

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Penny Tompkins	19/11/2023 10:25:53	OBJ	<p>I strongly object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill on the following grounds.</p> <p>1. The Planning Application is misleading. It only mentions potentially closing the park at certain times (Bonfire Night, Halloween and New Year's Eve) leading an uninformed reader to assume closure would be a few nights a year for specific reasons.</p> <p>It does not mention that 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.</p> <p>Keeping these times under review leaves open the potential for further and longer closure in the future. There is no stated process for a review that would enable reducing the closing times.</p> <p>The gates were installed as a temporary measure due to increased footfall during lockdown but I know of no research into the need to lock the park at all has ever been conducted</p> <p>2. Paragraph 6.8 from the Royal Park's Planning Application falls outside the conditions that need to be met by the Camden Local Plan Open Spaces Policy: 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.</p> <p>3. Paragraph 6.12 from the Planning Application falls outside the conditions that need to be met by The London Plan (July 2017). 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.</p>
2023/3861/P	Fay Israsena	22/11/2023 16:49:31	APP	<p>I don't think that this is a fair measure to take. Many people in London do not have access to outdoor private space and rely on public parks for their outdoor needs i.e. socialise, exercise, relax and connect with nature. Limiting the use of the park to such an extent is possibly detrimental to the mental health, physical health, and frankly, freedom of thousands of Londoners. Public spaces should be publicly available, full stop. The benefits for the thousands of park users hugely outweigh the possible detriments to a handful of locals. Implementing this measure is clearly unfair.</p>

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2023/3861/P	John Cottrell	17/11/2023 18:46:06	SUPC	<p>I guess the planning application is for the installation of gates, not whether they should be locked or not. The Heras fence panels look awful and get trashed every weekend, so I support the installation of the gates, as proposed.</p> <p>But, since this is also a de facto vote on whether the park should be locked at night, I wish to add that I strongly object to this. We live at the Albert Terrace / Regent's Park Road corner of the park, and have decent hearing, but have not been disturbed by loud music at night, neither during the pandemic or since. The main disruption has been when the park is being cleared on a warm summer evening and crowds of unhappy young people are milling around outside the gates.</p> <p>The various anti-social behaviours that people mention will not be solved by locking the park. They will simply be displaced onto the surrounding streets. Anti-social behaviour could be dealt with and the park kept open for the enjoyment of those without a private garden by the introduction of an occasional police patrol on foot.</p>
2023/3861/P	Hatem	22/11/2023 13:09:50	COMMNT	<p>I really don't think it's worth closing the Park. As a cafe owner. All the troubles that happen in the park is long before 10 o'clock at night. I think an it of police presence in Primrose Hill would solve the problem.</p>
2023/3861/P	Anthony Hallgarten	17/11/2023 13:24:09	COMMNT	<p>The design of the gates is admirable & fits in very well with existing railings. I entirely support installing gates in principle.</p>
2023/3861/P	Alison Harris	20/11/2023 11:54:37	PETITNOBJE	<p>Gates on Primrose Hill would deprive the local, and wider, communities of an open space that is recognised as supporting the lonely, the isolates and the disadvantaged.</p> <p>Mostly the complaints came from the white, upper middle-class residents who live on the roads surrounding the Hill. I know because I also live on the surrounding roads and talk with neighbours. Many of the visitors were from black and socially-deprived areas and they played their music that was more culturally compatible with black, young and poorer sections of our community. I am sure many of the complaints originated from a cultural bias (NIMBY).</p> <p>In putting up gates you are banning everyone from the Hill even those of us who regularly walk there in the evenings. Mostly, you are disadvantaging those we should be supporting - the young, the marginalised and those from BAME communities.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Robin Catto	22/11/2023 18:58:43	OBJ	<p>1</p> <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>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>1. 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> <p>The application form misleadingly states that:</p> <ul style="list-style-type: none"> - 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. <p>These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:</p> <ul style="list-style-type: none"> - 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. <p>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:</p> <p>"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>But the gates were never removed, and the Planning Committee will understand there are legitimate feelings locally of anger and betrayal.</p> <p>2. Crime Statistics and Anti-Social Behaviour</p> <p>The Planning Permission Application refers to a need for gates to manage 'the problem of anti-social</p>

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

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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 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.

