

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Hilary Muggridge	16/11/2023 14:50:51	COMMNT	Please stop treating residents like children and stopping us doing things!! This proposal is totally unnecessary. The Parks authorities are overstepping their responsibilities. They are not our nannies
2023/3861/P	Jeff Atmajian	16/11/2023 18:18:38	COMMNT	<p>To whom it may concern,</p> <p>Please note that I strongly object to the installation of ANY gates of any sort at any time and also object to any closure of the park other than in brief emergency situations.</p> <p>I was never approached regarding this planning application and I have live RIGHT NEXT to the Ormonde Terrace Gate for 30 years now. I also live in Belsize Park (Camden) and never received any notice or correspondence regarding this application at that address either.</p> <p>I am happy to share all my reasons for objecting to this application. Please feel free to contact me.</p> <p>All the best,</p> <p>Jeff</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Anna Marie Szuran-Wisniewski	16/11/2023 13:14:08	OBJ	<p>Objection To Planning Permission Number - 2023/3861/P</p> <p>I live directly opposite the park on Primrose hill Road</p> <p>I object to the proposal of gates as you will be severely affecting my quality of life as a disabled, council tenant with no garden.</p> <p>Due to my disabilities I often cannot leave the house until much later in the day so often go for walks in the late evening in Primrose Hill as I do not have a garden (unlike a lot of privileged Primrose Hill residents) and sit on a bench for fresh air.</p> <p>I have never felt scared.</p> <p>The noise from the park is very minimal and rare including disruptions, especially since the lockdowns have ended. Even then it wasn't much and I really didn't mind, knowing the youth especially had absolutely no where to go and all suffering from the lockdowns anyway.</p> <p>Royal Parks - Installation of gates to existing entrances to Primrose Hill open space at: Elsworthy Terrace, Primrose Hill and Oppidans Road, Primrose Hill Road and Ainger Road, Primrose Hill Road and Regent's Park Road, Regent's Park Road and Fitzroy Road, Regent's Park Road and Albert Terrace, Prince Albert Road and Albert Terrace, Prince Albert Road and Ormonde Terrace, Ormonde Terrace and St. Edmund's Terrace.</p> <p>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>The Planning Application is Misleading</p> <p>The Planning Application is disingenuous. At no point in the application is it mentioned the Royal Parks have publicly announced their intention to close the Park at 10pm Friday, Saturday, and Sunday nights from March to October i.e., within British Summer Time. This amounts to 90 nights a year. Keeping this 'under review' in their language means mission creep: further and longer closure will creep in later down the line. There is and never has been a process for review that would enable a lighter touch. The gates were installed as a "temporary" measure due to increased footfall during lockdown but no real time review of the need to lock the park has ever been conducted and no resources exist for conducting one.</p> <p>The application presents a misleading view. It only mentions potentially closing the park at certain times (Bonfire Night, Hallowe'en and New Year's Eve) leading an uninformed reader to assume closure would be a few nights a year for specific reasons, not a weekly pattern of closure for 7 months of the year.</p>

Application No: Consultees Name: Received:

Comment: Response:

The application form misleadingly states that:

the proposed development will not result in the loss, gain or change of use of an open space.

Despite the Royal Parks acknowledging elsewhere in the application that Primrose Hill is a site protected with a nature designation (a SNIC), they claim there will be no loss, gain or change of use of a site protected with a nature designation.

The proposed plan will not affect the 'Hours of Opening' of the park.

These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:

will result in the Loss and Change of use of an open space.

will result in the Loss and Change of use protected with a nature designation.

will affect opening hours.

A park that has been free of gates for over 50 years will regularly be closed for public use. Yet, after lockdown, in the Royal Park's own Annual Report 2022 Primrose Hill Park Manager, Nick Biddle said levels of usage and reports of anti-social behaviour had returned to normal levels after the pandemic:

"On Primrose Hill, we saw an increase in anti-social behaviour over the spring and summer months while Covid restrictions were still in place [2021], including groups gathering, playing loud music, and leaving litter. However, this declined for the remainder of the year, and visitor numbers and behaviour have now returned to pre-pandemic levels."

