

PROTECT BROCKWELL PARK – OBJECTION TO 25/00693/RG3

PLEASE NOTE THAT THIS IS AN INITIAL SET OF OBJECTIONS WHICH WILL BE EXPANDED UPON

Appendices referred to in this initial letter of objection will follow

The Park as Open Space / Green Space / Accessible land – Loss of Amenity

1. Whilst this application only seeks permission for the Lambeth Country Show, it is one of a series of events proposed to take place in the Park this summer which will see extensive areas of the Park fenced off and unavailable for general recreational use and enjoyment by the public for more than a month. Events are planned to take place every weekend from 23 May 2025 (23-26 May, 30-31 May and 7-8 June), with substantial parts of the Park fenced off from 11 May 2024 until 18 June 2025. Given the history of ground damage in previous years, there is also a substantial risk of those areas being further fenced off after this period of events in order for the ground to recover and/or those areas not being in a fit condition for ordinary use and access by park users whether or not fencing is in place.
2. The scale and intensity of such events is, in our view, both contrary to the Council's own Events Strategy and considerably increases the risk of damage to the Park itself – as evidenced by the Agrostis Report (30 June 2024) into the damage caused by the events in the Park last summer.
3. Firstly, the Events Policy (2020-2025) specifies that Brockwell Park has an 'EVENT SPACE area' of '51,900 m²' of a total area of 519,900 m² that is 'suitable' for an event, which is 10% of the overall area of Brockwell Park. The proposed Event Space for the Lambeth Country Show is considerably greater than that. We would in any event challenge the statement at para 1.4 of the Planning Statement that the event will cover 32% of the Park. It does not appear to us that this includes the areas which are not, in practice, accessible to the public (even if not included in the 'Event Area' itself). The attached maps [Appendix 1 & 2] show the area covered by this application including the ancillary zones, the area of amenity grassland actually available in the Park, and the areas that include zones that are not amenity grassland such as car parks, ponds, buildings. As can be seen this application site therefore covers 52% of useable amenity grassland, and 36.6% of the Park if non-amenity grassland areas are included. This is egregiously outside the area stated in the Policy to be suitable for events in Brockwell Park, which

policy term is unsurprising given the nature and purpose of this parkland held in trust for the public in a landscape ‘*designed for quiet, pedestrian recreation*’ (cf. Heritage Impact Report updated 19.3.25 Dr Rutherford [Appendix 3]).

4. Secondly, the Events Policy identifies, as a key objective, the need to “*Minimise, mitigate and manage the negative impact on park and open spaces and surrounding areas with minimal disruption to the environment and wildlife*” (pg 4) and that ‘*Events which would automatically not be granted permission*’ include “*Any event which is likely to have an unacceptable impact on the site, its infrastructure, biodiversity or existing commercial activities*”. (underlining as emphasis)
5. Whilst we recognise that this policy term is directed at events permissions or licencing rather than applications for planning permission *per se*, these impacts on the park, open space, surrounding areas, environment, wildlife and biodiversity are matters that fall to be considered in determining the application for planning permission. We note, for example, that Policy EN1 of the Lambeth Local Plan provides (inter alia) that:

“The council will meet requirements for open space and green infrastructure by:

- A. *Protecting and maintaining open spaces, green infrastructure and their function...*
- B. *Preventing development which would result in loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space including any designated or proposed Local Nature Reserves (LNR) or Sites of Importance for Nature Conservation (SINC) unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included, appropriate to the nature conservation value of the assets involved. ...”*

6. It is difficult to see on what basis it could be said that a proposed use of the Park for a particular event or type of event would be acceptable in principle (and thus, planning permission should be granted) if it is one which would “*automatically not*” be granted an events permit by reason of those matters.
7. We therefore submit that the Events Policy is a material consideration to which the Council should have regard in determining this application, as it is material to

considering both the principle of the development and the acceptability (or otherwise) of its impacts and any controls which may be proposed to mitigate or manage those impacts.

8. Further, we object, in the strongest terms, to the Council having put itself in a position whereby it has to seek planning permission for the Lambeth Country Show because it has allowed the 28 day permitted development rights conferred by the Town and Country Planning (General Permitted Development) Order 2015 to be allegedly exhausted or near exhausted by a commercial operator. We also do not consider the fencing off of significant parts of the Park for a prolonged period primarily for commercial events to be consistent with the statutory trust under which the Park is held and the various statutory duties that imposes on the Council.
9. Overall, this represents a truly significant and unacceptable loss of amenity for park users. This is exacerbated by the immediate and ongoing negative impacts on the site that this change of use inflicts on the park. Namely, for all the reasons we set out further below, we also argue that the various serious harms and effects fundamentally affect the overall amenity loss in terms not simply of access but also of heritage value, nature experience and ecological amenity to park users and residents.

