homes to be completed by 2029. The number of homes to be delivered within close proximity to Richmond Park is around 1,200 and around 1,000 within close proximity to Bushy Park. This would almost certainly result in an intensification of visitors to the Parks. Capturing some of the value of these developments, through S106 or CIL payments, would seem appropriate in this instance to help The Royal Parks ensure that the Parks can continue to cope with the resultant increase in visitor numbers and their increasing importance as open green space for residents of the Borough. It will be important for The Royal Parks to be



involved further on in the plan process to ensure that development is appropriate in the context of the Parks.

Policy 16 Small Sites

We note that the London Plan sets out a strategic priority to increase the rate of housing delivery from small sites but not at the expense of open space. However, there is potential for such small sites to be located close to the Royal Parks which could have an impact either individually or cumulatively on the Parks. We would like to see this addressed specifically in the Small Sites policy.

Policy 21 Protecting the Local Economy

Protection of the local economy is supported by The Royal Parks. However, any increase in numbers of workers in the area could increase footfall within both Richmond and Bushy Parks. We are keen to work with the Borough to ensure that the Parks are protected and any additional pressure on them effectively mitigated, so they can continue to provide the same experience for the additional visitors.

Policy 22 Promoting jobs and our local economy

We welcome the note within the policy's supporting text that the Royal Parks offer opportunities for economic spin-offs as well as contributing to supporting a high quality and unique environment. It is important that any resultant increase in footfall within the Parks is effectively mitigated through policy support for the work that The Royal Parks does to protect and conserve them.

Policy 26 Visitor Economy

As important visitor attractions within the Borough, we would like to see Richmond and Bushy Parks specifically included within this policy in the context of The Royal Parks being supported in providing the necessary infrastructure to support visitor numbers.

Policy 28 Local Character and Design Quality

The scale and nature of Richmond and Bushy Parks is such that they are considered to be a significant influence on the local character. It is important that development does not threaten their character. As an important component of the Borough's character, the inclusion of the Parks' importance, and reference to their protection, should be included within this Policy.

Policy 29 Designated Heritage Assets

We welcome the Council's approach to heritage assets, especially with regard to the protection and enhancement of the Borough's Historic Parks and Gardens.

Policy 31 Views and Vistas

We particularly welcome this policy as it aims to protect the quality of identified views, vistas, gaps and skyline, all of which are important factors in the Royal Parks. We also note that King Henry VIII's mound is included as a protected view which we commend. We would like to work further with the Council to positively manage views from the Parks in the context of new development.

Policy 34 Green and Blue Infrastructure

The Royal Parks form a large part of the green and blue infrastructure network within the Borough. We welcome the acknowledgement of recreational pressures and the impact of increased development on the Royal Parks within Richmond and therefore reference to working with The Royal Parks to ensure that careful management is achieved.

Policy 35 Green Belt, Metropolitan Open Land and Local Green Space

We are very aware of the importance of this policy and its equivalent in the NPPF and London Plan, given that both Bushy and Richmond Parks are designated MOL, and therefore welcome the inclusion of the policy in the Local Plan.

Policy 37 Public Open Space, Play, Sport and Recreation

We welcome the inclusion of this policy as it states that public open space, such as Bushy and Richmond Parks, will be protected. We also welcome the provision of new open spaces as part of development which could mitigate potential increases in visitor numbers to existing parks (including the Royal Parks).

Policy 39 Biodiversity and Geodiversity

We welcome this policy given the SSSI designation of both Richmond and Bushy Parks and the National Nature Reserve and SAC designation of Richmond Park.

Policy 45 Tall and Mid-Rise Building Zones



Tall buildings around the Parks can have a significant adverse impact on their character. We welcome the inclusion of the protection of views and vistas towards heritage assets across the Borough as well as the protection of parks and would like to work with the Borough to specifically help protect the views from Richmond and Bushy Park.

Policy 55 Delivery and Monitoring

In terms of size and value, The Royal Parks are key features of the Borough which provide open space for residents, workers and visitors. It is therefore important that some of the value of development in the Borough helps to support the maintenance, management and protection of Parks which will come under increasing pressure over the Plan period. We would like to work with the Council to achieve this.

COMMENTS SPECIFIC TO BIODIVERSITY AND THE ROYAL PARKS' ENVIRONMENTAL DESIGNATIONS:

2 Introduction

Responding to a changing environment (p12)

We welcome inclusion of paragraphs 2.33 and 2.39 on climate change and biodiversity, which recognise that 'additional residential development and population growth will likely bring more access pressure to the borough's parks and open spaces and make trampling and erosion potential issues. However additional issues of air pollution and light pollution should be identified and included.

