

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Graham Shore	28/11/2023 15:09:36	SUPPRT	<p>The closure of Primrose Hill Park at night has unfortunately become essential to the peace of mind of residents living close to the Park. During the period from about 2019 (note pre the epidemic) and the date when closures were implemented, weekend nights and even some weekday nights became hellish for residents & this is no exaggeration. Drug dealers sitting in cars on Regent's Park Road having drugs ferried up the hill by ebikers; DJs with massive boom boxes probably paid by the dealers, crowds of ravers until the wee hours, litter (and worse), knife attacks, needles left on the ground. Residents became terrified to leave their homes. The lost sleep and fear were cumulative. All in breach of Park regulations not enforced by the ineffectual, buck-passing, Royal Parks.</p> <p>Closures and hence gates were the only solution. Please note that, prior to this, Primrose Hill was the only Royal Park in Central London not to have gates and night-time closures. And this was not because the Park was laid out without gates. The gates were removed by some & free spirits & in the late 1960s. Unfortunately the days of peace have been replaced by the boom box rave culture.</p> <p>If there have to be gates & and they are essential & then it must be better to have well designed attractive permanent gates than ugly aluminium & builders & barriers &.</p>
2023/3861/P	Kate Ashbrook	28/11/2023 15:18:57	OBJ	<p>The Open Spaces Society is Britain's oldest national conservation body, founded in 1865. Our early victories included the saving of many London commons and open spaces, such as Hampstead Heath, Wimbledon Common, and Epping Forest.</p> <p>Primrose Hill, in the heart of a residential area, is an important open space, much enjoyed by local people and visitors. People need to have access to open spaces at all times for their health and well-being and never more so than since the pandemic.</p> <p>The society therefore objects most strongly to the application for nine gates on the perimeter of the park. If there was a guarantee that these would be kept open at all times we would not be objecting, but we understand that it is the Royal Parks's intention that the gates should be locked on Friday, Saturday, and Sunday nights from March to October, ie during British summer time. We have seen no evidence of need for this, especially since before 2022 the park had remained open for 24 hours at all times.</p> <p>The park is a particularly pleasant spot to visit on summer evenings, with the extensive view over London. There is no justification for depriving people of this experience. Once gates are installed there will be no control over the locking of the gates, whether during summer nights or on more occasions, with the deplorable exclusion of the public. We do not believe that this risk should be taken and therefore we oppose the installation of gates.</p>
2023/3861/P	Mel Wray	29/11/2023 07:54:30	SUPPRT	<p>The proposed gates are more appropriate than the ugly, temporary ones, so I support this application</p>

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2023/3861/P	Victoria Bedwell	28/11/2023 12:19:16	OBJ	<p>I object very strongly to the gates being fitted on Primrose Hill.</p> <p>As a proud North London resident for 51 years, Primrose Hill had always been a very special place to me.</p> <p>I visit Primrose Hill as a place of contemplation, of solace, reflection and of mediation and being able to go there at any time of day and night is exceptionally important to my mental health.</p> <p>I am not fortunate enough to have a garden, as are many other people who visit the Hill and it is very entitled of people who, in most cases, have only just moved to the area and have large gardens to enjoy.</p> <p>To take this away from people who are living in small homes with no outside space is an exceptionally devise and elitist move which will have massive implications on so many.</p> <p>Primrose Hill is the last place that I spent with my 8 year old boy before he sadly passed 4 years ago so being able to sit and spend time in 'our spot' day or night is so important to me.</p> <p>I have NEVER felt, as a woman walking alone and sitting at the top of the Hill, intimated or fearful of the people that I have encountered regardless of what time I am there and I have actually had wonderful conversations with youngsters who have come from local estates and deprived situations and they have said that 'people like me' don't ever talk to them.</p> <p>Sitting at the top of the Hill we are all the same.....</p> <p>PLEASE DO NOT TAKE THIS AWAY FROM US.....</p>
2023/3861/P	Paul Johnson	28/11/2023 17:14:20	SUPPRT	<p>I live directly opposite Primrose Hill park and strongly support the introduction of gates to the existing entrances which will be closed at night. The level of anti-social and criminal behaviour which takes place at night, particularly at weekends, causes great distress to local people and the introduction of gates will reduce the crime levels and enable the Park authorities to manage the Park more effectively.</p>
2023/3861/P	Barry Moody	28/11/2023 16:05:17	SUPPRT	<p>This proposal is supported by me as a local resident and user of the park. The proposed gates are completely unobjectionable in design and scale, and would be a welcome replacement for the unattractive and ineffective temporary gates.</p> <p>I note that most of the objectors oppose the application not on the merits of the proposed development (the new gates), but on the principle of open access to a public open space. That decision (to close the park in line with other Royal Parks in London) is not the subject of this application, and cannot be reversed by refusal of the application. The objectors fail to realise that they have already lost that argument (for the time being, at least) and it is open to them to continue to argue their case with the Royal Parks. In my view, objections on such grounds should properly be dismissed by the Local Planning Authority, and the application should be approved.</p>

