

**PROTECT BROCKWELL PARK**

**FURTHER UPDATED LETTER OBJECTING TO THE GRANT OF EVENT PERMITS  
FOR COMMERCIAL EVENTS AND LAMBETH COUNTRY SHOW**

TO:

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**LOCALS' ACCESS YES!**

**ECO-DAMAGE NO!**

**SAVE BROCKWELL FROM EXPLOITATION**

We are diverse local people who love our Park and cannot sit by and witness the Park's purpose and ecology being destroyed on your watch.

Our Open Letter (attached) was sent to Cllr Holland on 21.4.25 and signed by nine significant groups and stakeholders. Please also note our initial Response Letter dated 7.3.25 (attached), to which no reply has yet been received from any addressee. That letter has now been signed by c860 local residents.

The public response to our campaign has been overwhelming. Over 3,200 people have signed our petition. Over 700 people have contributed to our Crowd Justice fund, raising more than £34,000. The average donation is less than the cost of a single festival ticket with an average donation of £49. This is not a campaign

bankrolled by the elite – it's powered by local people who care deeply about their park.

We are local people who live and work in this borough. Brockwell Park helps our mental and physical health. It is essential for people living without outdoor space to access somewhere green and open. It is used for exercise, socialising, relaxation, mental relief, dog walking, and meeting up. It is a place for creativity, joy, tranquillity, diversity, health and community.

Our campaign is not about opposing celebration – it's about protecting a much-loved public space from irreversible harm and corporate exploitation. We are opposed to the privatisation of public space by a multinational investment firm (KKR) with offshore interests and ties to weapons manufacturing. We are raising serious questions about who is profiting from our public space, and at what cost. This is about commercialisation, not community. These event permits enable parksploration, and do not respect the Park and its biodiversity.

Brockwell Park is a designated Site of Importance for Nature Conservation. Its trees and wildlife are being placed under increasing pressure by the impact of 300,000 attendees, heavy infrastructure, HGVs, lighting, noise and polluting generators. These natural assets cannot be simply replaced – once they are lost, they are gone. This has 100,000 more attendees and over a far smaller area than Glastonbury, where they hold regular fallow years.

We therefore oppose the grant of event permits for either the commercial events or the Lambeth Country Show due to the following:

- Lambeth is in breach of its duties under the statutory trust and its Deed of Dedication of Brockwell Park;
- The reliance of the current model on very large scale commercial events creates a burden that is not suitable nor sustainable for this park;
- The scale and timing are destructive and environmentally unsustainable;
- The impacts on park users, nearby residents, biodiversity, heritage and landscape have not been properly surveyed nor assessed and so cannot be adequately mitigated nor taken into account;
- Fair procedures have not been followed.

Overall, Lambeth cannot lawfully grant any event permits due to the multiple breaches of statute and its own policies, and given its own expert's advice.

We respectfully request:

- Refusal of these event permits, and instead
- Review alternative models than this unsustainable scale and timing;
- Carry out genuine ecological and local impact assessments, with full consultation, transparency and accountability, working in partnership with nature and local people in every decision for the future of our Park;
- Restore genuine community-led events that respect the park's natural limits;
- Minimise damage and loss of access by returning the timing of events to late summer;
- Lambeth to respect its duties to defend public green spaces against private exploitation.

## **TRUST & DEED OF DEDICATION**

### **BROCKWELL PARK IS HELD IN TRUST FOR LOCAL PEOPLE**

It was bought by local people for local people over 130 years ago.

Lambeth Country Show used to be local, loved and run on a sustainable scale.

The whole event series is now huge, commercialised, shutting off the park and running off the back of damaging commercial festivals behind 4m high walls.

**OPEN SPACES ACT/statutory trust:** Lambeth must ***'administer...to allow...enjoyment...by the public as an open space...and for no other purpose...in a good and decent state'***.

**2020-2025 EVENTS POLICY:** at page 40 only **10%** of the Park is stated to be a **'suitable area'** for events - for good reason given the duty to allow it to be used as an open space. Breaching this Policy and the reasons for the policy have not been addressed anywhere.

Instead, we note that a laughably covert attempt to change this policy term mid-process has taken place, to now suggest that the suitable area is 25% at 134,561m<sup>2</sup>. No appropriate consultation or any due process has taken place to involve or even simply alert those who are clearly affected by such a change, and stand to lose the benefit of the pre-existing term, namely all park users, let alone even the appropriate park stakeholders named in the Policy. This is in clear breach of the Cabinet Office Principles, the Gunning Principles and relevant legal guidance. It is unreasonable and unlawful.

