

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Lindy Kester Rattenbury	26/11/2023 13:08:51	OBJ	<p>I have lived in close proximity to Primrose Hill for more that 30 years, on the corner of two roads leading to the Park itself, and I am entirely opposed to the closure of the park.</p> <p>Primrose Hill is a really remarkable example of an entirely successful 24 hour public park in a built-up urban area, which is a huge free resource and source of both solace and delight both for those of us lucky enough to live nearby, and to the wider visitors whove increasingly come to visit and use it. In a city where so many people work in low paid or uncertain jobs, often shift work, it is a truly wonderful place to be able to come, free, to view the skyline and meet other people in a safe, green, and beautiful space.</p> <p>In my thirty years here here, I've been able to enjoy sunset, sunrises, moonlit nights, wonderful moments, years of dogwalking in all weathers, social contact, raised children, made friends, and brought visitors. Because it is kept fully open, it effectively polices itself, and though all kinds of people may come here it has always felt - more than any park I've ever been in - an essentially safe space, where neighbours can actually meet and briefly chat, where even if there is misbehaviour (and this is exceptionally rare), you will always be surrounded by other peaceable people who are there simply to enjoy the wonderful green space with its exceptional views of London.</p> <p>Locking the park changes this - definitely for the worse. I have often been there as it is being closed and have noticed how groups of peaceful people relaxing and picknicing can sometimes start to become hostile, noisier and worse behaved when corralled up and driven out of the park -- and the sense that this is being done because a few local residents have complained raises a sense of 'them and us' which is totally unnecessary. Then the closures mean it has become known as a place to go if you are prepared to break the law - so peaceful, law-abiding dogwalkers like me are kept out, while those prepared to break the law break in and do whatever they want -- without the calming presence of the local dogwalkers and other users who would otherwise reinforce and passively police this remarkable 24 hour public space - and who do so when it is kept open.</p> <p>Under the extraordinary pressures of lockdown, the park performed astonishingly well, accommodating huge numbers of people who had absolutely nowhere else to go. Under the circumstances major problems were rare and could easily have been dealt with in other way (Richmond riverside provided 24 hour portaloos; Primrose Hill kept loos locked). Because of the shape of the park, even music noise is not that close to residents. The whole public consultation around this has been utterly scandalous, writing questions in such a way as to make it impossible to register alternative opinions to closure as part of a positive sense of civic space. Even in this hugely loaded survey (locally based, thereby stacked against more diverse and younger users) 'never close gates' got as many as 'always close', and the actual comments have never been collated.</p> <p>We should be studying why this park works so well on a 24 hour basis, not closing it down. (A proper research project from the University of Westminster's specialist Parks research?). Instead, and though the park is now entirely unproblematic, this application is making more moves which normalise the gradual closing down (through private pressure) of one of our most exceptional public park success stories of this great and inclusive city.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	David Woltonz	26/11/2023 15:16:37	COMMNT	I am a long time resident and rate payer of Camden. I think youth and others have a need and indeed a customary right to use Primrose Hill and whatever barriers are expensively erected and maintained to discourage them, they will continue to exert that right. Why waste public money - indeed our money - on trying to stop them?
2023/3861/P	David Woltonz	26/11/2023 15:16:38	COMMNT	I am a long time resident and rate payer of Camden. I think youth and others have a need and indeed a customary right to use Primrose Hill and whatever barriers are expensively erected and maintained to discourage them, they will continue to exert that right. Why waste public money - indeed our money - on trying to stop them?
2023/3861/P	Peter Robin	26/11/2023 20:28:46	SUPPRT	<p>I support fully this application.</p> <p>We have tolerated drug dealing and other appalling / immoral behaviour on Primrose Hill for too long. The noise, mess and smell is intolerable.</p> <p>Shutting the park at 10:00 pm, particularly during the summer months, has already made a positive difference. This tasteful proposal should continue the positive trend.</p>
