
From: Hannah Pearce [REDACTED]
Sent: 27 November 2023 19:45
To: Planning
Subject: Re: Comments on 2023/3861/P have been received by the council.

[REDACTED]

I live at [REDACTED]. I also spend a lot of time in Primrose Hill as I have several close friends who lives on King Henry's Rd, Oppidans Rd and Elworthy Rise.
Thanks
Hannah

[REDACTED]

>
[REDACTED]
>
[REDACTED]

> Kind Regards

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> [REDACTED]
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>

> [REDACTED]
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> Please consider the environment before printing this email.
> -----Original Message-----
> From: Hannah Pearce <zintl@gn.apc.org>
> Sent: 24 November 2023 08:38
> To: Planning <Planning@camden.gov.uk>
> Subject: Re: Comments on 2023/3861/P have been received by the council.

>
> [REDACTED]

>
> [REDACTED]

> Sent from my iPhone

>> On 24 Nov 2023, at 01:31, planning@camden.gov.uk wrote:

>>> 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:

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>> Bad faith:
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>> 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:
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>> 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.
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>> False premise:
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>> 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.
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>> Additional falsehoods:
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>> In this application the Royal Parks make two further claims that are untrue:
>> a) 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 be keeping the park a safe and high-quality space).
>> b) 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).
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>> Insufficient analysis and consultation:
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>> 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.

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

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>> 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.

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>> Money can be spent far better.

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>> 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.

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>> Damage to the Local Economy:

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>> 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.

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>> Discrimination and unfair access:

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>> 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).

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>> In summary:

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>> 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.

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>> Comments made by Hannah Tsecho of N19 3AE Phone [REDACTED] EMail

>> [REDACTED]

>>

>> Comment Type is Interested Party

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