

Planning Objection - Brockwell Live 2026 - 25/03733/RG4

1. Introduction and scope of objection

I object to this application on the basis that it fails to provide an adequate and lawful assessment of the cumulative environmental and amenity impacts arising from the proposed events, and materially understates the scale, duration and repetition of harm to a designated public park.

Before setting out those concerns, I want to be clear about where this objection is coming from. It is often presented as a disagreement between people who dislike festivals and those who simply want to enjoy them. That is not the case here. I have used Brockwell Park on a near-daily basis for going on thirty years. I am also an avid music lover and have attended music festivals across the country for decades. I remember attending Field Day in Victoria Park around 2015, when flooding left large areas of the park badly churned and unusable, and remarking at the time that I was grateful Brockwell Park was not being treated in this way.

I suspect that sentiment would resonate with many people in relation to the parks they value across London, but Brockwell Park happens to be the one closest to my heart. My objection does not arise from hostility to festivals or live music, but from a considered view that this particular park cannot absorb the scale, duration and cumulative intensity of what is now proposed without unacceptable harm. In my view, greater understanding of the cumulative and long-term impacts would significantly change how comfortable people feel about allowing public parks to be hired out like commercial event venues.

My objection is not to events in principle. It is to the scale, duration, timing and annual repetition of what is proposed, and to the way those impacts have been assessed. The London Plan and the Lambeth Local Plan require that proposals affecting public open space and designated sites demonstrate that harm has been avoided or is clearly justified. In this case, the application relies on an already degraded baseline, treats repeated annual impacts as “temporary”, excludes cumulative assessment across key topics, and defers critical matters to future management rather than addressing them properly at application stage.

Much of the justification advanced in support of the proposed events relies on their popularity, cultural value and audience demand, rather than on a substantive engagement with the environmental, ecological and land-use impacts identified through the application and by objectors. There is limited evidence demonstrating that those impacts are negligible, adequately mitigated or unavoidable, and little meaningful assessment of whether alternative formats, timings or approaches could materially reduce harm to the park.

It is sometimes suggested that objectors should identify an alternative location where such events would be acceptable. I do not consider that to be necessary or appropriate in this context. The planning question is not where festivals might take place in the abstract, but whether Brockwell Park is capable of accommodating the scale, duration and cumulative intensity of what is proposed without unacceptable harm. Nor is it essential that Lambeth Council itself should deliver or host large commercial festivals. The issue is not the existence of festivals, but whether the impacts arising from their repeated delivery in this specific park have been properly assessed and justified in policy terms.

In effect, the application assumes that significant, prolonged and annually recurring harm to a designated public park is acceptable in light of perceived benefits. That trade-off is neither clearly articulated nor tested against the policy requirements that apply to public open space. Planning

policy requires harm to be avoided, or clearly and robustly justified where avoidance is not possible. That justification has not been provided.

2. Failure to assess cumulative impacts

A central flaw in the application is its failure to assess cumulative impacts. Impacts are fragmented into individual days, discrete activities or individual locations, despite the proposal operating in reality as a single, prolonged period of disturbance, repeated annually.

In planning terms, the proposal constitutes a material intensification of use of designated public open space during the events season. That intensification arises from the combined scale, duration, timing and annual repetition of the events, resulting in prolonged occupation, repeated high-impact activity and restricted public access. Assessing those effects by reference to individual days or discrete activities fails to capture the intensity of use that the proposal would introduce in practice.

This approach is explicit in the Acoustic Report, which assesses noise on a short-term, event-by-event basis and treats impacts as acceptable where daily limits are met, without considering cumulative exposure across consecutive days, repeated weekends or the combined build, event and breakdown phases. Planning policy requires consideration of duration, frequency and repetition, not simply whether short-term thresholds are met. A use that occupies the park for weeks at a time, year after year, cannot sensibly be assessed as a series of unrelated temporary activities.

This is not simply a matter of presentation, but of substance. By failing to assess the proposal as a single, prolonged seasonal use repeated annually, the application does not address the impacts that actually arise from what is proposed. As a result, the authority is not provided with a clear, policy-compliant basis on which to conclude that cumulative harm has been avoided or justified.