2023/3861/P	D Joseph	25/11/2023 18:13:50	COMMNT	I fully support this application. The temporary gates have been very effective since they were installed with a reduction of noise and bad behaviour after 10pm. The benches close to the Elsworthy Terrace entrance to the park also no longer seem to be used as an office by those involved in anti-social behaviour/preying on others.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	sara j jones	23/11/2023 01:39:56	COMMNT	<p data-bbox="878 130 1223 150">Misleading Planning Application:</p> <p data-bbox="878 191 2002 274">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 data-bbox="878 316 2007 395">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 data-bbox="878 405 1223 424">Contradiction with Camden Plan:</p> <p data-bbox="878 466 1989 517">The application conflicts with Camden Local Plan policies by reducing public use and compromising open space.</p> <p data-bbox="878 526 1214 545">Contradiction with London Plan:</p> <p data-bbox="878 587 1980 606">The proposed closure contradicts The London Plan, prejudicing public use of the space and devaluing it.</p> <p data-bbox="878 616 1227 635">Lack of Community Engagement:</p> <p data-bbox="878 676 2024 727">The application falsely claims extensive engagement, while the Royal Parks have ignored community groups and meetings.</p> <p data-bbox="878 737 1182 756">Flawed Engagement Survey:</p> <p data-bbox="878 798 1980 849">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 data-bbox="878 858 1245 877">Impact on Other Areas of Camden:</p> <p data-bbox="878 919 1886 938">Closure has displaced park users to other areas, leading to complaints in neighboring locations.</p> <p data-bbox="878 948 1169 967">Long-Term Policing Impact:</p> <p data-bbox="878 1008 1948 1059">Policing resources will be consistently wasted on park closure, with potential increases in callouts and damage.</p> <p data-bbox="878 1069 1711 1088">Lack of a management plan raises concerns about ongoing safety and policing.</p> <p data-bbox="878 1098 1160 1117">Impact on Local Economy:</p> <p data-bbox="878 1158 1877 1177">Closure is already affecting local businesses, with residents avoiding Primrose Hill after 10 pm.</p> <p data-bbox="878 1187 1214 1206">Discrimination and Privatization:</p> <p data-bbox="878 1248 1993 1347">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>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Jenny McCririck	23/11/2023 18:30:30	SUPPRT	<p>I have experienced significant disruption over the last four years from noise and antisocial behaviour in the park: I have noticed how much better it is when the park is closed overnight This has all dragged on far too long so I support the park gates application which will give a clear sign when the park is open and closed The proposed gates look fine and much safer than the often vandalised temporary gates which became a danger to people and animals when they had protruding broken metal edges.</p>
2023/3861/P	Jenny McCririck	23/11/2023 18:30:31	SUPPRT	<p>I have experienced significant disruption over the last four years from noise and antisocial behaviour in the park: I have noticed how much better it is when the park is closed overnight This has all dragged on far too long so I support the park gates application which will give a clear sign when the park is open and closed The proposed gates look fine and much safer than the often vandalised temporary gates which became a danger to people and animals when they had protruding broken metal edges.</p>
2023/3861/P	Natalie Moitt	24/11/2023 01:51:20	OBJ	<p>Installing permanent gates to Primrose Hill is a disgrace and the exact kind of behaviour that is crushing the soul out of London. NIMBYism at its worst, but with the added insult that it affects those without a backyard the hardest. Clearing the park begins at 9pm (regardless of the alleged 10pm closing time) where those enjoying the long, light summer evenings are told by police to immediately leave.</p> <p>Not only does this disrupt the natural dissipation of people leaving the park from a steady decline as the night comes in to a sudden turving out of swathes at once, there is no evidence of any positive impact on crime levels in the park from closing the park.</p> <p>Keep Primrose Hill open and keep London alive!</p>
2023/3861/P	Laura Phillips	24/11/2023 11:36:22	OBJ	<p>Unnecessary and costly to put gates in Primrose Hill.</p>
2023/3861/P	Louis Weinstock	24/11/2023 16:39:28	OBJ	<p>As a Child Psychotherapist, I am very concerned about the impact these gates will have on young people's mental health. We know from all the research that having easy access to green spaces is one of the most critical ingredients for a young person to have good mental health. I am also concerned that The Planning Permission Application suggests gates are necessary to manage the problem of anti-social behaviour.</p> <p>This dog-whistle claim is problematic because (as mentioned above and according to the Primrose Hill Park manager himself) the problem does not exist to any serious extent.</p> <p>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 have been unable to verify the claims made by a few repeat callers complaining about noise.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Jim Warboy	24/11/2023 19:48:04	OBJ	<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 behaviour'. This 'dog-whistle' claim is problematic because the problem does not exist to any serious extent.</p> <p>1</p> <p>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:</p> <p>Nick McLaughlin - Inspector Royal Parks Operational Unit</p> <p>"The actual crime statistics across all Royal Parks are remarkably low."</p> <p>"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."</p> <p>Stevie Bull – Royal Parks Police</p> <p>"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."</p>