3. The Application Contradicts The Camden Plan Open Spaces Policy

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				<p>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.</p> <p>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.</p> <p>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.</p> <p>4. 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.</p> <p>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.</p> <p>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.</p> <p>5. 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.</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>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."</p> <p>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."</p> <p>4</p> <p>6. The 'Engagement Survey' The Planning Application relies of the evidence of the Royal Park's 'Engagement Survey.' This was</p>

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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 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.

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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.

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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

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 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.

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2023/3861/P	Theresa Hallgarten	17/11/2023 12:25:23	NOBJ	I thoroughly support this planning application for new gates to replace the ugly temporary gates. The design is in keeping with the railings, and most appropriate.
2023/3861/P	Jacquie Hamel	20/11/2023 14:30:32	OBJ	I totally oppose the gates on the grounds that the park should be accessible to all as it's always been, nature is therapeutic and many people don't have gardens as well as walking through nature actually helps physical issues such as migraines, I speak from personal experience especially if you add a dog or any animal into the equation. I've often had migraines after 10pm and being able to walk through Primrose is sometimes the ONLY cure. Also people who drink on the hill are pushed into the streets where they can cause noise and use their disgruntled attitude to run amok. The more you aggravate someone but curbing their freedom the more they fight against it if they are intoxicated and high spirited. People have been walking their dogs there for years and some can't get back from work (or have other valid reasons) till after 10 pm. It's their tranquil space with their pet and you are withholding that by locking them out of their sanctuary. It's also become a forbidden pleasure a hangover from lockdown which was managed badly, and a reminder of that time which was a tortuous time for many. It's like we aren't allowed to get on with our lives and forget our Covid restrictions, as we are STILL being stopped from having all the freedoms we had BEFORE lockdown! This is NOT democracy!

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2023/3861/P	Alasdair Nisbet	19/11/2023 23:01:27	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>

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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.

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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

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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,

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				<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	John Roberts	17/11/2023 10:20:30	OBJ	<p>This seems to be an entirely unnecessary action which will seriously reduce the benefit from a much-loved public amenity. The grounds for such a change (which appear to be based on exaggerated assumptions about anti-social behaviour and crime) appear spurious. The application should be denied.</p>
2023/3861/P	Dr Valerie Burton	17/11/2023 14:50:04	COMMNT	<p>I am writing to voice my objection to the restrictions proposed by Royal Parks under planning application Permission Number - 2023/3861/P.</p> <p>As a regular user of the Primrose Hill facilities I contest the accuracy of the comments made re disturbance and criminality in support of the application. There is no justification on these grounds to encroach on public enjoyment of the Hill and that public enjoyment is vital to preserving a diverse social environment where the owners of high value housing would otherwise predominate.</p>
2023/3861/P	Juliet	22/11/2023 11:12:44	COMMNT	<p>I object to gates being installed to entrances on Primrose Hill: the temporary gates were installed and the Hill closed at 10pm at weekends as a result of the measures taken as a result of Covid. These no longer apply. It is a restriction on our freedom to have this open space closed. Once gates are installed at great expense presumably coming from Royal Parks budget there will be more times that the Royal Parks will want to close them. They are a waste of money and no doubt if history is anything to go by (remember 1970's) will need endless maintenance. They are a so called solution to a non-existent problem. There is ample evidence that crime has not increased after 10pm and the more that crime is talked up as happening on the hill it will deter people from using it after dark now 4pm in winter. It is a wonderful natural resource for our neighbourhood especially for people without their own gardens. In summer picnics in the evening at weekends should not have to be packed up at 10pm. I regularly used to walk back over the hill after dinner (alas my friend no longer there) and many people must do or wish to do the same. I can only think that those who want gates are privileged and probably it is a problem of noise rather than anything else. We already have had restrictions on bonfire and fireworks and now gates are threatened. All this at a time when we are being urged to walk and get out into the fresh air. Primrose Hill is not a Royal Park even if they administer it, it is an open space.</p>

