

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Diana Fearnhead	27/11/2023 21:49:31	SUPPRT	The gates are necessary and I do support the application
2023/3861/P	Ruth Wilson	27/11/2023 21:48:05	SUPPRT	I support the application for gates
2023/3861/P	Jos Vernon	28/11/2023 08:50:01	SUPPRT	The design seems good and in keeping with the area. Indeed the current holes in the fence are the eyesore. The gates will improve matters. The times at which the gates are open or closed is not within the remit of the planning committee.
2023/3861/P	Karen Ciclitira	27/11/2023 19:45:03	SUPPRT	I fully support this planning application for the proposed new gates to be installed. The crime statistics for the Park show that there are risks late at night and ongoing fireworks and small fire issues.
2023/3861/P	Maureen Woodeson	27/11/2023 21:52:06	SUPPRT	I support the new gates

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2023/3861/P	Julie Chandler	27/11/2023 14:21:49	COMMNT	<p>Objection To Planning Permission Number - 2023/3861/P</p> <p>Royal Parks - Installation of gates to existing entrances to Primrose Hill open space at: Elsworthy Terrace, Primrose Hill and Oppidans Road, Primrose Hill Road and Ainger Road, Primrose Hill Road and Regent's Park Road, Regent's Park Road and Fitzroy Road, Regent's Park Road and Albert Terrace, Prince Albert Road and Albert Terrace, Prince Albert Road and Ormonde Terrace, Ormonde Terrace and St. Edmund's Terrace.</p> <p>I object to Planning Permission (2023/3861/P) for the installation of gates around Primrose Hill.</p> <p>1. The Planning Application is Misleading and Disingenuous</p> <p>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.</p> <p>Keeping this 'under review' - in their language - means mission creep: further and longer closure will be instigated 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 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. • While the Royal Parks acknowledge elsewhere in their 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: <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. A park that has been free of gates for over 50 years will regularly be closed for public use. <p>After lockdown, in the Royal Park's own Annual Report 2022 Primrose Hill Park Manager, Nick Biddle states that levels of usage and reports of anti-social behaviour 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>Despite this change, the gates have never been removed, and as the Planning Committee will understand that it has given rise to legitimate feelings among many local residents and park users of anger and betrayal.</p> <p>2. Crime Statistics and Anti-Social Behaviour</p> <p>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>The police officially and in person reported to a recent Camden Council Culture and Environment Scrutiny</p>

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

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.

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

It should be noted, the Royal Parks have chosen not to make that clear in their Planning Application: The crime statistics show that there is no ASB or crime problem.

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

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

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

The overly dominant influence of a few wealthy local homeowners

Local complainants, mostly home-owners on the perimeter of the park, have made numerous claims on social media, but have locked their Twitter [X] accounts against public replies so nobody can correct or challenge the claims made in these posts.

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.

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 all agree, does not significantly exist?

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

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open space.

To claim black is white more than stretches the truth.

4. The Application contradicts The London Plan Open Spaces Policy

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

This includes policies around the use of open space.

Paragraph 6.12 from the Planning Application states:

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

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

5. Lack of Community Engagement by The Royal Parks

The Planning Application states that there has been a ‘full and extensive process of public engagement in order to gather the views of local residents and park visitors.’ This is simply not true. The Royal Parks have not, as should be required for the change in use of a public resource of this magnitude, consulted with local stakeholders or the community adequately.

- The Royal Parks 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 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.”

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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.

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

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.

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.

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

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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.”

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. There is not addressed in the Planning Application.

The application also fails to provide a 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. These funds would be better used on 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 in gates.

One serious issue is that there is currently no 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 be allowed to alienate all other residents of Camden purely for their personal convenience and privilege.