Application No: Consultees Name: Received:

Comment: Response:

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

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.

Application No: Consultees Name: Received:

Comment: Response:

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

"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."

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

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.

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

Application No: Consultees Name: Received:

Comment: Response:

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.

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 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

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>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 Elsworth 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	Chris Blackburn	23/11/2023 11:56:36	OBJ	I often work until late so can only use the park at night and this is tantamount to denying me access. It is unfair to remove access for those of us that need to access the park late.
2023/3861/P	Peter Jones	23/11/2023 17:10:57	SUPNOT	I support this application. The existing temporary gates are unsightly and to my knowledge have been prised open a number of times. The propose gates are consistent with the existing historical railing design.
2023/3861/P	HM	23/11/2023 11:18:43	COMMNT	The park shutting at night is anti social! I am a life long local resident and love the freedom the park provides to clear heads, entertain kids, walk pets and enjoy the sights of our city. The fact that it closes at 10pm feels limiting and restrictive. Rather than closing things up and locking down, members of the public should be able to be trusted to be respectful and positive and have the freedom to enjoy this vital, public space together and whenever. The park is a lovely place and the sense of community and belonging that it provides is so important for mental and physical health. We are so lucky to have this space in London and it is important that it remains unlocked and free for all people to enjoy, safely and freely without locks and gates creating a unnecessary lack of freedom and trust. So that the local community and all people can enjoy and benefit from the nature and calm that Primrose Hill provides in our crowded city and working lives either at sunrise, mid afternoon, dusk or star gazing at midnight. Stop the locks and the freedom for our community to walk and talk in this special place when we need too.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	DECLAN O'QUIGLEY	23/11/2023 12:51:30	INT	As a late night dog walker I frequently witness how ineffective the current barriers are. Invariably by midnight the barriers have been vandalised, bent and broken in order for people to access the park. They are not fit for purpose and are an ongoing wasteful expense that serve no purpose. The park requires proper high metal gates in keeping with the style of the current railings. It requires gates similar to those found in Regents Park which are attractive and a proper deterrent.
2023/3861/P	Tom Muoio	23/11/2023 13:57:59	COMMNT	I am against permanent gates being installed as I've been against the temporary gates. I live in St John's Wood and the gates being closed make my walking to Primrose Hill prohibitively long. If this is the case we will choose going to Marylebone or Hampstead over visiting the businesses in Primrose Hill.
2023/3861/P	NICKEY KORN	23/11/2023 17:46:31	COMMNT	Reduce the public's use of an open space. Park gating and closure will require the consistent and wasteful use of police resource
2023/3861/P	Anna Sullivan	24/11/2023 10:46:32	OBJ	Restricting access to this wonderful resource is a terrible idea, and an infringement of the rights of local residents. It is our resource - leave it alone! It is one of the few open areas in the evenings and hugely prized by walkers, dog owners, couples - everyone. It is an oasis of green in a huge urban area. Do not restrict Londoners access to their own areas of recreation.
2023/3861/P	Robert Starr	23/11/2023 19:55:20	SUPPRT	I strongly support this application
2023/3861/P	Stephen Morrison	24/11/2023 17:24:03	OBJNOT	There should no gates to Primrose Hill its always been a public right of way and should remain so
2023/3861/P	Adrian Boylan	24/11/2023 18:49:40	OBJ	<p>This is a selfish and anti-social proposal resulting from complaints by a minority of local residents who are lucky enough to live in the area immediately surrounding Primrose Hill, and who assume that they should be able to bar others from enjoying the use of the space on summer evenings.</p> <p>It is a popular but safe gathering place for, mostly, young people in the summer. It isn't a pub, it doesn't cost anything to get in and doesn't have a chucking-out time. Such places are rare in London, but are preferable to hanging around on the streets or drinking all night indoors. All park visitors leave litter behind in the summer: visitors to Primrose Hill are no worse than visitors to other parks.</p> <p>Attempts to block access will be defeated by some determined park users, who will risk injury climbing over railings. If emergency access is needed as a result of any incident inside the park, gates will make any emergency response much slower.</p>
2023/3861/P	Jonathan Sattin	25/11/2023 10:50:06	OBJ	This is a completely unnecessary application

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Beth Coventry	23/11/2023 23:06:57	COMMNT	<p>I live at the end of Elsworthy Terrace on the edge of Primrose Hill. I have been disturbed in the past at all hours of the night by rowdy noise from people enjoying themselves late on Primrose Hill.</p> <p>However, in spite of that being very annoying and disturbing- sporadically - I am prepared to put up with it because I am against the installation of gates.</p> <p>I have always appreciated Primrose Hill being open at night and the noise level has gone down significantly since the pandemic</p> <p>I definitely vote against the installation of gates.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Tabitha	25/11/2023 11:12:40	OBJ	<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 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>

Application No: Consultees Name: Received:

Comment: Response:

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.

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

Application No: Consultees Name: Received:

Comment: Response:

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

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.

Application No: Consultees Name: Received:

Comment: Response:

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

- They have consistently refused to engage with local community groups or stakeholders, turning down meeting invites and not answering emails. This includes attending local meetings with Councillors or local Community Engagement groups.
- They have declined invitations to attend key Camden Council meetings where they could be held accountable. This includes a deliberate failure to attend the Camden Culture and Environment Scrutiny Committee on the eve of their announcement of installing permanent gates, a move called a 'grotesque snub' by the committee.
- They have only engaged with Councillors known to favour gates. Other Councillors have been ignore despite Primrose Hill being part of their ward (before the boundary change).

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

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

5.2 ¿Patrick Coulson from the Camden Community Safety Service states:

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

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.

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

Application No: Consultees Name: Received:

Comment: Response:

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.

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."

Application No: Consultees Name: Received:

Comment: Response:

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 Elsworth 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.