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2023/3861/P	Gary J	17/11/2023 19:10:05	COMMNT	<p>If there needs to be gates, they need to be aesthetically pleasing please.</p> <p>The proposed gates would be aesthetically in keeping with the existing railings that surround the park and of a visual appearance that befits a grade 2 listed Metropolitan Open Space.</p> <p>The proposed gates would be a significant improvement on the present wire barricades.</p>
2023/3861/P	Lindsay Gregory	19/11/2023 13:41:32	OBJ	<p>Please do not install gates.</p> <p>We've lived on Elsworthy Terrace since 1992 and have not seen any change in noise or antisocial behaviour, except a very small amount straight after lockdowns ended.</p> <p>That park is a beautiful and special space with unique views across London that still take my breath away after many years and daily walks to the summit. We are so lucky to live here and cannot understand why some selfish locals would petition to deny that experience to others.</p> <p>The crime statistics just don't add up: Nick McLaughlin - Inspector Royal Parks Operational Unit ¿The actual crime statistics across all Royal Parks are remarkably low.¿</p>

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2023/3861/P	Anne-Lise Miller	17/11/2023 12:49:01	COMMNT	<p>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill on the following grounds.</p> <p>1. The Planning Application is Misleading 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. 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> <p>The application form misleadingly states that:</p> <ul style="list-style-type: none"> - 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. <p>These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:</p> <ul style="list-style-type: none"> - 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 <p>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:</p> <p>"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.</p> <p>2. Crime Statistics and Anti-Social Behaviour</p>

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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.

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 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'.

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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.

3. 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.

4. 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.

5. 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

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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."

6. The 'Engagement Survey'

The Planning Application relies on 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 acknowledged 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 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.

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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

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

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>areas. Closing the park would require more police resource than a regular patrol.</p> <p>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 restaurants and pubs as they can't walk back across the park after 10pm. Closure is already impacting the local Primrose Hill economy.</p> <p>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.</p>
2023/3861/P	Edward Kerr-Dineen	21/11/2023 21:20:38	SUPPRT	Major improvement. Current temporary gate is just awful.
2023/3861/P	katy ostro	22/11/2023 17:33:55	COMMNT	The new gates would be a massive improvement on the flimsy gates that keep getting destroyed by those who force it open to go into the part when it is closed. The closure of the park on weekend nights has been a huge relief, particularly in summer months when we have suffered hours of loud noise and anti social behaviour. Please make it more effective by making the park less accessible to those who pull open the temporary fencing.

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2023/3861/P	Thiago Montoya	22/11/2023 17:20:27	OBJ	<p>I trust this message finds you well. I am writing to express my vehement objection to the proposed plan to close all the gates to Primrose Hill Park during nighttime hours. While I understand the need to address concerns related to antisocial behaviour and the challenges posed by the COVID-19 period, I believe that limiting access to this public space is an inappropriate and disproportionate response.</p> <p>Primrose Hill Park has long served as a vital and cherished resource for both the public and the residents in the surrounding area. It has been a haven for relaxation, exercise, and recreation for people from all walks of life, especially during challenging times such as the COVID-19 pandemic. Closing the gates at night would not only curtail the public's access to a valuable green space but also negatively impact the residents who rely on the park for various activities throughout the day and night.</p> <p>While I acknowledge the concerns about antisocial behaviour during the pandemic, it is crucial to address these issues through targeted and effective measures rather than implementing a blanket restriction that affects law-abiding citizens. Penalising responsible individuals who utilise the park for legitimate purposes is not a justifiable solution.</p> <p>As a resident who works long hours, I particularly value the opportunity to walk my dog in Primrose Hill during the nighttime. The proposed gate closure would severely impact my ability to engage in this essential activity for both my well-being and that of my pet. I urge you to consider the diverse needs of the community and explore alternative strategies to ensure the safety of the park without compromising the rights and routines of law-abiding citizens.</p> <p>I implore you to reconsider the decision to close the gates at night and to engage with the community in a collaborative effort to find solutions that address the concerns at hand while preserving the accessibility and functionality of Primrose Hill.</p> <p>Thank you for your attention to this matter. I trust that, the council will take our objections into account and can find a more balanced and equitable resolution.</p>