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2023/3861/P	Carol Allen-Storey	28/11/2023 16:16:19	AMEND	This proposal is riddled with a draconian response for a minority of residents who are unhappy for social gathering after dark on the most loved and revered park space in Primrose Hill ¿ a space for family gatherings, an elegant respite for walkers of all ages, a safe place to recharging energies 24 hours a day. Gates??? The hill is democratic and needs no shackles!
2023/3861/P	Paul Lawrence	28/11/2023 22:26:45	COMMNT	I am strongly in favour of the gates being installed to maintain the state of the park..to prevent it being taken over by anti social elements at night..and to give it the same protection as other Royal Parks.

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2023/3861/P	Patrick Geary	28/11/2023 13:42:53	OBJ	<p>I object to Planning Permission (2023/3861/P) for the installation of gates around Primrose Hill for all of the reasons listed below, and also as a parent with two small children who hopes to one day show them the beauty and wonder of the night sky over London from Primrose Hill.</p> <p>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. 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. 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 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." 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 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. 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</p>

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				<p>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.” This is a very low rate of crime to be clearing and closing a park. These statistics are very low and do not even indicate they happened at night:</p> <p>Even the CEO of the Royal Parks, Andrew Scattergood, stated at that meeting that this is a noise issue, not an ASB problem.</p> <p>“In the main, the issues that have faced us have primarily been noise.</p> <p>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.</p> <p>Nick McLaughlin - Inspector Royal Parks Operational Unit replied when asked specifically about whether he thought there was an issue with ASB on Primrose Hill:</p> <p>“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.”</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> <p>The overly dominant influence of a few wealthy local homeowners</p> <p>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.</p> <p>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.</p> <p>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?</p> <p>3. The Application Contradicts The Camden Plan Open Spaces Policy</p> <p>The Planning Application sits within Camden and is impacted by policies within the Camden Local Plan (July 2017). This includes policies around the use of open space.</p> <p>Paragraph 6.8 from the Royal Park's Planning Application suggests:</p> <p>“Rather than reducing the public's use of the open space, it is considered that the proposed gates will ensure that it remains a safe and high-quality space, in accordance with Camden Local Plan Policy, thereby improving it as an asset for the local community and for visitors from further afield, rather than compromising it as such.”</p> <p>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.</p> <p>To claim black is white more than stretches the truth.</p> <p>4. The Application contradicts The London Plan Open Spaces Policy</p>

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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.”

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

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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 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."

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 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

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2023/3861/P	Amanda Elliott	28/11/2023 22:38:09	OBJ	<p>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.</p>