1

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	H	23/11/2023 11:23:49	OBJ	The park shutting at night is anti social! I am a life long local resident and love the freedom the park provides to clear heads, entertain kids, walk pets and enjoy the sights of our city. The fact that it closes at 10pm feels limiting and restrictive. Rather than closing things up and locking down, members of the public should be able to be trusted to be respectful and positive and have the freedom to enjoy this vital, public space together and whenever. The park is a lovely place and the sense of community and belonging that it provides is so important for mental and physical health. And the local community and all people can enjoy and benefit from the nature and calm that Primrose Hill provides in our crowded city and working lives either at sunrise, mid afternoon, dusk or star gazing at midnight. Stop the locks and the freedom for our community to walk and talk in this special place when we need to.
2023/3861/P	Ann Marie Starr	23/11/2023 19:56:33	SUPPRT	I strongly support this application.
2023/3861/P	Tiffany Coppersmith-Heaven	23/11/2023 11:39:21	COMMNT	I strongly oppose to the closing off of Primrose Hill at night. As a local resident, the sheer numbers of people pouring off the hill at 10pm causes chaos in the surrounding roads, particularly during summer months. Before the hill was closed off, there were never a problem with disturbances at night and people would just leave the hill at their own convenience. It makes absolutely no sense to funnel people off all together, when this happens, they use our entrance pathway as a toilet and play loud music as they make their way off to wherever they are forced to head to, screaming and shouting at one another. This not only wakes up our young children but it's also really frightening and threatening. Where as before, people would just socialise on the hill happily, mostly peacefully and not be any kind of disturbance to residents. What has happened that is so significant to warrant this kind of closing off of the hill, which has been enjoyed for decades 24 hours per day. Please keep the hill open to all without restriction.
2023/3861/P	Chris McLaverty	24/11/2023 14:05:00	COMMNT	I am writing in support of the proposal to instal permanent gates at every entrance to Primrose Hill Park. The park should be closed at night, in line with the rest of Regent's Park. This will end the practice of noisy anti social elements gathering in the park, disturbing local residents with drug dealing and amplified music. The scenes witnessed during covid and during brighter summer evenings are an indication of the scale of this problem. There does not seem to be the resources to adequately police a park that is open all night. Closing it at night is the only practical solution. At all costs, the park must not become a magnet for late night revellers at the expense of the local community.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Kadi Debbah	25/11/2023 11:46:42	OBJ	Objection To Planning Permission Number - 2023/3861/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.

I object to Planning Permission no. (2023/3861/P) for the installation of gates around Primrose Hill.

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.

The application form misleadingly states that:

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

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

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

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

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

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

will affect opening hours.

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

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

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

Application No: Consultees Name: Received:

Comment: Response:

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.

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.

Application No: Consultees Name: Received:

Comment: Response:

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.

The Application Contradicts The Camden Plan Open Spaces Policy

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

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

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

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

The Application contradicts The London Plan Open Spaces Policy

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

Paragraph 6.12 from the Planning Application states:

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

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

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

Application No: Consultees Name: Received:

Comment: Response:

order to gather the views of local residents and park visitors.’ This is simply not true.

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

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

They have declined invitations to attend key Camden Council meetings where they could be held accountable. This includes a deliberate failure to attend the Camden Culture and Environment Scrutiny Committee on the eve of their announcement of installing permanent gates, a move called a ‘grotesque snub’ by the committee. They have only engaged with Councillors known to favour gates. Other Councillors have been ignore despite Primrose Hill being part of their ward (before the boundary change).

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

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

5.2 Patrick Coulson from the Camden Community Safety Service states:

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

The ‘Engagement Survey’

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

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

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

6.3 The survey presented with an inaccurate picture of the issues at stake. The wording ‘led the witness’ by

Application No: Consultees Name: Received:

Comment: Response:

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.

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

Application No: Consultees Name: Received:

Comment: Response:

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.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Hannah Tsecho	24/11/2023 01:31:35	INT	

As a regular night time user of Primrose Hill Park in all seasons of the year I am writing to object to this proposal. My reasons are as follows:

Bad faith:

During the pandemic lockdowns, due to increased footfall and limited antisocial behaviour, gates were installed as a “temporary” measure at Primrose Hill Park. These have never been removed. The Royal Parks have been guilty of bad faith for a considerable period through their refusal to remove them as originally promised.

Failing to disclose significant loss of public access to an iconic open space:

Earlier this year, the Royal Parks admitted publicly that they intend to retain the gates permanently and use them to implement a regime where the Park will be closed at 10pm on every Friday, Saturday, and Sunday night from March to October i.e., within British Summer Time (ie. a minimum of 90 nights a year) plus on major calendar dates in winter months such as Bonfire Night, Hallowe'en and New Year's Eve. Yet this planning application makes no reference to the planned new regime of closing times. Worse, the Royal Parks claim falsely in this application that the gates will not affect the park's 'Hours of Opening' to the general public.

False premise:

In a dog whistle claim the Royal Parks argues in this application that gates on the park are needed in to manage 'the problem of anti-social behaviour'. Yet, as the Royal Parks admit in their Annual Report 2022, "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."