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2023/3861/P	sara j jones	23/11/2023 01:39:56	COMMNT	<p>Misleading Planning Application:</p> <p>The application fails to mention Royal Parks' intention to close Primrose Hill 90 nights a year. Claims of a "temporary" measure lack evidence, and the application misrepresents potential park closures. Crime Statistics and Anti-Social Behaviour:</p> <p>Crime rates are notably low, and police reports emphasize noise issues, not significant anti-social behavior. Claims of widespread issues lack substantiation in local crime statistics, council records, and community efforts.</p> <p>Contradiction with Camden Plan:</p> <p>The application conflicts with Camden Local Plan policies by reducing public use and compromising open space.</p> <p>Contradiction with London Plan:</p> <p>The proposed closure contradicts The London Plan, prejudicing public use of the space and devaluing it.</p> <p>Lack of Community Engagement:</p> <p>The application falsely claims extensive engagement, while the Royal Parks have ignored community groups and meetings.</p> <p>Flawed Engagement Survey:</p> <p>The survey lacks diversity, with biased framing and inadequate representation of affected demographics. Acknowledged flaws in the survey raise concerns about its reliability.</p> <p>Impact on Other Areas of Camden:</p> <p>Closure has displaced park users to other areas, leading to complaints in neighboring locations.</p> <p>Long-Term Policing Impact:</p> <p>Policing resources will be consistently wasted on park closure, with potential increases in callouts and damage.</p> <p>Lack of a management plan raises concerns about ongoing safety and policing.</p> <p>Impact on Local Economy:</p> <p>Closure is already affecting local businesses, with residents avoiding Primrose Hill after 10 pm.</p> <p>Discrimination and Privatization:</p> <p>Park closure favors residents with private access, leading to unfair privatization of a public resource. In summary, the objection highlights misleading information, lack of evidence for proposed measures, and potential negative impacts on the community, policing, and local businesses.</p>

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2023/3861/P	Aggie Murch	20/11/2023 16:32:43	SUPPRT	<p>Dear Darren,</p> <p>Here we go with these Gates. It is sad but necessary that these gates need to be installed. And since they do have to be erected because of ASB it is far better for everyone concerned that you put in proper gates as show in the planning application. This will prove to be more stable, more in keeping with the fence line and the royal parks that surround us here in the NW area of London.</p> <p>I look forward to seeing this issue taken care of in a timely manner.</p> <p>Thank you for your understanding and support.</p>

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2023/3861/P	Emma Catto	22/11/2023 19:08:24	OBJ	<p>1</p> <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>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>1. 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> <p>The application form misleadingly states that:</p> <ul style="list-style-type: none"> - 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. <p>These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:</p> <ul style="list-style-type: none"> - 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. <p>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:</p> <p>"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>But the gates were never removed, and the Planning Committee will understand there are legitimate feelings locally of anger and betrayal.</p> <p>2. Crime Statistics and Anti-Social Behaviour</p> <p>The Planning Permission Application refers to a need for gates to manage 'the problem of anti-social</p>

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

2

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 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.

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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.

