Response to Lambeth Local Plan Scoping Consultation and Draft Borough Character Study: Brockwell Park

Submitted on behalf of Protect Brockwell Park

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Executive Summary

This response is submitted on behalf of Protect Brockwell Park in response to the London Borough of Lambeth's Local Plan Scoping Consultation and the associated Draft Lambeth Borough Character Study, published on 1 September 2026 for consultation closing on 13 October 2026. It is made pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Protect Brockwell Park is a local community group whose members live in proximity to Brockwell Park and are directly affected by the management and use of the park. The group has been closely engaged with the planning issues affecting the park, including through two sets of judicial review proceedings concerning the use of the park for large-scale commercial events.

This response asks the Council to address a significant gap in the emerging evidence base. Brockwell Park is designated as Metropolitan Open Land, a Grade II Registered Park and Garden, a Conservation Area, and a Borough Site of Importance for Nature Conservation. It is held on trust for public access and recreation. Despite these overlapping protections, neither the Scoping Document nor the Draft Borough Character Study addresses the cumulative pressure that repeated large-scale commercial events place on the park's ecology, heritage significance, public accessibility, and amenity.

We make detailed representations requesting amendments to: (a) the Draft Borough Character Study, to include evidence of event-related pressures on Brockwell Park; (b) the SEA/SA scoping baseline, to capture environmental, social and health impacts of intensive temporary commercial use; (c) the emerging Local Plan policy framework, to include criteria-based controls on the frequency, scale, duration, footprint, cumulative impacts and ecological recovery of large temporary commercial events on protected open spaces; and (d)

the evidence base generally, to ensure that the plan-making process is informed by transparent, proportionate and up-to-date data, as required by NPPF policy PM8.

We emphasise that this response is not opposed to cultural or community events in the borough. The Lambeth Country Show and other community-compatible activities can contribute positively to local life. Our concern is with the absence of evidence-based planning controls to distinguish occasional community-compatible activity from repeated commercial event occupation that materially changes this protected park's use and functions during spring/summer and undermines ordinary public access, ecological recovery and heritage conservation.

1. Context and Standing

Protect Brockwell Park is an unincorporated association of local residents who live in proximity to Brockwell Park. Its members are directly affected by the management, use and condition of the park. The group has standing to make these representations pursuant to Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and in its capacity as a body representing persons who live in the authority's area.

The group has been closely involved in planning matters affecting Brockwell Park, including through two judicial review proceedings:

- In R (Shaman) v London Borough of Lambeth [2025] EWHC 1372 (Admin), Mr Justice Mould quashed a Certificate of Lawfulness of Proposed Use or Development (CLOPUD) for Brockwell Live 2025, holding that the proposed use ran for 37 days from first enclosure to final de-rig and was incontrovertibly beyond the 28-day permitted development right under Schedule 2, Part 4, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015. That decision was appealed but then conceded by Lambeth at the eleventh hour. It has effectively, by implication, meant that such applications must be properly scrutinized via the planning process.
- In May 2026, Mr Justice Jay refused permission to apply for judicial review of the planning permission granted for Brockwell Live 2026, a temporary use of the park for up to 32 days. These processes, planning application and judicial review challenge, have nonetheless led to the creation of important documents, reports and statements that have provided some (but not all) necessary information to assist in understanding issues relating to Lambeth's management of Brockwell Park.

These proceedings inform the present representations. We do not ask the Local Plan to prohibit events. We ask the Council to use the plan-making process to assemble the evidence, establish the baseline and adopt policy criteria.

2. The Legal and Policy Framework

The following legal and policy provisions are material to the issues raised in this response. We set them out briefly for the avoidance of doubt.

National Planning Policy Framework (August 2026)

- The NPPF requires the planning system to be genuinely plan-led (paragraph 1). Sustainable development has economic, social and environmental objectives (paragraph 8). The social objective includes supporting accessible open spaces and community facilities that reflect current and future needs and support health, social and cultural wellbeing. The environmental objective includes protecting and enhancing the natural, built and historic environment, improving biodiversity and minimizing pollution.
- Policy PM2 requires local plans to set out a positive vision and spatial strategy, and specific proposals for conserving and improving the environment at local level.
- Policy PM8 requires all plans to be informed by a baseline understanding of needs, opportunities, constraints and wider context, based on relevant, proportionate, suitable, reliable and sufficiently up-to-date information.
- Policy PM13 provides that quantitative standards in development plan policies can be used where justified by evidence and proportionate.
- Paragraphs 153–154 apply Green Belt protections to Metropolitan Open Land. Paragraph 154(b) permits appropriate facilities for outdoor recreation as long as they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- Policies F1, F2 and F8 - **Policy F1** requires the Local Plan to be informed by an up-to-date Strategic Flood Risk Assessment addressing current and future flood risk from all sources, including cumulative impacts, and relevant advice from flood-risk authorities. **Policy F2** requires a risk-based approach to development, protection of land needed for flood management, and use of green infrastructure and natural flood-management measures to reduce flood risk, taking account of climate change. **Policy F8** requires development affecting drainage on or around a site to incorporate proportionate sustainable drainage systems that control runoff rates and volumes, provide wider environmental benefits where possible, and have effective long-term maintenance arrangements.