This behaviour also advertises the very significance of this Policy promise that events should only be held on up to 10% of the Park area in order not to prevent access to open space for residents and not to excessively damage the park. It is not an 'event venue', but a fragile heritage park bequeathed from the ordinary people of 130 years ago to the ordinary local people of today and of the future. In any case, Lambeth admits the events site covers 26-35% of total park area. Expert calculations estimate this actually means about 37-52% of the grassed amenity area over the commercial and Show events.

**DEED OF DEDICATION:** Lambeth's Cabinet approved a **Deed of Dedication** with **Fields In Trust** some years ago to ensure the protection of Brockwell Park in perpetuity as open green space for local people. This means the Deed is equivalent to Policy, but breaching it also isn't addressed anywhere.

Under the Deed, **consent is required for events that close off more than 25% of the green space for more than 21 days.** No such consent has been sought, and no explanation has been given.

The commercial events are followed on immediately by the Show and for all of the whole 39 consecutive days local users are shut out behind 3.4-4m high walls, from set-up to de-rig. Any purported separation of the commercial festivals from the Show, as has been attempted via the distorted application of planning decisions, is irrelevant to the Deed's terms and the point of the Declaration.

Additionally, the planning officer dealing with those festivals admitted that change of use from normal park access covered that whole period of enclosure 11<sup>th</sup> May to 18<sup>th</sup> June, covering first set-up to the end of de-rigging (J.Walsh - para 5.11 25/00003/LDCP).

**Granting event permits which have the effect of locking people out of so much of their Park is completely against the purpose of the Park's origins and the duties Lambeth owe under the Statutory Trust and its own Deed and Policies.**

### **FUNDAMENTAL BREACHES OF EVENTS POLICY**

Lambeth's 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)

## **UNSUITABLE SITE & UNSUSTAINABLE IMPACTS**

Lambeth's own reports obtained from **Agrostis** in June 2024 and most significantly March 2025 (attached highlighted) show that the ground itself tells the story:

- **the ground cover and soil conditions are still showing the legacy and disruption of events, clearly showing in the aerial photography;**
- **as parkland a 'dense, fairly vigorous sward of uniform height ... as would be sought by sunbathers' should be required (but has not been achieved);**
- **'substantial enhancements' would be required for the ground and sward to be able to withstand the impacts of major events;**
- **without these (sward quality and major works) there will be continual deterioration.**

P15: "*The condition of that ground cover, reflecting the health and density of the grass, continues to reflect the disruption that it has undergone. The pattern of the event structures and activities may still be discerned quite clearly in the aerial imagery. This implies that the soil conditions, as opposed to the grass cover on that soil, continue to carry the legacy of the events most probably in terms of its structure and hydraulic behaviour."*

- **This means that compaction from the events has affected the ground and hence the ability of the vegetation to regrow effectively.**

P15: "*probably quite satisfactory to serve the 'purpose' of the site as public open space and, essentially, an ornamental parkland. If and when the site is to be used for more intensive purposes, such as organised sport or the hosting of major events, then these areas will require appropriate enhancement in terms of both construction and maintenance in order to meet those challenges."*

- **This means that without the advised extensive drainage works and intensive extra maintenance over an extended period the Park will not be able to cope with major events and is not suitable for major events but is satisfactory for its current purpose as ornamental open space parkland.**

P19: "*Without this [restoration in good reasonable time to dense sward], the regular events will most likely lead to a continual deterioration."*

- **This means that without this effort to properly restore the ground and achieve a vigorous sward grass cover, and if events are permitted to proceed, the Park will get worse and worse.**

### **Agrostis' proposed ground remediation programme:**

- *significantly intensive;*
- *has to begin very late in the year with large machinery verti-draining etc from November through to April/May;*
- *autumn reseeded and at least 4 applications of fertiliser.*

This is only appropriate for non-parkland grounds such as sports fields or rural or unused spaces.

Here, it means that **the grasscover will remain unremediated for months**, and that means bare muddy areas, sparsely covered with poor vegetation, heavily worked or dressed with chemicals.

This is not just an operational issue but means a **year-round loss of public greenspace amenity for park users** - as we have seen over the last year.

**It is irrational and unreasonable to ignore this evidence and to ignore your own Policy and grant permits for events that pose such negative impacts to the Park and for which it is stated by your own expert to be unsuitable.**

### **ENVIRONMENTAL DESTRUCTION & UNSUSTAINABILITY**

What Lambeth has been saying about independent ecological reports and asserting that there is no damage is obviously nonsense and absolutely untrue.