More recent local crime statistics have underscored that the area is not a crime hotspot (In the period 01Jan - 30 June 2023 police received 131 calls relating to the park itself, of which only 28 related to ASB and crime specifically and half of those were phone theft related). In point of fact, as CEO of the Royal Parks, Andrew Scattergood, has admitted to a recent council committee, "the main challenge has been noise on the hill rather than anti social behaviour or crime" with repeat complaints from a small minority of wealthy homeowners who want to the park made sterile and completely quiet at night.

Additional falsehoods:

In this application the Royal Parks make two further claims that are untrue:

- the gates will result in no loss, gain or change of use of an open space (and are therefore in accordance with Camden Local Plan Policy by keeping the park a safe and high-quality space).
- the gates will cause no loss, gain or change of use of a site protected with a nature designation (even though, as they also state in the application, Primrose Hill is a site protected with a nature designation (a SNIC).

Application No: Consultees Name: Received:

Comment: Response:

Insufficient analysis and consultation:

Since the pandemic, no real time review of the need to lock the park has been conducted (and no resources currently exist for conducting one).

By contrast, the Planning Application claims there has been a 'full and extensive process of public engagement in order to gather the views of local residents and park visitors.'

In point of fact, for this application the Royal Parks relies on a flawed engagement survey and has consistently refused to answer emails, refused to engage with local stakeholders, has turned down meeting invites (with local councillors, Camden Community Safety Service and various Community Engagement groups), and failed deliberately to attend the Camden Culture and Environment Scrutiny Committee shortly before announcing its plans to make the gates permanent.

The aforementioned engagement survey also employed an online study devoid of demographic quotas or panel recruitment and consequently failed to engage the most underprivileged and under resourced or harder to reach segments of the local population. Canvassing on the hill itself took place during daylight hours - thereby excluding those night time users set to be most directly affected by the closures. The results also fail to accurately reflect the views of the local neighbourhood: 62% of the survey respondents were homeowners, and ~76% of the respondents were white. According to the 2021 census, only ~30% of Camden residents are homeowners and only ~60% are white.

The gates will frustrate crime prevention and may lead to more crime:

As Andrew Scattergood, CEO of the Royal Parks admitted park gating and closure will require the consistent and wasteful use of police resource: " I don't think two gate lockers would be able to clear the park of a thousand people, while the police have been able to do that for us." At the same time, the fastest growing crime statistic in the area is for people who have climbed the gates. The temporary gates have also been destroyed repeatedly. It is an error of judgment to characterise these acts of targeted protest as simple vandalism, as the Royal Parks like to pretend. Furthermore, the ongoing impact on local Camden policing resource of having to close and clear the park and of having to keep people out of the open space is not addressed: This application contains no long-term park management plan for safety or policing.

Money can be spent far better.

The cost of making, installing and maintaining gates, policing the clearance of the hill, employing gate-lockers at night and openers in the mornings, has not been thoroughly evaluated. Nor have those costs be compared fully to the cost of a more constructive strategy that employs lower key but more regular police patrols supported by private security and more park wardens.

Damage to the Local Economy:

Local hospitality businesses in Primrose Hill have already been badly affected by the temporary summer closure. Residents from St John's Wood and other areas across the park no longer frequent Primrose Hill restaurants and pubs as they can't walk back across the park after 10pm.

