



The Royal Parks

**Planning, Design and
Access Statement
Primrose Hill Gates**

Final report

Prepared by LUC

September 2023

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Planning, Design and Access Statement Primrose Hill Gates

Project Number
12498

Version	Status	Prepared	Checked	Approved	Date
1.	Draft	CC RS	RS	RS	29.08.2023
2.	Final	CC RS	RS TRP	RS	11.09.2023

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OHS627041

Contents

Chapter 1	
Introduction	1
Background & Context	1

Chapter 2	
Application Site	3
Relevant Planning Designations	3
Planning History	3

Chapter 3	
Proposed Development	5

Chapter 4	
Community Engagement	6

Chapter 5	
Planning Policy Context	7
Overview	7
Adopted Local Policy: Camden Local Plan	7
Regional Policy: The London Plan	7
Other Material Planning Considerations	8

Chapter 6	
Planning Assessment	9
Open Space & Safety	9
Metropolitan Open Land	10
Design	10
Ecology & Biodiversity	10

Chapter 7	
Conclusion	12

Chapter 1

Introduction

1.1 This Planning, Design and Access Statement has been prepared by LUC on behalf of The Royal Parks to accompany a planning application for the following development:

Proposed installation of gates to existing entrances to Primrose Hill open space.

1.2 Primrose Hill is managed by The Royal Parks who is seeking planning consent for the installation of new gates to provide them with the means to facilitate park closures when required.

Background & Context

1.3 Primrose Hill open space has several existing pedestrian entrance/exit points around its perimeter which currently consist of open gaps within the boundary treatment (predominantly black metal railings) around the open space. This has traditionally meant that there is unrestricted access at all times of the day and night for members of the public to enter Primrose Hill.

1.4 Unfortunately, during the pandemic instances of noise and anti-social behaviour increased resulting in complaints being received on a regular basis by The Royal Parks, who manage Primrose Hill. In more recent months, whilst the situation has stabilised, there have been reports of disruption at night, resulting in The Royal Parks introducing temporary weekend closures through the use of Heras fencing across the entrances secured by padlocks and chains.

1.5 The Royal Parks is now seeking to install permanent gates which would be more in keeping with the existing railings around Primrose Hill, to replace the unsightly Heras fencing which detracts from the protected landscape and is prone to damage. Amongst other things, the provision of permanent gates would provide The Royal Parks with the effective means to better manage visitor access with a view to reducing anti-social behaviour. The gates would also facilitate the closure of Primrose Hill during any extreme weather events and/or on other occasions in the interest of public safety.

1.6 The Royal Parks is aware that there are strong views, particularly within the local community, on both sides of the debate; those that wish to see Primrose Hill locked at night and those who wish to keep it open. They have undertaken a thorough engagement survey and have sought to take a balanced and proportionate decision leading to this planning

application which itself will be subject to statutory consultation by the Local Authority providing an opportunity for the public to comment on the design proposals. The installation of gates will not necessitate a change to the current temporary park opening times.

Chapter 2

Application Site

2.1 The application site consists of nine individual existing entrances to Primrose Hill which are located and described within the submission documents which accompany this application as follows:

- Elsworthy Terrace
- Primrose Hill Road No.1
- Primrose Hill Road No.2
- Primrose Hill Road No.3
- Fitzroy Road
- Albert Terrace No.1
- Albert Terrace No.2
- Prince Albert Road
- Ormonde Terrace

2.2 The sites which make up the 'application site' all fall within the boundary of Primrose Hill which is owned by the Crown and managed by The Royal Parks.

Relevant Planning Designations

2.3 Primrose Hill is Grade II Registered on the Historic England Register of Parks and Gardens of Special Historic Interest in England.

2.4 It is also adjacent to Elsworthy Conservation Area and Primrose Hill Conservation Area.

2.5 Listed Buildings immediately adjacent to the boundary of Primrose Hill open space include a Grade II listed drinking fountain at the junction with Albert Terrace and a telephone kiosk at the junction with Prince Albert Road. There are also other listed buildings within relatively close proximity.

