

[Insert name and address of relevant licensing authority and its reference number (optional)]

Application for the review of a premises licence or club premises certificate under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form.
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

I **Gunnersbury Park Garden Estate Residents Association**

(Insert name of applicant)

apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description Gunnersbury Park, Popes Ln,	
Post town London	Post code (if known) W3 8LQ

Name of premises licence holder or club holding club premises certificate (if known) Gunnersbury Estate (2026) CIC
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Number of premises licence or club premises certificate (if known) H01288

Part 2 - Applicant details

I am

Please tick ✓ yes

- 1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)
- 2) a responsible authority (please complete (C) below)
- 3) a member of the club to which this application relates (please complete (A) below)

(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)

Please tick ✓ yes

Mr Mrs Miss Ms Other title
(for example, Rev)

Surname

First names

I am 18 years old or over

Please tick ✓ yes

**Current postal
address if
different from
premises
address**

Post town

Post Code

Daytime contact telephone number

**E-mail address
(optional)**

(B) DETAILS OF OTHER APPLICANT

Name and address

Gunnersbury Park Garden Estate Residents Association
Triangle Way, Chiswick, London W3 8LN

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address
Telephone number (if any)
E-mail address (optional)

This application to review relates to the following licensing objective(s)

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

Please tick one or more boxes ✓

-
-
-
-

Please state the ground(s) for review (please read guidance note 2)

Please see attached document below pages 1 to 2.

Please provide as much information as possible to support the application (please read guidance note 3)

Please see attached document below pages 2 to 22

Additional evidence on Appendix pages 23 to 207

Please tick ✓ yes

Have you made an application for review relating to the premises before

If yes please state the date of that application

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

If you have made representations before relating to the premises please state what they were and when you made them

Please tick ✓

yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

Part 3 – Signatures (please read guidance note 4)

Signature of applicant or applicant's solicitor or other duly authorised agent (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature

[Redacted Signature]

Date

9/12/25

Capacity Chair of Gunnersbury Park Garden Estate Residents Association

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)

Pete Bainbridge

Post town

Post Code

Telephone number (if any)

If you would prefer us to correspond with you using an e-mail address your e-mail address (optional) [Redacted]

Notes for Guidance

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

Please state the ground(s) for review:

The Gunnersbury Park Garden Estate Residents Association (GPGE RA) formally requests a review of the premises licence granted to Gunnersbury Estate (2006) CIC under Section 51 of the Licensing Act 2003. This request is necessary because the current blanket licence facilitates activities that conflict with all four statutory licensing objectives and has proven incapable of being enforced effectively.

Grounds for Review

1. Prevention of Public Nuisance

Licensed noise levels consistently exceed WHO, DEFRA, and Noise Council Code of Practice 1995 (also known as the Pop Code) thresholds, exposing homes, schools, hospitals, cemeteries, and playgrounds to harmful sound levels. Large-scale events also restrict access to public parkland for more than 98 days in 2025, amounting to a material change of use that undermines residential amenity.

2. Protection of Children from Harm

Children are exposed to unsafe levels of noise in playgrounds and school grounds, and to loss of safe recreational space during term time. Restricted access to sports facilities and play areas undermines their wellbeing, while antisocial behaviour linked to events creates additional safeguarding risks.

3. Prevention of Crime and Disorder

Residents have documented drug use, nitrous oxide and other drug sales, public urination, blocked driveways, and other antisocial behaviour. Police presence is concentrated inside the park, with insufficient patrols in the surrounding residential areas most affected.

4. Public Safety

Large-scale occupation, fencing, heavy infrastructure, and crowding compromise emergency access and resident safety. The ongoing failure to comply with statutory planning controls (exceeding the 28-day limit for temporary use) and restrictive covenant terms further create legal uncertainty over land use and undermine confidence in regulatory oversight.

Legal and Policy Context

- The High Court ruling in *Friends of Brockwell Park v Lambeth LBC (2025)* confirmed that events exceeding the 28-day statutory threshold require full planning permission and cannot be legitimised solely through licensing.
- Comparable licensing regimes at Finsbury Park, Hyde Park, and Richmond Parks demonstrate that more restrictive, event-specific licensing is both lawful and workable.

- The current blanket licence is drafted so broadly that it cannot be effectively monitored or enforced, contrary to the purpose of the Licensing Act 2003.

Conclusion

This review is brought in good faith, supported by documentary and photographic evidence, case law, and statutory policy. It is not frivolous, vexatious, or repetitious. A formal review is required to align the licence with statutory licensing objectives, planning law, and the Council's human rights and equality duties.

Please provide as much information as possible to support the application:

1. **Failure to comply with Rothschild Covenants-Impact on Public Safety and Prevention of Public Nuisance (Concerns: inconsistent with policy and legal requirements exclusion of the public, uncertainty over lawful use, conflict over access)**
 - The 1925 Conveyance restricts park use to a public park or sports ground. Commercial festivals and private hire events appear inconsistent with these terms by restricting public access and enabling private, profit-driven activities.
 - The covenant is a restrictive covenant attached to the land and enforceable by the beneficiaries under the Law of Property Act 1925. No known application under Section 84(1)(aa) in relation to use for commercial festivals has been made to the Upper Tribunal to discharge or modify the covenant. There is no known approval from the Rothschild estate to allow these commercial uses, making them unauthorised.
2. **Planning Policy Non-compliance - Public Safety, Prevention of Public Nuisance, and Protection of Children from Harm (Concerns: inconsistent with policy and legal requirements material change of use, excessive occupation of land, loss of play space and sports facilities)**
 - Events breach protections under Hounslow Local Plan Policies GB1, GB9, EQ5 and London Plan Policies G3, G6, and D14. These policies safeguard MOL, children's spaces, biodiversity, and noise control standards. (Further details and specifics below)
 - These events constitute a **material change of use** from public parkland to a fenced, ticketed commercial venue and roads, with restricted access, high sound levels, and environmental disruption lasting more than 98 days in 2025 alone.

Critically, the recent **High Court ruling in *Rebekah Shaman v. Lambeth Council (May 2025)*** established that events exceeding the 28-day threshold for temporary use require **full planning permission**, not just licensing. Gunnersbury events clearly exceed this limit and therefore all events over this threshold (including private events at museum, filming crews and other such activities) demand planning scrutiny.¹ The Council's failure to apply this standard consistently through the years of the CIC's operations constitutes a failure to comply with both statutory planning law and local policy.

¹ **Rebekah Shaman v. Lambeth Council**, High Court of Justice, Queen's Bench Division, May 2025. Judgment available via Protect Brockwell Park campaign site: <https://protectbrockwellpark.org>

Additionally in October 2025 a new decade long planning application was submitted to Hounslow Council under reference P/2025/3274. This planning application seeks to overwrite the existing Premises Licence by authorising higher noise levels, additional major events, multi month construction periods, and extended park closures that the licence does not permit. Planning permission cannot be used to enlarge licence parameters or remove statutory safeguards that exist only under the Licensing Act 2003. Any planning regime that contradicts or exceeds the binding controls of the Premises Licence is legally defective and cannot be relied upon.

The proposed decade long planning permission would, in practice, create a parallel regulatory system that replaces and expands the current Premises Licence H01288. Under the existing licence, noise is strictly limited to 75 dB LAeq at residential properties. The planning documents instead **introduce bass limits up to 90 dB C weighted**. Although LAeq and C weighted measurements use different scales, **a limit of 90 dB C weighted is still significantly louder and more intrusive**. C weighting captures low frequency bass energy that travels further, penetrates buildings more easily, and causes greater vibration. A 15 dB increase represents roughly a doubling of perceived loudness. Allowing 90 dB bass would therefore expose residents to sound levels far higher than the licence permits.

The difference in event numbers is also substantial. The licence restricts the park to 14 large music events per year plus 4 special events. It also includes clear definitions that specify which events can be large, what their capacities are, and what safeguards apply. The planning application removes these distinctions entirely. **It simply allocates 28 event days (10 more potential large events than the current licence) with no classification by size or impact.** When combined with approximately 90 additional build, dismantling, and inactive days, the planning proposal reaches 118 operational days each year, compared with the much smaller number authorised by the licence.

A ten-year planning consent of this type would replace the required annual licensing oversight with a single approval that grants operators broad discretion to increase event size, increase noise levels, occupy land for extended periods, and close large areas of Metropolitan Open Land without individual review. Licensing law requires event specific scrutiny to protect public safety, prevent public nuisance, and safeguard children and vulnerable users of the park. **Removing this oversight is incompatible with the Licensing Act 2003**, which does not allow licensing protections to be expanded, diluted, or bypassed through planning.

There has also been a clear **lack of proper public consultation**, with many residents receiving no notification at all and the planning portal repeatedly failing during the statutory objection period. These failures prevented meaningful participation and fall below the legal requirements for transparency and fairness in decision making. Detailed legal breaches arising from these consultation defects, and from the wider planning non-compliance enabled by blanket licensing, are provided in Appendix E.

The scale and nature of the changes proposed under planning application P/2025/3274 therefore demonstrate why the licence must be reviewed to prevent the planning process from

being used to alter or undermine the statutory protections that H01288 provides. **The current licence must be reviewed to ensure that planning cannot be used as a backdoor mechanism to alter event limits, remove statutory protections,** or authorise impacts that licensing law does not permit.

3. **Public to Private Use Transformation and Restricted Access -Prevention of Public Nuisance and Protection of Children from Harm (Concerns: exclusion of residents, fencing, restricted access to play areas, disruption of peaceful enjoyment of homes, exclusion issues)**

- Ticket-only access, security fencing, and permanent commercial infrastructure proposed in the 2021 Master Plan (as submitted to and provided by Historic England such as turning the Small Mansion into an AirBnB to support these events) conflict with the public park designation and covenant terms.
- In summer 2025, Gunnersbury Park has hosted **six major commercial events**, totalling **19 live event days** between **30 May and 14 September**. These events collectively result in **over 98 days of hire, setup, and breakdown**, with significant impact on **children's play areas, sports facilities, and public routes** - including during **school term time**.
- The cumulative effect of these overlapping events - including infrastructure build-up, roads, sound pollution, visual obstruction, and public exclusion - effectively constitutes a **material change of use** from a public park to a seasonal commercial venue. This transformation should be assessed as such under planning law and licensing law, particularly given its scale, duration, and impact on local amenity.

This continuous, large-scale commercial occupation, characterised by substantial infrastructure and public exclusion, moves beyond the scope of 'temporary use' and creates a 'de facto development' that fundamentally alters the character and function of Gunnersbury Park. Such a transformation, when enabled by a blanket licence that bypasses individual planning scrutiny, amounts to a subversion of the planning system's protective mechanisms, which are designed to ensure sustainable development and safeguard public amenities.

