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Review of Lambeth Country Show Reports 2025

OVERALL OBSERVATIONS

- **A principal and obvious observation is the fundamental inability to assert mitigation of any ecological impacts due to the lack of up-to-date data, lack of relevant surveys, lack of assessments, the consequent ignorance of impacts and therefore inability to mitigate such impacts.**
 - **The fact that it is now suggested that an Ecological Impact Assessment should be completed AFTER the events are approved or undertaken is a nonsense, as it is supposed to be available beforehand to know whether the mitigations are adequate to the impacts based on current relevant data, and how the Biodiversity Net Gain requirements under the Environment Act 2021 apply and are going to be met so that conditions can be applied.**
 - **I note that there is no cumulative impact assessment looking at the range of impacts due to the preceding intensive commercial events programme then being followed by the development proposed under this application. Any such assessment would need to take into account the ecological impacts of those events: the later night lighting, 7 previous days of sound stages with later finish times, and 180,000 visitors etc. Any observations isolated solely to this planning application will therefore be inaccurate/invalid in that respect.**
 - **Baseline survey data typically has a 'shelf life' of 12-18 months, depending upon the nature and size of the development scheme, and the ecological**

receptors potentially affected. The baseline data collected to derive assessment of potential effects appears to be 'patchy' at best, with all of it now out of date. The reports uploaded date from 2020 (Salix) and 2023 or earlier (Iain Boulton).

- Reference to 'current data' is not set out in detail, nor is it clear that it can be related back to previous baseline data that precedes the expansion of events in recent years (since 2018).
- Many of the assertions in section 7 of the Planning Statement are based either on those out-of-date reports and outdated data, or lack properly conducted updated ecological surveys to substantiate any claims that there are no adverse ecological impacts from events of this type and scale.
- I note and endorse the observations within the RSPB report obtained by the Friends of Brockwell Park, and the subsequent observations by email from its author Czech Conroy. It is concerning that the Applicant and the Council appear to be distorting the content of his report.

Review of Salix Ecology (July 2020 Update) Ecological Impact Assessment for Brockwell Park – numbered references are to the paragraph numbers in the Salix document:

2.0 Method

In respect of areas of '*moderate ecological sensitivity*', it is noted that '*large crowds should be discouraged from the area (particularly during the bird breeding season - March to April inclusive)*'. **What constitutes a 'large crowd' and how are these being discouraged from accessing areas of 'moderate ecological sensitivity' (e.g. the copse)? The breeding bird season is typically taken as March – September inclusive within the construction industry, and may in fact extend outwith this time period for certain bird species.**

Para 2.3. The author acknowledges that '*although increased disturbance in woodland areas may have had an impact on associated species, any impacts would not be measurable in the absence of detailed faunal surveys*'. **If it is accepted that impacts are not measurable due to a lack of detailed survey effort, then how is it possible to mitigate such impacts?**

Para 3.1.6 The author acknowledges that '*several bird species are likely breeding within scrub, woodland and mature trees at the site.*' **Presumably this might include such species nesting within the copse? How has this been determined or surveyed, and the impacts on these species assessed? Table 1 is incorrectly labelled as Table 2. This table describes these as 'relevant' bird records but relevant to what? The table in fact is a list of those species with a higher conservation value, and / or with a higher degree of legal protection (Schedule 1 species), but in fact all nesting birds are legally protected, as the author himself / herself notes in Para 3.1.6.**

Para 3.17 acknowledges that '*all species of bat have a high level of protection under the Habitat regulations (2010) as well as the Wildlife and Countryside Act 1981 (as amended)*' and that '*there are some bat roosting opportunities, particularly within mature trees at the site.*' **There are mature / semi-mature trees within 'the copse' which appear to have bat roost potential, and which presumably will be affected by light, noise and potentially vibration, but Potential Bat Roost Assessments (PBRAs) of such trees do not appear to have been undertaken.**

3.1.8 As a species of Principal (not 'Principle' sic) Importance (Section 41 of the Natural Environment and Rural Communities (NERC) Act), the West European hedgehog is a material consideration under planning law. The author acknowledges that '*there is potential for hedgehogs to use the less intensively managed areas of the site, especially within woodland and woodland edge areas. They may also forage within the amenity grassland areas.*' **What survey has been undertaken to assess this in the areas earmarked for festival usage ? And the consequent impacts? As stated above, if it is accepted that impacts are not measurable due to a lack of detailed survey effort, then how is it possible to mitigate such impacts or argue that they have been mitigated?**

3.1.9 *Stag Beetle Lucanus cervus is a Nationally Notable B and Species of Principal Importance, with stag beetle habitat includes logs and dead wood within, and at the edge, of woodland habitat.* **What are the impacts of the lighting, noise and visitor numbers on stag beetle populations? Have these been assessed in terms of impacts upon beetles which may be present within dead wood in the copse for example?**

Moderate ecological sensitivity:

W1: Mixed deciduous woodland with a well-developed shrub layer and ground flora - this area is impacted by additional noise and lighting due to the festivals.