Ecology and Biodiversity

10. LLP Policy EN1 and LP Policy G6 apply, and in particular Part b) of EN1 in which developments are encouraged that make a positive contribution to biodiversity and seeks to prevent development that would result in loss or harm to nature conservation or biodiversity value of an open space including a SINC unless adequate mitigation is possible.
11. We are also very concerned about the impact of the development on ecology and biodiversity within the Park, in particular, by reason of its cumulative impacts with the other events intended to precede it this summer, and the cumulative impacts of these events this summer taken with a similar intensity of use and the damage that was caused to the Park last year and in earlier years.
12. In submitting the application, Event Lambeth appears to rely on out-of-date ecological impact reports (e.g. Salix 2020, and by Dr Iain Boulton undated but in existence prior to the 2023 planning decision). Indeed, all the documents uploaded to the online planning register in respect of this crucial factor in this

application are identical to those uploaded for the similar application made in 2023. Of note, there is no updated Ecological Mitigation and Management Plan (EMMP), Ecology Impact Assessment or Ecology Impact Management Plan (cf. LBL Event Policy, Event Strategy and Green Event Strategy) nor a current Lambeth Biodiversity Action Plan. We intend to provide further material relevant to this factor.

13. The ecology of the park is being damaged to a degree from which it cannot recover quickly or possibly at all, and this damage is cumulative. Large areas of the greensward were destroyed and are still failing to recover, grass areas are infiltrated by invasive weeds like plantains, trees have been damaged and cut back or cut down, and tree roots are being damaged by compression and compaction. Small items of litter have been compressed into the soil. The paths, which were restored to a high standard by Lottery funding as part of the landscape restoration (completed in 2011) are now badly damaged by movement of multiple HGVs with enormous axle weights. The Lottery funding was not intended for paths to be used like major roads when major events were being set up, and the set-up and de-rig vehicles have damaged them badly.
14. **Ground damage:** The Agrostis Report (30 June 2024) which was commissioned to assess the impacts on the Park following the events in the summer of 2024 highlights a wide range of major damages that were “*not prevented nor is preventable*” by trackways or surface measures and that reseedling could not take place until the end of August at the earliest and which in fact did not happen until November. Significant areas of parkland were therefore inaccessible, in a damaged and degraded state for many months after the events of 2024 and indeed continue to be visibly poor in vegetation cover, significantly boggy and more degraded compared to areas not used for the 2024 festival events.
15. At the 17 February 2025 community event the ground and grass reinstatement procedure for 2025 was described by Alistair Hayes of Origin Enterprises (the grounds management team being employed by Lambeth and/or the Brockwell Live applicants and promoters managing the Show). Mr Hayes said work could not begin on grass reinstatement until the autumn growing season. This means any damage will therefore remain unmitigated all summer. That procedure and timing appears to be the same as the remediation efforts recommended in the 2024 Agrostis report.
16. We therefore challenge the statement on the application form (in respect of the BNG condition – discussed further below) that “*impacts to biodiversity will be remediated within a reasonable one year period time frame*”. That has not been

the case with the 2024 events. Following the 2024 events fencing was extended to a total of 68 days, with ongoing greensward damage is still evident to date, with poor cover over obvious infrastructure areas, plantain weed proliferation, compacted areas, and bare and boggy ground still visible to date [Appendix 4 – Park photographs]. Further, we note that the Planning Statement states (at para 7.49) that “*A further assessment of the remedial works is due to be published shortly with recommendations.*” Has that assessment been published / provided to the Council? We have requested it by FOI/EIR but it has not yet been provided. Additionally, no Landscape Management Plan has been provided.