;

But the gates were never removed, and the Planning Committee will understand there are legitimate feelings locally of anger and betrayal.

Crime Statistics and Anti-Social Behaviour

The Planning Permission Application refers to a need for gates to manage 'the problem of anti-social

Application No: Consultees Name: Received:

Comment: Response:

behaviour'. This 'dog-whistle' claim is problematic because the problem does not exist to any serious extent.

2.1 The police officially and in person reported to a recent Camden Council Culture and Environment Scrutiny Committee meeting Primrose Hill on crime and anti-social behaviour. Their comments included:

Nick McLaughlin - Inspector Royal Parks Operational Unit

"The actual crime statistics across all Royal Parks are remarkably low."

"My advice to anyone is that if you suffer a crime near a Royal Park is to go inside the park and phone the police because the response will be much quicker."

Stevie Bull – Royal Parks Police

"The statistics from 1st January to 30th June this year. We counted that there were 131 calls relating to the park itself, but only 28 related to ASB and crime specifically. About half of these were phone theft related."

This is a very low rate of crime to be clearing and closing a park. These statistics are very low and do not even indicate they happened at night:

Even the CEO of the Royal Parks, Andrew Scattergood, stated at that meeting that this is a noise issue, not an ASB problem. The Royal Parks have chosen not to make that clear in their Planning Application:

"In the main, the issues that have faced us have primarily been noise challenges on the hill."

Nick McLaughlin - Inspector Royal Parks Operational Unit replied when asked specifically about whether he

Application No: Consultees Name: Received:

Comment: Response:

thought there was an issue with ASB on Primrose Hill:

We do have a number of callers, or repeat callers... But my instincts with this is that this is largely a noise issue as opposed to a crime issue... It is not a crime hotspot, but it will be a place that generates noise and I suppose one of the questions that people have to consider is, is it reasonable to expect a large open space, near a very popular iconic location to be sterile at night and for it to be completely quiet? I suspect London as a whole is never quiet."

2.3 Local crime statistics don't substantiate the claims of crime and anti-social behaviour. Nor do Camden Council's own records and despite the efforts of the ward's local councillors, they too been unable to verify the claims made by a few repeat callers complaining about noise.

2.4 Local complainants, mostly home-owners on the perimeter of the park, whilst making claims wantonly on social media, have locked their Twitter account against public replies so nobody can correct the claims made therein.

2.5 The laws against public nuisance, public order offences and ASB exist to protect people against false accusations as much as it is to prosecute them. There was a real problem with one individual who was successfully prosecuted using due process that first had to demonstrate he had a case to answer. Wild accusations on social media are no substitute.

2.6 There is a strong element of name-calling, classism and racism in the social media among those in favour of gating the park, labelling people on the hill they don't like as 'scum' ,and calling for them 'to get back to Castlehaven'.

How can gates be an answer to a problem that the police, the Royal Parks, Camden's Community Safety Team, the ward councillor and those who have for 3 years opposed the imposition of gates agree, does not significantly exist? The crime statistics show that there is no ASB or crime problem.

Application No: **Consultees Name:** **Received:**

Comment: **Response:**

The Application Contradicts The Camden Plan Open Spaces Policy

The Planning Application sits within Camden and is impacted by policies within the Camden Local Plan (July 2017). This includes policies around the use of open space.

Paragraph 6.8 from the Royal Park's Planning Application states:

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.

The Planning Application falls outside the conditions that need to be met by the Camden Local Plan: emptying and closing the park 3 nights a week for 7 months of the year will reduce the public's use of an open space. Claiming black is white is more than stretching the truth.

The Application contradicts The London Plan Open Spaces Policy

The Planning Application sits within London and is impacted by policies within The London Plan (July 2017). This includes policies around the use of open space.

Paragraph 6.12 from the Planning Application states:

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.

The Planning Application falls outside the conditions that need to be met by The London Plan. Emptying and closing the park on a weekly basis for 7 months of the year will prejudice the public's use of an open space and devalue it. This application does not comply.

Application No: **Consultees Name:** **Received:** **Comment:** **Response:**

Lack of Community Engagement by The Royal Parks

The Planning Application states that there has been a 'full and extensive process of public engagement in order to gather the views of local residents and park visitors.' This is simply not true.