Strategic objectives (p16 onwards)

We welcome the prominence of climate change, culture and heritage and biodiversity within the strategic objectives.

6 Place-based Strategy for Hampton & Hampton Hill

Policy (p35)

This should include reference to the protection of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure

Site Allocation 5: Carpark for Sainsburys, Uxbridge Road, Hampton (p44)

We welcome recognition of potential impacts on the Longford River and the requirement to enhance.

7 Place-based Strategy for Teddington & Hampton Wick

Policy (page 48)

Future development plans should include reference to the protection of open space (as well as 'increasing and improving') given the risk to open space associated with increased recreational pressure

10 Place-based Strategy for Ham, Petersham & Richmond Park

Policy (page 92)

This should fully recognise the need to protect Richmond Park SAC, SSSI and NNR from all impacts associated with development including increased traffic, recreational pressure and light spill. Effective measures to reduce traffic in the vicinity of, and importantly through, Richmond Park should also be included.

11 Place-based Strategy for Richmond & Richmond Hill

Area Profile (page 98)

This should include recognition of the nature conservation designations of Richmond Park as immediately adjacent to this area.

Policy 9 (page 101)

Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park's SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.

It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.

13 Place-based Strategy for Mortlake & East Sheen



Area Profile (page 127)

This needs greater recognition of the nature conservation designations of Richmond Park (SAC, SSSI and NNR) as immediately adjacent to the area.

Policy (page 101)

Whilst this policy encourages 'active travel and exercise', it should also identify the need to protect Richmond Park SAC, SSSI and NNR from impacts associated with recreational pressure, as well as other impacts associated with development, including increased traffic and light spill.

It should also include measures to reduce traffic in the vicinity of, and through, Richmond Park.

21 Increasing biodiversity and the quality of our green and blue spaces, and greening the borough

Policy 34 (p240). Green and Blue Infrastructure (Strategic Policy)

Recognition of the role of green infrastructure in reducing recreational impacts on sites such as Richmond Park is welcomed. This is included in the background text, but specific reference should also be made within the policy text given the significance of this impact on sites, including the Bushy Park SSSI and Richmond Park SAC, SSSI and NNR.

Policy 39 (p257). Biodiversity and Geodiversity

We welcome this policy and the protection and opportunities it offers for enhancement of designated sites and green corridors. Comments regarding proposed SINCE extensions are provided further below.

23 Reducing the need to travel and improving the choices for more sustainable travel

Page 283 onwards

Specific reference should be made within this section to the impact of traffic and associated air pollution on designated sites and priority habitats, such as: Richmond Park SAC, SSSI and NNR; Bushy Park SSSI; veteran trees (a critical habitat for stag beetles, the SAC designated interest feature, and SSSI designated interest feature); and acid grassland (SSSI designated interest feature).

This section should also highlight the need for the impacts referenced above to be mitigated by measures to reduce vehicle traffic in the vicinity of, and through, such sites and habitats.

HABITAT REGULATIONS ASSESSMENT (LUC, 2021)

Screening Assessment, Noise, vibration and light pollution, Richmond Park SAC (page 49)

The report states that '*artificial lighting at night (eg. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species*'. There is therefore no consideration of the potential impact on invertebrates such as stag beetle, which may alter their behaviour (including mating activity) or be more vulnerable to predation as a result of artificial lighting. This potential impact on the Richmond Park SAC should be considered.

Screening Assessment, Air Pollution, Richmond Park SAC (page 56)

There is no consideration of through traffic within Richmond Park SAC and the potential for associated air pollution to impact stag beetles, either through impacts on trees and particularly veteran trees, or on soil chemistry (stag beetle larvae developing beneath ground). Nor is there consideration of the impact which local developments or transport policies may have on levels of traffic through the Park.

Screening Assessment, Recreation, Richmond Park SAC (page 58)

Recreation impacts on Richmond Park SAC are discounted solely on the basis of site management. However, as per the discussion for Wimbledon Common (which is screened in for further assessment partly on the basis of its draw to visitors), Richmond Park is subject to extremely high visitor numbers and would likely be impacted by increased development in the Borough to a greater degree given location and accessibility. Visitor pressure is at such a high level that even with extensive resources allocated to tree and deadwood management the tree population - including veteran trees - suffer from compaction and erosion, vandalism and fire (for example), whilst deadwood habitats are subject to significant disturbance by visitors.

It is therefore not considered appropriate to screen the site out from further assessment as a result of recreational pressure and for the incorporation of mitigation within the Local Plan.