2.6 The site is designated as Metropolitan Open Land (MOL) and a Site of Importance for Nature Conservation (SINC).

Planning History

2.7 There is no planning history specific to gates or other structures within the application site locations. However, the following applications are noted:

- Ref: 2010/6849/P – Alterations to the existing hard standing at the summit of Primrose Hill to include change of shape to oval and addition of golden gravel

top dressing. Provision of four benches – Approved
April 2011

- Ref: 2008/5795/P – Alterations to railings on south-west corner of Primrose Hill in connection with relocation of the vehicular entrance from Prince Albert Road – Approved February 2009

Chapter 3

Proposed Development

3.1 New gates are proposed for nine existing entrances to Primrose Hill. The precise location of the entrances are marked on the Location Plan which accompanies this planning application.

3.2 At each gate location, the proposed gates will be designed to fit the existing entrance width. In some locations, small alterations will be required to the existing fencing infrastructure, including the following:

- Replacement railing panels either side of new gates, to match existing but with ball-topped finials for safety.
- Small alterations to location of existing bollard in opening where required.
- New gate posts to match existing metal posts.

3.3 All alterations are clearly marked on the drawings for each of the new gates which accompany this planning application.

3.4 The proposed gates will all consist of powder coated steel gates, posts and railings with arrowhead and ball top finials to match the style and height of the existing railings. They will be lockable with matching sliding latch and drop bolts.

3.5 All of the gates will open into Primrose Hill, rather than onto the public footpath beyond the line of the existing railings.

3.6 The gates will be used to close the open space when required, as a means to reduce anti-social behaviour and for other operational reasons in the interest of public safety, as is currently the case through the use of temporary barriers. Other Royal Parks within London, such as Regents Park, also already operate a similar pattern of opening/closing through the use of gates across the entrance/exit openings.

Chapter 4

Community Engagement

4.1 Leading up to the submission of this planning application, The Royal Parks have carried out a full and extensive process of public engagement in order to gather the views of local residents and park visitors. Specifically, the engagement covered the following topics:

- Exploring visitor experiences in Primrose Hill.
- Witnessing antisocial behaviour and at what time of day.
- Exploring attitudes towards measures being implemented in the park (e.g. restricting access / installing gates).
- Opportunity for further comments regarding Primrose Hill.

4.2 The Primrose Hill Engagement Survey was carried out between 9 November and 21 December 2022, and was conducted by an independent research agency. It took the form of a dual online and in-park survey and was communicated to local residents via a leaflet-drop to 37,000 households within a 3-mile radius of the park, The Royal Parks' website and social media channels, The Regent's Park Facebook page, other stakeholder channels, and on-site posters. Additionally, posters were placed on park noticeboards and an email was sent to The Royal Parks Panel (circa 700 contacts).

4.3 Face-to-face surveying in the park was conducted on Saturday 3 December, Tuesday 6 December, Sunday 11 December and Thursday 15 December. Internet access in the Primrose Hill area is 98.3%; however, paper copies of the survey were also distributed in the local area.

4.4 A total of 1,437 responses were collected, with 1,222 fully complete responses. These numbers have a statistical confidence level of 99%. All responses were quality checked, and checked for duplication by IP address, device type and location co-ordinates. Seven hundred responses were required to be statistically valid.

4.5 The Public Engagement Survey Results have been included in this planning submission for information.

Chapter 5

Planning Policy Context

Overview

5.1 The proposed development has taken account of relevant national, regional, and local planning policy. This section of the Planning, Design and Access Statement sets out a brief summary of the relevant planning policy documents and the following section seeks to demonstrate compliance with these policies.

5.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

5.3 The application site includes or is within the following key planning designations:

- Metropolitan Open Land (MOL).
- Grade II Registered Park and Garden.
- Site of Importance for Nature Conservation (SINC).

Adopted Local Policy: Camden Local Plan

5.4 The Camden Local Plan was adopted by the London Borough of Camden in July 2017.

5.5 The Local Plan is the key strategic document in Camden's development plan, setting out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.

5.6 Relevant policies from the Local Plan include the following:

- Policy C1: Health and wellbeing
- Policy C5: Safety and security
- Policy A2: Open space
- Policy A3: Biodiversity
- Policy D1: Design
- Policy D2: Heritage

Regional Policy: The London Plan

5.7 The current London Plan was adopted in March 2021 and sets out the spatial development strategy for Greater

London, providing a framework for the development and use of land over the next 20-25 years.

