

## London Borough of Richmond Upon Thames Air Quality Supplementary Planning Document, Draft for Public Consultation

### The Royal Parks Response:

The Royal Parks is the charity with responsibility for managing over 5,000 acres of historic parkland and open spaces across London. This includes eight Royal Parks: Hyde, The Green, St James's, The Regent's and Primrose Hill, Richmond, Greenwich and Bushy Parks, and Kensington Gardens. In addition to managing other important public spaces including Brompton Cemetery and Victoria Tower Gardens. The parks are also valued amenity spaces for the 77 million visitors who come each year to enjoy their beauty and tranquillity.

Richmond Park and Bushy Park are located solely within the London Borough of Richmond upon Thames and provide highly valued natural green space for the local communities as well as visitors from further afield.

Richmond Park is designated for its nature conservation value at the International and National level, as a Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR). These designations relate, in particular, to its veteran trees and acid grassland habitats, and associated invertebrate assemblages including stag beetle (the designated interest feature of the SAC).

Bushy Park forms part of the Bushy Park and Home Park SSSI, designated at the National level particularly in relation to its veteran trees and acid grassland habitats, and associated species.

Both sites are vulnerable to air pollution. In particular acid grassland is vulnerable to Nitrogen deposition, which results in changes in soil nutrient status and as a result vegetation communities and the condition of the habitat. There is also potential for veteran tree health to be impacted by air pollution with potential long term implications for stag beetle and other important invertebrate species (as well as other wildlife).

The Air Pollution Information System (APIS website) identifies that for both sites the critical loads for air pollution (including Nitrogen deposition) are already in exceedance. Use of internal roads for traffic passing through Richmond Park is of particular concern, whilst wider traffic and contamination sources contribute to dispersed air pollution.

The Draft Air Quality SPD makes passing reference to the impact of air quality on the natural environment. However, there is no explicit discussion of the impact on the natural environment or the designated sites within the document, with the focus on human health.

Many of the policy documents summarised within the *Background* section of the SPD include strong policy support for the protection of the natural environment from impacts such as air pollution, including the Air Quality Planning Practice Guidance, whilst numerous policy and legal mechanisms place a duty on Local Planning Authorities to consider and put in place mechanisms for the protection of the natural environment and biodiversity, in particular for designated nature conservation sites such as SACs, SSSIs and NNRs. However, this is not explicitly recognised in the SPD, and Richmond Park and Bushy Park are not identified as specific and particularly sensitive receptors. It is important to note that, as well as the

value of the parks and their habitats in terms of their nature conservation value in its own right, there is also abundant evidence regarding the value of access to high quality natural green space for people's health and well-being. Therefore, the impact of air quality on the natural environment does have implications for human health, as well as the condition of designated habitats.

Given the strength of policy and legal support, including in relation to the protection of Internationally and Nationally nature conservation sites, and the specific sensitivity of habitats and species within Richmond Park and Bushy Park to air pollution, we feel that more explicit reference should be made to the natural environment and these designated sites throughout the SPD (from the background discussion to justification for mitigation proposals), alongside human health issues.

This would provide a more robust evidence base and justification in support of the proposed mitigation measures to reduce air pollution in the Borough.

Mitigation measures should also explicitly state where specific consideration is needed in decision making to ensure changes in the Borough (e.g. development, transport infrastructure etc.) do not result in increased traffic through or adjacent to these designated sites, or contribute to an increase in other sources of air pollution or dispersed air pollution.

We look forward to receiving feedback over the issues we have raised and to seeing the revised Air Quality SPD, and would be happy to meet to discuss any of the issues raised.