Planning and Compulsory Purchase Act 2004

- Section 19 requires development plan documents to include policies designed to secure that development and use of land contribute to climate mitigation and adaptation. Local planning authorities must have regard to national policies and advice, the spatial development strategy for Greater London, and prescribed matters.
- Section 19 also requires sustainability appraisal of proposals in the plan.

- The plan must be sound: positively prepared, justified, effective and consistent with national policy (section 20; NPPF policy PM14).

London Plan 2021 and Draft London Plan 2026

- Policy G1 requires green and open spaces to be protected, enhanced and planned in an integrated way for multiple benefits.
- Policy G3 provides that Metropolitan Open Land has the same status and level of protection as Green Belt and should be protected from inappropriate development. MOL can include open-air facilities for leisure, recreation, sport, the arts and cultural activities, but subject to the national Green Belt tests.
- Policy G4 requires open-space needs assessments covering quality, quantity and accessibility, and policies for the protection of open space.
- Policy G6 requires development proposals to manage biodiversity impacts and aim to secure net biodiversity gain.
- The Draft London Plan 2026, whilst not yet adopted, is relevant emerging strategic context. Its draft Policy PV6 provides that MOL justifies the highest levels of protection.

Biodiversity and Ecological Duties

- Section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021) requires public authorities to consider what action they can take to further the general biodiversity objective, and to have regard to relevant Local Nature Recovery Strategies.
- Biodiversity net gain under Schedule 7A to the Town and Country Planning Act 1990 generally requires at least a 10% increase in biodiversity value. However, from 6 August 2026, temporary development permitted for five years or less is exempt from mandatory BNG where the whole development is temporary and does not impact onsite priority habitat.
- This exemption makes it all the more important that the Local Plan includes specific policies for the protection of SINCs and ecologically sensitive open spaces from the cumulative effects of repeated temporary commercial events, rather than relying solely on the mandatory BNG regime.

Other Material Provisions

- The Environmental Assessment of Plans and Programmes Regulations 2004 require Strategic Environmental Assessment of plans likely to have significant environmental effects.

- Section 149 of the Equality Act 2010 (the Public Sector Equality Duty) requires due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations, including for those who rely on free local green space.

3. Representations on the Draft Borough Character Study

The Draft Lambeth Borough Character Study states that it will form part of the evidence base for the emerging Local Plan and will be the foundation for the borough Growth Strategy. It assesses Lambeth's social, physical and environmental qualities, including heritage assets, transport, public spaces, landscape, open spaces, air quality, noise, tree cover, green infrastructure, Metropolitan Open Land and Sites of Importance for Nature Conservation.

We welcome the preparation of a character study as part of the evidence base. However, the study's treatment of Brockwell Park is materially incomplete. It describes the park's landscape and ecological value in static terms without acknowledging the significant and recurring pressures that large-scale commercial events place on the very features the study identifies as defining local character. Indeed the photos accompanying the draft character study show photos which appear to not have been taken recently and show none of the damage to the ground which are currently very visible. Please add photos to reflect the Herne Hill side of the park use for events. See attachements for up to date images.

3.1 Brockwell Park's Designation and Status

The Character Study should record the full range of Brockwell Park's designations and protections, which together make it one of the most heavily designated open spaces in the borough:

- Metropolitan Open Land, with the same level of protection as Green Belt under NPPF paragraph 153 and London Plan Policy G3;
- Grade II Registered Park and Garden on the Historic England Register, recognising its special historic interest as an early 19th century landscaped parkland;
- Brockwell Park Conservation Area, encompassing the whole of the park and adjoining residential properties;
- Borough Site of Importance for Nature Conservation (SINC), recognising its importance for wildlife and access to nature;
- Green Flag and Green Heritage Flag park, reflecting high standards of management and historic significance;
- Public open space held by the Council on trust for public recreation;
- We invite the Council to confirm the current status of any Fields in Trust deed of dedication for the park, and to reflect this in the Character Study.