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2023/3861/P	Simone Gozzetti	28/11/2023 13:27:01	OBJ	<p>Good morning, I do not wish to reiterate what Amy McKeown has already commented, as I fully support what she has written.</p> <p>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.</p> <p>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.</p>
2023/3861/P	Courtney Muoio	28/11/2023 12:21:12	OBJ	<p>I object to the Gating of Primrose Hill as my husband and I live in St John's Wood and often dine and shop in Primrose Hill and thoroughly enjoy the evening walk back home across Primrose Hill. Locking the gates at 10pm on Friday, Saturday and Sunday evenings during BST adds 30 minutes to our walk home. This changes an enjoyable walk with lovely views of the City and replaces it with a much longer walk along busy roadways. When the gates are locked we choose to go out in Hampstead Heath or Marylebone rather than add the additional time and distance to our walk home. I'm sure there are many of our SJW neighbours who make the same decision at the detriment of the Primrose Hill businesses.</p>
2023/3861/P	Geraldine Moloney	29/11/2023 09:08:05	SUPPRT	<p>The night-time closure of Primrose Hill Park over the weekends has made a huge difference to the quality of life in the area since it was implemented. Prior to this action there was a significant risk of anti-social and criminal behaviour because the area was largely unpoliced. This incentivised the activities of people intent on causing mischief and also people engaged in illegal activities. The simple and expedient action of preventing access to the park at night time over the weekends has been a practical and proportionate solution and the installation of gates (replacing the Harris fencing which is currently used) to the entrances is to be welcomed.</p>
2023/3861/P	Andrew Waidhofer	28/11/2023 22:54:50	SUPPRT	<p>Supportive of installation of gates, the amount of crime has increased as we have seen increased visitors to the park late at night during and post pandemic</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	catherine usiskin	28/11/2023 16:51:38	OBJ	<p>Objection To Planning Permission Number - 2023/3861/P</p> <p>Royal Parks - Installation of gates to existing entrances to Primrose Hill open space at: Elsworthy Terrace, Primrose Hill and Oppidans Road, Primrose Hill Road and Ainger Road, Primrose Hill Road and Regent's Park Road, Regent's Park Road and Fitzroy Road, Regent's Park Road and Albert Terrace, Prince Albert Road and Albert Terrace, Prince Albert Road and Ormonde Terrace, Ormonde Terrace and St. Edmund's Terrace.</p> <p>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 Committee meeting Primrose Hill on crime and anti-social behaviour. Their comments included:</p>

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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.”

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.

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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 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."

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 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."

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2023/3861/P	Caroline Strachan	29/11/2023 05:17:57	SUPPRT	<p>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.</p> <p>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.</p> <p>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.</p> <p>What is needed is increased, consistent and visible police patrols across Primrose Hill and in neighbouring areas. Closing the park would require more police resource than a regular patrol.</p> <p>9. Impact on Local Primrose Hill Business and the Local Economy Local hospitality businesses in Primrose Hill are already being affected by the temporary summer closure. Residents from St John's Wood and other areas across the park are choosing not to frequent Primrose Hill restaurants and pubs as they can't walk back across the park after 10pm. Closure is already impacting the local Primrose Hill economy.</p> <p>10. Discrimination and Privatisation Gating and closing the park will lead to unfair access for the residents of Elsworthy Road (and others) who have private gates in their back gardens that lead directly into the park. Gating the park has in effect privatised a public resource. Public access is restricted to some whilst these wealthy residents can access the park freely. The people living on the perimeter who are the persistent callers the police talk about, want to turn a public park into their private garden. They must be allowed to alienate all other residents of Camden purely for their personal convenience and priviledge.</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/3861/P	Thomas Roe	28/11/2023 16:12:05	SUPPRT	<p>From the perspective of Camden as planning authority, Primrose Hill Park is property that does not belong to the authority. It belongs to the Royal Parks (on behalf of the population generally). Camden as planning authority has no power under the planning legislation to insist that the Royal Parks keep the Park open for 24 hours a day, as some objectors would prefer.</p> <p>You can test this by imagining that people were asking the relevant planning authority to order the Royal Parks to take down the existing gates at the entrances to Regent's Park: they would be told to speak to the Royal Parks about this as it was not a planning matter. Similarly, if a shop or home owner were to propose to put up a replacement fence to fill in a gap in the fence around the property, the planning authority could refuse permission on grounds of appearance etc, but it could not object in principle to the property owner wishing to fill the gap.</p> <p>Camden's only concern, as the planning authority, is therefore with whether the proposed gates comply with their planning policies in terms of appearance, materials, etc. Since it appears that they do, the application should be granted. The objectors' arguments about the supposed benefits of keeping Primrose Hill open 24/7 should be redirected to the Royal Parks.</p> <p>If I am wrong in the above and it is up to Camden whether to have gates or not, I support the application, which strikes a fair balance between people who want to enjoy the Park as a recreational space and the legitimate interest of local residents in not having their lives blighted by crime and antisocial behaviour.</p>
