

Gunnersbury Park Events

Application P/2025/3274

Comments from the West Chiswick and Gunnersbury Society

1. Introduction

These comments are submitted on behalf of the West Chiswick and Gunnersbury Society (WCGS) and are based on our understanding of the outstanding value of Gunnersbury Park and our lived experience of the impact of events held in Gunnersbury Park over recent years.

The Society has long supported the restoration of the park (see letter of 12 February 2012 in Appendix 1, provided as a separate document). As noted in that letter, Marie Rabouhans, now WCGS Chair, was appointed as a member of the Gunnersbury Park and Museum Community Advisory Panel which assisted during the successful bid for Heritage Lottery funding for regeneration in 2011-2014. Considering the length of time and necessary phasing of the regeneration project, the Advisory Panel discussed how to maintain motivation and public interest. Having the 2026 centenary of Gunnersbury as a public park as a goal/incentive (Marie's suggestion) was taken up in the title of the Master Plan and that of the CIC as "Gunnersbury Estate (2026) CIC".

2. General

WCGS objects strongly to the application. The Society fully appreciates the need for the CIC to generate income for the park but there needs to be a much better balance between using the park as a commercial entertainment venue and its prime purpose as a public park. There needs to be a greater recognition of the negative impact of events on the quality of life and health of the local community, on park users and on key attributes of the park such as the park's nature value as a SINC. Income generation that degrades the very asset it is intended to support is not sustainable.

The implications of the park's location next to the Great West Corridor Opportunity Area also needs to be taken into account.

3. Number, Nature and Capacity of Events

The Society objects strongly to the total number of events proposed per year in this application and especially the number of events with a capacity of 10,000 or more (Bands 2 and 3). Twenty-eight event days per annum (with 22 in Bands 2 and 3) is unacceptable. It is significantly in excess of the numbers (6 to 8) held in other London Parks (Sound Management Statement, Table 5 refers). We understand that Brockwell Park, for example, intends to have 4 event days (2 weekends) with 32 days for set-up/take-down in 2026.

Twenty-eight event days would entail events being held on many summer weekends with little respite for local residents and park users from the negative impacts discussed below.

3.1 Impact on public use of park On event days the park as a whole would be subject to high levels of noise and large numbers of event attendees. With 90 days allowed for set-up and take-down and an additional unspecified number of days for tracking and fencing to be

removed, significant parts of the park would be out of bounds to either the local community or the general public for over a third of the year. This begs the question “When does temporary use become semi-permanent?”

Much is made in the application of the event spaces only occupying 10 - 13% of the park. However, other parts of the park are affected by the fencing off of secured vehicle and pedestrian routes; the red pedestrian route runs across the centre of the park through heritage parkland. During some events in 2025, additional fencing was erected within the heritage core, for example, along the southern edge of the Round Pond (“the tranquil lake to go boating on in the summer months” according to the park’s website). All this enclosure leads to the loss of a sense of space/openness which is such an important feature of Gunnersbury Park and curtails the public’s freedom to roam. Together with the movement of very large numbers of venue-goers through the park, the fencing also detracts from the appreciation of the heritage landscapes of the park and of the wildlife. The fencing alongside the Round Pond also denied the wildfowl access to a regular resting area.

The event period from May to September spans the entire summer months when public need for/use of the park is highest. An important function of urban parks is to provide the tranquil outdoor green spaces people need for refreshment and relaxation. The importance of access to such spaces for both mental and physical health is now widely recognised. This need is increasing locally as recent high density residential developments already built or consented in the area place reliance on access to the public space of Gunnersbury Park. The proximity to the park is used to justify very significant shortfalls in outdoor amenity space for residential developments in the Opportunity Area of the Great West Corridor. For example, there is a shortfall of over 50% for the consented development at 2 Larch Drive - the B&Q site [see Appendix 2].

3.2 Impact on park environment While the site in use for any individual even will occupy about 10% or 13% of the park, the area impacted by events will comprise both sites, that is about 25% of the park. The Planning Statement (Dec 2025) attempts to provide assurances in Sections 5 and 6 that the ground will be restored to its previous condition and that there will be “no evidence of any event having taken place”. Regular users of the park are well aware of the damage caused by events. The frequency of events is such that there is little opportunity for recovery between events and so, as the season progresses, the “previous condition” is poorer. This “baseline shift” gives rise to cumulative damage for which recovery does not take place even between event seasons. A visit to the park now (January 2026) provides clear evidence that damage to the ground remains four months from the end of the 2025 event season.