3.2 Event-Related Pressures: An Evidence Gap

The Character Study does not mention the annual programme of large-scale commercial events in Brockwell Park, despite their being a defining feature of how the park is experienced during the summer months. As the court proceedings summarised above demonstrate, the use of the park for commercial festivals has been the subject of sustained community concern, legal challenge and judicial scrutiny.

In order to fulfil its stated purpose of establishing a baseline understanding of the borough's existing environment, the Character Study should include a specific Brockwell Park subsection addressing:

1. the annual event calendar, including the number, type and scale of events in each of the last five years;
2. the total duration of ground enclosure each year, calculated holistically from first build/enclosure to final de-rig and reopening to the public, not merely 'event days' (the first judicial review established that the relevant period runs from first enclosure to reversion to normal park use);
3. the proportion of the park fenced off and inaccessible to the public during event and build/de-rig periods;
4. year-on-year data on ground condition, recovery time and any permanent or cumulative degradation;
5. tree-root protection measures and any recorded damage to mature trees;
6. impacts on meadow habitat, pond ecology and the SINC-designated features;
7. nesting bird and protected species constraints, and any recorded disturbance;
8. noise, air quality, waste, servicing and traffic data during event periods;
9. public safety and crime data, with a comparison between festival and non-festival periods (the current crime data in the study presents Herne Hill as having a high crime rating without distinguishing event-driven crime from the area's ordinary baseline);
10. the interaction between commercial event uses and ordinary daily public recreation, including impacts on children, older residents, disabled residents and others who rely on the park as their primary accessible green space.

3.3 Heritage Settings

The Character Study should address the impact of temporary event infrastructure on the settings of heritage assets within and adjacent to the park, including Brockwell Hall (Grade II*), the Tritton Clocktower, the Walled Garden, the Lido, historic paths and designed vistas. Historic England's consultation response to the 2026 planning application described Brockwell Park as a 'highly significant grade II historic landscape' and noted that event

development would bring 'localised but time-limited physical and visual harm'. This assessment should be reflected in the evidence base, as should evidence of cumulative physical and consequential visual harm to the heritage landscape.

3.4 MOL and Public Accessibility

The Character Study notes that common land and urban parks comprise about 20% of the borough by area. It should go further and assess the effective accessibility of protected open spaces, taking into account seasonal periods when parts of those spaces are fenced off for commercial events. Metropolitan Open Land protection under NPPF paragraph 153 and London Plan Policy G3 is directed at preserving openness; any evidence base that does not address known and recurring enclosures within MOL is incomplete.

4. Representations on SEA/SA Scoping

The Scoping Document confirms that the Council is undertaking a Strategic Environmental Assessment (SEA) as part of preparing the new Local Plan. The SEA Scoping Report is currently being prepared and will be consulted on with the statutory bodies. We make the following representations on the scope of the SEA/Sustainability Appraisal.

4.1 Baseline Information

Planning Practice Guidance on SEA and Sustainability Appraisal states that baseline information should include the existing environmental, economic and social characteristics of the area likely to be affected and the likely evolution without the plan, including trends where possible. The SA should be an iterative process that is integral to preparing the plan.

The SEA/SA baseline should include, for Brockwell Park and other protected open spaces subject to intensive temporary commercial use:

- ecological baseline data, including habitat condition surveys, species records (with particular reference to nesting birds, pollinators and aquatic ecology), and the SINC citation;
- ground condition and soil compaction data, before and after event seasons;
- air quality monitoring data during event and non-event periods;
- noise mapping data during event and non-event periods;
- public accessibility data, measuring the proportion of each park available for public use across the calendar year;
- heritage significance assessments for affected heritage assets;
- health and wellbeing indicators for communities whose access to green space is affected by seasonal event closures;

- crime and antisocial behaviour data, disaggregated by event and non-event periods.

Without this baseline, the SA cannot properly assess the likely significant effects of Local Plan policies that may permit or encourage continued intensive commercial event use of protected open spaces. This is a soundness issue: NPPF policy PM8 requires plans to be informed by relevant, proportionate, suitable, reliable and sufficiently up-to-date information.

This baseline information should also take into account the cumulative degradation of Brockwell Park over the past years' intensive commercial events programme as identified in the Greengage PEA undertaken in May 2025, which explains the importance of recognizing and remediating those past impacts.