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>Discrimination and unfair access:</p> <p>Temporary gating of the park has in already part privatised a public resource. Public access is restricted to some whilst some wealthy residents can access the park freely (eg. the residents of Elsworthy Road, and others, who have private gates in their back gardens that lead directly into the park).</p> <p>In summary:</p> <p>If this applications is granted then an iconic London park that has been free of gates for over 50 years will be closed to the general public for upwards of 90 times a year - thereby privatising a public resource. Permanent gates will pander to the prejudice and intolerance of a handful of local residents who (through persistent complaints about noise) have sought to have a public park turned into a private garden that they can access at their own convenience via private gates in their back gardens. It will also punish the vast majority of local residents who rely on the park for its nature services and their wellbeing.</p>
2023/3861/P	Maureen Betts	23/11/2023 16:08:33	SUPPRT	I agree new gates better than current and agree gates to be closed at night on relevant nights to stop unruly behaviour.
2023/3861/P	Matthew Nelson	23/11/2023 22:37:58	OBJ	As a long-term resident of Primrose Hill (Regent's Park Rd), I strongly object to the installation of gates at the entrances to Primrose Hill park.
2023/3861/P	Hugh Gaukroger	24/11/2023 02:31:56	COMMNT	I do not agree with putting a fence around Primrose Hill. People have freely used the park for years. I often walk through the park late in the evening for exercise and to get some fresh air.
2023/3861/P	Graham Anthony	24/11/2023 15:41:13	OBJ	<p>I wish to vehemently object to the planning application to install gates to Primrose Hill. I have lived in Primrose Hill for 50 years and one of the joys of living here is being able to go onto the Hill at anytime of the day and night. When it snowed people could be seen sledging down the Hill at 3am, causing no bother whatsoever. When momentous events happen, people seem to naturally gravitate to the Hill to look over London and share the occasion.</p> <p>Perhaps there is a mystic quality that draws us there, but whatever it is, it must not be allowed to be interfered with.</p> <p>Primrose Hill is not an area of high crime and vandalism. In fact I have always felt extremely safe there whatever the time.</p> <p>I believe Camden Council has a duty to protect the freedom for people to go on to the Hill whenever they want. It has been like that for as long as I can remember and long may it continue for our children and our children's children.</p> <p>I have always felt totally safe there.</p>
2023/3861/P	Caterina Albano	23/11/2023 21:30:12	COMMNT	I object to the proposed closure of Primrose Hill as it will deprive local residents access to the park which is currently an important space for health related activities, for elderly residents to socialise. The park is safe and enjoyable across year. Early closures will deprive residents of a green space to exercise and of easily walk. As someone who often walks there, Primrose Hill is always quiet and safe.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Samuel Searles-Bryant	26/11/2023 19:29:24	OBJ	<p>I object to Planning Permission (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>The problem the application is claiming to solve is not a problem that Primrose Hill has. In the Royal Parks' 2022 annual report, the temporary problems seen during the lockdowns were reported as having gone away ("visitor numbers and behaviour have now returned to pre-pandemic levels").</p> <p>Closure of the hill overnight on weekend evenings is already disruptive to those living in the area, particularly since it now requires some to walk much further to get home if their journey would usually cross the hill.</p> <p>The plan contradicts both Camden's and London's open spaces policies.</p>
2023/3861/P	David Green	25/11/2023 17:42:47	INT	<p>I object to the proposed installation of gates to Primrose Hill for all the reasons set out in detail in other closely argued submissions. The case for their installation is disingenuous in several material aspects and no relevant evidence is offered to support any reason for their installation. Apart from perhaps a certain amount of very occasional noise of the kind that is normal anywhere in parks in London, no case is made that there is nuisance the gates are needed to prevent.</p> <p>This proposal, if implemented, would mark a gross infringement of freedom of movement with no corresponding benefit. I write as a local resident and frequent user of the park including after dark when its paths are very well lit.</p>
2023/3861/P	Samuel	26/11/2023 11:33:01	OBJ	<p>This has been an historic open space and to close it at night would be to deny Local residents and Londoners there historic rights.</p>
2023/3861/P	Sophia Swannell	26/11/2023 11:33:23	COMMNT	<p>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.</p> <p>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>
2023/3861/P	James Kennedy	26/11/2023 13:50:31	SUPPRT	<p>I am strongly in favour of the gates as proposed (including their design) and the proposal for the park to be closed from 10pm. My view (as someone who walks there with my dog every day) is that the unfortunate reality is that it has become a destination for anti-social behaviour in the late evenings with many locals and others staying away as a result - with the park being overwhelmed by litter, noise and vandalism. This cycle needs to be broken and the option of closing the park with these gates is now unfortunately a necessity if policing is not to be greatly improved (which, also unfortunately, is not realistic)</p>
2023/3861/P	Laura	25/11/2023 11:19:46	COMMNT	<p>Please stop putting fences and gates on all the parks in London. It's dangerous, unnecessary and just makes life harder for everyone.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Thierry alexandre	23/11/2023 12:26:38	OBJ	Key reasons for Objection are:

1. The Planning Application is Misleading and Disingenuous

At no point in the application does the application mention the Royal Parks have announced publicly their intention to close the Park at 10pm on Friday, Saturday, and Sunday nights from March to October i.e., within British Summer Time. This amounts to 90 nights a year.

2. Crime Statistics and Anti-Social Behaviour

The Planning Permission Application suggests gates are necessary to manage 'the problem of anti-social behaviour'.

This 'dog-whistle' claim is problematic because (as mentioned above and according to the Primrose Hill Park manager himself) the problem does not exist to any serious extent.

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 have been unable to verify the claims made by a few repeat callers complaining about noise.

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 suggests:

"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."

In point of fact, the Planning Application falls outside the conditions that must 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.

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

Application No: Consultees Name: Received:

Comment: Response:

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.

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 in no manner an adequate Public Consultation for such a major decision.

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 (night time users) set to be most directly affected by the closures.

By their own admission, The Royal Parks have relied on a survey that does not represent the local community.

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 neighborhood, 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.

7. Impact of Closure on Other Areas of Camden

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

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

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

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

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

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

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. These acts of targeted protest are characterised by the Royal Parks as simple vandalism. This is a gross error of judgment.

There will be an ongoing impact on local Camden policing resource closing and clearing the park and keeping people out of the open space. This is not addressed in the Planning Application.

9. 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 be allowed to alienate all other residents of Camden purely for their personal convenience and privilege.