17. **Ground compaction / surface water:** We are also very concerned about the impacts on ground compaction in particular as a result of the cumulative impacts of the various events over this summer and as a result of events in previous years. We had already seen extremely compacted conditions in Brockwell Park over the festival period. We can still see ongoing compaction which is leading to flooding of the lower reaches of the area. For example, there was a considerable loss of amenity on the on the bottom path from the Herne Hill gate to the Lido due to flash floods experienced in October, November, December 2024, and January and February 2025 due to compaction, failure to adequately recover and regenerate the principally affected event site [Appendix 5 – flood photographs].
18. We are very concerned that ground compaction is reaching levels at which the future maintenance of a green space will become costly or impossible without major groundworks that would require enclosure of the space as, for example, happened on Clapham Common where part of the event site was lost for half the year over five years and required a costly reinstatement of £200k.
19. There are additional concerns about the repeated, cumulative and incremental ground compaction and whether the attempts at verti-draining and similar will ever be adequate to recover the parkland to its previous state within any reasonable period of time or at all, with consequent long-term negative tree, plant, wildlife and biodiversity impacts. Arguments are raised as to the use of trackway etc, but these methods are largely to enable events to proceed rather than actually provide adequate prevention or mitigation (cf Agrostis June 24 report). The problem is not simply wet weather and soft ground, but the significant effects of the weight of HGVs, infrastructure (including the significantly heavy trackway itself) and footfall in the hundreds of thousands over an intense period. The Applicant has not provided adequate evidence on this matter to be able to assert that this is not a fundamental and irremediable harm to a wide area.

20. This is not in accordance with the Lambeth Local Plan or London Plan policies (in particular, Lambeth Local Plan Policy EN1) as to the protection of open spaces/green spaces, or with policy Q10.

21. **Trees:** According to our group's tree specialist and numerous examples gathered, and in relation to which we plan to provide further information and evidence:

“Tree protection protocols have not been followed in recent years. Root protection zones of 15x the trunk diameter have not been created for trees onsite. ...Consequently, trees within the event site and at its perimeter have begun to fail. This is with a high degree of likelihood down to compaction of the ground. Compaction weakens trees by inhibiting root growth, reducing water and nutrient uptake, and limiting oxygen availability. This causes structural weaknesses that allow for fungi such as Kretzschmaria deusta (in limes and beeches e.g.) and Massaria (in Planes) to dominate. This in turn leads to tree weakness and death. As a result, multiple trees at the perimeter of the site have failed and been removed. We believe this failure to be well above average for the area. Furthermore, the extent of events over the area will prevent replacement of trees in this area.”

22. There are numerous examples of reckless and repeated infringement of root protection zones [Appendix 6 – RPZs] and cutting back and damaging of tree branches (cf. images in Appendix 3 Heritage Impact Report 19.3.25 Dr Rutherford) and further images [Appendix 7 – Tree damage photographs].

23. We are therefore very concerned that if permission were to be granted for this development, that while it might be argued that stringent conditions could be imposed, but that where conditions have been imposed previously, they have not only not been observed but systematically breached, and not enforced. There is clear evidence that steps said to have been in place to ensure the protection of the trees within and around the Event Area, including the moderate biodiversity zone covering the copse of mature trees situated at approximately the centre of the proposed site (cf. plan attached to Salix 2020 Ecological Assessment Report), these have not been effective and would be unlikely to be effective again this year. It is also clear from the Site Plan for Brockwell Live [Appendix 8 – Site Plan] that a wide range of fencing, infrastructure, high footfall areas such as bars and even a stage structure are infringing those trees RPZs and closely abutting or passing inside the edges of this copse. It is highly likely that there will be similar structures in use during Lambeth Country Show. Additionally, in 2024 the sensitive biodiverse copse area was not protected but subject to extensive footfall and heavy public use.

