

Dear Ms Bebb

Brockwell Park, Dulwich Road, London SE24 0PA application ref 25/03733/RG4

Thank you for consulting the Friends of Brockwell Park on this application. We are the charity representing the users of the park. We have been working to care for the park for more than 40 years.

The question for us and for the planning authority is not whether festivals are fun – they certainly are – it is whether a historic urban park is the best place for some of the very largest events in the country to be staged every year in early summer.

The annual repetition and the timing of the commercial events go to the heart of a sound decision. It is plainly nonsense to describe the effects of the events as temporary – we don't consider the sunrise to be temporary just because it only happens in the morning.

introduction

Brockwell Park is an especially beautiful green space of immense value to the people of Lambeth. Its sloping topography and historic design as formal parkland to Grade II* listed Brockwell Hall give it a unique landscape and amenity quality. The variety of character areas - including sweeping parkland, the walled garden, wildflower meadows, ponds, Lido, and sports facilities - allow the park to be enjoyed in many ways. Its popularity, especially during spring and summer, shows how much it is cherished by local people as an irreplaceable source of wellbeing.

Fortunately, it is strongly protected by local and national policy intended to recognise the park's immense value and sensitivity through its landscape, heritage, nature and amenity.

We are pleased that a full planning application is being made so that, for the first time, the scale, duration and timing can be tested against these protections.

FoBP **object** to the proposal because the evidence of past events together with the documents supporting this application make it clear that there is significant harm to the park and loss to park users and local residents. The applicant characterises this harm as temporary, but the proposed events are part of an annual sequence making much of the damage and loss effectively permanent. And even where the harm is temporary it is still harm and needs assessing.

The technical reports describe harm to the trees, ecology, and ground, but delay conclusions until the production of future surveys and management plans. This is information which should already be known as these large events have been taking place for years. This lack of basic knowledge, together with the damning post-event reports, point to the need for extra caution by the planning authority in making a decision.

A vivid and shocking example of this is the root damage caused every year to the two spectacular Holm oaks - without either Council officers or the public knowing about it. These are the most important trees in the park for landscape value but have been needlessly put at risk.

The FoBP believe the specific harms can be summarised as follows

1. *Loss of openness and distinctive landscape character on Metropolitan Open Land*
2. *Loss of public access and harm to the enjoyment of the park as an essential public resource during the occupation by the applicant and during the subsequent period of repair – this is borne by people less likely to be able to afford a ticket*
3. *Harm to trees and grassland, especially through repeated compaction of roots and surface damage.*
4. *Harm to the significance of designated heritage assets and their settings*
5. *Risk of harm to biodiversity and sensitive ecology*

The FoBP believe the public benefits identified by the applicant are vague, unsubstantiated and far too insignificant to outweigh the evident harms.

The harm to the MOL, heritage assets, and trees; and the extended loss of access to a public amenity are each in themselves reasons to refuse the application. The absence of detail and surveys in the supporting documents mean that the Council plainly do not have sufficient information to weigh the balance of harm with any public benefit.

To consider approving an application like this, the Council would need to call a pause in the events this year to allow proper surveys of park usage, ecological baselines, tree root compaction, and soil condition. Without these, decision makers are required to guess. This will not meet the high standards required of the protective legislation and policy.

Landscape quality and Metropolitan Open Land

Brockwell Park is recognised by its designation as Metropolitan Open Land to have an important strategic role within London's green infrastructure, delivering (amongst other things) sporting/leisure use, heritage value, biodiversity, and health benefits. This gives it protection through the London Plan, the NPPF and the Lambeth Local Plan which require the openness of the park to be permanently preserved.

Openness refers to both the landscape quality and access. Plainly, if either of these are lost, even intermittently each year, then permanent openness is not achieved, and very special circumstances are required to justify the loss.

The event infrastructure of solid fences, stages, plant and towers either occupies or overbears the entirety of the historic landscape. A sense of openness is lost during the occupation and the landscape quality, which benefits from the extra protections of listing and Conservation Area status, is significantly affected both during occupation and for the months of recuperation afterwards. It is inarguable that a professional *Landscape Visual Impact Assessment* is required but one has not been provided.

The other protected quality of openness refers to the ability of the public to freely access and enjoy the benefits of open parkland. The 3.4m high fences – sometimes higher in previous years – prevents access to a large part of the park and a particularly high proportion of open grassland.

It is not possible to dismiss these losses as temporary. The truth is that the openness of the park is *not* maintained permanently as a result of both the scale proposed for 2026 and the annual repetition of the same commercial events. The necessary VSC are not provided by vague claims

of economic value and entertainment vibrancy as these could plainly be achieved in other less sensitive locations.

Loss of an Essential Amenity

It should not be necessary to make a case for the value of parks. The most distinctive townscape characteristic of south London is the number and quality of its green spaces. Lambeth's cultural identity is bound up with its excellent parks which are the only remaining freely accessible place where the entire community, in all its diversity, comes together. Surveys show that they are the single most popular thing Lambeth provides.