The Royal Parks have not, as should be required for the change in use of a public resource of this magnitude, consulted with local stakeholders or the community adequately.

They have consistently refused to engage with local community groups or stakeholders, turning down meeting invites and not answering emails. This includes attending local meetings with Councillors or local Community Engagement groups.

They have declined invitations to attend key Camden Council meetings where they could be held accountable. This includes a deliberate failure to attend the Camden Culture and Environment Scrutiny Committee on the eve of their announcement of installing permanent gates, a move called a 'grotesque snub' by the committee.

They have only engaged with Councillors known to favour gates. Other Councillors have been ignore despite Primrose Hill being part of their ward (before the boundary change).

5.1 David McLaren, Chief of Staff of the Royal Parks acknowledges the lack of Councillor engagement through this process stating:

"We failed to get a response from the council to our engagement exercises."

5.2 Patrick Coulson from the Camden Community Safety Service states:

"I am not going to speak for the entire council, but as a community safety service the conversation about gating is something that we're not part of."

Application No: **Consultees Name:** **Received:** **Comment:** **Response:**

The 'Engagement Survey'

The Planning Application relies of the evidence of the Royal Park's 'Engagement Survey.' This was fundamentally biased, both in its failure to ensure a wide and fairly-weighted sample, but also in its framing of key questions. This was not an adequate Public Consultation for such a major decision.

6.1 Discrimination: this survey failed to engage the most underprivileged and under resourced segments of our local population. The 'Engagement Survey' on which this application relies was not completed by them. An online study devoid of demographic quotas or panel recruitment excludes all harder to reach park users. Canvassing on the hill took place during daylight hours, thereby excluding those affected by the closures.

6.2 The demographic most affected by the locking of the park are young people, often living in flats, who rely on use of an open space for health and mental health, as evidenced by the number of complaints received from local Councillors about the Royal Park's gating policy. Though the Royal Parks state the survey accurately reflects the views of the local neighbourhood, 62% of the survey respondents were homeowners, and ~76% of the respondents were white. In contrast, according to the 2021 census data, only ~30% of Camden residents are homeowners and only ~60% are white. By their own admission, The Royal Parks have relied on a survey that does not represent the local community.

6.3 The survey presented with an inaccurate picture of the issues at stake. The wording 'led the witness' by presupposing an ASB problem in Primrose Hill park without offering any evidence, and then presenting gates as the only solution. No alternative solutions were canvassed. Despite this, the two most commonly chosen answers were a) to never gate the park or b) only occasionally on specific holidays.

6.4 The Royal Parks, and their CEO, have acknowledge their 'Engagement Survey' was flawed but still continue to rely on it as a key part of their Planning Permission Application. When challenged about the 'Engagement Survey's' flaws and obvious biases, the CEO of the Royal Parks, Andrew Scattergood, stated publicly:

"We have tried to seek a balanced view through the engagement strategy but in effect, I don't think I would disagree with the assessments that have been made in the main."

6.5 A further problem with the so-called engagement survey is the completion rate. The Royal Parks at first

Application No: **Consultees Name:** **Received:**

Comment: **Response:**

concealed but then were forced to acknowledge the low response rate (3.5%). They then had to concede that the demographics of those who did complete the survey were very different to those from the demographics of Camden (as described below).

No robust public consultation has been done, There has been no effective engagement with the key stakeholders affected by the decision.

6.6 It may surprise the Planning Committee to learn that the Primrose Hill Keeper's group was a joint initiative between those who favoured closing the park at weekends in the 2020 and 2021 lockdown years, and those opposed. It was an attempt to address problems of common concern, not including the gates issue which had polarised us, like Brexit. Those in favour of gating the park stopped attending in 2020 and now contribute nothing except their persistent public demand for gates. The Royal Parks never attended. Nor did any pro-gate Councillor despite weekly invitations.

The Keepers group still meets weekly with an open invitation to the whole community and its representatives to work together, to arrive at a compromise.