- This effective reclassification of Gunnersbury Park into a seasonal private venue through the current licence raises profound concerns regarding its compatibility with fundamental human rights. The systematic exclusion of the public, the demonstrable disruption of peaceful enjoyment of homes and private life through excessive noise and antisocial behaviour, and the disproportionate impact on vulnerable residents and families, directly engage **Articles 6 (Right to a Fair Trial/Access to Justice)** and **8 (Right to Respect for Private and Family Life) of the Human Rights Act 1998**. Furthermore, the lack of consideration for low-income and vulnerable users in accessing what should be a public amenity may raise issues under the Equality Act 2010. The Council, as a public authority, has a positive obligation to protect these rights, and its failure to adequately regulate commercial activities to prevent such infringements could expose it to legal scrutiny or further review and complaints to the Local Government and Social Care Ombudsman.

4. **Noise Regulation Non-Compliance-Prevention of Public Nuisance and Protection of Children from Harm (Concerns: noise exceeding WHO/DEFRA/Pop Code thresholds, harmful impact on children, hospitals, schools, cemetery, playgrounds)**

- **The Pop Code** (Noise Council Code of Practice 1995) recommends a maximum of **65 dB LAeq,15min** for outdoor areas near dwellings used for relaxation or recreation - a threshold that applies directly to Gunnersbury Park's adjacent playgrounds, sports fields, Clayponds hospital, a mental health half way house in the Gunnersbury Park Garden Estate (Triangle) area, Gunnersbury cemetery and two school grounds (Lionel Primary School and International School of London) on each side of the park. Other greenspaces such as Hyde Park have adopted this threshold in their licencing. Richmond council is also currently undergoing consultation for a brought wide park event policy under the same guidance.
- **WHO environmental noise guidelines** advise that exposure for children should remain below **70 dB(A)** to avoid harmful cognitive and health effects - a limit the current blanket 75 dB(A) licence exceeds without zoning or mitigation.

These thresholds are relied upon by courts, planning inspectors, and licensing authorities, and are embedded in the **Agent of Change principle** under **London Plan Policy D14**. Exposing sensitive receptors such as children and families to noise levels above these standards fails to comply with the Council's **statutory duty under the Environmental Protection Act 1990** to prevent public nuisance and protect community health.

Furthermore, under the 'Agent of Change' principle, it is incumbent upon the source of the noise or activity-in this case, the commercial events facilitated by the current licence-to mitigate their impact on existing sensitive receptors. The Council, by granting and maintaining a licence that permits noise levels exceeding established guidelines, appears to be failing in its duty to apply this principle effectively and to protect the pre-existing residential amenity and public health of the surrounding community. This constitutes an inconsistency with applicable regulations of the protective intent of Policy D14

- **Misuse of Industry-Sourced Guidance (The Purple Guide-<https://www.thepurpleguide.co.uk/>):** The council and promoters justify extreme thresholds (including 90 dB(C) bass levels) by citing "The Purple Guide" or its references. However, it is crucial to note that *The Purple Guide* is not an independent scientific study or public health document. It is published by the Events Industry Forum (EIF), an organisation funded and governed by major event operators and promoters (including Festival Republic and its parent Live Nation). The guide is not peer-reviewed, lacks WHO or DEFRA alignment, and was not designed to assess long-term residential impacts. Its recommendations prioritise the viability of events, not the wellbeing of nearby communities. As such, the use of this guide to support C-weighted limits up to 90 dB(C) constitutes a serious conflict of interest. Licensing decisions should be based instead on neutral, peer-reviewed standards such as WHO noise guidelines and the 1995 Code of Practice on Environmental Noise Control at Concerts (Pop Code), which are relied upon in judicial settings and public health frameworks.

5. **Transparency and Oversight Failures-Public Safety, Prevention of Public Nuisance, and Protection of Children from Harm (Concerns: lack of accountability for licence holder, conflicts of interest, weakened enforcement, no assurance of child-safeguarding or**

mitigation of nuisance)

- The CIC's exemption from Freedom of Information requests as imposed by the council prevents residents from accessing full financial and governance details regarding event income, use of funds, and decision-making. The CIC is contractually exempt from directly responding to FOI requests, as per the CIC Business Transfer Agreement (July 2018), which refers requests to the councils. However, many such requests are also declined by the council under Section 43 FOI exemptions creating a Catch22. The council must address this and ensure transparency across plans for this public asset and finances relating to it.
- This lack of transparency is incompatible with the **Nolan Principles of Public Life**, particularly **accountability, openness, and integrity**. The current arrangement creates a regulatory grey zone in which the CIC acts as a **de facto public authority under the current licence**, managing and sub-letting public land and services, yet evades the transparency obligations required of such bodies. This arrangement raises serious concerns regarding transparency and may be inconsistent with the principles underpinning the **Freedom of Information Act 2000** and modern standards of public accountability. We therefore request the Council, as a public body, to fulfil its responsibilities under **Section 1 of the FOIA 2000**, and to apply the test under **Section 5(1)(b)**, ensuring that **all third-party contractors engaged in public service delivery** - including Community Interest Companies (CICs) operating parks - are brought within the scope of public scrutiny.
- Several decision-makers and or councillors who may be overseeing licensing and planning processes are also directly involved in the oversight of the CIC or its board structure, this may create the appearance of bias or conflict of interest. We request a declaration of interest and recusal of any such parties from this review. As the council sits on the board of the CIC any licenses issued need to be reassessed for bias. Please note here many other licensing authorities favour single per event licences vs a blanket licence as is in this case. While this decision may prove to not be directly related to the council's participation in the CICs trustee board it must be re-examined.

6. Lack of Licensing Conditions for Police Presence in Residential Areas-Prevention of Crime and Disorder and Public Safety (Concerns: antisocial behaviour, drug use and sales, urination, blocked driveways, insufficient police deployment outside event site)

GPGE RA remains seriously concerned that, while significant policing is deployed within Gunnersbury Park and at nearby transport hubs during major events, there is a notable absence of consistent police visibility or patrols in the surrounding residential streets - particularly those most impacted by festival-related disturbances. Multiple residents have reported and submitted complaints to the Council regarding incidents of public nuisance and suspected drug use, including the presence of nitrous oxide canisters, antisocial behaviour, and unauthorised parking. These reports are supported by photographic documentation, including submissions made via the Waterworks 2024 Event Restoration Plan (Application P/2025/1574) by the organisers themselves.

Residents have also documented instances of public urination, intoxicated individuals being sick in gardens and lying on pavements, and driveways blocked by festivalgoers or vehicles for hire/taxis. These accounts raise serious questions about the adequacy of enforcement, public

safety planning, and crowd management obligations under the Safety Advisory Group framework and the wider event licensing structure.

There is no evidence from recent FOI responses indicating that event organisers contribute to the costs of policing in these surrounding zones. If public funding is disproportionately allocated to internal park policing at the expense of residential street patrols, this may represent a misalignment with the Council's duty to protect local amenity and uphold its obligations under the Crime and Disorder Act 1998 and Health and Safety at Work Act 1974.

We therefore request that licensing conditions be amended to require targeted police and stewarding presence in the Triangle and other affected zones. These measures are necessary to safeguard public safety, support vulnerable residents, and protect the rights to peaceful enjoyment of home and community under Article 8 of the Human Rights Act 1998.

7. Legal Precedent and Comparable Standards-Prevention of Public Nuisance and Public Safety (Concerns: failures to comply with planning law, binding precedent from Brockwell Park, failure of meaningful consultation, undermining due process, unsafe and prolonged occupation of land)

There is a growing and now judicially confirmed precedent across London boroughs for restricting or amending event licences in urban parks where residential amenity, public access, and environmental integrity are compromised.

7.1 Judicial Ruling - Brockwell Park 2025

In May 2025, the High Court issued a landmark judgment invalidating Lambeth Council's authorisation of commercial festivals in Brockwell Park on grounds of exceeding the 28-day use limit (Town and Country Planning Act 1990, s57). The court accepted arguments by residents that prolonged event operations- totalling over 30 days of build, live days, and breakdown- constituted a material change of use requiring additional planning scrutiny not just licensing as us the case with multiple events in Gunnersbury Park (notably not just festivals but other for-profit and private events on museum grounds.)

The case has direct implications for Gunnersbury Park:

- Gunnersbury is licensed for 98 total operational days of hire in 2025
- The land is subject to a restrictive covenant limiting use to public recreation and sport
- Failure to seek proper planning permission: Until 2025, the organisers failed to submit planning applications for some events constituting a material change of use. This fails to comply with the Town and Country Planning (Development Management Procedure) Order 2015, which requires public notice and consultation for such changes. Additionally existing licensing was quoted as one of the reasons behind rejected planning call ins.

This ruling sets binding precedent that extended festival schedules cannot be treated as de facto permitted development or solely a licensing matter.

7.1.1 Brockwell Park (High Court, May 2025):

In a landmark ruling, the High Court upheld a legal challenge brought by residents opposing large-scale commercial festivals such as Mighty Hoopla and Field Day. The Court found Lambeth Council had acted unlawfully by permitting events that exceeded the 28-day statutory limit for temporary land use without securing proper planning permission under the Town and Country Planning Act 1990. The case confirms that extended commercial occupation of public parks must be scrutinised through planning controls not just blanket licensing. The judgment also reaffirmed that environmental, amenity, and access concerns must take precedence over economic motivations. This creates a binding legal precedent directly applicable to Gunnersbury Park, where over 98 operational days are currently licensed. In fact the current licence puts on limits on hire periods something that must be rectified. Please note that while the CIC has in 2025 applied for planning permission for some of the festivals in previous years this was omitted.

The current blanket event licence in Gunnersbury Park allows multiple large-scale events to proceed without proper individual planning scrutiny or meaningful public consultation. Residents have reported that online planning consultation forms are often non-functional - restricting the use of standard punctuation and free text - and fail to provide clear instructions on how to formally object should the form fail (as it consistently does). No public council-led meetings have been held to allow direct engagement with planning or licensing officers other than Area Forums where residents had specifically requested officers attend, and no clear appeals process has been communicated to residents.

Freedom of Information (FOI) requests have revealed that previous event planning approvals were rushed through with minimal transparency in part due to enabling by current licensing, undermining both due process and residents' rights to be heard under Article 6 of the Human Rights Act 1998.

These failings justify the immediate revocation of blanket multi-event licences such as the one currently granted to Gunnersbury CIC. Moving forward, all applications should be assessed on an event-by-event basis, with full statutory consultation, functioning public objection portals, and scheduled public meetings with council officers present (not just event organisers and CIC) to enable residents to engage directly with decision-makers. The current set up defacto hands over enforcement to a sub-contracted third parties (CIC and Vanguardia). The council should resume its licensing enforcement duties and communicate freely with residents.