5.8 Key London Plan policies which are relevant to this proposal include:

- Policy GG1: Building strong and inclusive communities
- Policy D5: Inclusive design
- Policy D8: Public Realm
- Policy D11: Safety, security and resilience to emergency
- Policy S5: Sports and recreation facilities
- Policy HC1: Heritage conservation and growth
- Policy G1: Green infrastructure
- Policy G3: Metropolitan Open Land
- Policy G4: Open space
- Policy G6: Biodiversity and access to nature

Other Material Planning Considerations

National Planning Policy

5.9 The latest National Planning Policy Framework (NPPF) was published in 2012, however, it was revised in 2018, 2019, 2021 and most recently in September 2023. The NPPF constitutes guidance for local planning authorities (LPAs) as a material consideration in determining planning applications. It follows a principle-based system and reinforces the Government's commitment to a plan-led system where LPAs should approve development proposals that accord with an up-to-date development plan without unnecessary delay.

5.10 At the heart of the NPPF is a presumption in favour of sustainable development that should run through both plan-making and decision-taking. In assessing and determining development proposals, LPAs should apply the presumption in favour of sustainable development.

Planning Practice Guidance

5.11 The Planning Practice Guidance is a web-based resource created by DCLG and launched in March 2014. The national Planning Practice Guidance (PPG) adds further context to the NPPF and it is intended that they be read together. LPAs must have regard to advice contained within the guidance, which is also a material consideration when taking decisions on planning applications.

5.12 Other material planning considerations include:

- Camden Planning Guidance: Design (January 2021).
- Camden Planning Guidance: Public Open Space (January 2021).

Chapter 6

Planning Assessment

6.1 This chapter of the Planning, Design and Access Statement provides an appraisal of the proposed development in the context of relevant adopted planning policies and other material planning considerations. Whilst naturally seeking to provide an argument in support of the scheme, this appraisal aims to be both balanced and considered in its approach to how the relevant policies and other considerations should be applied to the assessment of the development in this instance.

Open Space & Safety

6.2 Camden Local Plan Policy C1 requires development to positively contribute to creating high quality, active, safe and accessible places.

6.3 Camden Local Plan Policy C5 states that the Council will aim to make Camden a safer place and will work with partners to tackle crime, fear of crime and antisocial behaviour. It will also require appropriate security and community safety measures in spaces and will promote safer public areas.

6.4 Camden Local Plan Policy A2 stipulates that the Council will support small scale development which is associated with the use of land as open space and contributes to its use and enjoyment by the public.

6.5 The driver behind the proposal to install permanent gates to the existing access points to Primrose Hill is the objective to better manage closure of the park when conditions require it.

6.6 In its management of Primrose Hill open space, The Royal Parks seeks to take balanced and proportionate decisions when it comes to implementing any changes. The installation of lockable gates will enable The Royal Parks to more effectively manage Primrose Hill and for the benefit of visitors and local residents. The strategy of gate installation has followed a thorough process of public engagement and consideration of available evidence.

6.7 The Royal Parks will use the gates to close Primrose Hill at certain times as required as part of their management of the open space. This will include night time closures on Bonfire Night, Hallowe'en and New Year's Eve, as well as during extreme weather events, continuing a pattern of closures which has been in place for more than 10 years. Being able to close the gates at certain times will also help The Royal Parks address the problem of anti-social behaviour more effectively. Up until now this has been achieved through the use of

temporary fencing across the entrances. Use of permanent gates in this way is already used in other Royal Parks, such as Regents Park.

6.8 Rather than reducing the public's use of the open space, it is considered that the proposed gates will ensure that it remains a safe and high quality space, in accordance with Camden Local Plan Policy, thereby improving it as an asset for the local community and for visitors from further afield, rather than compromising it as such.

Metropolitan Open Land

6.9 London Plan Policy G3 states that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt.

6.10 Paragraph 150 of the NPPF identifies certain forms of development which are not inappropriate in the Green Belt (or in this case MOL) provided that they preserve its openness and do not conflict with the purposes of including land within it, which includes (among others) engineering operations. As gates, rather than a new building, it is considered that this paragraph of the NPPF is most relevant to the planning assessment of this particular scheme.