4.2 Reasonable Alternatives

The SA process should test reasonable alternatives for the policy approach to temporary commercial events on protected open spaces, including alternatives that vary the maximum annual frequency, duration, attendance size and footprint of events, the required recovery periods, and the approach to biodiversity and heritage protection. Thise alternatives should include whether major commercial events are an unsustainable exercise in light of the cumulative impacts, applicable policies and the purpose of the park. A plan that proceeds without testing alternatives for event controls will be vulnerable to challenge at examination on grounds of inadequate sustainability appraisal.

4.3 Public Sector Equality Duty

Section 149 of the Equality Act 2010 requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations in the exercise of its functions, including plan-making. The SEA/SA should include assessment of the effects of event-related open-space closures on protected groups, particularly:

- children and young people, for whom the park is a primary outdoor play and recreation space;
- older residents, for whom the park provides essential daily exercise and social interaction;
- physically and mentally disabled residents, who may have fewer alternative accessible open spaces or for whom it provides an essential resource;
- Black, Asian and minority ethnic communities, who are disproportionately represented in Lambeth's population (24.0% of residents identify as Black or Black British) and who may be disproportionately reliant on free local green space.

This is not to overclaim without demographic evidence; it is to request that the Council gather and assess such evidence at this early stage, so that the plan is properly informed.

5. Representations on the Scoping Document and Emerging Policy Framework

The Scoping Document identifies a number of themes that the Local Plan should address, including 'Parks, Nature and Climate'; 'Local Services, Community Facilities and Inclusive Spaces'; and 'Design, Heritage and Local Character'. We welcome these themes and make the following representations on how they should be developed.

5.1 Parks, Nature and Climate

The Scoping Document says the Local Plan can 'protect and enhance parks, open spaces and heritage assets' and 'help address climate change and environmental challenges'. We agree. To give these commitments substance, the Local Plan should:

- include a specific policy or supporting text addressing the use of protected open spaces for large temporary commercial events, setting evidence-based criteria for frequency, scale, duration, footprint, seasonal timing, cumulative impacts, restoration and monitoring;
- require that the total period of ground enclosure for each event is assessed holistically, from first build or enclosure to final de-rig and reopening, not merely the days of public-facing activity;
- require pre- and post-event ecological and ground-condition surveys for any large temporary commercial event on a designated SINC, Registered Park and Garden or MOL;
- require that any biodiversity enhancement arising from event impacts is delivered preferably within the affected park itself, treating offsite delivery or statutory biodiversity credits as a last resort, consistent with the hierarchy in PPG on biodiversity net gain and the Council's duty under section 40 of the NERC Act 2006;
- align with the London Local Nature Recovery Strategy and the London Green Infrastructure Framework, as required by the Draft London Plan 2026;
- address the role of Lambeth's parks in urban cooling, air quality improvement and flood management, and assess whether intensive temporary commercial use is compatible with these functions. We note that SUDS plans drawn up by the council were dropped and that the constraint was that the site is 'used for events'

5.1A Surface-Water Flood Risk and Sustainable Drainage

Brockwell Park is elevated, sloping green infrastructure from which surface water may flow into surrounding streets and the Herne Hill road network. Its Flood Zone 1 classification relates principally to river and sea flooding and does not address surface-water runoff caused by intense rainfall, reduced soil infiltration, inadequate drainage or blocked gullies.

NPPF policies F1, F2 and F8 require assessment of current and future flood risk from all sources and cumulative impacts, use of green infrastructure and natural flood management, and proportionate sustainable drainage systems with effective maintenance arrangements.

The Local Plan evidence base and SEA/SA should therefore assess:

- overland flow routes from the park into Herne Hill;
- the condition, capacity and maintenance of drainage infrastructure;
- recorded flooding and effects on roads, key junctions, properties, public transport and emergency access;
- soil compaction and infiltration before and after event seasons;
- the effects of temporary structures, trackway and vehicle movements on drainage;
- cumulative impacts where the ground has not fully recovered;
- climate-change rainfall scenarios and opportunities for SuDS and natural flood management; and
- why previously proposed SuDS measures were not implemented, including that event use was treated as a constraint.

The Council should undertake a catchment-based surface-water assessment covering Brockwell Park and the downstream Herne Hill road network. Commercial event use should not prevent or constrain necessary SuDS or flood-management infrastructure. It should be noted that SUDS plans were drawn up by Lambeth council which were not implemented. The constraint was listed as “events’’

5.2 Local Services, Community Facilities and Inclusive Spaces

The Scoping Document’s theme of ensuring local spaces ‘feel safe, accessible, inclusive and welcoming to everyone’ is directly relevant. The Local Plan should recognise that the fencing off of large areas of a public park for weeks at a time during the summer months is fundamentally at odds with this objective, and should set out how the balance between commercial event use and ordinary public access will be managed.