7.1.2. Finsbury Park (Highbury Corner Magistrates' Court, 2019):

Wireless Festival's licence was successfully challenged by residents, resulting in reduced capacity, stricter noise thresholds, and caps on event days. Festival Republic withdrew its appeal, confirming the enforceability of these terms. This case demonstrated courts' willingness to limit commercial use of public land to safeguard Article 8 ECHR rights (private and family life). Festival Republic is also the operator of Gunnersbury Park events.

7.1.3. Crystal Palace Park (2021–2022):

Sustained community backlash led to formal apologies from the Park Trust for noise, disruption, and public exclusion during events. While not a legal case, this reflects increasing scrutiny and demand for tighter regulation.

These examples establish that large-scale commercial festivals are not exempt from legal scrutiny. The Brockwell Park ruling particularly underscores that licensing cannot override planning controls. Gunnersbury Park - smaller than Brockwell, enclosed by homes, schools, cemetery and other noise sensation areas as well as covenant-protected- exceeds the thresholds that triggered these reforms. Councils have a duty under the Human Rights Act 1998 and planning law to prevent nuisance, protect access, and uphold residents' rights.

7.1.4 Richmond Council's Events Policy: A Lawful Precedent for Good Governance

The London Borough of Richmond has set a clear standard for lawful and accountable management of parks through its recently proposed *Events in Parks Policy* (see [policy summary:https://www.richmond.gov.uk/news/news_august_2025/new_events_in_parks_policy](https://www.richmond.gov.uk/news/news_august_2025/new_events_in_parks_policy) and [full document:https://haveyoursay.citizenspace.com/richmondecslbruteventsinparks/user_uploads/events-policy-appendix1-2.pdf](https://haveyoursay.citizenspace.com/richmondecslbruteventsinparks/user_uploads/events-policy-appendix1-2.pdf)). Importantly, this policy is subject to a full public consultation, open to all residents and stakeholders ([consultation link:https://haveyoursay.citizenspace.com/richmondecslbruteventsinparks/](https://haveyoursay.citizenspace.com/richmondecslbruteventsinparks/)).

The Richmond model contains clear safeguards to protect residents and green spaces:

- Major events are defined as over 10,000 attendees; large events as 5,000–9,999.
- No site may host consecutive large/major events on back-to-back weekends, except in exceptional circumstances.
- A maximum of four major events and six large events are permitted per site in any six-month period.
- Organisers are required to reduce waste, safeguard air quality, promote public transport use, and contribute to the local community (for example through employment opportunities or significantly discounted/free tickets for residents). They must also protect park infrastructure by preventing damage to grass, footpaths, and trees. Vehicle access to grass is only permitted with council consent and never in wet weather. Careful planning is required to avoid soil compaction or root damage, with the council's arboricultural team consulted case by case to safeguard tree health.

Critically, the Events Policy expressly prohibits *blanket licensing or planning approvals*. Each event must:

- Secure a separate premises licence or temporary event notice under the Licensing Act 2003, and
- Obtain distinct council land hire approval.

The policy states clearly that a licence alone does not confer permission to use council-owned land. The land hire decision remains a separate process, under the direct authority of the

council. This preserves the integrity of licensing and planning law and prevents these statutory functions being delegated to, or circumvented by, third-party bodies such as CICs or CIOs.

Richmond's approach also mandates a three-stage approval process:

- Initial review by ward councillors.
- Consultation with resident associations, community groups, responsible authorities, and other affected stakeholders.
- Final determination by the Strategic Cabinet Member for Environment & Planning and the Head of Parks & Open Spaces.

This layered governance framework ensures decisions are transparent, consultative, and legally defensible.

By contrast, Hounslow has not implemented comparable safeguards. Allowing decision-making to be concentrated in the hands of a CIC and commercial operators creates legal and procedural risks, and weakens residents' rights to fair consultation under planning and licensing law.

To ensure compliance with statutory duties and to maintain lawful, transparent, and community-focused governance, Hounslow Council is strongly encouraged to adopt the Richmond model.

A comparative table of licensing conditions across London parks, included at Appendix A, further demonstrates that Gunnersbury is subject to significantly weaker safeguards on noise, duration, and event numbers than any comparable site.

7.2 Counterpoint: “Temporary Cultural Use” Argument on Metropolitan Open Land (MOL)

The council has argued that the large-scale commercial events held at Gunnersbury Park constitute a form of “temporary cultural use” of Metropolitan Open Land (MOL), with no permanent physical footprint. This argument has been publicly suggested in previous statements (see:

<https://www.chiswickw4.com/default.asp?section=community&link=https://neighbournet.com/server/common/congunnsprk178.htm>). However, this claim is both **legally insufficient** and

factually misleading under applicable planning policy, licensing frameworks, and case law. Please see details below.

7.2.1. Conflict with London Plan Policy G3

Policy G3 of the London Plan (2021) affords MOL the same level of protection as Green Belt land. Any development- including temporary events- must **preserve openness**, both spatially and experientially. In 2025 alone, Gunnersbury Park was occupied for at least **98 operational days** (according to some sources) across six major commercial events excluding any additional events taking place at the museum or other greens. These include ticket-only entry, heavy

security fencing, industrial infrastructure, large stages, sound towers, lighting rigs, generators, and vehicle access that cuts across playing fields and walkways.

These cumulative impacts degrade both the visual and physical openness of the land. The loss of recreational access to children's areas, sports pitches, and heritage walkways both outside and during **school term time** further contradicts the intended public use of MOL. This scale and intensity of use appear inconsistent with Policy G3, which does not allow for routine repurposing of protected open land as a seasonal event venue as is the current case yearly.

7.2.2. Inconsistency with established guidance of National Planning Policy Framework (NPPF) Paragraph 150

Paragraph 150 of the NPPF states that **temporary uses on MOL or Green Belt must not conflict with the purpose of that designation**. The prolonged build and breakdown schedules, combined with months of restricted access, create a material change in use.

The Council's continued reliance on the 28-day rule under Class B of the GPDO is not applicable here, as the **28-day threshold has been exceeded every year since at least 2022**. As such, these festivals operate outside the scope of national planning requirements despite the blanket licence allowing them, and the "temporary" label is no longer credible.

7.2.3. Cultural Value Must Be Genuine and Public-Facing

It is also essential to distinguish **genuine cultural use** from **commercial entertainment**. True cultural programming is typically inclusive, educational, and low-cost or free. In contrast, most events licensed under this premises licence:

- Charge premium ticket prices (often £60+ per day with some events such as Soho House requirement private membership of more than £1.7k yearly to purchase tickets priced additionally above £270)
- Exclude non-ticket holders via fencing and security patrols
- Deliver minimal artistic or educational programming
- Prioritise branded commercial experience over cultural enrichment (with events such as Krankbrother and Waterworks being raves bringing drugs, crime and anti-social behaviour to residents)

Such events are more accurately described as **profit-generating leisure products**, not cultural interventions. Courts and planning authorities have repeatedly ruled that this type of activity does not qualify as cultural use for the purpose of overriding protections on Green Belt or MOL land.

7.2.4. Park Cultural Value Undermined by Misuse of the Museum

The contradiction becomes starker when one examines the state of Gunnersbury's own cultural and heritage facilities. The **Gunnersbury Park Museum**, once home to a publicly accessible, locally significant collection, has left **over 50,000 historical artefacts in offsite storage**, at

significant cost. No list of the 50k artifacts that used to be housed at the museum's first floor (now mostly used for events) has yet been made publicly available, despite requests and the CIC stating that there was a requirement by the storage facility to list everything. There is a claim that 8 mil pounds is needed to bring these back (despite previous lottery funding granted to museum restoration):

<https://www.heritagefund.org.uk/news/green-light-gunnersbury-park-museum-improvements#:~:text=The%20two%20councils%20found%20out,floors%20to%20improve%20public%20access>
<https://www.standard.co.uk/homesandproperty/property-news/colossal-ps50-million-gunnersbury-park-restoration-is-one-great-reason-to-make-the-move-west-a122336.html>

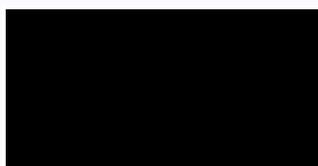
Thank you for your enquiry.

Gunnersbury's collections are owned by Ealing & Hounslow Councils . The vast majority of the 50,000+ objects are stored off site with the agreement of the councils and we meet that cost from our funds.

The two councils are working with us on a scheme to repatriate the collection to Gunnersbury but the current estimated cost of that project is in the region of £8m and is dependent on external funding. We also have an ongoing project to add collections to our online database so they can be searched and viewed so please watch this space.

Please could you let us know which collections specifically you are looking to locate so we can be of further assistance?

All the best,



Collections Assistant (working days Monday to Thursday)

Gunnersbury Park and Museum

Gunnersbury Park

Popes Lane

London, W5 4NH

www.visitgunnersbury.org

Meanwhile, the **first floor of the museum building**, historically used for public exhibitions and educational displays, is now routinely **hired out for private events** under the very licence being reviewed. There is no publicly available list of the stored collection, and no stated timeline or funding model shared with residents for its return.

If the CIC or licence holder were genuinely prioritising cultural access and education, these public assets would be on display. Instead, the space has been repurposed for commercial functions- directly contradicting the argument that large-scale events serve cultural aims.

7.2.5. Suitable Alternative Venues and Competitive Damage to Grassroots Institutions

London is home to dozens of purpose-built venues far more appropriate for commercial events of this scale. These include:

- **Over 45+ major music festivals** already hosted at Hyde Park, Victoria Park, Crystal Palace Park etc.
- **15+ food and lifestyle festivals** with cultural and artistic programming
- **Dedicated large-capacity venues** like Wembley Stadium, OVO Arena, Twickenham, and Hammersmith Apollo
- **Indoor and club venues** such as Bush Hall and Ministry of Sound
- **Multiple underutilised stadiums** available during the summer without displacing green space use

The existence of these venues further invalidates the claim that Gunnersbury Park must absorb the impact of large-scale festivals in the name of cultural necessity.

In fact the licensing and expansion of large, temporary or publicly subsidised live-music events in the locality of parks risks distorting competition to the detriment of existing small to medium purpose-built venues that operate year-round under stricter planning and licensing constraints. In essence Hounslow council is creating the very cultural issues it claims to be addressing by aiding large commercial promoters to the detriment of small and mid-size purpose-built venues who cannot compete and who do not bring large scale disruption. Evidence shows material fragility in the smaller venue ecosystem. Music Venue Trust reports that 125 grassroots music venues either permanently closed or ceased qualifying as live-music venues in 2023, and a further 46 closed in the twelve months to 26 July 2024. This coincides with the expansion of mass commercial events in parks. The average margin across the sector in 2024 was approximately 0.48 percent, with 43.8 percent of venues trading at a loss. Parliament's Culture, Media and Sport Committee has concluded that large-show operators should support the grassroots infrastructure through an industry levy on arena and stadium tickets, a position the Government accepted in November 2024, and which the London Assembly has urged for London. Please however note this levy does not

apply to festivals in parks thus they currently do not support or aid smaller purpose-built venues but rather compete with them in a way where the existence of smaller venues is threatened. These findings recognise that large-scale events capture value created by smaller venues, while year-round cultural infrastructure bears the fixed costs and local externalities. Music Venue Trust further identifies reduced regional touring opportunities as a cause of lost or reduced live-music provision. In this context, granting or expanding temporary large-scale permissions without reciprocal support would likely exacerbate closures, erode local cultural infrastructure, and harm the long-term cultural ecosystem. Hounslow council has not to our knowledge provided any offset to the current Gunnersbury licence in order to safeguard the competition effect on smaller and mid-sized purpose-built venues.