3. Ecological baseline is flawed and materially understates harm

The ecological assessment adopts a baseline that already reflects repeated historic event impacts. Grassland condition, soil compaction and habitat quality are assessed in a degraded state and treated as the normal starting point for further impact assessment.

This approach masks cumulative harm. By normalising prior damage, each new iteration of disturbance appears less significant than it would against a functioning baseline. This is not a neutral choice. It materially understates the true scale of impact, particularly on land designated as a Site of Importance for Nature Conservation, where policy expects harm to be avoided or minimised.

This concern is sharpened by the fact that the degraded condition of the park reflects, at least in part, large-scale events delivered under a planning approval that was subsequently quashed by the High Court as unlawful and irrational. Although a further approval was later granted for the same events, that decision has been subject to judicial review proceedings which have not been finally resolved. While this application must be determined on its own merits, it is not appropriate to treat degradation arising from activity found by the court to be unlawful, and from subsequent decisions whose legality has not been finally determined, as a neutral or acceptable baseline against which further harm is assessed. In these circumstances, a precautionary approach is required.

Treating this condition as a neutral baseline defeats the precautionary approach required for designated land. It embeds the consequences of past damage into future decision-making, making each successive approval appear acceptable precisely because prior harm has already occurred.

4. Mischaracterisation of annual impacts as “temporary”

The Ecological Impact Assessment repeatedly characterises impacts as temporary or restorable within a two-year period. That assumption does not withstand scrutiny where the same impacts recur annually.

Damage occurs at the beginning of summer, during sensitive growing and breeding periods. Recovery is assumed later in the year, yet before recovery is complete the same disturbance begins again the following season. An impact that recurs annually before recovery is achieved cannot properly be described as temporary.

The application does not explain how an impact that recurs year after year can meaningfully be treated as temporary in planning terms. That characterisation is critical to the assessment of significance and mitigation, yet it is asserted rather than demonstrated. This downplays harm and overstates the effectiveness of mitigation and reinstatement.

It is also relevant that the timing of these events is not driven by the ecological capacity of the park or by the needs of park users, but by the commercial programming of the event organiser. This has been acknowledged by Lambeth council in committee discussions. As a result, impacts consistently occur at the beginning of the summer season, during sensitive periods for grass growth and wildlife activity, with recovery assumed later in the year. Where timing is fixed in this way, harm cannot be described as unavoidable or treated as a neutral constraint. The choice to programme events during these periods materially contributes to the significance and recurrence of impact and should be weighed accordingly in the ecological assessment and planning balance.

It is also important to be clear that the commercial programming requirements of the event organiser are not material planning considerations. The fact that events are scheduled to align with an organiser’s commercial calendar does not justify environmental harm, nor does it render that harm unavoidable. Planning policy requires impacts on designated public open space to be assessed and justified by reference to land-use considerations, not by reference to the operational or commercial preferences of an applicant.

5. Biodiversity Net Gain relies on repeated repair, incomplete evidence and deferred assessment

The Biodiversity Net Gain assessments rely heavily on reinstatement and post-event management to demonstrate neutrality or gain. This approach conflates mitigation with avoidance. Measures to repair damage after it has occurred, or to manage impacts once they arise, are not the same as preventing harm in the first place. Planning policy requires that harm to designated sites and public open space be avoided wherever possible, with mitigation relied upon only where avoidance is not feasible and where there is clear justification.

That distinction is particularly important on land of this sensitivity. A Biodiversity Net Gain position that depends on repeatedly restoring the same damaged habitats does not provide confidence that biodiversity is being protected or enhanced in practice. Repeated cycles of damage and repair cannot sensibly be characterised as effective mitigation where the scale, timing and repetition of harm are inherent to the proposal rather than incidental.

A credible Biodiversity Net Gain assessment for a site of this scale and sensitivity would normally be informed by baseline bat activity surveys, breeding bird surveys and an assessment of how prolonged event occupation affects habitat condition. These elements materially influence risk, habitat condition and deliverability, yet they are either absent from the submitted material or deferred to future management.