6.11 In the context of Primrose Hill as an open space and the existing railings which occupy a significant amount of its boundary, the proposed gates would occupy very small areas where MOL designated land meets non-MOL designated land (i.e. at the very outer edge). Their open railing design would match that of the existing railings, as such they would not result in any significant visual barrier, or prominent feature, which would detract from the character or openness of the MOL.

6.12 For the majority of time within any given day, the proposed gates would be open and would not restrict access. Their provision is intended to allow The Royal Parks to effectively manage the open space in order to reduce anti-social behaviour and protect the public during other events, such as extreme weather. They would therefore not be considered to significantly prejudice the public's use of the space or de-value it in any way.

6.13 Given the above, it is considered that the proposed gates would not be an inappropriate form of development in MOL and would accord with London Plan policy and the NPPF.

Design

6.14 Camden Local Plan Policy D1 stipulates that the Council will seek to secure high quality design which respects local context and character and preserves or enhances the historic

environment and heritage assets. The policy also encourages design to minimise crime and antisocial behaviour.

6.15 Camden Local Plan Policy D2 stipulates that the Council will seek to protect heritage assets including Registered Parks and Gardens. The effect of any proposal on the significance of a heritage asset will be weighed against the public benefits of the proposal.

6.16 The Royal Parks is seeking to install gates to Primrose Hill primarily to enhance their ability to manage the open space, specifically in relation to minimising anti-social behaviour. Until now, the closure of Primrose Hill has been facilitated through the use of unsightly Heras fence panels which detracts from both the open space and the surrounding area.

6.17 The Royal Parks is seeking a permanent solution which would be in keeping with the character of Primrose Hill as a Registered Park and which would not detract from the character of surrounding areas. As such, it is proposed that the gates will be of the same height and design as the existing boundary railings. They would comprise of powder coated steel gates, posts and railings with arrowhead and ball top finials to match the existing style and height of the railings and posts which already exist either side of the openings in which they are proposed.

6.18 It is therefore considered that the proposed gates would protect the character of Primrose Hill in accordance with Camden Local Plan Policy.

6.19 Furthermore, in the interest of thoroughness, The Royal Parks has commissioned a Heritage Impact Assessment to be carried out by appropriately qualified professionals. Their report is included within the planning application, the findings of which are summarised as follows:

- The effects of the change will not cause harm to any of the affected heritage assets.
- No aspects of the significance of other assets in the area will be harmed.
- The special architectural or historic interest of the listed buildings and conservation areas is preserved.
- The effect of the installation of gates on archaeology is likely to be very low to negligible.

Ecology & Biodiversity

6.20 Camden Local Plan Policy A3 seeks to protect and enhance sites of nature conservation and biodiversity, stipulating that permission for development should not be granted if it would directly or indirectly result in the loss or harm to a designated nature conservation site.

6.21 The proposed gates would be across existing entrances to the park, falling between existing railings and across existing hard surfaced pathways into the Primrose Hill open space. No alteration to any soft landscaping, trees or vegetation would be required to facilitate the installation of the gates and their operation would not result in any harm in the context of the nature designations which affect Primrose Hill.

6.22 Given the above, it is considered that the proposed development would comply with relevant Camden Local Plan Policy.

Chapter 7

Conclusion

7.1 The Royal Parks is seeking to install nine gates across existing entrances to Primrose Hill. This planning application follows a thorough process of public engagement by The Royal Parks and careful balanced consideration on what is in the best interest of Primrose Hill as an open space and those that visit it, both from the local area and from farther afield.

7.2 In planning terms, it is considered the proposed gates would be compliant with relevant local, regional and national planning policy and all other material planning considerations, for the following reasons:

- The gates would improve safety for visitors and reduce anti-social behaviour.
- The gates would not be an inappropriate form of development in Metropolitan Open Land.
- The gates have been designed to be in keeping with the existing railings which form the boundary around much of the open space and there would be no adverse impact on the character of Primrose Hill as a Registered Park.
- The installation of gates would have no adverse impact on Primrose Hill as an area of importance for nature.