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2023/3861/P	Simon Pearson	27/11/2023 22:32:58	OBJ	<p>I object to the application to install permanent gates and to use them every weekend in British summer time and throughout other key dates in the year. This is demonstrably not a temporary measure and is not in line with Royal Park's commitment to maintaining amenity spaces open to the public. The park has been fully open for more than 50 years and there is no good reason to gate it now.</p> <p>The Engagement Survey carried out was completed by fewer than 4% of people to whom it was sent, and the questions were loaded in favour of gating.</p> <p>The anti-social behaviour referred to was always minimal and only occurred during the summer months of 2020 when all other venues were closed due to the covid pandemic. At the time I was the local Councillor for Swiss Cottage ward which included the western half (or more) of the park and no residents contacted me with concerns about behaviour in the park. The behaviour referred to, such as amplified music, occurred if anything more during daytime and was always contrary to park by-laws, and could have been, and was, dealt with by proactive policing. I did have discussions with residents of the Kingsland Estate whose gate was never locked and some people used it at night when all other entrances were closed, causing security concerns because of the closures.</p> <p>There is no evidence that anti-social behaviour is continuing. In September 2020 I spoke with police officers charged with clearing the park at 10pm at weekends, by which time there were typically only about 50 people in the park, and the officers had little to do. Indeed any troublemakers tended to move to local streets such as Regent's Park Road which had not previously been a problem, causing annoyance to residents there rather than in the park.</p> <p>There is no report of any discussions with Parks Police or Met Police to co-ordinate proactive policing.</p> <p>I note that some respondents support the design of the gates because the current temporary barriers are so awful, not because of any perceived need for gates per se.</p> <p>So the gates are unnecessary, visually intrusive, and a restriction on people's access to green space for leisure, exercise and health.</p>

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2023/3861/P	Adam Simmonds	27/11/2023 20:57:04	SUPPRT	<p>I am very much in favour of the gates.</p> <p>Problems started in Primrose Hill during the various lockdowns as the park is not policed and has continued to be a favourite location for drug dealing and drug use. Whilst I have no objection to the use of drugs (that's a whole other subject) the soft (completely absent) approach of the police has attracted large numbers of dealers, who bring menace and antisocial behaviour to the park. Cars are lined up along the surrounding streets with brazen dealers plying their trade, advertising their presence with loud 'music' and poisoning the air. I get stoned walking past the wafts of smoke in Primrose Hill Road.</p> <p>I have heard of teenagers coming to Primrose Hill to 'score' and ended up being mugged. Even worse, there have been multiple cases of young people becoming stab victims.</p> <p>Clearly, the closure of the park after dark will dissuade the dealers and reduce such incidents and, hopefully, make the surrounding streets safer.</p> <p>I don't understand the mentality of those that object. If they're crying that their civil liberties are being affected, then we have to ask what they hold more dearly. These liberties or their safety.</p> <p>In the ideal world that we had prior to Primrose Hill being discovered, we didn't need the gates. I'd rather that we didn't need them, but sadly we do.</p>

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2023/3861/P	Phil Gee	27/11/2023 22:34:13	SUPPRT	<p>To those who know and care, Primrose Hill gates are essential.</p> <p>I cannot tell you how welcome these Gates will be after the past few years disturbances. They cannot come soon enough to those like me, close to the park. As a reminder, the recent taking down of temporary gates has seen a most unwelcome uptick in ASB.</p> <p>The drugs, the noise, massive extended firework displays, other ASB elements are encouraged by a lack of gates.</p> <p>I would kindly request that they are truly fit for purpose - sturdy and large enough to not just keep people out at night but give an unambiguous message that this is important to abide by.</p> <p>Temporary ones were inadequate and gave the impression of a lack of resolve that I believe actually encouraged ASB.</p> <p>Please ensure they are truly a deterrent at night so I would hope they are high enough, cannot be circumvented in any way and have spikes on top to deter drunken/hopeful climbers. This is also essential to make it harder to carry large sound boxes, boxes of NOX or fireworks into the park.</p> <p>The only issue I have with the gate application is that for some ludicrous reason it wasn't proposed to be employed for the whole year round. Obviously 90 days is better than none, but why compromise on ASB. In this sense the application feels it lacks some will or moral fibre. It certainly doesn't take the local's safety, security and quiet enjoyment concerns fully to heart.</p> <p>And to be clear the kind of noise disturbance in the small hours from the park can be significant. Imagine the equivalent of 500-gun salutes going off in your back garden at 01.30 in the morning, sometimes for days in a row. Imagine what this does for pets, young children and people needing to be on the ball in demanding jobs the next day.</p> <p>And then on top of that imagine some then saying it's their RIGHT to disturb and harass a minority for the sake of the majority's theoretical freedoms even though what it actually does is encourage criminality and ASB.</p> <p>I trust common sense prevails. The gates will bring much needed safety and security and mitigate ASB. So please make them fit for purpose and support their instigation with strong signage to remind people of the moral and legal obligations to others closeby and the criminal nature of NOX and public fireworks and effect of amplified music.</p> <p>Thank you for reading.</p>