The extent of the damage is made clear in the Preliminary Ecological Appraisal (PEA) report by Greengage:

Grassland/soils (page 39) The majority of the grassland was identified as being heavily mown, with a short sward. These areas had evidence of existing heavy compaction from the 2025 events, which is likely occurring on top of previous years compaction. Compaction will likely be exacerbated year-on-year without appropriate ground management being undertaken. Compaction of the soils associated with the grassland has implications beyond reduced floral diversity. When soils are compacted, the amount of carbon that can be sequestered within them is greatly reduced,

compared with less compacted areas. This is a result of less space for roots to penetrate and fungi and bacteria to inhabit resulting in a breakdown of soil ecosystems and reduction in rate of carbon cycling through the plant-soil interface. In addition, compacted soils are less able to store water and act as a 'sponge' during intense or prolonged rainfall events. Surface water run off rates are therefore likely to be significantly increased which could stand to impact surrounding residential, commercial or transport infrastructure in the mid to longer term.

The damage that has already taken place must be undone and any further damage avoided by reduction in the number of events and by following the recommendations in the Greengage PEA.

3.3 Impact on nature/biodiversity The Planning statement (Dec 25) states "Given the location of the site within a Site of Importance for Nature Conservation (Borough Grade II), care has been taken to plan the event arena locations and layouts to protect, conserve and enhance wildlife and habitats. Due to the temporary and daytime nature of the events proposed, there is considered to be an overall low impact to any habitats and wildlife areas, in line with the Hounslow Biodiversity Action Plan (2011- 2016) and Policy GB7 'Biodiversity'."

The event sites are located within the southern part of the park, close to the Potomac Lake which was recognised as an important area for nature, especially bats, during the preparatory work for the regeneration project.

Extract from HLF Parks for People Application, PP-11-04157 – Round 2
Gunnersbury Park D13a Ten Year Park Maintenance and Management Plan, 28 February 2014

6.2 Bat Survey, Popes Lane, Gunnersbury Park, W5 The bat survey (Furesfen, August 2013) identified the presence in the park of at least six bat species protected by European law: Common Pipistrelle, Soprano Pipistrelle, Nathusius Pipistrelle, Daubenton's Bat, Noctule Bat, Leisler's Bat. The report highlights the importance of the woodland in the vicinity of the Potomac lake to bat populations in the park:

The impact of events over recent years is such that some of these species may have been lost to the park. The Greengage PEA includes important sections on bats (pages 28 -34 and 40-42) highlighting the need for further surveys and action by event organisers. "The staging of large-scale events at the park is likely to impact bats through the severing of potential flightlines and temporary removal of foraging grounds as a result of increased artificial light, increase of noise during dusk, dawn and nighttime hours when bat activity is at its greatest." (page 40).

We seriously question the applicant's suggestion that light pollution will not be a problem as the events are "day-time only hours". The events finish at 22.30 (22.00 on Sundays) and event goers will take some time after the finish to exit the park. In mid-May sunset is at 20.44 and in mid-September at 18.40.

3.2 and 3.3 In relation to the impacts on both environment and nature biodiversity we would draw attention to the concluding paragraphs of the Greengage PEA:

Fundamentally, the park constitutes a stock of natural capital, owned by the council and managed for the benefit of the community. Events will inevitably degrade that stock. This degradation is however 'externalised' meaning it is not associated with typical flows of financial capital and is not paid for by those running events. Degradation can therefore occur without being appropriately conceptualised, measured and addressed.

A 'just' approach to strategy creation for this year's event and for future years would accordingly be to 'internalise' the natural capital through considering the holistic onward impact on the environment (and factoring in historic losses) and ensuring that appropriate compensation to enhance stocks elsewhere in the park or surrounding areas is undertaken. Such an approach could form a win-win for nature and people. It is accordingly recommended that such logic is followed to develop a broader long-term strategy.

3.4 Impact on local community; noise The local community is not only affected by the impacts described above but also by the major negative impact of noise. Major events in Gunnersbury Park can be heard across a very large area and for residents within the West Chiswick and Gunnersbury area the level of noise is frequently intrusive and diminishes their quality of life.

3.4.1 Noise limits The application is seeking to maintain the noise limits applied to previous events that have taken place in the park on the basis that these are acceptable in terms of impact on residents. We strongly disagree. In our experience, many of the events fall within the Significant Observed Adverse Effect Level (SOAEL)* within the Noise Exposure Hierarchy table of the PPGN (2019) with some having an Unacceptable Adverse Effect.

A personal (MLR) example of the latter was the event held on Friday, 8th August 2025. The noise and vibrations experienced at my home in Silver Crescent were so disruptive that not only was it impossible to spend time in the garden but, even indoors with all double-glazed windows shut, it was impossible to focus on any activity or to relax. Knowing that, despite having phoned the complaints line, nothing would be done to lessen the harm only added to the psychological stress.

We request that in addition to lowering the noise levels, some restrictions are placed on the nature of events and types of performance that can be held in Gunnersbury Park with, for example, drum and bass being excluded. If the park management wish to broaden the cultural offer, they could consider including jazz, folk or classical music events.

As far as recent past events are concerned, a low level of complaint or feedback cannot be interpreted as little negative impact. It is more a reflection of "complaint/response fatigue" as over the years residents have learned that complaints do not lead to remedial action nor feedback sessions to meaningful change or engagement.