3. The Application Contradicts The Camden Plan Open Spaces Policy

3

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>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.</p> <p>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.</p> <p>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.</p> <p>4. 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.</p> <p>5. 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.</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>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."</p> <p>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."</p> <p>4</p> <p>6. The 'Engagement Survey' The Planning Application relies of the evidence of the Royal Park's 'Engagement Survey.' This was</p>

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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 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.

5

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.

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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

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 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.

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2023/3861/P	Jacqueline Kerr-Dineen	22/11/2023 17:49:37	COMMNT	I completely support the planning for the installation of the new gates as they look far more attractive than the old ones and more secure and safe for all.
2023/3861/P	E. Ruscoe	20/11/2023 23:25:17	COMMNT	I fully support the installation of gates on Primrose Hill . These will curtail the anti-social behaviour that currently takes place at nightfall.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	New Etons Residents Association, NW3	17/11/2023 09:55:11	OBJ	<p>I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill on the following grounds.</p> <p>1. The Planning Application is Misleading 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> <p>The application form misleadingly states that:</p> <ul style="list-style-type: none"> - 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. <p>These statements are false. To close Primrose Hill Park overnight at weekends for 7 months of the year:</p> <ul style="list-style-type: none"> - 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. <p>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>But the gates were never removed, and the Planning Committee will understand there are legitimate feelings locally of anger and betrayal.</p> <p>2. 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.</p> <p>2.1 The police officially and in person reported to a recent Camden Council Culture and Environment Scrutiny</p>

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Committee meeting Primrose Hill on crime and anti-social behaviour. Their comments included:

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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.

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

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2023/3861/P	Emily Jane Gladstone	17/11/2023 13:09:29	SUPPRT	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 restaurants and pubs as they can't walk back across the park after 10pm. Closure is already impacting the local Primrose Hill economy.</p> <p>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.</p>

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2023/3861/P	A. Boyd	17/11/2023 11:32:19	SUPPRT	<p>I support installation of gates in Primrose Hill.</p> <p>Sadly, since lockdowns during COVID, news that the park did not close at night spread far and wide. Young people from across London that would normally go to regular venues such as pubs and night clubs found the park in Primrose Hill a convenient gathering place for raves, parties, etc. The obvious consequence is that increased number of visitors of certain age brought drug dealing and anti social behaviour to the area.</p> <p>Loud music, fireworks, fights, shouting, urination in public are regular occurrences, specially at nighttime during weekends. The most recent example is the setting where of fireworks in the middle of the night in contravention with specific public guidelines set around Bonfire and Diwali dates.</p> <p>In my experience, the people that come and engage in such annoying behaviour are not local residents, ie they just couldn't care less about whether their actions are disruptive and affect local residents.</p> <p>The installation of gates, along the lines of Regent's Park system / timings, cannot come soon enough. The Metropolitan Police should also be asked to patrol the area more regularly at night during weekends.</p>
2023/3861/P	Nadia Crandall	21/11/2023 15:41:28	COMMNT	<p>the proposed gates would represent a significant improvement on the unattractive temporary gates so I support the application</p>
2023/3861/P	P J White	22/11/2023 12:33:58	SUPPRT	<p>I am strongly in favour of the replacement of the gates which were removed in the 1970s and consider that the proposed design is admirable. It proposes to replicate the railings beside which the new gates will stand and is therefore appropriate. I live in a road which adjoins the roads surrounding Primrose Hill Open Space and use the park on a regular basis. The replacement gates will help to reduce the evening and late night noisy and sometimes violent disturbances which have been in evidence in the park in recent years and will thus help local residents to have a quiet and reasonable enjoyment of their homes and property.</p>
2023/3861/P	Mark Geller	17/11/2023 13:11:45	OBJ	<p>I object to the plans for closing Primrose Hill Park.</p>
2023/3861/P	Janet Cowen	19/11/2023 20:50:11	OBJ	<p>This application is objectionable because the implied result is a reduction of public use of an open space protected with a nature designation.</p>