What the data shows since 2023

2023: 125 grassroots music venues lost, through permanent closure or no longer meeting the GMV definition. Source: Music Venue Trust 2023 report, confirmed again in the 2024 Annual Report.

12 months to 26 July 2024: a further 46 permanent closures identified. Source: Music Venue Trust 2024 Annual Report.

Profitability pressure: average sector margin about 0.48 percent in 2024, with 43.8 percent of venues loss-making. Source: Music Venue Trust 2024 Annual Report.

Parliamentary assessment: CMS Committee found margins around 0.5 percent and recommended a levy on arena and stadium tickets to support grassroots venues, recognising ecosystem interdependence. The Government accepted this recommendation in November 2024 and pressed industry to implement it.

Wider night-time context: roughly one in four late-night venues have closed since 2020, with nightclub numbers down by about a third. Granted many have been impacted by factors such as Covid and Cost of living but the decline is further exacerbated by the mass commercial events that receive public support while small venues do not. This indicates broader ecosystem decline that affects stages for new artists and local culture.

Limits of available data: please note that to our knowledge there is no single national statistic that isolates closures of only “purpose-built” music venues as a category. The Music Venue Trust series is the most authoritative proxy for dedicated small and mid-scale live-music rooms, and the Parliament and Government sources corroborate the systemic risk and the need for cross-subsidy, which Hounslow council is not currently offsetting the Gunnersbury licence to in order to defend its stance of “protecting culture “ while creating competition for these venues and effectively helping in their permanent loss by offering public assets and support to large commercial music providers such as Live Nation.

Full links to the sources

Music Venue Trust, Annual Report 2024 (PDF)

https://www.musicvenuetrust.com/wp-content/uploads/2025/01/MVT_2024-Annual-Report.pdf

Music Venue Trust, Annual Report 2023 (PDF)

https://www.musicvenuetrust.com/wp-content/uploads/2024/01/MVT_2023-Annual-Report_Digital.pdf

UK Parliament, Culture, Media and Sport Committee, “Grassroots music venues” report, 11 May 2024

<https://publications.parliament.uk/pa/cm5804/cmselect/cmcomeds/527/report.html>

UK Government response to CMS Committee on grassroots venues, 14 Nov 2024

<https://publications.parliament.uk/pa/cm5901/cmselect/cmcomeds/380/report.html>

UK Parliament CMS Committee news, Government pressed industry to implement levy, 9 Dec 2024

<https://committees.parliament.uk/committee/378/culture-media-and-sport-committee/news/204278/grassroots-music-venues-government-responds-to-cms-committee-calls-for-voluntary-levy-timetable/>

London Assembly press release, call for voluntary levy on arena and stadium tickets, 24 Feb 2025

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/support-grassroots-music-venues-levy-stadium-tickets>

CGA Strategy and NTIA monitor, venue counts to Dec 2024

<https://cgastrategy.com/new-cga-and-ntia-monitor-reveals-the-changing-landscape-of-night-time-hospitality/>

MusicRadar coverage of NTIA figures, closures since 2020

<https://www.musicradar.com/music-industry/coming-like-a-ghost-town-the-uk-has-lost-a-quarter-of-its-clubs-and-late-night-venues-since-2020>

7.3 Applicability of the Review - Not Frivolous, Vexatious, or Repetitious. Exhaustion of Alternative Remedies under Statutory Guidance.

This application is brought in good faith and supported by extensive documentary and photographic evidence, case law, and statutory references. It does not arise from any known private dispute with the licence holder or from commercial rivalry, nor does it lack seriousness. On the contrary, it raises substantial issues directly linked to all four licensing objectives: the prevention of crime and disorder, public safety, the prevention of public nuisance, and the protection of children from harm.

The grounds advanced here are not a repetition of matters already determined. They reflect continuing and escalating impacts arising from licensed activities in 2023-2025, including

events scheduled for 2025 totalling more than 98 days of operational occupation. These impacts are ongoing and cumulative in nature, and cannot be dismissed as isolated or historic concerns. Judicial authority (including *R (Friends of Brockwell Park) v Lambeth LBC* [2025] EWHC 1372 (Admin)) confirms that excessive occupation beyond the 28-day threshold constitutes a material change of use requiring fresh scrutiny. This submission is therefore timely, necessary, and proportionate to address systemic and recurring non-compliance.

The matters raised cannot reasonably be resolved through informal dialogue with the licence holder (as previously attempted by multiple residents) or by reliance on existing licence conditions. The current licence is drafted so broadly that it is difficult to monitor or enforce effectively, making a review necessary to ensure alignment with the licensing objectives. Previous attempts to raise concerns with both the Council and the CIC have not resulted in meaningful remedies. The scale, frequency, and cumulative nature of the licensed events, together with their planning and covenant implications, demonstrate that only a formal review can ensure compliance with statutory duties outside of costly legal action. For these reasons, the application is properly made, firmly grounded in law and evidence, and falls well outside the scope of “frivolous”, “vexatious”, or “repetitious” representations.

In addition to the above please note local residents have pursued every avenue available to them short of a licensing review or court action. Councillors have already been asked to engage with the licence holder, and residents have themselves attended two Area Forums as well as the annual in-person and online meetings with the licence holder and event organisers. On residents’ request, the local Member of Parliament has also intervened. Despite repeated assurances, these engagements have not resulted in any material or positive change. On the contrary, the number of events and area used has increased, and new formats such as the “Krankbrother” have been introduced, causing significant disruption comparable to that experienced during prior events such as Lovebox. Residents have also attempted to pursue remedies through the planning system, including two formal call-ins and a committee referral, all of which were rejected or dismissed without serious consideration of the legal issues raised, notwithstanding the Brockwell Park decision, and despite the fact that the planning regime has effectively overridden the licence conditions by allowing Waterworks 2025 to operate at 90 dB in contravention of the 75 dB licence limit.

Accordingly, every alternative measure set out in the statutory guidance-dialogue with the licence holder, involvement of councillors and MPs, and referral to responsible authorities-has already been attempted over a period of several years. None have resolved the issues. Residents have acted in good faith, repeatedly seeking constructive engagement, but these efforts have been met with either dismissal or further intensification of the problems. As such, the statutory review process, and if necessary subsequent legal challenge, now remains the only available and proportionate course of action.

7.4 Blanket Licence: Impossible to Enforce

A critical defect in the current premises licence is that it is drafted so broadly that it cannot be effectively monitored or enforced. There are no clear caps on hire days or operational periods, despite evidence that the park is occupied for at least 98 days in 2025 alone. Conditions around noise monitoring are equally flawed. The licence permits **75 dB(A) LAeq over a 15-minute period**, a threshold that is practically impossible to breach because no song or set maintains a single continuous beat for 15 minutes. This averaging approach masks real-world nuisance. In

practice, it is the **low-frequency bass surges**-often unmeasured under the current regime-that shake Grade II listed and conservation area buildings and disturb residents even through triple-glazing.

The problem is compounded by the fact that the original licence **misapplied the Noise Council's 1995 Pop Code**. Instead of enforcing the 65 dB(A) limit specified for open green parkland, Hounslow applied the higher 75 dB(A) standard intended for purpose-built arenas. This fundamental error has given organisers a free hand to run noise levels well above what planning and licensing law allow in public parks. A licence that cannot be enforced, and that relies on misapplied standards, appears inconsistent with the Licensing Act 2003 and may not meet its intended standards. Parliament intended licensing conditions to be clear, measurable, and enforceable. By granting a blanket licence with vague limits, Hounslow has created a regulatory gap where neither the council nor residents can reliably hold organisers to account. These failures are reflected in the escalation of resident complaints year-on-year, despite supposed mitigation by consultants. **Appendix H** sets out complaint data supplied by the Council itself, which shows a steep rise since 2022. The result is the legitimisation of departures from planning law, public safety standards, and nuisance thresholds, leaving the community without remedies and undermining confidence in the licensing system itself.

8. Requested Amendments and Formal Remedies

We respectfully request that the London Borough of Hounslow initiate an immediate and full review of the premises licence granted to Gunnersbury Estate (2006) CIC, to ensure it complies with all applicable legal, planning, environmental, and human rights obligations. In particular, the licence must be amended to:

- cap noise at **no more than 65 dB(A) LAeq measured over 5 minutes** at sensitive receptors, in line with WHO/DEFRA/Pop Code standards, and
- restrict events to **no more than 5 major events per year with a maximum of 28 operational days in total** (including setup and breakdown).

The licence as currently granted facilitates activity that exceeds lawful thresholds, undermines statutory protections attached to Gunnersbury Park, and fails to safeguard the public interest. We understand that the Council has discretion to choose between 65 dB and 70 dB as already internally proposed as per FOI, change to the existing 75db licence. Please note only 65 dB is consistent with WHO health guidance, London Plan Policy D14, the Noise Council's Pop Code, and existing precedent in Hyde Park. Any higher level would be exceptional, lack evidential support, and expose residents to acknowledged health risks.

Detailed requested Amendments:

Core Amendments Requested

Noise Limits and Zoning

- Adopt WHO, DEFRA, and Pop Code standards.
- Use **5-minute LAeq measurement periods** to reflect real-world nuisance more accurately.
- Set the Music Noise Level (MNL) at **no more than 15 dB above background** or **65 dB LAeq (5 min)**, whichever is lower, at the nearest sensitive residential receptor.
- Introduce **mandatory dB(C) thresholds** and enforce **frequency-specific caps**: maximum **65 dB in the 63 Hz and 125 Hz bands** to limit harmful bass frequencies.
- Require real-time monitoring without averaging; low-frequency surges must trigger immediate enforcement.
- Noise sensitive areas must be recognised both inside and outside park premises applying zoning. Zone 1 inside the park-playground and sports fields used by children and families routinely exposed to decibel levels above the current 75db threshold. Zone 2 Noise sensitive areas such as the Lionel Primary School, International School of London, Gunnersbury Cemetery, Clayponds hospital, the Triangle Half -Way mental health house. Zone 3 Residential housing.