7. Impact of Closure on Other Areas of Camden

Gating and closure of Primrose Hill during the 'temporary circuit breaker' has shown that the impact on other areas of Camden as people are displaced, en masse, from a large, open space into the side streets and other areas.

Local Councillors are noting complaints made from other nearby open spaces, such as the bridge over the railway line, and in Swiss Cottage, where people leaving the park later congregate. The park's closure impacts all Camden.

8 Long Term Impact on Camden Policing and Safety in The Park

Application No: Consultees Name: Received:

Comment: Response:

Park gating and closure will require the consistent and wasteful use of police resource. As Andrew Scattergood, CEO of the Royal Parks admitted:

“The police have been absolutely fantastic in their support because in reality, I don’t think two gate lockets would be able to clear the park of a thousand people, while the police have been able to do that for us.”

8.1 An unpoliced, closed park will lead to more police call outs about people who have climbed the gates. The fastest growing crime statistic in the area is people in the closed park. In demonstration at the perceived unfairness of locking people out of a public resource, the gates have constantly been destroyed. It would be a error judgment to characterise these acts of targeted protest as simple vandalism, as the Royal Parks pretend.

8.2 There will be an ongoing impact on local Camden policing resource closing and clearing the park and keeping people out of the open space. There is not addressed in the Planning Application, nor does this application contain any long-term park management plan for safety or policing. The costs of manufacturing and installing gates, policing the clearance of the hill, employing gate-lockers at night and in the mornings to reopen the park, and repairing them will be a gross waste of money. It would be better used at initiatives that can unite the community, not divide it. For example, supporting low-key policing of the hill is a much better strategy than the collective punishment of all hill users. Or the Royal Parks investing resource in private security or wardens rather than gates.

8.3 A big issue is that there is not adequate police presence in Primrose Hill during busy day times or at night. Police resource has been affected by budget cuts across Camden but it is simply not acceptable to resign responsibility. Cumbria Police recently showed that the presence of just one officer regularly walking the beat reduced its anti-social behaviour crimes problem by 47 per cent. Visible regular patrols would negate the need to gate the park and would make the community safer and calmer.

What is needed is increased, consistent and visible police patrols across Primrose Hill and in neighbouring areas. Closing the park would require more police resource than a regular patrol.

9. Impact on Local Primrose Hill Business and the Local Economy

Local hospitality businesses in Primrose Hill are already being affected by the temporary summer closure. Residents from St John’s Wood and other areas across the park are choosing not to frequent Primrose Hill

Application No: **Consultees Name:** **Received:**

Comment: **Response:**

restaurants and pubs as they can't walk back across the park after 10pm. Closure is already impacting the local Primrose Hill economy.