It simply cannot be said that there is no ecological damage when your own ground expert says that the soil conditions and vegetation are still showing the previous years' legacy of disruption and damage, and that more major events will cause '**continual deterioration**'.

No up-to-date ecological surveys have been done and/or are just desk-based without any on site data or assessments, and any reports are at least several years old and so are completely out of date.

Lambeth has **spent no money on independent ecological assessments since 2020-2021** according to its response to a recent FOI request. So, it cannot assert, as it has done recently to the press and public, that there are independent ecological reports on which it can rely to say that the Park suffers no ecological damage.

There are important mature trees of amenity, historic or ecological value all over the site which must be retained and protected. Mature trees have already suffered damage last year: branches broken off, branches cut back, crown loss and root compaction. Repeated heavy footfall and infrastructure place long-term pressure on tree root health, with multiple examples of Root Protection Zones being ignored. Significant tree loss has already occurred, closely correlating with the event footprint and timing. The various new HGV access points are passing next to and beneath mature trees whose branches are clearly lower than the height of HGVs and so will inevitably be damaged or cut. **Mature trees are unique ecological resources and can't simply be replaced** just like that.

EventsLambeth/Brockwell Live have obtained from **arboricultural specialists Surrey Trees a range of significant assessments**, but none of their surveys, impact assessments or protection plans have been made public. That in itself speaks volumes: it is clear that **those assessments would reveal past, present and future threats to the Park's trees**.

And this is all taking place in **prime nesting season**: May/June, although March to September must be treated as the full nesting period. Birds, bats and other wildlife are scared away, leaving nestlings to die or just abandoning this crucial ecological island. The RSPB report prepared by Czech Conroy has been misquoted and misused. His further response by email to those distortions clearly emphasises the disastrous impacts of major events at this time of year and the careful stewardship of this precious ecological resource that is required of Lambeth (see the documentation uploaded to the relevant planning webpage).

A review of the existing ecological assessments has been provided by ecologist Tony Stones (uploaded to the planning application for the Country Show and attached). He points out the numerous ways in which the material is wholly inadequate to be able to claim any mitigation of ecological impacts. For example, there is no data relating to bat roosts, no examination of ALAN (Artificial Light At Night) splays, nor noise management in an ecological context etc etc etc

Without data you cannot assess the impacts of current proposals and so Lambeth cannot possibly know enough to meet its own Policy principle to **"Minimise, mitigate and manage the negative impact on park and open spaces and surrounding areas with minimal disruption to the environment and wildlife"**.

An ecology impact assessment report is now apparently now promised and a condition of the Show's planning permission. Astonishingly, unreasonably and irrationally however, it is suggested that this can be done between now and the start of the set-up works for the events on 11.5.25. This is evidently absurd and

certainly cannot be sufficient given the **complexity and scale of the Park's ecology** and the events. It is also backwards. Adequately **detailed on-the-ground data surveys, impact assessments of the current events, and adequate further review of any event mitigation proposals must come before** planning consent and before any event permits can be reasonable and rationally granted.

Equally, although planning permission has been granted for the Show and Lambeth has purported to grant Permitted Development for the commercial events, none of these events have complied with the recent statutory requirements arising under the **Environment Act 2021**. The Park is undoubtedly a habitat that will be and is impacted within the terms of the Act, but no statutorily required **Biodiversity Net Gain 'metric'** has been applied, nor any **BNG assessment nor implementation plan** supplied. Any grant of an event permit in those circumstances is therefore irrationally and unreasonably ignoring the legal requirements of all developments that impact on biodiversity habitats.

Given these clear ecological failings, it is evident that these events fall within the Policy category of ***"Events which would automatically not be granted permission"***, being ***"Any event which is likely to have an unacceptable impact on the site, its infrastructure, biodiversity ..."***.

## **FURTHER IMPACTS & ASSESSMENTS**

**EQUALITY ACT - Under Section 149 of the Equality Act 2010 Lambeth has a duty to satisfy its Public Sector Equality Duty (PSED), but in order to do so must first carry out Equality Impact Assessments (EQIA).**

**No EQIAs** have been provided at all or sufficiently covering any impacts of amenity loss, noise, traffic, pollution, crowds, waste, crime etc on local residents who may experience a greater and/or differential negative impact as a result of any protected characteristics.