There is insufficient opportunity for such surveys to be undertaken, scrutinised and meaningfully influence decision-making before impacts begin. Matters that go directly to baseline understanding, ecological impact and Biodiversity Net Gain are not matters of detail suitable for discharge by condition after permission has been granted.

Reliance on reinstatement and post-event management is particularly problematic where the timing and scale of impact are dictated by the applicant's commercial programme rather than by the ecological capacity of the site, as this limits meaningful opportunities to avoid harm in the first place.

6. Noise assessment excludes cumulative experience and lived impact

The noise assessment focuses on single-day compliance with noise limits and explicitly excludes cumulative impacts. The Acoustic Report proceeds on the basis that, because the events are defined as temporary and time-limited, cumulative or ongoing harm cannot arise. It is surprising that such an assumption is made in the context of a proposal involving multiple consecutive event days, repeated weekends and extended periods of site occupation.

The report states that, as a "time-limited event with finite operating hours, there is no mechanism for cumulative or ongoing harm" and that a full assessment of cumulative noise impacts is therefore "not proportionate for this type of short-duration temporary event". Cumulative effects are excluded by assumption rather than assessed and found acceptable. This approach treats the scale, frequency and repetition of the proposed activity as effectively irrelevant to the assessment of impact.

By defining the proposal as a series of discrete short-term events, the assessment does not engage with how the noise would actually be experienced over time. It does not consider the cumulative effect of repeated noise exposure across consecutive days, multiple weekends and successive years, nor the combined effects of build, event and breakdown activity.

Elsewhere, the report concludes that "adverse cumulative impact is unlikely due to the short tenancy and structured operational schedule". That conclusion does not appear to be based on any examination of how repeated disturbance would actually be experienced by residents and park users over hours, days, weeks and repeated year after year.

Concerns regarding the representativeness of noise monitoring locations have also been raised previously through established stakeholder forums. In particular, it has been noted that upper-floor dwellings in nearby residential towers directly overlook the main stage and are not screened in the

same way as ground-level façades, yet monitoring has historically been undertaken at ground level. In response, it has been suggested that practical or health and safety constraints prevent monitoring at upper levels. However, independent professional acoustic advice has been sought on this point, and it does not support the proposition that assessment of upper-floor or elevated exposure is inherently impractical or prohibited on health and safety grounds. A range of established methods are routinely used in practice to assess façade and elevated noise exposure. In the absence of any assessment addressing these receptors, it remains unclear whether monitoring locations reflect the experience of the most affected residents.

The assessment places determinative weight on technical compliance with daily noise limits and on complaint data as indicators of acceptability. Complaint-based evidence is a limited proxy for cumulative disturbance. Where monitoring shows technical compliance, ongoing disturbance is treated as acceptable regardless of frequency or duration, which risks complaint fatigue rather than demonstrating absence of harm.

The Acoustic Report also does not establish baseline noise conditions for Brockwell Park as a public open space. Baseline noise is assessed only at limited residential locations and for short-term compliance purposes, rather than characterising the park's normal acoustic environment or its role as a place of respite. Assessing acceptability by reference to surrounding roads or residential façades understates the impact on park users.

Taken together, the noise assessment does not address the impact of the proposal as it would actually be experienced over time. Compliance on individual days does not answer the planning question of whether repeated disturbance over weeks, year after year, resulting in loss of respite in a public park, is acceptable in principle.

7. Loss of public amenity and access is disproportionate and ongoing

The proposal results in prolonged loss of access, visual intrusion and disturbance during the most heavily used months of the year. The effective footprint extends beyond the main arena through ancillary infrastructure, fencing, trackways and operational areas, fragmenting the park and undermining its function as a freely accessible public space.

It is also relevant, when considering proportionality, to note the relationship between the duration of disruption and the activity that is said to justify it. Although the proposal occupies the park for a total period of approximately 32 days when build, event and breakdown phases are taken together, this extended occupation is in practice required to deliver only a small number of principal events, each of limited duration. The application therefore seeks to justify prolonged loss of access, environmental disturbance and amenity harm on the basis of a relatively small number of concentrated event hours. That disparity sharpens, rather than reduces, concerns about proportionality and the efficient use of designated public open space.