10. Discrimination and Privatisation

Gating and closing the park will lead to unfair access for the residents of Elsworthy Road (and others) who have private gates in their back gardens that lead directly into the park. Gating the park has in effect privatised a public resource. Public access is restricted to some whilst these wealthy residents can access the park freely. The people living on the perimeter who are the persistent callers the police talk about, want to turn a public park into their private garden. They must not at their convenience be allowed to alienate all other residents of Camden.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	ELIZABETH NISBET	16/11/2023 12:07:49	OBJ	<p>Objection To Planning Permission Number - 2023/3861/P</p> <p>Royal Parks - Installation of gates to existing entrances to Primrose Hill open space at: Elsworthy Terrace, Primrose Hill and Oppidans Road, Primrose Hill Road and Ainger Road, Primrose Hill Road and Regent's Park Road, Regent's Park Road and Fitzroy Road, Regent's Park Road and Albert Terrace, Prince Albert Road and Albert Terrace, Prince Albert Road and Ormonde Terrace, Ormonde Terrace and St. Edmund's Terrace.</p> <p>To whom it may concern:</p> <p>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>1. Discrimination and Privatisation – Primrose Hill belongs to all Londoners in perpetuity Primrose Hill belongs to all people in London, not just the local residents. Gating the park has in effect privatised a public resource. The people living on the perimeter who are the persistent callers the police talk about and they seem to want to turn a public park into their private garden. They talk of unsavoury people coming into the area – that is code for the people who are not 'one of them'. They must not be allowed to alienate all other residents of London. Gating and closing the park will lead to unfair access for the residents of Elsworthy Road (and others) who have private gates in their back gardens that lead directly into the park. Public access is restricted to some whilst these wealthy residents can access the park freely. A park that has been free of gates for over 50 years will regularly be closed for public use. Yet, after lockdown, in the Royal Park's own Annual Report 2022 Primrose Hill Park Manager, Nick Biddle said levels of usage and reports of anti-social behaviour had returned to normal levels after the pandemic: "On Primrose Hill, we saw an increase in anti-social behaviour over the spring and summer months while Covid restrictions were still in place [2021], including groups gathering, playing loud music, and leaving litter. However, this declined for the remainder of the year, and visitor numbers and behaviour have now returned to pre-pandemic levels."</p> <p>2. Impact of Closure on Other Areas of Camden Gating and closure of Primrose Hill during the 'temporary circuit breaker' has shown that the impact on other areas of Camden as people are displaced, en masse, from a large, open space into the side streets and other areas. Local Councillors are noting complaints made from other nearby open spaces, such as the bridge over the railway line, and in Swiss Cottage, where people leaving the park later congregate. The park's closure impacts all Camden.</p> <p>3. Crime Statistics and Anti-Social Behaviour The Planning Permission Application refers to a need for gates to manage 'the problem of anti-social behaviour'. This 'dog-whistle' claim is problematic because the problem does not exist to any serious extent. See section 1 above. The police officially and in person reported to a recent Camden Council Culture and Environment Scrutiny Committee meeting Primrose Hill on crime and anti-social behaviour. Their comments included: Nick McLaughlin - Inspector Royal Parks Operational Unit - "The actual crime statistics across all Royal Parks are remarkably low." Stevie Bull – Royal Parks Police - "The statistics from 1st January to 30th June this year. We counted that there were 131 calls relating to the park itself, but only 28 related to ASB and crime specifically. About half of these were phone theft related." This is a very low rate of crime to be clearing and closing a park. These statistics are very low and do not even indicate they happened at night.</p>

Application No: Consultees Name: Received:

Comment: Response:

Even the CEO of the Royal Parks, Andrew Scattergood, stated at that meeting that this is a noise issue, not an ASB problem. The Royal Parks have chosen not to make that clear in their Planning Application: "In the main, the issues that have faced us have primarily been noise challenges on the hill."

Nick McLaughlin - Inspector Royal Parks Operational Unit replied when asked specifically about whether he thought there was an issue with ASB on Primrose Hill:

We do have a number of callers, or repeat callers... But my instincts with this is that this is largely a noise issue as opposed to a crime issue... It is not a crime hotspot, but it will be a place that generates noise and I suppose one of the questions that people have to consider is, is it reasonable to expect a large open space, near a very popular iconic location to be sterile at night and for it to be completely quiet? I suspect London as a whole is never quiet."

- Local crime statistics don't substantiate the claims of crime and anti-social behaviour. Nor do Camden Council's own records and despite the efforts of the ward's local councillors, they too been unable to verify the claims made by a few repeat callers complaining about noise.
- There is a strong element of name-calling, classism and racism in the social media among those in favour of gating the park, labelling people on the hill they don't like as 'scum' and calling for them 'to get back to Castlehaven'.

How can gates be an answer to a problem that the police, the Royal Parks, Camden's Community Safety Team, the ward councillor and those who have for 3 years opposed the imposition of gates agree, does not significantly exist? The crime statistics show that there is no ASB or crime problem.

4. The Application Contradicts The Camden Plan Open Spaces Policy

The Planning Application sits within Camden and is impacted by policies within the Camden Local Plan (July 2017). This includes policies around the use of open space.

Paragraph 6.8 from the Royal Park's Planning Application states:

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.

The Planning Application falls outside the conditions that need to be met by the Camden Local Plan: emptying and closing the park 3 nights a week for 7 months of the year will reduce the public's use of an open space.

Claiming black is white is more than stretching the truth.

5. The Application contradicts The London Plan Open Spaces Policy

The Planning Application sits within London and is impacted by policies within The London Plan (July 2017).

This includes policies around the use of open space.