24. The 'Tree Survey' (so-called) submitted with the application, shows nothing more than a number of green dots on a park site outline and does not appear to match the number and siting of trees on the Site Plan for Brockwell Live. This is of particular concern due to the death of, damage to and removal of trees during last year's events. There is said to be an arboriculturalist report and Tree Management Plan but neither have been published in support of this application and although subject to FOI/EIR have not been provided. In all the circumstances, it is argued that there will not be proper compliance with LLP Policy Q10.
25. **Species:** The following protected bats and birds were recorded in Brockwell Park during the period 2020-2021 when events were paused and have not been recorded since events resumed in August 2021 according to GiGL (Greenspace Information for Greater London): Pipistrelle bat. Common scoter. Fieldfare. Brambling. Kingfisher. Lesser redpoll. Skylark. White-fronted Goose. Cuckoo. House Martin. Linnet. Spotted Flycatcher. Whinchat. Ring Ouzel. Short eared Owl. Common Tern. Gadwall. Sand Martin. Reed Bunting. Pied flycatcher. Lesser black backed Gull. Baltic Gull.
26. Much of Lambeth's evidence for their wildlife and biodiversity claims appears to be based on reports by Czech Conroy (RSPB), yet Mr Conroy has suggested that these have been selectively quoted or misinterpreted. In his attached response dated 22.3.25 [Appendix 9 – RSPB 22.3.25] he states the following:
'Regarding the disturbance caused by major events in the park, particularly loud noise, I think that May is the month when this could have the largest detrimental effect on birds, because May is the most important month for breeding. The disturbance could lead some birds to abandon their nests, and the presence of exceptionally large numbers of people could deter birds from accessing certain areas to collect food for their chicks.', and
'DISTURBANCE results in birds feeling threatened, and avoiding an area where they might otherwise feed or nest; and may also damage important habitats or plant species. It can be caused by:... (d) sustained abnormally loud noises (generated by e.g. traffic, machinery, or potentially major events) having negative impacts on birds and other animals (Note 5).
Higher levels of disturbance tend to lead to lower levels of biodiversity.
Note 5 A recent review of the literature concluded that "anthropogenic noise ... is potentially a threat to the persistence of many species". "Evidence of the impact of noise pollution on biodiversity: a systematic map", R. Sordello and others, *Environmental Evidence*, 2020. Regarding birds specifically, there is evidence of them avoiding areas with loud noises (e.g. from gas well

compressors), and of noise affecting reproductive success: “Effects of noise pollution on birds: A brief review of our knowledge”, Chapter 2 in Ornithological Monographs, by C. Ortega, Vol 74, July 2012’.

27. Mr Conroy also draws attention to Lambeth’s duties under its 2019-2024 Lambeth Biodiversity Action Plan, including ‘*minimising anything that is likely to have a negative effect on the park’s biodiversity.*’ We also argue that there is ample evidence that the proposed application represents a significant harm and detriment to biodiversity on several fronts and where mitigation is neither properly proposed, nor evidenced, nor in fact in many cases likely to be achievable. This must particularly be the case where it involves wide areas of ground compaction, mature tree damage and destruction, and consequent implications for multiple species supported by normal soil structure, appropriately rich and varied plant varieties in greensward areas, and by mature trees in the Park – contrary to Policy EN1 of the LLP.
28. There is no updated document evidencing compliance of the proposed temporary lighting with the ‘Bats and Lighting in the UK Guidance’ produced by the Bats Conservation Trust.
29. We consider these matters are of particular importance, not least, given the duty on the Council under s.40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021.
30. **BNG:** It is stated, on the application form, that the BNG condition in Schedule 7A to the Town and Country Planning Act 1990 would not apply to this development. It indicates on the application form that this is because the development is below the ‘*de minimis threshold*’. It identifies that the site is greater than 25m², however seems to suggest the de minimis exception applies because the application is for a “*temporary use of land where impacts to biodiversity will be remediated within a reasonable one year period time frame*”.
31. Firstly, Regulation 4 of the Biodiversity Net Gain Requirements (Exemptions) Regulations 2024 does not identify temporary use of land or development where impacts to biodiversity will be remediated within a reasonable time period as constituting or falling within the de minimis exemption. Regulation 4 provides that:

“4.—(1) *The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.*

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts—

(a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and

(b) less than 5 metres in length of onsite linear habitat.

(4) For the purposes of this regulation—

(a) “priority habitat” means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006(2);

(b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat.

(c) “linear habitat” means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric(3) (which are measured by length (expressed in kilometres) rather than area).”

32. Both condition 1 and condition 2 must be satisfied if the *de minimis* exemption is to apply.

33. The application form identifies that the development affects a site of more than 25m². It does not identify – let alone evidence – that any habitat affected does not have a biodiversity value of greater than 0.

34. The PPG on Biodiversity Net Gain states (Paragraph: 004 Reference ID: 74-004-20240214) that:

“When providing reasons for the de minimis exemption, an applicant should provide sufficient evidence to support their justification. In cases where the development would be smaller than 25 square metres, the description of development, existing and proposed site plans, and the development’s area size (in square metres) may be sufficient evidence.

In other cases where it cannot be clearly demonstrated through site plans and descriptions whether an onsite habitat would be lost or degraded by the development, applicants are strongly encouraged to provide a completed metric for the pre-development and post-development value for the onsite habitat and clear plans identifying the nature and size of this pre-development onsite habitat and how much of it will be impacted by the development. This will be particularly important where the development involves multiple small-scale impacts on

onsite habitat, especially if the onsite habitat covers a large area, to avoid the cumulative effect on onsite habitat being more than the de minimis threshold.”