For further information, crime statistics or evidence please email us at:

Keepthehillopen@gmail.com

2023/3861/P Simone Gozzetti 25/11/2023 12:45:44 COMMNT

Good morning, I do not wish to reiterate what Amy McKeown has already commented, as I fully support what she has written.

However, I would like to add my own brief personal note in opposition to the proposal for installing gates in the park, and the very likely ensuing closures.

In 2020 and 2021, there were issues, but it seems to be forgotten that these were exceptionally unique years in recent memory. After these incidents, I have observed the park returning to its normal life, and as the police have also attested, I have never seen such high levels of crime or serious incidents of Anti-Social Behavior. Primrose Hill is a unique place, and what we are at risk of losing is this uniqueness; the ability to go to the top of the hill and view the panorama of Regent’s Park and London from above in the utmost peace at midnight is invaluable. The opportunity to meet friends for a chat, sitting on the grass until late in the summer, is a unique experience.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	John Prideaux	25/11/2023 16:25:11	COMMNT	These seems sensible and will be an improvement on the temporary gates that are there at the moment, which are both ugly and often twisted by people trying to get through them.
2023/3861/P	Dominic Sullivan	23/11/2023 16:30:30	OBJ	I object to the plan to install gates at the entrances of Primrose Hill. As a long time resident who grew up in Primrose Hill one of the huge benefits and joys of living in the area was having access to the park in the evenings. Primrose Hill has always been a safe and friendly outdoor space to enjoy at night, except for the limited time during lockdowns when there were unacceptable events taking place on the hill. These unfortunate, but isolated, events during a once in a hundred years pandemic no longer occur now that bars and clubs are back open, and therefore there is no longer a need to restrict access to the park which removes the long held freedom of locals to enjoy a neighbourhood asset just because some kids a couple of years ago didn't have anywhere to get drunk. The loss of access to the park in the evenings would be sorely missed, and would be to the detriment to the local area, and London as a whole. If the council does insist on punishing law-abiding locals by installing gates at the entrance to the park, I suggest distributing keys or a code to locals within a catchment area of the park who request them so that at least locals can continue to enjoy the park as we have done without any issues for so many years.
2023/3861/P	Gill P	23/11/2023 12:35:03	COMMNT	One of London's great qualities is the number of parks that are open to all, providing space for leisure pursuits to the vast number of city dwellers who live in flats. To close the parks at night would stop people meeting to chat with friends in the evening, taking shortcuts home after a night out, or just stretching their legs after a day sitting deskbound. It's punitive and wrong to deprive citizens of this facility and I am strongly opposed.
2023/3861/P	Sheryl Needham	23/11/2023 21:35:36	SUPPRT	I strongly support the installation of the gates. As a person who lives on Regent's Park road directly opposite the park I have lost many nights sleep to fireworks and noise late at night in the park. For those who in other comments have suggested that this is coming from other places and nearby pubs I have 10's of videos of fireworks on the hill in the middle of the night. It is not a bit of pub merriment. This is often happening at 1,2 and 3 am and materially impacts my health. Since the temporary gates were imposed and especially in the summer when the police attended to clear the hill of people the situation has improved though has got going again since the temporary gates have been removed. I understand people want to stroll on the hill late at night but for me at this point it is not about access to a leisure facility but something that means I cannot continue to enjoy my own home in peace from 11am til 6am every day. Please do install the gates.
2023/3861/P	Mimi F	25/11/2023 14:36:51	COMMNT	Primrose Hill is a special place that provides contact with nature in one of the most beautiful ways for many people. It is important to keep such a place open to the public
2023/3861/P	Dick Bird OBE	25/11/2023 15:09:12	SUPPRT	Our community in Primrose Hill benefits on the whole from the preparedness of the Royal Parks to close the Hill on occasions, as evidenced by the recent improvement in disturbances. For this gates are physically and symbolically useful, and the current designs are an improvement on the previous temporary gates. So I strongly support the application.
2023/3861/P	Jyrki Kolsi	26/11/2023 14:47:18	OBJ	I object to permanent, or any, gates installed in primrose hill park entrances. I live locally. Gates would go against and diminish the traditional character of the park and area, open to all Londoners and visitors to enjoy, into the evening without presupposed judgement.

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Huma Yusuf	23/11/2023 22:26:04	OBJ	<p>I object to Planning Permission (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>1. The Planning Application is Misleading and Disingenuous 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. To close Primrose Hill Park overnight at weekends for 7 months of the year: - will result in the Loss and Change of use of an open space. - will result in the Loss and Change of use protected with a nature designation. - will affect opening hours. A park that has been free of gates for over 50 years will regularly be closed for public use.</p> <p>2. Crime Statistics and Anti-Social Behaviour The Planning Permission Application suggests gates are necessary to manage 'the problem of anti-social behaviour'. This 'dog-whistle' claim is problematic because (according to the Primrose Hill Park manager himself) the problem does not exist to any serious extent. Local crime statistics don't substantiate the claims of crime and anti-social behaviour.</p> <p>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 suggests: "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." In point of fact, the Planning Application falls outside the conditions that must 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. To claim black is white more than stretches 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"> The Royal Parks have consistently refused to engage with local community groups or stakeholders,

Application No: Consultees Name: Received:

Comment: Response:

turning down meeting invites and not answering emails. This includes attending local meetings with Councillors or Community Engagement groups.