Transparency and Monitoring

- **Immediate review and amendment of the licence** to ensure compliance with planning law
- **Enforcement action under Section 172 of the Town and Country Planning Act 1990**
- Publicly advertise and hold **event-specific planning and licensing meetings** where residents have a **statutory right to speak to council officers**, in accordance with the Local Government Act 1972.
- Install **independent, fixed-location acoustic monitoring stations** across the park perimeter, particularly at Gunnersbury Triangle, Lionel Road, and Popes Lane rather than sub-contractors such as Vanguardia who primarily serve the contracting party enabling events vs serving affected communities
- Publish all environmental and acoustic monitoring data **without need for FOI**, and ensure monitoring is conducted by parties **without commercial interest**.

- Conduct unannounced, year-round licence enforcement inspections to ensure continuous compliance. Currently CIC and organisers are aware of enforcement plans.
- The licences must hold a stipulation to inform residents of all events, rehearsals, and sound checks **a minimum of 28 days in advance**, with published complaints contact points subject to FOI vs the current telephone line which is often non-functional and reporting is not available to the public.
- Prohibit exclusion of lawful public voices (including local residents) from official digital channels such as social media, particularly where those channels promote publicly funded land use.
- Require the licensee to produce and publish an annual **heritage and infrastructure reinvestment strategy**, detailing how event revenue is used to restore and protect listed structures and park features.
- **Tighten planning/licensing loopholes:** Licensing conditions should be strengthened to prevent event organisers from using planning permissions to override licensing limits. For example, the Waterworks Festival 2024 submitted a sound management plan through Vanguardia that set a 90 dB limit, despite the event licence only permitting 75 dB. This demonstrates how planning approvals can be used to circumvent licence safeguards.
- **Prohibit ticket sales before planning consent:** Licensing should require that no tickets are sold for events until full planning permission has been granted. For instance, Waterworks 2026 began ticket sales on 16 September 2025 despite not having planning consent (please see appendix G, point 22). The current licence permits 4 special, 14 large, and 20 medium events each year (excluding lengthy set-up and disassembly periods of up to 29 days). This framework means the number of event days always exceeds the statutory 28-day planning limit, creating a situation where planning committees effectively grant approval to applications without substantive scrutiny. As a result, events can sell tickets a year in advance with confidence that permission will follow, undermining resident objections and statutory protections.

Set-Up and Breakdown Restrictions

- Require all events to apply individually for licensing and planning permission-**discontinue blanket or rolling licences.**
- Limit events to **5 per year**, with **a combined maximum of a total of 28 days** for setup and breakdown.
- Prohibit events during school terms.
- Ban overnight generator or plant use unless silent and inaudible beyond park boundaries.

Heavy Machinery and Infrastructure Controls

- Ban all HGVs, cars, and generators from accessing or damaging grassed areas.
- Prohibit installation of any **permanent logistical infrastructure**.
- Ban fireworks, BBQs, helicopter rides, and drones associated with commercial events.

Environmental Protection and Accountability

- Require **annual biodiversity and soil health audits** by independent agencies ideally hired by the council (e.g., APHA or Environment Agency) not sub-contractors hired by CIC or organisers enabling commercial profits to avoid bias and greenwashing.
- Enforce a **bond/deposit system** whereby event organisers pre-pay for any restoration work.
- Ensure strict compliance with the **Environment Act 2021** and **Local Nature Recovery Strategy** in all event planning.
- Add a Cumulative Environmental Impact Assessment Requirement
The repeated and extensive commercial use of Gunnersbury Park, encompassing prolonged setup and breakdown periods, heavy vehicle movements, and significant noise generation, necessitates a comprehensive Environmental Impact Assessment (EIA). Despite individual events potentially claiming minor impact, their cumulative effect over 98 days in 2025 alone undeniably constitutes a significant environmental change that requires full assessment under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The absence of such an assessment, particularly given the park's designation as Metropolitan Open Land and its ecological sensitivities (e.g., protected bat species near Potomac Lake), represents a significant gap in regulatory oversight. We request that the Council mandate a full, independent EIA for the totality of commercial events proposed annually in Gunnersbury Park, ensuring that all direct, indirect, and cumulative environmental effects are properly identified, evaluated, and mitigated before any further licences are granted or renewed. This however must not be carried out by a sub-contractor paid for by the CIC or promoters who will be inevitably biased and support the events, instead a governmental body such as DEFRA must be actively engaged by the council ensuring true independence of findings.
- All generators, lighting rigs and amplified equipment must be switched off within one hour of the event closing time, to protect the habitat of endangered bat species and other nocturnal fauna known to forage and breed within the park. This measure is vital for compliance with UK Habitats Regulations and to prevent unlawful disturbance to protected species under the Wildlife and Countryside Act 1981.

Heritage Protection and Use Restrictions

- Limit private hire to the Orangery only; prohibit use of the Rothschild Rooms and main house for private events.
- Require the first floor of the museum to be reinstated and maintained for its public museum function, with guaranteed public access days.

- Cap the number of days the grounds may be closed for small events (e.g., weddings), in line with the 28-day planning law limit.

Access and Congestion Controls

- Prohibit all event access routes through the **A406 overpass and Gunnersbury Triangle residential zone**.
- Stagger ticket entry times to reduce gate congestion and public transport overload.
- Cut off alcohol sales no later than **22:00** to mitigate antisocial behaviour
- Mandate a fair and transparent resident ticket allocation scheme as a condition of the premises licence. Tickets must not be distributed via a non-transparent “lottery” system with no public visibility on outcomes as is now. Instead, either:
 - Free/discounted tickets for all major events (not just the least expensive or a single one) must be made available to all roads directly affected by noise, disruption or access restrictions, or
 - A rotational and staggered system must be implemented, whereby households are guaranteed free/discounted tickets in alternating years for different events or on a published schedule.

This must be a formal benefit for residents bearing the cumulative impact of multiple annual festivals and included as a condition in all relevant licences.

- Residents of the roads demonstrably affected by large-scale events at Gunnersbury Park should be entitled to relief in the form of council tax discounts or refunds, as the Council’s own complaint data and postcode records establish the extent of impact. In 2025, residents lost access to the park for approximately 116 days, while also enduring road and underground closures, business shutdowns due to crowding, and noise at levels that drove many from their homes. Under the Local Government Finance Act 1992 (s.13A) councils hold discretionary powers to reduce council tax liability where circumstances warrant, and case law such as *Coventry v Lawrence [2014] UKSC 13* affirms that sustained noise and disruption constitutes interference with the ordinary use and enjoyment of property. No compensatory measures have thus far been offered, and in line with statutory powers the Council should recognise the deprivation of amenities and refund residents accordingly.

- Fencing and site layout must not restrict public access to key amenities, including:

-Ponds

-Seating/benches

-Public bins

-Children’s playground

-Open recreation areas used for football, rugby and picnicking

These amenities must remain accessible to the public at all times, regardless of event setup. Fencing layouts must avoid enclosing or obstructing areas not directly used for the festival itself.

Additional public access points through fencing must be provided and clearly signposted to prevent total exclusion from large areas of the park for extended periods.

Public Safety and Policing

- Require the licence holder to fund and implement policing or accredited security patrols in neighbouring residential streets during major events, to prevent opportunistic crime such as vehicle break-ins and burglaries.
- Patrols must operate before, during, and for at least two hours after event closure, with published accountability and reporting mechanisms to affected residents.
- Require the park to be locked and secured overnight to protect adjacent homes from crime and anti-social behaviour, with event organisers held accountable for security during and after events.

8.1 Escalation Notice

If the Council fails to act in line with the above, we respectfully assert the following legal obligations and rights:

8.1.1 Under **Section 52(2) of the Licensing Act 2003**, the Council must schedule a licensing hearing **within 28 calendar days** of receiving this request. We request **written acknowledgement and a case reference within 5 working days** of submission.

8.1.2 Continued operation of the licence in its current form, given apparent inconsistencies with the Town and Country Planning Act 1990, the **Licensing Act 2003**, and the **Human Rights Act 1998** (Articles 6 and 8), may invite applications for judicial review or referral to oversight bodies such as **Local Government and Social Care Ombudsman**.

8.1.3 If enforcement action under **Section 172 of the TCPA 1990** is not pursued for clear land-use non-compliance or if blanket licensing continues to override planning controls, we will initiate escalation to:

- The **Ombudsman**
- And, if necessary, pursue **judicial review** via the Administrative Court.

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Appendix A

Licence comparison Gunnersbury and other local parks as publicly available

Licence documents available here:

<https://drive.google.com/drive/folders/1zhevfv-lb1QdeTgu7TOTew0xpcCKTPst?usp=sharing>

Category	Hyde Park (Westminster)	Finsbury Park (Haringey)	Brockwell Park (Lambeth)	Gunnersbury Park (Current)	Richmond Parks (policy under consultation)	Requested Changes
Park Size	350 acres	Approx. 46 hectares	50.8 hectares	76 acres	128 parks and areas of open space (excl. Kew Gardens or the Royal Parks Richmond Park and Bushy Park)	N/A
Max Major Event Days Per Year	<u>Not fixed in licence-event-by-event approval by Council/Parks Service/SAG</u>	<u>Not fixed in licence-event-by-event approval by Council/Parks Service/SAG</u>	<u>7 major event days per year (out of a total of 10 event days)</u>	<u>Up to 38 days (20 medium events +14 large + 4 special)</u>	<u>No more than 4 major event days per park/common/open space in any 6-month period.</u> <u>No more than 6 large event days in any 6-month period.</u> <u>No consecutive weekends with large/major events unless impact is reduced.</u>	<u>Max 5 events/year, 28 days total days</u>