5.3 Design, Heritage and Local Character

The Scoping Document identifies heritage and local character as a key theme. The Local Plan should ensure that the heritage significance of Brockwell Park — as a Registered Park and Garden, Conservation Area and setting for multiple listed buildings — is properly reflected in any policy that permits temporary commercial use, and that no such use causes harm to heritage significance that is not clearly and convincingly justified and outweighed by public benefits, in accordance with NPPF paragraphs 203–215.

5.4 Transparency and Evidence of Public Benefits

The 2026 judicial review proceedings raised issues about the transparency of evidence relied upon to support the grant of planning permission, including consultation responses and the allocation of event-related income.

We need total transparency on how all the income from events is being spent -it being an obligation under the statutory trust for all sums raised by Brockwell Park to be spent on Brockwell Park.

Whilst these issues arose in the context of a specific planning application, they highlight the importance of establishing at plan-making stage a transparent evidence base for the alleged benefits of commercial events, including:

- clear data on the economic, social and cultural benefits claimed for commercial events, supported by independent evidence rather than applicant assertions;
- transparent accounting for where all money raised by events in Brockwell Park (and indeed all parks) is spent. - not soley the Park Investement Levy and the Community Fund expenditure.
- evidence of how event income compares with the costs of ground restoration, ecological remediation and loss of public amenity.

We do not suggest that these governance points are soundness objections in themselves. We raise them because a plan that relies on event-related benefits to justify impacts on MOL, heritage assets and SINCs must be supported by transparent and verifiable evidence, as required by NPPF policy PM8.

6. Proposed Amendments and Indicative Policy Wording

In light of the representations set out above, we invite the Council to make the following amendments to its evidence base and to include specific policy provision in the emerging Local Plan.

6.1 Amendments to the Draft Borough Character Study

1. Include a specific subsection on Brockwell Park within the Herne Hill character area profile, addressing the park's full range of designations (MOL, Grade II Registered Park and Garden, Conservation Area, Borough SINC, Green Flag/Green Heritage, trust land, and any Fields in Trust deed).
2. Include within that subsection evidence of annual event calendars, build/de-rig durations, fenced footprints, ground condition, ecological impacts, heritage settings, noise, air quality, crime data (with festival/non-festival comparisons), and public accessibility.

3. Amend the crime data for the Herne Hill character area to disaggregate festival-period and non-festival-period data, so that the baseline reflects the area's true character rather than event-driven distortion.
4. Record the interaction between the park's cultural uses (including the Lambeth Country Show) and its function as everyday public open space.

6.2 Amendments to the SEA/SA Scoping

1. Include ecological, ground-condition, air quality, noise, accessibility, heritage and health/wellbeing baseline data for protected open spaces subject to intensive temporary commercial use.
2. Test reasonable alternatives for the policy approach to temporary commercial events on protected open spaces.
3. Assess the effects of event-related open-space closures on protected groups under the Public Sector Equality Duty.

6.3 Indicative Local Plan Policy: Large Temporary Commercial Events on Protected Open Spaces

We invite the Council to include a specific policy in the emerging Local Plan, either as a standalone policy or as criteria within a broader open-space or events policy. The following indicative wording is offered for the Council's consideration. It is intended to be precise but not absolute, and to be capable of being applied flexibly to individual applications while providing a clear framework for cumulative assessment.

Indicative Policy [XX]: Large Temporary Commercial Events on Protected Open Spaces

A. Planning applications for large temporary commercial events on Metropolitan Open Land, Registered Parks and Gardens, Conservation Areas, Sites of Importance for Nature Conservation and other protected open spaces will be assessed against the following criteria:

1. **Cumulative annual assessment:** the total number of days in any calendar year during which any part of the site is enclosed, built upon, in use for events, or subject to de-rig and restoration works, calculated holistically from first enclosure or build to final de-rig and reopening to unrestricted public access;
2. **Frequency and duration:** the number of separate event periods per calendar year and the duration of each, having regard to any maximum annual thresholds established by evidence;
3. **Footprint:** the proportion of the total site area to be enclosed or made inaccessible to the public, having regard to the need to maintain **meaningful** public access to the remainder of the site during event periods; (cross paths over the park were totally closed during Brockell Live 2026)