3.2.2. *It is noted from the 2018 survey that three species of birds (wren, blackbird and blue tit) were noted in the wood and are possibly nesting. This is a snapshot from a single day's survey, and thus the numbers of species nesting may in fact be under-recorded.*

W2: A copse of mature trees including several large pedunculate oaks

3.2.4 *It is noted that a 'mix of tree species is present, including notably four large pedunculate oak trees some of which may have some invertebrate, bird and bat interest'. It is our understanding that this area is subject to some of the highest levels of impacts as a result of festival activities. How have the impacts been assessed on invertebrates, birds and bats without some detailed baseline data?*

4.0 Discussion

Areas of medium ecological sensitivity

4.2.1 *'Areas W1, W2, W3, W4, V1, G2 and L1b first identified in 2018, remain moderately sensitive ecological areas which should be avoided in planning large scale public events unless appropriate ecological management measures are in place and present before, during and after the event, so as to avoid and/or mitigate for any potential ecological impacts'.*
How can you be certain that the management measures in place do avoid and/or mitigate potential impacts without appropriate surveys and detailed impact assessments?

5.0. Conclusions and recommendations

5.1 The acknowledgement that *'no surveys were carried out to detect impacts of the events on fauna using the habitats present on site'*, and that *'such impacts cannot, therefore, be ruled out'* is suggestive that such surveys should have been undertaken before any potential impacts could be identified and adequately mitigated for. **If it is accepted that impacts**

are not measurable or cannot be ruled out due to a lack of detailed survey effort, then how is it possible to mitigate such impacts, or argue that they have been or can be mitigated?

5.7 All of the measures identified seek to minimise the risk of impacts to species protected under the Wildlife and Countryside Act 1981 (as amended) as well as the Conservation of Habitats and Species Regulations (2010). Natural England protected species licences will therefore not be required subject to the implementation of this precautionary approach.

How is it possible to determine if Natural England Protected Species Licences will not be required, if say, an individual bat roost is impacted, but this can't be known as insufficient study / survey has been undertaken to determine this?

Review of Events in Brockwell Park: Management and Mitigation of Ecological Impacts - Dr Iain Boulton

1. This is undated, but I am aware that it is the same document provided for the 2023 application for planning permission and is therefore out of date.

2. Dr Boulton references '*wildlife habitats or species that are extremely sensitive to disturbance, disruption inappropriate uses, e.g., woodlands, hedges and trees used by nesting wild birds and bats.*' There appear to be no specific surveys / checks on whether bats and nesting bird make use of 'the copse', a habitat of '**moderate**' biodiversity value, which is heavily impacted by noise and lighting by any events.

3. Dr Boulton states that events are located in a part, or parts, of Brockwell Park which, based on previous ecological surveys and assessments undertaken by qualified and competent individuals, have been classified as being of '*low ecological sensitivity*', containing limited habitat and species diversity. The copse is identified as being of '**moderate**' biodiversity value, and this appears to contradict Dr Boulter's commentary.

4. '*Appropriate mitigation measures are still put in place to contain, minimise or remove any potential adverse impacts upon wildlife that may still use these areas or are in close proximity to them.*' **How can 'appropriate mitigation measures' be put in place if there is no detailed survey evidence upon which to base these?**

Conclusions (Dr. Boulton)

5. *'It is how an event is designed, located and managed that determines the degree of disturbance and harm to protected species, and then determines what measures are required to remove or reduce the level of harm through appropriate mitigation. This is a key element of the terms and conditions of any events licence, and any planning consents if this was also required.'* **What evidence has been gathered to assess the level of disturbance and harm to protected species?**

6. There is reference to species diversity and abundance increasing across the Park as a whole since the advent of public events, but this is generic and refers to no data to back up the assertion, and doesn't consider impacts specifically in relation to protected species within the impact zones.

Lambeth Event Management Report

Paragraph numbers are taken from the Report for ease of reference.

10 Landscape Management Plan

10.4 Has a Grounds Management Plan been submitted? Without this plan it is not possible to identify or respond to assessment or mitigation issues. It has not been provided or uploaded to the relevant planning webpage.

NB – a Ground Impact Management document and an Agronomist report have both been uploaded on 17.4.25, too late for proper public consultation.

Given the conclusions of the Agronomist that the vegetation and soil structure are still showing signs of the legacy of the disruption from the events, this may likely have longer term ecological consequences at the site such as species assemblages, quality of the turf, root compaction, water retention etc.

11 Tree Protection Plan

11.5 The events' proponents agree the ground protection for weight distribution for any areas where structures are near or in RPZs.