					Sports/physical activity events excluded from the count.	
Max Hire Period(Total occupation by events)	BST Typically around 44 to 46 days	37 days in total	Not clearly defined in licence(Aproximatel y 37 days in 2025)	Currently at least 98 days in 2025	Not explicitly listed as a number of days. Only frequency rules are given.	Max 28 days
Max Attendance Per Event	64,999	49,999 (including staff, performers, etc.)	29,999 (Major Events), 14,999 (Minor Events)	29,999	Major events are considered at 10,000	19,999
Noise Limit (Residential)	<u>65dB(A) over a 5-minute period</u> throughout the duration of the advertised event.	75 dB(A) LAeq,15min at residential properties during events (standard limit);90 dB(C) LAeq (limit applies specifically to low-frequency bass sounds), 15min at monitoring locations- <i>but only if it does not cause public nuisance</i>	Not defined in licence. Must comply with Lambeth's 2016 upper sound levels for major events(https://app1.apply4.com/uploads/uk/instance_document/file/1488-20170802_-_Guidance_for_Control_of_Sound_at_Outdoor_Events_2016.pdf?utm_source=	75 dB LAeq (15 min)	Events with licensable activities: limits set in licence process, following Noise Council Code of Practice 1995 (Pop Code setting parks at 65 db). Other events: must not be audible outside park boundary. Repeat offenders may be banned.	65 dB (A) over 5min period Include dB(C) limits in addition to dB(A). Specify limits for 63Hz and 125Hz octave bands, the typical bass frequencies regulated. Low frequency noise should

			chatgpt.com)			not exceed 65dB in the 63Hz and 125Hz octave bands, and the overall sound level should not exceed 65dB(C) at the nearest noise-sensitive premises.
Sound Measurement Window	<u>5 minutes</u>	15-minute LAeq at multiple residential locations including LB Islington, Hackney	Covered in the Sound Management Plan and Noise Monitoring Plan (NMP), to be agreed with SAG	15 minutes	Not given as a specific decibel/time window. Noise management plans and monitoring points agreed with Environmental Health before event.	Real-time peak limits (no averaging)
Rehearsal/Sound check Limits	Throughout the duration of the events (including sound checks, rehearsals and concert performances) the Music Noise Levels (MNLs)	Max 90 mins per day within a 3-hour agreed window, only allowed day before or day of event	Defined in Sound Management Plan. Sound checks subject to agreement with Lambeth	Allowed under 75 dB	Not explicitly stated.	Max 65 dB

	shall not exceed 15dB (LAeq5 minute) above background (Representative LA90 obtained on a number of equivalent days during the last 4 hours of the proposed concert time without the event running) or 65dB (LAeq 5 minute) whichever is the lowest.					
Music Curfew	<u>22:30</u>	<u>22:30</u> <u>Mon–Sat:</u> <u>21:30 Sun</u>	Major Events: 22:45 (Fri–Sun), Minor Events: 21:45. All regulated entertainment ends 15 mins before close	23:00 (22:30 Sundays)	All non-licensed events must finish by 10 pm. Licensed events' finish times set in licensing process. Licence per event rather than blanket licence.	22:30 or earlier
Alcohol Sales Cut-off	30 mins before	22:00 Mon–Sat; 21:00 Sun	Major Events: 22:30	22:30	Determined by the premises licence or TEN	22:00

	event ends or 22:30		(Fri/Sat), 22:00 (Sun); Minor Events: 21:45		under Licensing Act 2003.	
Setup/Breakdown Limits	Strict timings, phased dispersal	Build/break periods must be communicated; dates and access routes shared with council	spanned up to 37 days, exceeding the 28-day limit for temporary use without planning permission	No defined cap		10 days max (setup + breakdown + event)
Advance Public Notice	28 days, Hotline required; 3 months advance notice to authorities	Leaflets to homes 2 weeks before events; draft sent to Licensing 5 weeks prior	Minimum 6 months' notice to residents and businesses (unless otherwise agreed)	14 days prior (minimum)	Notices placed in park and online to alert users about upcoming events, expected impacts, and mitigations. For large and major events, residents and businesses in the vicinity must also be consulted/informed.	Public reports, 28 days
Planning Law Compliance	Not challenged	Not exceeded 28 days	Exceeds legal threshold	Exceeds legal threshold	The policy defers to licensing law and planning law.	Full per event application

					<p>Explicitly notes that a licence or TEN is separate from land hire approval.</p> <p>Events must comply with Licensing Act 2003, Noise at Work Regulations 2005, and environmental protections.</p>	
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Appendix B:

List of Relevant Documents Provided:

- Copy of the Rothschild Covenant (1925 Conveyance)

https://drive.google.com/file/d/1HAm8X66z5x-8RW3D5om2VwzWJC9TYvl-/view?usp=drive_link

- Upper Tribunal Section 84 case reference

<https://drive.google.com/file/d/1dQz0WQa59SkNKuZtJk72W1ELX98dRoO1/view?ts=672b657f>

- WHO noise guidance:

<https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1>

- Pop Code (Code of Practice on Environmental Noise Control at Concerts)

<https://www.gov.uk/SiteCollectionDocuments/Leisure%20and%20entertainment/ID%20Code%20of%20Practice%20on%20Environmental%20Noise%2020110517%20RWJ.pdf>

- Gunnersbury Estate (2006) CIC premises licence

https://drive.google.com/file/d/14M-zff5nk8Br_YfR-P5oxBc8bKImpPvB/view?usp=sharing

- Gunnersbury Master Plan 2021 (proposals and commercial intent)

https://drive.google.com/file/d/15-fUq5Q7tHDQRwafJuEMN4yYLncoRXX/view?usp=drive_link

- Hounslow Local Plan and London Plan policies (GB1, GB9, EQ5; G3, G6, D14):

GB1- Hounslow Local Plan: Green Belt & Metropolitan Open Land

[Policy GB1- Hounslow Local Plan 2015–2030 \(PDF\)](#)

https://www.hounslow.gov.uk/downloads/file/2545/local_plan_volume_1

- Fencing off MOL for private use violates protection of openness and access.
- No ecological, recreational or public value added- which GB1 requires.

GB9- Hounslow Local Plan: Play Space & Outdoor Facilities

[Same document- see Policy GB9 on p.174](#)

https://www.hounslow.gov.uk/downloads/file/2545/local_plan_volume_1

- Event blocks children’s play areas and sports hub during school term.
- No alternative provision is made, against policy protecting play access.

EQ5- Hounslow Local Plan: Noise

[EQ5- Hounslow Local Plan Volume 1, p.201](#)

https://www.hounslow.gov.uk/downloads/file/2545/local_plan_volume_1

- Event exceeds safe decibel levels for children and residents (WHO recommends <70 dB).
- No detailed noise protection for nearby sensitive sites like homes or playgrounds.

G3- London Plan: Metropolitan Open Land

[Policy G3- London Plan 2021 \(page 320\)](#)

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- MOL is given **Green Belt-level protection**; must stay open and publicly accessible.
- This festival is **inappropriate development** with no “very special circumstances”.

G6- London Plan: Biodiversity & Nature

[Policy G6- London Plan 2021 \(page 328\)](#)

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Requires developments to avoid ecological damage and aim for **biodiversity net gain**.
- Festival admits **0% net gain** and offers no real wildlife protection.

D14- London Plan: Noise

[Policy D14- London Plan 2021 \(page 289\)](#)

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

- Festival fails to minimise adverse noise impacts on sensitive uses.

Agent of Change principle ignored- **festival causes the noise**, but fails to protect the community.

Environmental and community impact reports (crime, access restriction, wildlife disturbance):

https://drive.google.com/drive/folders/1_gNhQ6s8axUiSHbTPmNK7LCu1HJJNT7F?usp=drive_link

- **DEFRA- Low Frequency Noise Guidelines**

DEFRA’s NANR45 report (“Proposed criteria for the assessment of low frequency noise disturbance”, 2005) recommends controlling bass energy by limiting the difference between dB(C) and dB(A).

https://www.ioa.org.uk/system/files/publications/D%20FIUMICELLI%20V%20PA RKER%20E%20LAWRENCE%20J%20STEWART%20LOW%20FREQUENCY%20SOUND%20AT%20OUTDOOR%20CONCERTS%20%E2%80%93%20A%20NECESSARY%20NOISE.pdf?utm_source=chatgpt.com

WHO - Community Noise Guidelines

The WHO's Community Noise (2000) states:

A-weighting underestimates low-frequency sound.

Where strong low-frequency content exists, C-weighting should be used.

It suggests indoor noise with prominent low-frequency should be kept below 30 dB(A) and that A-weighting is insufficient.

https://journals.lww.com/nohe/fulltext/2004/06230/low_frequency_noise_and_a_nnoyance.6.aspx?utm_source=chatgpt.com

Appendix C

Snapshot of other events

Please note the below are not all currently listed venues and festivals outside Gunnersbury Park but a snapshot of a wide variety and selection.

	Major London Music Festivals 2025	Venue	Major Food, Drink and Wellness Festivals London 2025	Major West London Purpose Built venues	Major West London Stadiums	Stadium Capacity
1	Multitudes	Southbank Centre	Taste of London at Regent's Park	OVO Arena Wembley (Wembley Arena)	Wembley Stadium	90,000
2	Brick Lane Jazz Festival	Brick Lane	Great British Food Festival at Wimbledon Park	Eventim Apollo (Hammersmith Apollo)	Twickenham Stadium	82,000
3	Polygon Live LDN	Crystal Palace Park	National Geographic Traveller Food Festival at the Business Design Centre	O2 Shepherd's Bush Empire	Stamford Bridge	40,343
4	Wide Awake	Brockwell Park	Eat & Drink Festival at the Ideal Home Show at Olympia London	Bush Hall	Craven Cottage	25,700
5	GALA	Peckham Rye Park	Urban Village Fete at Greenwich Peninsula	Exhibition London	Gtech Community Stadium	17,250

6	Project 6 Festival	Brockwell Park	Clerkenwell Design Week across various venues in Clerkenwell	606 Club	Loftus Road Stadium	18,439
7	We Are FSTVL	Dagenham	London Craft Beer Festival at Tobacco Dock	Under the Bridge	McGovern Park	3,000
8	Urban Village Fete	Greenwich Peninsula	Meatopia at Tobacco Dock		Brentford Gtech Community Stadium	17,250
9	Field Day	Brockwell Park	Wellnergy Festival at Wimbledon Park			
10	Cross the Tracks	Brockwell Park	Fitzrovia Quarter Wellness Festival			
11	City Splash	Brockwell Park	Mind Body Spirit Festival at Olympia London			
12	Mighty Hoopla	Brockwell Park	Feel Good Festival at Hampton Court Palace			
13	Lambeth Country Show	Brockwell Park	The Beauty Triangle Festival at The Strand			
14	Lido Festival	Victoria Park	Brentford Canal Festival			
15	All Points East	Victoria Park	Foodies Festival at Syon Park			
16	BST Hyde Park	Hyde Park				
17	Wireless Festival	Finsbury Park				
18	Lovebox Festival	Gunnersbury Park				
19	Waterworks Festival	Gunnersbury Park				
20	Junction 2 Festival	Boston Manor Park				
21	South Facing Festival	Crystal Palace Bowl				
22	Tinlicker In the Park	Crystal Palace Bowl				
23	KISSTORY On	Blackheath				

	Blackheath	Common				
24	Uptown Festival	Blackheath Common				
25	Latino Life in the Park	Walpole Park				
26	As One in the Park	Walpole Park				
27	Breakin' Convention	Sadler's Wells Theatre				
28	Notting Hill Carnival	Notting Hill (Street Festival)				
29	DnB Allstars Festival	Gunnersbury Park				
30	Raver Tots Outdoor Festival	Copthall Playing Fields				
31	Raver Tots Outdoor Festival	Old Deer Park Car Park, Richmond				
32	UKG LDN Open Air Garage Rave	LDN East, Canning Town				
33	Michael Bibi - One Life	Silverworks Island				
34	A State of Trance London Festival	Silverworks Island				
35	WAH in the City	Silverworks Island				
36	Sonny Fodera	Silverworks Island				
37	Body Movements	Southwark Park				
38	Queen's Yard Summer Party	Hackney Wick				
39	Pitchfork Music Festival London	Various Venues (e.g., Roundhouse, Royal Albert Hall)				
40	La Linea Festival	Various Venues across				

		London				
41	C2C: Country to Country	The O2 Arena				
42	SXSW London	Various Venues in Shoreditch				
43	Outbreak Festival	Victoria Park				
44	Colourscape Music Festival	Clapham Common				
45	Big Smoke Festival	Crystal Palace Bowl				
46	Ben & Jerry's Sundaes in the Park	Chiswick House & Gardens				

Appendix D

Estimated additional footfall and amenity pressures in the park and surrounding residential areas

(incl tube/bus stations, parking, uber etc) due to festivals based on licensing:

- Up to 29,999 ticketed attendees per day,
- A maximum of 4 Special Events, 14 Large Events, and 20 Medium Events each year

*Please note Hounslow council unfortunately confirmed they **DO NOT hold** any record or audit of the correct footfall numbers as per FOI request: [FIR013402](#)*

"We confirm we do not hold the information requested."