- The Royal Parks declined an invitation 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.

- The Royal Parks have only engaged with Councillors from one ward (those known to favour gates). The park covers two wards. Other Councillors have been ignored.

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

"We repeatedly sought the views of the council throughout the engagement process. On many, many occasions we sought the council's view. Their view on the Royal Park's handling of the situation on Primrose Hill. We failed to get a response from the council to our engagement exercises."

Other stakeholders have also acknowledged their lack of engagement participation. 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 in no manner an adequate Public Consultation for such a major decision.

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 (night time users) set to be most directly affected by the closures.

By their own admission, The Royal Parks have relied on a survey that does not represent the local community. 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 neighborhood, 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.

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.

Application No:	Consultees Name:	Received:	Comment:	Response:
				<p>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."</p> <p>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).</p> <p>No robust public consultation has been done, There has been no effective engagement with the key stakeholders affected by the decision. 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 the two constituencies. 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.</p> <p>7. Discrimination and Privatisation</p> <p>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 be allowed to alienate all other residents of Camden purely for their personal convenience and privilege.</p>

2023/3861/P	James Brown	26/11/2023 12:59:49	OBJNOT	<p>I object to planning permission for the installation of gates around Primrose Hill for a number of reasons.</p> <ol style="list-style-type: none"> 1.The application contradicts the Camden Plan Open Spaces policy and the London Plan Open spaces policy.The application falls outside the conditions that must be metty both these plans by emptying and closing the park 3nights a week fir 7months thus reducing yhe publics use of an Open space 2.It is claimed the gates are necessary to manage the problem of anti-social behaviour.Nick McLaughlin -Inspector Royal Parks Operational Unit at a recent Environmental Committee meeting said "the actual crime statistics across all Royal Parks are remarkably low" 3.A lack of Community Engagement by the Royal Parks is shown by tge fact they have engaged only with Councillors from one ward .The park covers 2 and other councillors have been ignored.The Engagement survey had a low response 3.5 % The Royal Parks conceded it was not a demographically reprentative response. 4The impact of closure on other areas of Camden.Gating abd closure of Primrose Hill during the temporary circuit breakers has shown a significant impact on others areas of Camden as people are displaced from a large park into the side street and other areas. 5.Long term impact on Canden Policing and Safety in the Park.Park gating abd closure will require the consistent and wasteful use of police resources.
-------------	-------------	---------------------	--------	--

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Ayala Gill	23/11/2023 17:33:19	COMMNT	This is an unnecessary infringement of the free and positive use of public spaces. I do not support this misleading and worryingly restrictive application. Too many of our public outdoor spaces are already restricted and locked at night. They should be available for all to use at all times, and I have never had any issues at all with the way the park has been used after dark.
2023/3861/P	Matthew Skinner	25/11/2023 14:34:40	SUPPRT	I fully support this planning application. It is beneficial for the local area and for the welfare of the Park generally. It is also consistent with how nearby Regent's Park is treated. The gates looks except being in keeping with the railings and general atmosphere of the park and surrounding area. Great initiative.
2023/3861/P	Georgina	25/11/2023 11:16:29	APP	Please don't do this. Public opened spaces should be open. Not gated away like a private development. You are custodians of this space on behalf of the residents of Camden and the park should be open to all whenever they wish to use it. If this goes ahead What next. Charges to enter?
2023/3861/P	Rodney Carr	24/11/2023 18:30:41	COMMNT	We support the gates and approve the design We visit friends regularly and there is less trouble with antisocial behaviour when the gates are locked at the weekends.
2023/3861/P	Nicola Gamble	25/11/2023 14:15:35	PETITNOBJ E	I am a regular user of the park. I am also a practicing psychotherapist. I feel it is a vital resource for the mental and physically wellbeing of many people in the area. Many of whom have no access to outdoor space. I have never seen any antisocial behavior that justifies such draconian measures. I object strongly to the introduction of gates.
2023/3861/P	A M Fox	25/11/2023 14:06:10	OBJ	I object to this application. Emptying and closing the park 3 nights a week for 7 months of the year will reduce the public's use of a valuable open space. The "risk" of antisocial behaviour is greatly exaggerated and unsubstantiated (post covid). By their own admission, the Royal Parks have relied on a survey that does not represent the wider local community. The "engagement survey" was biased and selective. There will be an ongoing impact on local Camden policing resource closing and clearing the park and keeping people out of the open space. This is not addressed in the Planning Application and is bound to generate antagonism and conflict. As a comparison , Hampstead Heath is not gated , and suffers minimal disturbances. This gating is clearly to appease a few privileged residents only.