A loss of access to this amenity hits everyone, but the people most affected are those without gardens, many of whom cannot afford the high price of entry to the private festivals.

There is much academic study on the health and wellbeing value of a park visit, and a walk through Brockwell Park on any bright day will confirm it. This essential value does not come from how many square metres there are but from the park's landscape quality – how it looks and makes you feel, and how it can be used.

The occupation of the park by event infrastructure takes away the landscape quality from all parts of the park on which it overbears. The events site itself takes up most of the open grassland, so it is simply not true to say that enough space is left elsewhere. Sunbathers, families picnicking or playing informal games, and dog walkers throwing sticks are squashed together in too little space.

After the events and for the rest of the summer, families and groups will need to search for small patches of less damaged grass and sit in a landscape which feels more like an abandoned events site than a valued civic space.

Organised sports such as the park run and football club are displaced and experience a loss of participation. Even the applicant's informal and unverifiable research suggests a 40% reduction in use.

The outcome – obvious to anyone who knows the park well - is that far fewer people use the park in the summer than they would if the events were not at the scale, time and duration they are.

If the Council intends to consider the loss of access in a planning balance, they should have actual data to help them. A survey of a space with limited access points would be easy to do.

Damage

There is damage to the park which can be seen during and after the events, but also damage which is harder to see and needs professional measurement.

The obvious damage is to the grass over the entirety of the events site. This harm cannot be dismissed by claiming the grass grows back because even with remediation the sward doesn't begin to recover until the autumn and often has not fully recovered by the start of the following year's events. This is evidenced in the series of agronomy reports by Agrostis, by photographic records, and by simply visiting the park throughout the year.

The scarred grassland, much of it bare all summer, significantly reduces the amount of space available for the ordinary and proper park use such as sunbathing, picnicking and informal games during the most popular time of year.

The agronomy report identifies historic damage from soil compaction and predicts further compaction from vehicles, structures and footfall. The proposed trackway only reduces the compaction – it does not prevent it – and we know now that trackway does not protect tree roots. But as the report acknowledges, the trackway *does* kill the grass underneath it.

The Agrostis agronomy reports commissioned by both the applicant and the Council consistently identify the need for a standard for grass sward and have suggested one which is characterised as being suitable for sunbathing. Their November report makes it clear that the sward remediation should start at the end of the summer. Crucially, they conclude that the site can *only* accommodate events of the type proposed if

“The events are timed to allow renovation work to be conducted at the optimum time of year”

This expert conclusion must be made clear to decision-makers. It means that the events are proposed to take place at a time when the ground cannot accommodate them.

The hidden damage is no less alarming. Even a small amount of damage to urban trees is catastrophic and especially so to Brockwell Park whose tree canopy is well below average and whose distinctive landscape character depends on its mature trees. The proposal demonstrably will damage the root system of irreplaceable mature trees and indeed the infrastructure of past events has been doing so for years.

The submitted Ground Protection and Wet Weather plan shows the trackway in the same position as previous years. When this is overlaid with the tree constraints drawing (made available on the 5th January) it is clear that the trackway bears on many Root Protection Areas.

The Arboricultural Impact Assessment (AIA) identifies a risk to trees if vehicles, machinery or equipment enter their RPA and so forbids it. Trackway requires heavy plant to lay it, has heavy vehicles running over it for 32 days and will need tractors for verti-draining and reseeded.

The only plan showing the site layout – BL26 Simplified Overview - shows storage and other areas located inside the RPA despite the requirements of the AIA.

The application drawings show the steel fencing in broadly the same position as last year. It also crosses RPAs in many places. The AIS requires all work inside RPAs to be done by hand. This is plainly impossible to do with 3.4m by 2.4m steel panels and has not been done by hand in the past.

The fencing is proposed to be retained by steel pegs driven into the ground while avoiding roots of 25mm and greater. It is not credible that the applicant can be relied on to do this or that a monitoring system can prevent it.

We note the AIA’s acknowledgement that the Council has not been prepared to make a 2025 ‘non-compliance log’ available.

This history of damage by the applicant and inability of officers to manage the risk, together with the carelessness of the application documents makes it unreasonable to rely on further reports not yet produced. Without them, the application can only be refused.

Heritage

The heritage significance of the park derives from the survival of a coherent Regency villa landscape, forming the designated setting for the listed structures within the park, most notably Grade II* listed Brockwell Hall and its associated Grade II listed buildings and the designed relationships and views associated with them.

These are not dry academic qualities – they are enjoyed by anyone visiting the park and are intrinsic to its health and wellbeing amenity.

FoBP have commissioned a pre-eminent historic landscape specialist to advise us on the impacts of the annual events. Her Heritage Impact Assessment is attached here. It identifies the particular sensitivity of the main approach to the Hall which is entirely covered by the event infrastructure and is then left scarred for a large part of the year. This harm would only be temporary if a single year is considered in isolation, but in practice this is a permanent repeating harm.