35. No evidence at all has been provided as to the biodiversity value of the on-site habitat that would be/would not be affected by the development, let alone a completed metric as “*strongly encouraged*” in the guidance. In fact, the evidence which has been provided with the application would seem to support the Park supporting habitats of greater than 0 biodiversity value.
36. We do not see, in those circumstances, how the Council can properly proceed on the basis that the development is one to which the *de minimis* exemption applies, such that the BNG condition in Schedule 7A to the Town and Country Planning Act 1990 does not apply, with the corresponding requirements for the applicant to have submitted adequate and up-to-date information about how it intends to meet the BNG objective.
37. Secondly, it is impossible to assert (even if it were relevant) that impacts on diversity would be remediated within a one year period, for the reasons set out above.

Heritage

38. The Park – and proposed event site – are located in the Brockwell Park Conservation Area. Brockwell Hall is a Grade II* listed building and there are other listed buildings in and around the Park. Brockwell Park is also included on the Register of Historic Parks and Gardens held by Historic England. The statutory duties in s.66 and s.72 of the Planning (Listed Buildings and Conservation Areas) Act are therefore engaged, as well as Chapter 15 of the NPPF (2025) and policies Q20, Q21 and Q22 of the Lambeth Local Plan and Chapter 7 of the London Plan.
39. Further, the (draft) Brockwell Park Conservation Area Appraisal document highlights that:

“With the exceptionally important historic landscape and many fine buildings both within and around it, the Brockwell Park Conservation Area is deserving of its designation. It warrants every effort being made to preserve its character and appearance”. (Underlining as emphasis)
40. We have considered the Heritage Statement prepared by Turleys and note the assessment it has made of the impacts of the development on the setting of listed

buildings, on the character and appearance of the Conservation Area, and on the Park as a Registered Park and Garden as a result of the visual and experiential impacts of the development, and on the basis that (para 5.5) *“The proposed works are temporary and fully reversible. It will therefore have no material impact on existing buildings or landscape features of Brockwell Park.”*

41. What it does not, consider, however, is the impact on the RPG, the character and appearance of the Conservation Area or the setting of Brockwell Hall (or other listed building) as a result of the damage caused by the use of the Site for the event (including the impact of temporary works such as trackways, fencing and other temporary structures). It is clear from previous events (discussed above) that the impacts are not merely *“temporary”* let alone *“fully reversible”*. Yet there is no consideration of this whatsoever in assessing the impacts on heritage assets, despite the recognition of the parkland character and landscape to the significance of the RPG and of the Conservation Area and the importance of that parkland to the setting of Brockwell Hall in particular.

42. Those impacts are exacerbated by the fact that the event for which permission is sought in this application is not an isolated event. Rather, it is the 8th in a series of events in this year which mean that temporary structures will be in place and with significant footfall and other movements detrimentally affecting the Event Site over the course of a minimum of a 5 ½ week period from early May 2025. And with similar such impacts and events cumulatively over previous years since the use of high fencing in 2018 (save for during Covid restrictions).

43. We note, for example, in that regard that para 10.102 of the Explanatory Text to Policy Q20 in the Lambeth Local Plan highlights the need to consider the cumulative impact of development on the setting of a listed building:

“10.102 Consideration will be given to the cumulative impact of development when considering changes affecting the setting of statutory listed buildings. Listed buildings need to maintain the ability to adapt and evolve. In this respect it is important that they retain adequate space around them to provide an adequate setting and sustain future uses. Similarly, the development of curtilage land around a listed building will be resisted where it is considered that the listed building would not retain sufficient land to remain viable in the longer term.”
(underlining added).

44. See also, to similar effect, policy HC1 C of the London Plan.

45. We do not consider, therefore, that the position put forward in para 7.24 the Planning Statement (based on the Heritage Statement) that “*no harm would be caused to the identified designated heritage assets because of the proposed temporary nature of the development*” such that no assessment of harm versus benefits if required is either realistic or evidenced. It is, in our view, clearly not correct.
46. The Heritage Impact Report by Dr Rutherford dated 19.3.25 [Appendix 3] and the Review of Level of Harm to Historic Environment of Brockwell Park from Proposed Lambeth Country Show 2025 dated 23.3.25 [Appendix 10] both apply here. The former establishes numerous examples of significant and serious heritage impacts. The latter clearly illustrates that there is an evident level of heritage harm. The harms and impacts identified are not merely short term but have lasting longer term impacts.
47. These reports also demonstrate that the Turley heritage assessment and the planning assessment analyses are wholly inadequate and incorrect and should not be relied upon, and that no rigorous and necessary assessment of harm has been undertaken to inform the planning decision makers.