The loss of amenity does not end when events finish. Reinstatement and recovery take time, with any meaningful recovery typically not beginning until late summer or early autumn. In practice, large areas of the park remain in poor condition throughout much of the summer, precisely when demand for outdoor space is highest.

Community football pitches and informal sports areas are frequently unavailable or unusable, while other grassed areas may be either roped off, or technically open but of markedly reduced quality

due to compaction and wear. Although such areas may not always be formally closed, their condition significantly limits their use for recreation, play and informal sport.

In weighing this loss of amenity against claimed public benefits, it is also relevant to consider the nature of the events themselves. The application relies on claims of community benefit and continuation of inclusive park use. However, the principal events proposed are predominantly ticketed, commercial festivals with age restrictions. Several of the headline events are explicitly 18+ or operate in a way that significantly limits access for children and families. This marks a clear departure from the genuinely inclusive, free or family-oriented events historically associated with the park, such as the Lambeth Country Show and Brockwell Bounce. While limited child access may exist for certain events, this does not alter the overall character of the programme, which is primarily adult-focused and commercial. This distinction is relevant when weighing public benefit against the loss of access, disruption and environmental harm to a public park intended to serve the whole community.

Taken together, the proposal results in a materially longer period of reduced amenity than the application suggests, and that reduction occurs at a time of peak demand. This ongoing impact should be given substantial weight in the planning balance.

8. Over-reliance on future management, monitoring and enforcement

The application places significant reliance on future management, monitoring and enforcement to control impacts that are acknowledged to be substantial and prolonged. This includes reliance on management plans, operational controls, post-event reinstatement and complaint-based monitoring to address matters that go directly to the acceptability of the proposal.

This is not a theoretical concern. In the 2025 Lambeth Country Show application for Brockwell Park, conditions intended to operate as pre-event safeguards, including requirements relating to environmental assessment and biodiversity, were not discharged in advance, with submission deadlines extended to the commencement of the event and information approved retrospectively or not at all. This illustrates the risk of relying on future controls to address impacts that are inherent to the proposal, rather than ensuring that acceptability is demonstrated before permission is granted.

While the current application submits assessment material in advance, those documents explicitly rely on further surveys, future management and post-event assessment. The same structural risk therefore remains, namely that matters fundamental to acceptability are deferred until after permission is granted, when they can no longer influence whether the events proceed. This risk is heightened by the February 2025 update to the Council's Events Policy, which removed an explicit statement that failure to comply with event conditions would prejudice future applications. In that context, it is particularly important that the acceptability of the proposal is demonstrated clearly and robustly through the planning process itself.

9. Public park context and conclusion

Brockwell Park is held by the Council as a public park for the benefit of residents, visitors and future generations. Proposals that result in prolonged disruption, loss of access and environmental harm therefore require particularly careful scrutiny and a clear, policy-compliant justification.

Nothing in this objection is intended as a criticism of festivals as such. The concern is whether, in this location and at this scale, the planning balance has been properly struck and whether the cumulative impacts on Brockwell Park and its users have been lawfully and adequately assessed.

Taken together, the application fails to demonstrate that the cumulative impacts arising from the scale, duration and annual repetition of the proposed events have been adequately assessed or avoided. The ecological and amenity impacts identified are not shown to be unavoidable, but arise from choices about timing, scale and repetition that are driven by the applicant's commercial programme rather than by the capacity of the park or the requirements of planning policy.

The application relies on a degraded baseline, mischaracterises recurring harm as temporary, excludes cumulative assessment across key topics and places undue reliance on mitigation, reinstatement and future management to address impacts that are inherent to the proposal. Measures to reduce or repair harm after it has occurred are not a substitute for preventing harm in the first place, particularly on designated public open space where policy requires avoidance unless clear justification is demonstrated.

In these circumstances, the planning balance has not been properly struck. The application does not provide a clear, policy-compliant basis for concluding that the identified harm to Brockwell Park is justified, and it should therefore be refused.

End

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