Review of Sites of Importance for Nature Conservation in Richmond upon Thames (Salix Ecology, 2021)

The recommendations listed below are included within the report and impact on sites managed by The Royal Parks. We have commented accordingly beneath the quoted paragraphs highlighted in *italics*.

M082 Richmond Park and Associated Areas:

We have comments relating to the following two paragraphs:

5.3.10 Add in additional land, including areas of amenity grassland and a small allotment at Palewell Park to ensure continuity of Semi-natural habitat and a wildlife corridor to the Beverley Brook SINC. Include additional areas at the Richmond Park Golf course as a buffer/additional semi-natural habitat to the site.

5.3.11 adjust the site boundary adjacent to Petersham Meadows.

It is assumed that the 'additional areas at the Richmond Park Golf course' comprise the two small Expansion areas on the eastern boundary of the site. Please note that these comprise: an existing overflow car park to the adjacent Roehampton Gate car park (which is included within the existing SINC boundary); and an existing golf driving range largely comprised of closely mown grassland and boundary scrub.

On the assumption that inclusion of these areas within the SINC boundary will not preclude the existing use explained above, there is no objection to these proposals. Other extension areas are on land outside of TRP control.

M084 Bushy Park and Home Park

5.3.13 Incorporate National Physical Laboratory (NPL) land into the SINC. NPL land holdings include extensive areas of acid grassland, a habitat of Principal Importance. Whilst this is currently closely mown, a change of management of selected areas to enhance this habitat may be possible. There is a large area of unmanaged woodland with mature oaks. Although there is understorey of rhododendron and other non-native invasive species, restoration to parkland or native woodland habitat is feasible.

The habitats located within this area warrant their inclusion in the SINC boundary. There is no objection to these proposals.

RiB06 Longford River in Richmond

5.3.17 Pantile Bridge Open Space, at the junction of Uxbridge Road and High Street Hampton Hill to be added to the existing SINC. Whilst not of high nature conservation value, this small area of amenity grassland acts as a buffer to the SINC.

There is no objection to these proposals which would provide a buffer to the Longford River.

Conclusions and Proposals

We are pleased to see the quality of the policies put forward which align with many objectives of The Royal Parks.

We would however like to work with the Council to achieve more policy support for The Royal Parks, both in terms of its protection from development beyond the Park boundaries, and in terms of The Royal Parks' own activities and objectives to maintain, protect and enhance these important assets and provide for the increasing number of visitors to them.

In addition to the policy-by-policy comments provided above, we would like to suggest the following actions in respect of the development of this Local Plan:



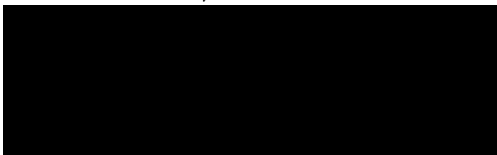
A stand-alone Royal Parks policy: Bushy and Richmond Parks account for most of the green space in the Borough and deliver significant environmental and amenity benefits for local residents. The Royal Parks are key features and assets in the London Borough of Richmond upon Thames. It would therefore be proportionate for a specific Royal Parks policy to be included within the Local Plan. This could be similar to draft Policy 32 (Royal Botanic Gardens, Kew World Heritage Site). A specific Royal Parks policy in the Local Plan could refer to the Royal Parks Management Plan. It could then be referred to and cross-referenced within other key relevant policies, for example similarly to how draft Policy 45 refers to Policy 32 (note there is a typo which refers to the policy as Policy 29 rather than Policy 32). We believe the objectives of the Council and The Royal Parks are aligned and we are keen to engage with the Council in the drafting a stand-alone policy which would have the benefit of giving the Parks the protection and support which they require over the Plan period.

Capturing value of development to support The Royal Parks:

The Royal Parks are a key part of green and open space infrastructure in the Borough, in terms of both the quality they provide and the sheer scale of space they provide. Development in the Borough, particularly new residential development, benefits significantly from what the Royal Parks provide but also significantly increases the pressure upon them, through increase and intensification of visitor numbers. The Royal Parks would therefore like to work with the Council to capture the value of relevant development to support The Royal Parks in our work to protect, maintain and enhance the Parks, potentially through S106/CIL contributions over the next Plan period.

As we review and refresh existing policies and develop new initiatives in respect of development within the Parks, we will engage with the Council and other key stakeholders at appropriate times and take into account the new Local Plan for the Borough.

Yours sincerely,



Darren Woodward
Director of Estates & Projects