NB – Again on 17.4.25, at the end of the Ground Impact Management document there appears this text:

'Tree survey undertaken by The Sussex Tree Company to BS5837:...

The constituent sections of a compliant report are these:

- *A tree survey, (measuring, categorising each tree on a sliding scale of 'value' and establishing its canopy spread and 'root protection area' (RPA));*
- *The creation of two plans, (a 'Tree Constraints Plan (TCP), which shows how the proposed development is constrained by the existing treescape, and a 'Tree Retention and Protection Plan (TRPP), which demonstrates how the retained trees are protected through the phases of a development);*
- *An 'Arboricultural Impact Assessment' (AIA), describing in detail the potential impact of the development on the Site's existing trees, and*
- *An Arboricultural Method Statement ('MS), which demonstrates how the adopted methodologies will sufficiently protect the retained trees and details any mitigations proposed to assist in that.'*

However, notably not one of the above Tree or Arboricultural surveys, plans or assessments are actually provided, nor are their conclusions set out.

It is therefore impossible to know whether the impacts of the proposed development can be adequately mitigated by the proposals of any actual management plan by the Applicants, nor assert that it meets the concerns of the Arboricultural Impact Assessment and recommended protection methodologies.

It is also noted that the Officer's Report states as follows: "*The Applicant has commissioned tree and ground surveys which have been conducted across the entire event space. Recommendations from the reports have informed the site design for LCS. There is currently no indication from the reports that the trees or ground within the 'copse area' would be negatively impacted based on the current site plan. No*

furniture will be placed within the 'copse area' and the grass will be kept long to deter excessive gatherings. Signage will also be put up in the area to deter people from gathering in this area."

Given the presence of 120,000 people, the 'site design/site plan' appears to be only one of the risk factors for this moderate biodiversity area, with significant mature trees and likely bat roosting potential. This appears to be a significantly limited appraisal of the possible impacts upon this significant group of trees. Most importantly, without sight of the above reports, it is impossible to know what analysis and concerns are set out in these withheld Arboricultural reports and what the risks are to trees over the event site.

It is also doubtful that signage and slightly longer grass will deter extensive footfall in and around the 'copse' given the numbers involved. I note that the Agronomist's reports identify footfall as a principal cause of compaction and change to soil structure.

12 Tree Locations 'On' Brockwell Park

It is unclear if the tree location plan is accurate. In addition, it is of little value if it does not identify significant characteristics of trees, e.g. age / maturity / size, whether or not assessed for bat potential / nesting birds / other wildlife interest, features of particular ecological significance etc.

13 Lighting Strategy

13.1 'This requires a significant quantity of permanent lighting that illuminates vehicular, pedestrian, and cycle routes that traverse the park'.

This is categorically NOT in fact the case (and one of the reasons that this green space is so attractive). Compared to most of the city it is a 'haven of darkness', for example, there is very little permanent illumination to enable cyclists etc. to traverse the park, and only a single light over the Lido Car Park and a string of lights on the street side of the Lido Café. Clearly there is some light pollution as we are in

a major conurbation, but it is a 'dark park'. Unless the change in lighting and the light splay is surveyed and evidenced (so a 'baseline' established and then a prediction of light levels in areas where increased lighting is anticipated), then how can effects of lighting be assessed, controlled or mitigated?

13.5 The negative effects of temporary lighting are acknowledged.

'No bat roost (including access points) should be directly illuminated.'

How is this managed without knowing if bat roosts are present or not? Without a survey and assessment of impacts how is this properly understood and mitigated?

The Institution of Lighting Professionals (ILP) launched the latest practical guidance on considering the impact upon bats when designing lighting schemes in August 2023 (below 1). This document was developed and produced by the 'Bats and Artificial Lighting at Night' (ALAN) steering group (details below) chaired by BCT's Built Environment Manager. This supersedes the original guidance published in 2018.

<https://cdn.bats.org.uk/uploads/pdf/Resources/ilp-guidance-note-8-bats-and-artificial-lighting-compressed.pdf?v=1542109349>

"For bats, artificial lighting is thought to increase the chances of predation by avian predators, such as owls and hawks; in lit areas bats modify their behaviour, potentially in response to this threat. vii Many avian predators will hunt bats, which may be one reason why bats avoid flying in the day; viii species such as peregrine falcons have been recorded hunting bats in lit environments.

Roosting: *Illuminating a bat roost can cause disturbance, and this may result in the bats deserting the roost or even becoming entombed within it. Lighting would therefore be considered an obstruction under the legislation protecting bats and their roosts. Light falling on a roost access point will at least delay bats from emerging, and this shortens the amount of time available to them for foraging. As the main peak of nocturnal insect abundance occurs at and soon after dusk, a delay in emergence means this vital time for feeding is missed. This has been shown to have direct impacts on bats' reproductive ecology, such as a study showing slower growth rates and starvation of young. In addition, the associated flightpath to and from the access point is just as valuable, and vulnerable, as the roost*

itself. Severing a key flightpath some distance from the roost could cause desertion in its own right, and this loss of a roosting site could constitute an offence under the legislation.