Failure to monitor or audit footfall as required does not comply with the principles of lawful decision-making under the Licensing Act 2003 and undermines planning control by failing to assess environmental impact under the Town and Country Planning Act 1990. A licence that lacks or ignores monitoring conditions is potentially inconsistent with policy/legal requirements and subject to review or judicial challenge for failing to protect public safety and amenity

Year	Total Event Days	Estimated Visitors
2017	1	15000
2018	3	45000
2019	3	45000
2022	8	120000
2023	12	180000

2024	31	195,000-465000
2025	14	206,000

Appendix E

Planning Non-compliance Enabled by Blanket Licensing

1. Failure to comply with Planning Control- Unauthorised Change of Use

As of 15 July 2025, Gunnersbury Park has been hired for commercial events for 56 consecutive days, far exceeding the 28-day annual limit set by Schedule 2, Part 4, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015. This includes Pub in the Park (14 days), Krankbrother (16 days), Soho House Festival (18 days) and the Happy Place Festival (8 days). Notably, the combined hire of Krankbrother and Pub in the Park alone totals 30 days, already above the permitted threshold without a valid planning application before other events are considered.

No planning application had been made public for the Happy Place Festival as of mid-June 2025 either, a month before its scheduled start, preventing lawful public consultation and violating the London Borough of Hounslow's Statement of Community Involvement. No application was made public up to September 2025 either. This also fails to meet Policies CC1, CI1 and GB1 of the Hounslow Local Plan, which protect public open spaces from unauthorised or intensive use. A premises licence issued by the council cannot override planning law, as confirmed in *R (Friends of Brockwell Park) v Lambeth LBC* [2025] EWHC 1372 (Admin). Events exceeding the 28-day limit constitute a material change of use and are inconsistent with policy and legal requirements without planning consent. Continued licensing in the absence of planning control amounts to procedural impropriety and a failure to meet governance and accountability standards, and invites enforcement action under Section 172 of the TCPA 1990 and legal scrutiny or further review under Section 31 of the Senior Courts Act 1981.

Legal Reference: *R (on the application of Friends of Brockwell Park) v Lambeth London Borough Council* [2025] EWHC 1372 (Admin)

Full judgment:

<https://caselaw.nationalarchives.gov.uk/ewhc/admin/2025/1372?query=Lambeth>

Applicable Law: Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 4, Class B.

Link to legislation: Class B – temporary use of land

<https://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/4/made>

Key provision:

Class B permits the use of land for any purpose for not more than 28 days in total in any calendar year (with certain exclusions for markets and motor car racing, which do not apply here).

Clarification on set-up and de-rig days:

The 28-day limit includes all days the land is in use for that purpose, not just active event days. This was confirmed in *Friends of Brockwell Park v Lambeth LBC* [2025] EWHC 1372 (Admin), where extended set-up and de-rig were treated as operational occupation and a material change of use. In the case of Gunnersbury each hire begins with a Vehicle route install blocking access from Lionel Road and ends with the deinstall.

In the High Court's case of *Brockwell Live 2025*, the planning officer's report specifically addressed how to count days within the 28-day permitted-development allowance. The report explicitly stated that computing the number of days "requires consideration" of two issues: "the extent of the geographical area against which the annual 28-day allowance should be assessed" and, importantly, "the extent to which account should be taken of set up and de-rig days when considering whether the land is being used for the temporary purpose" (caselaw.nationalarchives.gov.uk). The report noted that officers believed the change of use would begin when fencing was erected and would cease only when the de-rig process was completed. This meant that both the set-up period and the break-down (de-rig) period formed part of the temporary event use, so those days must be included in the calculation of whether the 28-day limit was exceeded.

Hire Periods:

Gunnersbury Park CIC's own published event schedule and operational documents list a cumulative hire period of at least 98 days in 2025. This figure combines event days and operational occupation days (including set-up and de-rig) for festivals (excludes weddings, filming, plays, film screenings and other events that have not applied for planning permission but restrict access and change the use of the grounds from park to private and ticketed).

<https://www.visitgunnersbury.org/residents/information-announcements>

2025 hire breakdown as advertised by multiple sources (website and letter to residents totalling 98 days of hire below, please note park notice boards however show 116 days):

- Pub in the Park: **14 days**
- Krankbrother: **16 days- Exceed 28 days by 2 days but no planning application submitted**
- Soho House: **18 days**

- Happy Place: **8 days - No planning application submitted, total hire exceeds 28 days by double the allowance (28 days on top)**
- Festival Republic: **23 days**
- Waterworks: **19 days**

	Vehicle route build and removal (based on noticeboards)	Hire Days 2nd letter to residents	Hire Days 1st letter to residents	CIC website
Pub in the park	21st May- 5th June (16 days)	22 May -4th June (14 days)	22 May -4th June (14 days)	22 May -4th June (14 days)
Kranckbrother	3rd June- 22nd June (20 day)	5th June- 20th June (16 days)	5th June- 20th June (16 days)	5th June- 20th June (16 days)
Exceed 28 days by 8 days but no planning application submitted		Exceed 28 days by 2 days but no planning application submitted		
Soho House	23rd June-11th July (19 days)	23rd June- 10th July (18 days)	23rd June- 10th July (18 days)	23rd June- 10th July (18 days)
Happy Place	8 July -15th July (8 days)	8 July -15th July (8 days)	Not Included	8 July -15th July (8 days)
No planning application submitted, total hire exceeds 28 days by double the allowance (28 days on top)				
Festival Republic	28th July-30th August (34 days)	1st Aug-23rd Aug (23 days)	1st Aug-23rd Aug (23 days)	1st Aug-23rd Aug (23 days)
Waterworks	1–19 September 2025 (19 days)	1–19 September 2025 (19 days)	1–19 September 2025 (19 days)	1–19 September 2025 (19 days)
Total After Waterworks	Total (116 days)	Total (98 days)	Total (98 days)	Total (98 days)
Total hire period exceeds legal limit by 88 days		Total hire period exceeds legal limit by 70 days		

2. Pattern of Historic Repeated Instances of Non-compliance- Gunnersbury Park Events

There is a documented, ongoing failure by both the local authority and private event organisers to comply with national planning law regarding the use of Gunnersbury Park as enabled by the current licence.

Statutory Framework Failures of Compliance

Under the Town and Country Planning (General Permitted Development) (England) Order 2015, land may only be used temporarily for events for up to 28 days per calendar year. Events beyond this limit require a full planning application.

The ongoing use of Gunnersbury Park by commercial event operators has repeatedly and inconsistently with policy and legal requirements exceeded the statutory 28-day limit for temporary land use without the necessary planning permission, inconsistent with applicable regulations of the **Town and Country Planning (General Permitted Development) (England) Order 2015**.

A licence that permits continuation of such activity may be inconsistent with planning law, as it permits an activity that constitutes a **material change of use** without planning consent. This contravenes established case law, including **R (Friends of Brockwell Park) v Lambeth LBC [2025] EWHC 1372 (Admin)**, and violates the statutory framework governing land use.

Such a licence cannot be considered valid in law and must be either **amended immediately** to comply with planning legislation or **revoked**.

This ongoing failure to enforce planning controls raises serious concerns about governance, transparency, and the legal responsibilities of both the **local authority** and **Gunnersbury CIC**.

The current practice of issuing a blanket premises licence that facilitates and legitimises the operation of large-scale commercial festivals in Gunnersbury Park-without requiring prior planning approval for each event-is fundamentally inconsistent with policy and legal requirements. No licence, whether issued under the Licensing Act 2003 by Hounslow Council or by Gunnersbury CIC under leaseholder powers, can override the statutory requirements of the Town and Country Planning Act 1990, nor the limitations set out under Schedule 2, Part 4, Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015, which restrict temporary land use to 28 days annually in the absence of full planning permission.

The continued reliance on this blanket licence structure, coupled with the sale and promotion of event tickets months/year in advance-often prior to the submission or determination of relevant planning applications-prejudices the integrity of the planning system. It gives rise to a presumption of approval, effectively bypassing public scrutiny and undermining the London Borough of Hounslow's Statement of Community Involvement, which requires open, transparent and accessible public consultation processes. In multiple instances, these processes have been obstructed or rendered ineffective through the use of broken digital

forms, postponed planning panels, or scheduling during periods of known reduced public engagement (e.g. school holidays).

Moreover, this practice does not comply with the Council's own Local Plan Policies CC1 (Context and Character) and CI1 (Providing and Protecting Community Infrastructure), which are designed to safeguard open space and ensure that development respects the needs and rights of local communities. Authorising events that exceed lawful land use thresholds through licensing, rather than proper planning consent, constitutes procedural impropriety and may amount to a failure to meet governance and accountability standards. It exposes both the Council and Gunnersbury CIC to potential legal scrutiny or further review under Section 31 of the Senior Courts Act 1981, and to enforcement obligations under Section 172 of the Town and Country Planning Act 1990.

For these reasons, the blanket licence in its current form is incompatible with national and local planning law. It must be suspended or amended to ensure that no event proceeds or tickets are sold in advance of planning determination, and that genuine, accessible public consultation is carried out without obstruction. A licence that enables unlawful development may be inconsistent with planning law and should be reviewed or amended accordingly.