Some unaddressed examples show why this is a critical failing:

- People with autism or other sensory disorders, particularly given the research around the impact of noise and crowds;
- Mental health disorders, particularly given the research around the importance of calm greenspace to addressing depression and anxiety;
- Physical disabilities, particularly relating to ease of access;
- Physical disorders, such as pollution impacts on respiratory disorders;
- Children taking GCSE/A-level exams;
- The very old/young;

- Carers of any of the above;
- People who are insecurely housed, or lack access to outdoor space.

Reliance on pre-2020 assessments is inappropriate and out of date given the hugely expanded scale proposed. **Without proper EQIAs**, including any consideration of **cumulative impacts**, any permits granted are in breach of Lambeth's Public Sector Equality Duty under the Equality Act.

**HERITAGE/GRADE II\* HALL/S.I.N.C.** - Brockwell Park is being treated as automatically suitable as a major event venue when in fact it is a heritage site with SINC and Grade II protected status.

Brockwell Park is a nationally significant historic park registered at Grade II by Historic England. It forms the essential and immediate setting for the Grade II\* listed Brockwell Hall. The Hall has recently undergone a significant renovation led by Brockwell Park Community Partners. It is a beautiful and significant centrepiece to the parkland and is due to be a wedding venue. Leader of the Council Clare Holland said this on opening the renovated Hall yesterday: the funding provided by Lambeth was on top of that used for 'protecting and enhancing Brockwell Park...one of our fantastic award-winning Green Flag Parks', and that this renovation had been 'a catalyst for improvements across Brockwell park - ensuring the entire area flourishes'.

But it is astonishing that she could say this only a few days before this important heritage amenity is about to be gravely devalued by being surrounded by 4metre high fences and destroyed parkland for many weeks through May and June and on through the summer again. And that she could say this when Lambeth is about to knowingly risk losing Brockwell Park its **Green Flag status** and causing long-term damage to its heritage, fabric and ecology.

A Heritage Impact Assessment has been prepared by Dr Sarah Rutherford (uploaded via planning webpage and attached). Dr Rutherford is a former head of the English Heritage Register of Parks and Gardens with an expertise in designed landscapes. She concludes that the **annual rota of events including Brockwell Live causes unacceptable long-term harm to both the historic fabric and character of the park.**

**DUE DILIGENCE/CONTRACTOR** - It also appears clear that Lambeth has failed in its due diligence to ensure under its Codes and Protocols that Policy requirements are met on assessing and rejecting private contractors whose associations may bring the Council into disrepute or fail to reflect its values and Policies, [ec-Part-IV-Codes-and-Protocol 0.pdf](#) particularly where that touches upon Rules relating to Procurements and Partnerships.

## **UNFAIR PROCESS**

We also reserve the right to refer to the numerous examples where Lambeth has breached or ignored its own Events Application and Permit process as set out in the Events Policy, or as required by its own Codes and Protocols, or has permitted breaches by the Applicants.

Many such procedural issues have been raised by local residents and none adequately addressed, in fact almost comprehensively ignored, and have had substantive effects:

- late applications, leaving insufficient time for scrutiny and responses;
- inadequate creation of and provision of documents, meaning that consultation and informative processes are fundamentally flawed;
- inadequate community communication and meetings, meaning that local residents were without proper methods of responding to proposals;
- attempts to change Lambeth policy documents covertly.

## **FINALLY**

It is worth noting the following:

BROCKWELL PARK - 300,000-315,000 attendees, 9 days of events, over only 33 acres, no fallow years, no proper eco-surveys or impact assessments.

GLASTONBURY - 210,000 attendees, on 5 days, over 1500 acres, fallow years, eco-surveyed and impact assessed.

That is 140 people per acre at Glastonbury, but it is 910 people per acre in Brockwell Park for commercial events and 1820 people per acre for the Show (using 30k people/day and 60k people/day respectively as per the Licensed and ticketed numbers).

What's more, this is all on sensitive heritage parkland that is a rare and precious green lung needed for an urban populace, not privately owned rural land.

**In all the above circumstances, PROTECT BROCKWELL PARK re-emphasises that the grant of any event permits cannot be a reasonable, rational, lawful or appropriate decision under the Events Policy and none can properly be granted.**

PROTECT BROCKWELL PARK invites Lambeth to reconsider the current model, scale and timing, and to sit down with the community and with appropriate experts to genuinely review the way forward in order to steward and respect Brockwell Park and its ecology under its statutory duties holding the Park in trust for local residents.

**Thank You**

**Protect Brockwell Park**

8.5.25

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