Paragraph 6.12 from the Planning Application states:

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 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.

The Planning Application falls outside the conditions that need to be met by The London Plan. Emptying and closing the park on a weekly basis for 7 months of the year will prejudice the public's use of an open space and devalue it. This application does not comply.

6. The 'Engagement Survey'

The Planning Application relies of the evidence of the Royal Park's 'Engagement Survey.' This was fundamentally biased, both in its failure to ensure a wide and fairly-weighted sample, but also in its framing of key questions. This was not an adequate Public Consultation for such a major decision.

Application No: Consultees Name: Received:

Comment: Response:

6.1 Discrimination: this survey failed to engage the most underprivileged and under resourced segments of our local population. The 'Engagement Survey' on which this application relies was not completed by them. An online study devoid of demographic quotas or panel recruitment excludes all harder to reach park users. Canvassing on the hill took place during daylight hours, thereby excluding those affected by the closures.

6.2 The demographic most affected by the locking of the park are young people, often living in flats, who rely on use of an open space for health and mental health, as evidenced by the number of complaints received from local Councillors about the Royal Park's gating policy. Though the Royal Parks state the survey accurately reflects the views of the local neighbourhood, 62% of the survey respondents were homeowners, and ~76% of the respondents were white. In contrast, according to the 2021 census data, only ~30% of Camden residents are homeowners and only ~60% are white. By their own admission, The Royal Parks have relied on a survey that does not represent the local community.

6.3 The survey presented with an inaccurate picture of the issues at stake. The wording 'led the witness' by presupposing an ASB problem in Primrose Hill Park without offering any evidence, and then presenting gates as the only solution. No alternative solutions were canvassed. Despite this, the two most chosen answers were a) to never gate the park or b) only occasionally on specific holidays.

6.4 The Royal Parks, and their CEO, have acknowledged their 'Engagement Survey' was flawed but continue to rely on it as a key part of their Planning Permission Application. When challenged about the 'Engagement Survey's' flaws and obvious biases, the CEO of the Royal Parks, Andrew Scattergood, stated publicly: "We have tried to seek a balanced view through the engagement strategy but in effect, I don't think I would disagree with the assessments that have been made in the main."

6.5 A further problem with the so-called engagement survey is the completion rate. The Royal Parks at first concealed but then were forced to acknowledge the low response rate (3.5%). They then had to concede that the demographics of those who did complete the survey were very different to those from the demographics of Camden (as described below).

No robust public consultation has been done, There has been no effective engagement with the key stakeholders affected by the decision.

6.6 It may surprise the Planning Committee to learn that the Primrose Hill Keeper's group was a joint initiative between those who favoured closing the park at weekends in the 2020 and 2021 lockdown years, and those opposed. It was an attempt to address problems of common concern, not including the gates issue which had polarised us, like Brexit. Those in favour of gating the park stopped attending in 2020 and now contribute nothing except their persistent public demand for gates. The Royal Parks never attended. Nor did any pro-gate Councillor despite weekly invitations.

The Keepers group still meets weekly with an open invitation to the whole community and its representatives to work together, to arrive at a compromise.

7. The Planning Application is Misleading

The gates were installed as a "temporary" measure due to increased footfall during lockdown but no real time review of the need to lock the park has ever been conducted and no resources exist for conducting one. The Planning Application is disingenuous.

At no point in the application is it mentioned the Royal Parks have publicly announced their intention to close the Park at 10pm Friday, Saturday, and Sunday nights from March to October i.e., within British Summer Time. This amounts to 90 nights a year. Keeping this 'under review' in their language means mission creep: further and longer closure will creep in later down the line. There is and never has been a process for review that would enable a lighter touch.

The application presents a misleading view. It only mentions potentially closing the park at certain times (Bonfire Night, Hallowe'en and New Year's Eve) leading an uninformed reader to assume closure would be a

Application No: Consultees Name: Received:

Comment: Response:

few nights a year for specific reasons, not a weekly pattern of closure for 7 months of the year.