Sustainability/Environment

48. There is no adequate Sustainability or Environment Plan underpinning this application despite relevant policies and historic action plans.
49. Applicant evidence relating to compliance with sustainability and environmental policies is lacking and/or inadequate.

Impacts on amenity of neighbouring residents

Noise

50. Policy Q2 of the LLP applies and supports development that does not harm the amenity of neighbouring residents, which includes ensuring only an acceptable level of noise.
51. The current sound levels were devised as long ago as 2016, and in which there are only four points of inadequate noise testing. In Vanguardia’s 2023 post-event

report there are six sites, however some of those have been shown to be inadequately sited, for example behind sound reflective structures or at ground level rather than higher up a relevantly affected block of neighbouring flats. See Clarke Saunders Acoustics initial report dated 11.2.25 [Appendix 11 – Clarke Saunders Acoustics]. Significantly, the Sound Management Plan at paragraph 7.55 of the application statement has been treated as ‘confidential’ with no rationale given for it being withheld. There can be no good reason for this approach but it inevitably raises concerns as to what is not being openly shared with the local community who are seriously affected, and why.

52. The excessive noise levels generated by the event—including loudspeakers, live music, funfair rides, and generators—have consistently been a major issue for local residents. Sound tests begin early, and noise pollution continues late into the evening, disrupting the daily lives of those living near the park. Previous events have resulted in widespread complaints about sleep disturbances and mental health impacts due to the sustained noise levels. Those complaints have not been itemised properly in the 2024 post-event report nor by Vanguardia and are subject to FOI/EIR requests but should form part of any adequate assessment of impacts by the planning authority.

Flood Risk

53. The Flood Plan lodged with this application, contrary to the assertions in the planning application statement, clearly demonstrates high risk areas within the site and additional run-off risk areas in the immediate vicinity. This is increased by the cumulative compaction referred to above.

54. We have referred above to the loss of amenity on the bottom path from the Herne Hill gate to the lido due to flash floods experienced in October, November, December 2024, and January and February 2025 due to compaction, failure to adequately recover and regenerate principal affected event site. Flooding is extending into Dulwich Road and Croxted Road on occasion.

55. ‘Events’ are listed as a ‘*constraint*’ on plans produced by SUDS to relieve this problem by putting soft measures into Brockwell park. If events act as a constraint to SUDS in Brockwell Park, then they are impacting on Lambeth’s Climate Action Plan. As part of this plan Lambeth committed to “*implementing SUDS across Lambeth’s parks, streets, schools and estates*”. To quote from the SUDS Consultation in 2024: ‘*The parks are ideal for SUDS schemes.*’ ‘*The changing climate in Lambeth will result in more extreme weather conditions...this increases the borough’s risk of flooding and the urban heat island effect, which*

impacts our health and impacts infrastructure. This will impact those in the most vulnerable groups’.

56. On 31.1.25, the flash floods in Brockwell Park meant there was a complete loss of access between the Herne Hill gate and the lido car park. And again, in February. We understand that ‘*New grants will be made available after April 2025*’ for SUDS. However, the 2024 post-event report suggests the SUDS anti-flood plans are now being withdrawn from Brockwell Park, despite the evident acute need for them and the significant funds spent on drawing up these plans in accordance with Lambeth’s green policies. This leaves the local residents and businesses at ongoing risk of repeated and serious flooding in order to pursue damaging events in the Park, and is also a material failing in meeting the Council’s environmental, climate and green policies.

Generally

57. Additionally, the event has led to increased antisocial behaviour in the surrounding areas, including public urination, littering, and congestion caused by visitors arriving and leaving the venue. It is clear that the Licensing scheme has not been adequate to address these issues appropriately.

58. Local residents have not been properly consulted. There are telling examples of groups of residents in blocks and streets nearest to the Park in key affected areas not being consulted by the same method of consultation used for residents in streets that are further from the event area.

Conclusion

59. We therefore object to the application. The Appendices referred to in this initial letter of objection will follow.

4.4.25

For and on behalf of Protect Brockwell Park

PBP is a group of concerned local residents and park users. We have marshalled a Petition of 2800+ residents, a Response Letter to Lambeth opposing Brockwell Live events series signed by 860 residents, and a growing campaign group of many 100s of local park users.

(Names Redacted)