Foraging: *In addition to causing disturbance to bats at the roost, artificial lighting can also affect the feeding behaviour of bats. Many night-flying species of insect that bats hunt are attracted to light, xiv especially those light sources that emit an ultraviolet component (Light Emitting Diodes (LEDs) have removed this) or have a high blue spectral content (this can include LEDs). 1.13 The slower-flying, broad winged species have been shown to avoid commuting and foraging routes illuminated with a variety of different street luminaires.*

For a number of years, studies have recorded that faster-flying species, such as pipistrelle bat species amongst others, can congregate around white light sources. This is particularly true for light sources with ultra-violet spectrum light, with the bats subsequently feeding on the insects attracted to the light. This is a problem especially if it is a single light source in a dark area, as it creates a 'vacuum effect', denuding the surrounding area of invertebrate prey.

As well as moths, a range of other insects can be attracted to light, such as craneflies, midges and lacewings. While this might seem to give these faster-flying species a competitive advantage, the bats are risking predation, but have little choice if insects are attracted to a light source. This only takes into account the benefits to these species from a foraging perspective when considering their roosting and commuting behaviours, the cumulative impacts from ALAN are likely to be negative to their Favourable Conservation Status (FCS).

Key message: it is important to minimise ALAN [Artificial Light At Night] close to vegetation, particularly for slower-flying species, and the need to increase dense vegetation in urban landscape to provide, not just roosting opportunities, but also protection against ALAN for open-space foraging bats in city landscapes.

Key message: when considering how bats move through the landscape, ALAN has been shown to be particularly harmful along river corridors, near woodland edges and hedgerows.

Even bat species that have been shown to opportunistically forage in lit conditions are also impacted by ALAN when commuting through the landscape. In our cities, for example, common pipistrelles, the UK's most numerous species, have been recorded avoiding gaps that are well lit, thereby creating a barrier effect.

Key message: *Studies have shown that even species known to display some light opportunistic behaviours can be detrimentally impacted by ALAN, and that it is a complicated picture requiring knowledge gathered at a site level to make accurate predictions of impacts. This is a particular issue in recent years with moves to save energy by using PNL schemes, or switching from low pressure sodium to LED Light sources. This is because it can lead to an increase in light intensity, so in an attempt to tackle climate change this may impact bat conservation, especially where there are light averse species present and/ or at high light intensities.*

Key message: *Research highlights the importance of integrating avoidance measures (as per the first step of the mitigation hierarchy) into developmental design, by retaining ecologically functional 'dark corridors' within schemes wherever feasible, and in preference to seeking lighting mitigation strategies."*

Common pipistrelle, at least, occurs within the park (foraging at least) – a recent incidental record of a pipistrelle bat sp. was of a bat observed close to the mansion at dusk on Thursday 17th April 2025, and hence presumably roosting within close proximity within the park. Potentially some of the bats occurring may be 'tree roosters', but bats of a number of species may potentially converge on the park for foraging.

We don't know if there are favoured areas for foraging due to a lack of baseline data. Different species (and presumably individuals within those species) have different levels of light tolerance. Bats typically prefer areas with habitat mosaics, e.g. trees, grassland and water for foraging, but will cross (and forage to an extent) across open areas, e.g. when crossing to reach a more optimal foraging area, which potentially could include 'the copse', but no appropriate surveys appear to have been done to assess the bats and bat environment, and therefore the impacts and implications of the lighting rigs, timings and levels are not possible to ascertain.

13.7 It is claimed that '*Lighting tests for all external lighting is undertaken ahead of the event days to ensure what is in place is sufficient, provides sufficient safety measures and is not impacting the biodiversity and residents.*'

So what exactly are the baseline lighting assessments? What about predictions of light splays from proposed lighting and the areas this impacts (both in terms of vegetation and also potentially in terms of use of foraging areas by bats?) Again, without proper surveys of the biodiversity including bats roosting and foraging areas, and without proper data relating to the brightness, positioning, type, light modelling, light pollution levels and light splays, it is not possible to assert that what will be put in place will *'not impact'* wildlife such as bats.

14 Sound Management Plan

14.4 Large and major events. **The Sound Management Plan has not been provided. The same observations are made as above in terms of lack of survey, lack of assessment, the consequent ignorance of impacts and therefore inability to mitigate such impacts.**

NB - A summary of a Sound Management Plan was uploaded on 17.4.25, outwith the timescale for public consultation, and does not include any meaningful detail as above.

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