The application form misleadingly states that:

- the proposed development will not result in the loss, gain or change of use of an open space.
- Despite the Royal Parks acknowledging elsewhere in the application that Primrose Hill is a site protected with a nature designation (a SNIC), they claim there will be no loss, gain or change of use of a site protected with a nature designation.
- The proposed plan will not affect the 'Hours of Opening' of the park.

These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:

- will result in the Loss and Change of use of an open space.
- will result in the Loss and Change of use protected with a nature designation.
- will affect opening hours.

But the gates were never removed, and the Planning Committee will understand there are legitimate feelings locally of anger and betrayal.

8 Long Term Impact on Camden Policing and Safety in The Park

Park gating and closure will require the consistent and wasteful use of police resource. As Andrew Scattergood, CEO of the Royal Parks admitted:

"The police have been absolutely fantastic in their support because in reality, I don't think two gate lockets would be able to clear the park of a thousand people, while the police have been able to do that for us."

8.1 An unpoliced, closed park will lead to more police call outs about people who have climbed the gates. The fastest growing crime statistic in the area is people in the closed park. In demonstration at the perceived unfairness of locking people out of a public resource, the gates have constantly been destroyed. It would be an error judgment to characterise these acts of targeted protest as simple vandalism, as the Royal Parks pretend.

8.2 There will be an ongoing impact on local Camden policing resource closing and clearing the park and keeping people out of the open space. There is not addressed in the Planning Application, nor does this application contain any long-term park management plan for safety or policing. The costs of manufacturing and installing gates, policing the clearance of the hill, employing gate-lockers at night and in the mornings to reopen the park, and repairing them will be a gross waste of money. It would be better used at initiatives that can unite the community, not divide it. For example, supporting low-key policing of the hill is a much better strategy than the collective punishment of all hill users. Or the Royal Parks investing resource in private security or wardens rather than gates.

8.3 A big issue is that there is not adequate police presence in Primrose Hill during busy day times or at night. Police resource has been affected by budget cuts across Camden but it is simply not acceptable to resign responsibility. Cumbria Police recently showed that the presence of just one officer regularly walking the beat reduced its anti-social behaviour crimes problem by 47 per cent. Visible regular patrols would negate the need to gate the park and would make the community safer and calmer.

What is needed is increased, consistent and visible police patrols across Primrose Hill and in neighbouring areas. Closing the park would require more police resource than a regular patrol.

9 Lack of Community Engagement by The Royal Parks

The Planning Application states that there has been a 'full and extensive process of public engagement in order to gather the views of local residents and park visitors.' This is simply not true.

The Royal Parks have not, as should be required for the change in use of a public resource of this magnitude,

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>consulted with local stakeholders or the community adequately.</p> <ul style="list-style-type: none"> - They have consistently refused to engage with local community groups or stakeholders, turning down meeting invites and not answering emails. This includes attending local meetings with Councillors or local Community Engagement groups. - They have declined invitations to attend key Camden Council meetings where they could be held accountable. This includes a deliberate failure to attend the Camden Culture and Environment Scrutiny Committee on the eve of their announcement of installing permanent gates, a move called a 'grotesque snub' by the committee. - They have only engaged with Councillors known to favour gates. Other Councillors have been ignore despite Primrose Hill being part of their ward (before the boundary change). <p>10. Impact on Local Primrose Hill Business and the Local Economy Local hospitality businesses in Primrose Hill are already being affected by the temporary summer closure. Residents from St John's Wood and other areas across the park are choosing not to frequent Primrose Hill restaurants and pubs as they can't walk back across the park after 10pm. Closure is already impacting the local Primrose Hill economy.</p>
2023/3861/P	Jubin Motamed	16/11/2023 23:34:59	INT	I am against them putting up a gate and closing the park after 10 pm in weekends. In my opinion, having Primrose Hill for late evening walk is great as it has an excellent view of London at night.
2023/3861/P	D Reece	16/11/2023 14:25:19	PETITNOBJ E	The installation will take away the facility and open space for use by the locals.
2023/3861/P	CATHERINE PACE-O'SHEA	16/11/2023 16:58:08	SUPPRT	<p>I am very pleased that we are going ahead with gates to the Hill and that they are in keeping with the railings around the park.</p> <p>Thank you</p>