Use of the terms **Bands 1, 2 and 3** within the Sound Management Plan (SMP) to set different noise limits with Band 3 having the *lowest* limits is very confusing as according to the Planning Statement (Dec 25) the same terms are used to set different capacities with Band 3 having the *highest* capacity. The SMP states "While typically, the largest capacity events may be the noisiest, medium event less so and small events emitting the lowest levels of noise beyond the site boundary; the proposed bands have not been tied to event size, to allow a degree of flexibility in allocation."

How and by whom will decisions be made as to the capacity and sound limits for any particular event? How will these decisions be recorded and notified to local residents in advance of events? What measures will be taken to ensure the “quotas” are not exceeded?

*PPG identifies the SOAEL as the level above which “noise causes a material change in behaviour such as keeping windows closed for most of the time or avoiding certain activities during periods when the noise is present.”

3.4.2 Site and noise-monitoring locations The Sound Management Plan states “The proposed sound measurement locations are those areas closest to the event site which are likely to experience the greatest noise from the events and therefore are representative of the worst case as noise impacts further away from the park are likely to be lower due to attenuation of noise over distance and screening by topography and local buildings etc.” and proposes that “ the continuous noise monitoring equipment can be installed at proxy locations within the park”. We know that there are locations further from the event site which, due to their specific acoustic environment, are heavily impacted and should be included in the sound monitoring programme. Proxy locations within the park would be inappropriate in such cases.

Silver Crescent and Thorney Hedge Road These residential streets lie to the south-east of Manor Gardens between Power Road and the Chiswick Business Park (CBP). They are partially visible on the Scenario maps included in the Sound Management Plan (see Scenario 7 – C-weighted Level map). Event noise passing between buildings in Power Road is amplified by being reflected back by the large steel and glass buildings of the CBP immediately to the east. Residents are thus bombarded by noise from two directions. Any assumption that noise levels reduce the greater the distance that the receptors are from the noise source does not hold for this reflected noise from the CBP as experienced by residents in nearby properties. The layout of the Victorian terraced properties in Silver Crescent in close proximity to the CBP boundary wall gives rise to particular acoustic effects. In particular the long, narrow side returns result in amplification of sound from the business park. Thus sounds are louder and clearer at the end of side returns, where living rooms and bedrooms are usually situated, than at or near the boundary wall.

We request that Silver Crescent is included in the sound monitoring programme.

4. Duration of Planning Permission

Given the multiple serious negative impacts discussed above, planning permission for events to be held over a 10-year period is unacceptable. The cumulative damage to the park environment from events held during recent years and the likely loss of biodiversity together with the toll on the quality of life of the local community militates against giving permission for “more of the same” for 10 years.

Such a permission would make no allowance for unforeseen circumstances, offer no hope of future respite for residents and would provide even less incentive for the park management to engage with the local community.

Over a ten-year period there will be changes in the surrounding area which may require changes to the management of the park, including events. As noted above, there will be more large-scale residential buildings within close proximity of the park. This will add to the

number of people subject to the impacts of events, especially noise. It will also place increased pressure on public use of the park

In relation to engagement, it is noted that when WCGS Chair attended a feedback session on 14 November 2025 and raised some of the issues covered in these comments, there was no mention of the intention to submit this planning application

5 Conclusion

Our objections to the application are based on our understanding of the outstanding value of Gunnersbury Park and on our lived experience as local residents and park users. We request the following changes:

- a significant reduction in the number of events with a capacity of 10,000 or more
- a reduction in the noise levels both A-weighted and C-weighted
- exclusion of music genres with a pronounced bass element
- inclusion of additional external noise-monitoring locations – to include Silver Crescent
- a reduction in the duration of the planning permission to one year
- a commitment to meaningful community engagement

WCGS January 2026

Appendix 1 is provided as a separate attachment to the covering submission e-mail

Appendix 2 Extract from WCGS 2020 comments on development at 2 Larch Drive (the B&Q site)

3.3 Quality of and access to open space

3.3.1 There is a serious cumulative deficit of open space within the high-density developments under construction, consented or in the pipeline in the Great West Corridor. This will not only undermine Borough strategies concerning health and well-being but will also put existing public open spaces such as Gunnersbury Park under great pressure. This trend to “off-load” the delivery of open space for relaxation and informal activities to existing public spaces such as parks is inconsistent with policies in the Local Plan and the draft Great West Corridor Local Plan review. See, especially GW3 and GW4.

Gunnersbury Park is expected to compensate for the lack of adequate open space within the dense residential developments under construction around the Brentford Stadium and other consented/proposed schemes in Capital Interchange Way. At the same time the CIC responsible for the park has embarked on a strategy of holding large-scale, commercial events (for example, Lovebox and Citadel, Gunnersville and Secret Cinema) in order to generate much-needed income for the park. By occupying significant parts of the park for considerable periods of time, these events reduce the capacity of the park and its value to local residents. In addition the quality of life of local residents is negatively impacted by the noise and other negative consequences of these events.