4. **Remediation and Recovery periods:** the adequacy of the period between the end of one event's de-rig/restoration and the commencement of any subsequent event's build, to allow for ground recovery, ecological recovery and uninterrupted public enjoyment; coupled with responsibility for all appropriate steps for full remediation;
5. **Ecological impact:** the likely effects on habitats, species and ecological connectivity, with particular reference to SINC-designated features, nesting birds, mature trees, meadow habitat and aquatic ecology, informed by pre-event and post-event ecological surveys;
6. **Flood risk and drainage:** event infrastructure, temporary surfaces and ground compaction must not increase runoff or flood risk, obstruct drainage or overland flow routes, affect key junctions or emergency access, or constrain future SuDS and flood-management measures (whether during or subsequent to events due to ongoing impacts), and appropriate monitoring, maintenance and ground restoration must be secured;
7. **Heritage impact:** the likely effects on the significance of designated and non-designated heritage assets, including their settings, assessed in accordance with NPPF paragraphs 203–215;
8. **Openness:** the effect on the openness of Metropolitan Open Land, assessed in the context of the cumulative annual impact of all events and associated works, not merely the individual application;
9. **Public accessibility:** the effect on public access to and enjoyment of the open space, including for children, older people, disabled people and others for whom the site is a primary accessible green space;
10. **Noise, air quality, waste and traffic:** the effects on the amenity of neighbouring residents and the wider area, including cumulative effects across the event season;
11. **Monitoring and reporting:** the adequacy of proposed pre-event and post-event monitoring, including ecological and ground-condition surveys, and public reporting of results.

B. Where any biodiversity enhancement is required to mitigate or compensate for event impacts on a Site of Importance for Nature Conservation, enhancement should be delivered within the affected site wherever practicable. Offsite delivery or the use of statutory biodiversity credits should be treated as a last resort.

C. Planning permission should be refused where the cumulative annual impacts of large temporary commercial events would undermine the openness of Metropolitan Open Land, materially harm the significance of heritage assets (including their settings), cause harm to ecological features or Sites of Importance for Nature Conservation, or result in unacceptable loss of public accessibility to protected open space.

D. Applicants for large temporary commercial events should be required to submit transparent specific evidence of claimed public benefits, including economic, social and

cultural benefits, and to demonstrate how event-related income will be applied to the maintenance, restoration and enhancement of the affected site.

We recognise that the precise wording of any policy will be a matter for the Council, informed by evidence. The indicative wording above is intended to illustrate the type of criteria-based approach that we consider necessary to ensure that the Local Plan provides an adequate framework for assessment, bearing in mind ongoing and cumulative impacts

7. Conclusion

This response asks the Council to seize the opportunity presented by the new Local Plan to address a significant gap in the current planning framework for Brockwell Park and other protected open spaces in the borough.

Brockwell Park is a strategic green infrastructure, heritage, biodiversity and public-health asset. Its character cannot be understood without evidence of the cumulative pressure that repeated large-scale commercial events place upon it. Neither the Scoping Document nor the Draft Borough Character Study currently provides that evidence.

We ask the Council to:

- amend the Draft Borough Character Study to include a specific subsection addressing event-related pressures on Brockwell Park, as set out in Section 3 above;
- ensure that the SEA/SA baseline captures the environmental, social and health impacts of intensive temporary commercial use of protected open spaces, as set out in Section 4 above;
- include in the emerging Local Plan a criteria-based policy for large temporary commercial events on protected open spaces, informed by evidence and capable of supporting cumulative annual assessment, as set out in Sections 5 and 6 above;
- publish transparent evidence of claimed event benefits and their distribution at plan-making stage, as set out in Section 5.4 above;
- start with what the park needs to flourish - not what event operators demand, nor what mitigations might be attempted – and only then is it correct to move on to consider what events it can properly sustain.

We emphasise that these representations are pro-park, pro-nature, pro-health and pro-community access. They are consistent with the Council's own stated objectives of protecting and enhancing parks, supporting healthier neighbourhoods and addressing climate and environmental challenges. Cultural and community events can contribute positively to London life; the question is whether the Local Plan provides an adequate evidence-based framework to ensure that such events do not cumulatively undermine the very assets that make Brockwell Park and similar spaces valuable.

We look forward to continued engagement as the Local Plan progresses and would welcome the opportunity to discuss these representations with officers.

Protect Brockwell Park

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[See photo appendix below. Photos taken September 2026. 3 months after events ended. Current photos should be part of the draft character study.]