There is also permanent harm to the protected landscape. Repeated compaction stress of RPAs of mature trees is evidenced in the technical reports. The Council has acknowledged the elevated presence in the park of disease associated with root compaction. The mature trees are an intrinsic component of the historic landscape.

The listed railings and gate at the Lido entrance were illegally demolished and rebuilt to a different design by the event organiser in 2025. The fact that this work was not enforced by the planning authority and still does not have permission speaks to the need for increased caution in decisions about heritage assets.

The history of harm to the trees together with the annual harm from the scale, timing and duration of the commercial events make it clear that the harm should be considered *substantial*.

Ecology and Biodiversity

The applicant asserts that the events are in an area of low ecological value. If that is true of the grassland areas, it is because damage to the grass of the events themselves prohibits a richer sward. The November 2025 agronomy report describes how good sward, appropriate for parkland, can have a huge variety of wildflowers and species other than grass, but the damage from footfall and the need to reseed with robust grass varieties make this impossible.

The Ecological Impact Assessment appears to have been produced to meet the applicant's commercial deadline and acknowledges that mitigation and enhancement recommendations 'may not have been fully integrated within proposals at this time' (p.2), and that 'an addendum will be provided prior to determination' (p.3).

The EcIA identifies risk from lighting, but the application documents do not provide any detail beyond light location and nothing to show how it will avoid ecological harm – especially to bats, birds and invertebrates. This is critical information in a SINC context.

We do know that birds and bats are frightened away by the events and that populations are decreasing. We know that areas of high ecological value within the events site, such as the copse, have not been protected in the past.

A biodiverse ecology has a value in itself but is also a significant component in the health and well-being amenity of the park. Any reduction in quality is a harm which must be considered in a planning balance. The missing surveys and reports, together with repeated assertions that protective measures will be defined later, do not give a full enough picture for a reasonable decision to be made.

Scale, Duration and Timing

The scale and duration of the occupation is an important consideration in assessing the harms. The applicant's use of percentage figures for size is intentionally misleading and should not be repeated by the Local Authority.

The applicant seeks permission to use the full area within a drawn red line for, amongst other things, fencing which might not be placed where the indicative drawing shows it. The red line area encloses 19.38 ha which is **38%** of the total area of the park.

However, within the perimeter fence of the park are buildings, storage areas, hardstanding ponds and other inaccessible areas. A more accurate assessment would consider the percentage of accessible parkland areas taken up by the events which is **45%**. (drawing 794 B-10 attached)

The most accurate assessment would compare the specific character type of the land enclosed by the events – open grassland suitable for sunbathing, picnicking and family games. In this case, the proposal occupies **60%**. (drawing 794 B-11 attached)

Any reporting of duration must take into account the time of year the park is enclosed because the park is used very intensively during May and June and days lost during these times are not comparable with days during the colder months.

Conclusion

The Friends of Brockwell Park can claim to understand the park better than anyone. Our members have worked to maintain the walled garden for more than 30 years; the biodiversity projects rely on our volunteers; and many of the trees in the park have been paid for by our donors.

We have an indisputable long-term interest in protecting the park for future generations. Our voice is an important one.

The Friends of Brockwell Park are not against events in the park, but we know from our experience of the last 8 years that the scale, duration and timing of the commercial festivals is an indefensible privatisation of an essential public space.

The loss and damage cannot be explained away by the temporary nature of the occupation of the park because this has been an annual event which creates continuous, compounding, permanent harm.

The applicant cannot point to the Lambeth Event Strategy for support as it is out of date, has not been consulted on, and does not address scale or timing. Nor is it relevant that the events have been held for a number of years; a full planning application for the commercial events has not



been made before, so the harms and losses have never been assessed by a planning authority. Event permit decisions have been made without the technical information required in a planning application.

There must be Very Special Circumstances and clear and convincing justification for harm to the park and loss of its amenity. The applicant relies on the popularity of events – which are irrelevant in the planning balance – but can only identify vague secondary public benefits.

Crucially, none of these benefits, if they exist at all, are dependent on Brockwell Park as a location. There are other highly accessible open spaces in the borough and elsewhere which are large enough to accommodate the commercial events, but which do not have a Grade II* listed building at their heart. Neither are the meagre benefits dependent on events at the proposed scale or time of year. Smaller, community focussed events would have a greater cultural value, while events held at the end of the summer would cause much less harm and loss of amenity.

The Friends of Brockwell Park believe the planning authority must refuse the application.

Yours sincerely

Michael Taylor

Chair, Friends of Brockwell Park

c/o FOBP Secretary

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Enc:

1 Heritage Impact Assessment (SR Historic Environment)

2 Accessible Areas Plan 794 B-10

3 Grassland Areas Plan 794 B-11