2023/3861/P	Bernard Caplan	27/11/2023 18:52:09	SUPPRT	<p>I feel strongly that permanent gates must be installed. Primrose Hill park is not a safe space at night . The anti social behaviour in and around is totally unacceptable and is disrupting what has always been a very quiet safe area . I no longer feel I can walk alone at night . Most disruption coming from the park .</p>
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2023/3861/P	Melanie Richards	27/11/2023 20:29:28	SUPPRT	This is a very good proposal. I support the introduction of metal gates instead of the existing hideous temporary gates. They are necessary to close the park at night in summer to keep the neighbour safe.
2023/3861/P	RICHARD COTTON (CLLR)	27/11/2023 22:04:20	COMM	<p>I am a councillor for Camden Town ward and I write to strongly support Planning Application 2023/3861/P.</p> <p>I was one of the councillors for the former Camden Town with Primrose Hill ward from May 2014 until May 2022 when boundary changes separated Primrose Hill from Camden Town. For the last 3-4 years of my tenure as ward councillor in Primrose Hill, the hill had become focus for serious anti-social behaviour, which eventually resulted in this much loved and cherished open space effectively becoming an unlicensed open-air night club. Residents were kept awake all night by powerful sound systems, drug dealing was rife, residents were assaulted for daring to challenge the revellers and local businesses suffered criminal damage.</p> <p>For all those reasons, the ward councillors worked for years with residents, police, Primrose Hill Community Association, the Royal Parks Authority and other stakeholders to find a solution. Temporary gates were installed, and the park closed overnight at weekends, bringing it in line with every other Royal Park. However, those temporary gates are unsightly and were never intended to be permanent. I therefore welcome the proposal to install gates that will be robust and aesthetically pleasing as well as in keeping with the existing fencing and appropriate to the needs of the Primrose Hill Conservation Area.</p>
2023/3861/P	Ann Marie Starr	23/11/2023 19:56:33	SUPPRT	I strongly support this application.
2023/3861/P	Olivier Brahin	27/11/2023 18:47:52	COMMNT	As a Primrose Hill resident, I support the installation of the permanent gates. The gates proposed look aesthetically pleasing and will enhance the look and safety of the park for all. In the past the night time entrance to the park has caused many problems including noise and litter. I do trust this proposal will be approved.
2023/3861/P	Mark Sturdy	27/11/2023 19:18:55	SUPNOT	I write in support of The Royal Parks application to reinstate gates at the entrances to Primrose Hill Park. Suitable designs have been submitted which are needed for the safe management of the space.
2023/3861/P	Bernard Hunt	27/11/2023 21:57:28	OBJNOT	The sight of masses of people, particularly young people, enjoying Primrose Hill is heartwarming. The Hill has magnetic attraction drawing people from far and wide and inspiring social interaction more like a Mediterranean paseo than a London park. No money required. A truly civilized feature of London. It's not just a local park. It's one of the most valuable assets of London, and it's free. Close it and you close down social interaction. Close it and you say if you want to enjoy time together you must pay. I live a few hundred yards away, but I think it is mean minded to think of this as our park. And it's mean minded to lock it at night. I know there was once noise and broken windows on Regents Park Road. The Park Police are funded to counter anti-social behaviour. We don't lock the streets because crimes are committed on them. We police the streets. Don't let the bad behaviour of a tiny minority and the objections of a likewise tiny minority close one of the glories of London. Don't let the elderly and the affluent deprive the inpecunious poor of something extraordinarily valuable. That would be so mean minded.