Documented Non-compliance:

Year	Events (Selected)	Total Days Hired	Legal Limit	Breach (Days Over)	Notes
2022	Soho House, Gunnersbury Live	38 days	28 days	10 days	No planning permission found
2023	Soho House, Festival Republic	54 days	28 days	26 days	Waterworks & DnB Allstars excluded
2024	Festival Republic, Soho House	48 days	28 days	20 days	Waterworks & DnB Allstars excluded

The current licensing framework, approved by Hounslow Council, is notably incredibly permissive and facilitates up to 38 events annually. This includes provisions for four "special" events, 14 classified as "large," and 20 designated as "medium." The laxity of this licensing

arrangement results in the continued and expanding commercialization of the park at the expense of its ecological, recreational, and community value.

Events breakdown:

2017-1 day of events, unknown disassembly time

2018- 3 days of events, unknown disassembly time

2019 - 6 days of events, unknown disassembly time

2022- 6 days of events, 56 days of set up and disassembly (excluding Refugee Week festival 24th and 25th June as charitable)

2023- 10 days of events, 73 days of set up and disassembly (excluding Synafaircas as unknown, and excluding Refugee week on 24th and 25th June as charitable)

2024- 31 days of events, with a minimum of 61 days of setup and disassembly outside of cinema events as unknown, no Refugee week in 2024

2025- 19 days of events, **116 hire days** or three and a half months taking up the entirety of summer between May to September, no Refugee week in 2025

Event days:

	M e l a	Love box	Cita del	Gunner sville	Soh o hou se and DLT The Reci pe	Gu nn ers bur y Liv e	Festi val Repu blic	Waterw orks and DnB Allstars	Syna fair	Refuge week (Charita ble)	Immersive cinema(unk nown if taken place)
2017	1 d a y										
2018		2 d a y s	1 d a y								
2019		2 d a y s	1 d a y	3 days							
2022					2 d a y s	3 d a y s		1 day		2 days	
2023					2 d a y s		5 d a y s	2 days	1 d a y	2 days	
2024					2 d a y s		8 d a y s	3 days			18 days

Set up and disassembly where known:

	Mela	Lovebox	Citadel	Gunnerville	Soho House and DL T The Recipe	Gunnery Live	Festival Republic	Waterworks and DnB Allstars	Synafair	Refugee week (Charitable)	Immersive cinema(unknown if taken place)
2017	unknown										
2018		unknown	unknown								
2019		unknown	unknown	unknown							
2022					15 days	23 days		18 days		unknown	
2023					23 days		31 days	19 days	unknown	unknown	
2024					19 days		29 days	13 days			unknown

Additional events such as Waterworks and DnB Allstars operated for up to 19 days in 2023 and 13 days in 2024 respectively. Waterworks is the only organiser known to have submitted a planning application based on notices circulated to residents (please note planning website may contain unadvertised entries).

The cumulative overuse of Gunnersbury Park not complying with planning law allowed by the current licence undermines statutory obligations and may justify both enforcement action and judicial review.

3. Historical Event Data and Setup/Teardown Periods

CIC 1st 2025 letter to residents:



Friday 24 January 2025

Summer 2025 – Events at Gunnersbury Park

Dear resident or business owner,

We would like to share details of the exciting, high quality summer events that Gunnersbury Park will be hosting this year.

In this letter you will find:

- The Event Schedule with more information on each event.
- Guidelines on how to get in touch with us before and during the events.
- Details of public consultation meetings, providing the opportunity to discuss events directly with the organisers and learn about the projects and benefits that will be on offer for the local community, including the chance to win event tickets.

This year's programme offers the residents of Ealing and Hounslow the opportunity to experience some of the best live events available in the Capital. These events provide essential income that enables the Gunnersbury Museum and Park Development Trust to maintain the Estate and continue to serve the community. We sincerely appreciate the valuable feedback and input from all who have contributed and we are committed to continuing to work closely with the community.

We have created a dedicated section on our website for all residents, local businesses and stakeholders where all information related to the events programme is collated. We hope you will find this useful. You can access this via the link below: <https://visitgunnersbury.org/residents>



Join us for the 2025 Events Launch to discover what's coming to Gunnersbury Park this year. We'll introduce you to the event organisers, share details of the exciting programme we have lined up, and provide opportunities for you to ask questions. You'll also gain priority access to resident discounts, concessions, and offers on event tickets, making sure you're among the first to enjoy everything this event season has to offer.

2025 Outdoor Park Events Launch:

Date: Friday 14th February

Time: Two sessions: 3pm - 4.30pm and 4.30pm - 6pm

Venue: Gunnersbury Park Museum, Popes Lane, London, W5 4NH

Book your free ticket for the 2025 Events Launch on the website visitgunnersbury.org under the What's On Section > Concerts & Outdoor Events, alternatively, you can call us on 020 3961 0280 or pop into the Museum and we can reserve a place on your behalf.

Following on from this meeting, FAQs for each event will be available on the website, along with information on how you can contact the Community Liaison Representative for each event.

2025 Events Programme:

Event:	Location:	Hire Period:	Live Event Dates:	Live Days:
Pub in the Park	Old Cricket Pitch	22 May to 4 June	Friday 30 May to Sunday 1 June	3
Krankbrother at Gunnersbury Park	South Playing Fields	5 June to 20 June	Sunday 15 June	1
Soho House Festival	Old Cricket Pitch	23 June to 10 July	Thursday 3 July	1
Rock N Roll Circus	South Playing Fields	11 July to 25 July	Friday 18 to Sunday 20 July	Up to 3
Festival Republic Summer Concert Series	Old Cricket Pitch	28 July to 23 August	Wednesday 6 to Sunday 17 August	Up to 8
Waterworks	Old Cricket Pitch	1 to 19 September	Friday 12 to Sunday 14 September	3

2025 Event List for Gunnersbury Park:

Pub in the Park:

Pub in the Park will be hosted over three days at Gunnersbury Park in 2025, running from Friday 30 May to Sunday 1 June. Conceived by Tom Kerridge, each event day celebrates everything there is to love about the glorious British pub: delicious food, award-winning chefs, epic live music, delicious drinks, but above all else a fantastic time with friends and family.

<https://www.pubintheparkuk.com/london>

Krankbrother at Gunnersbury Park:

Krankbrother, one of the UK's leading forces in electronic music since 2009, will be hosting one event in Gunnersbury Park on Sunday 15 June. Known for transforming unexpected spaces and outdoor locations into unforgettable party venues, Krankbrother events showcase cutting-edge sounds, delicious food, and a vibrant atmosphere.

Soho House Festival:

Soho House will only be hosting one festival day this year on Thursday 3 July, offering food, drink and music for their members.

Rock N Roll Circus:

Plans are still being developed for Rock N Roll Circus to run up to 3 days of events from Friday 18 July to Sunday 20 July, offering a multi-day celebration that fuses top-tier live music with spellbinding circus entertainment. Alongside a lineup of artists, there will be circus workshops, a wide selection of food and drinks, multiple stages, and so much more with the extraordinary talents of Circus Antics, aerialists, fire performers, contortionists, acrobats, and stilt walkers. You can view images of Rock N Roll Circus' 2024 event in Sheffield here: <https://www.rocknrollcircus.co.uk/gallery-2024>

Festival Republic Summer Concert Series:

A series of single stage open-air concerts with artists across a range of popular music genres. There will be up to 8 concerts between Wednesday 6 August – Sunday 17 August. You can watch Tom Grennan's performance in Gunnersbury last summer here:

<https://www.youtube.com/watch?v=1ksoOVw2CuY>

2nd letter to residents:

6th of May 2025

Summer 2025 – Events at Gunnensbury Park

Dear Resident or Business Owner,

We would like to share details of the summer events that Gunnensbury Park will be hosting this year.

In this letter you will find:

- The detailed event schedule with more information on each event
- Guidelines on how to get in touch with us before and during the events
- Details of public consultation meetings, providing the opportunity to discuss events directly with the organisers and learn about the projects and benefits that will be on offer for the local community, including the chance to win event tickets.

These events provide vital income to enable the Gunnensbury Museum and Park Development Trust to maintain the estate and continue serving the community. We understand that events can also bring some challenges for our neighbours, and we want to assure you that we are committed to listening to your feedback and working closely with you to minimise any disruption. We truly appreciate the input we have already received and value the ongoing support of the community.

To help keep everyone informed, we have created a dedicated section on our website for residents, local businesses and stakeholders where you will find all the latest information about the events programme. You can access it here: <https://visitgunnersbury.org/residents>

Improvements for 2025 Events

We held a resident feedback meeting in January 2025 to review the previous year's events. The session was constructive, with many residents acknowledging continued improvements in areas such as sound management, signage, and facilities. While the overall response was positive, residents also shared helpful suggestions for further enhancements. We are working closely with all event organisers to address this feedback and will provide further details on planned improvements at upcoming meetings and on our website.

Please do not hesitate to contact us if you need any more information.

Yours faithfully,




CEO, Gunnensbury Estate (2026) CIC

ENC.

2025 Events Programme (some events are subject to planning and additional days may be added to instal and remove event production trackway)

Event:	Hire Period:	Live Event Dates:	Sound Checks (after 10am)	Gates Open:	Live Music Finishes:
Pub in the Park	22 nd May to 4 th June	Friday 30 th May to Sunday 1 st June	Noise Propagation Test: 3pm on Friday 30 th May Sound & Line Checks after 10am	Friday 30 th : 6pm Saturday 31 st : 11:30am & 6pm Sunday 1 st : 1pm	Friday 30 th : 10:30pm Saturday 31 st : 4:30pm & 10:30pm Sunday 1 st : 7pm
Krankbrother at Gunnersbury Park	5 th June to 20 th June	Sunday 15 th June	11.30am 15 th June	1pm	10pm
Soho House Festival	23 rd June to 10 th July	Thursday 3 rd July	Sound Checks after midday on 2 nd July & after 10am on 3 rd July	2pm	10.30pm
Happy Place Festival	8 th July to 15 th July	Saturday 12 th & Sunday 13 th July	Sound Checks after 10am on Friday 11 th July	8:30am	6pm
Festival Republic PAWSA in the park	1 st August to 23 rd August	Friday 8 th August	Full sound check: Thursday the 7 th August System Checks after 10am	2pm	10.30pm
Festival Republic The Libertines	As above	Saturday 9 th August	System Checks after 10am	1pm	10.30pm
Festival Republic Smashing Pumpkins	As above	Sunday 10 th August	System Checks after 10am	2pm	10pm
Festival Republic Khruangbin	As above	Friday 15 th August	System Checks after 10am	4pm	10.30pm
Festival Republic MARTIN GARRIX	As above	Saturday 16 th August	System Checks after 10am	1pm	10:30pm
Annie Mac presents Before Midnight	1 st September – 19 th September	Friday 12 th September	Full sound check: Thursday 11 th 4pm - 6pm System Checks after 10am on Friday	2pm	10pm
Waterworks	As above	Saturday 13 th September	System Checks after 10am	12pm	10:30pm
DnB All Stars	As above	Sunday 14 th September	System Checks after 10am	11am Doors 12pm Music Starts	10:00pm

ADVANCE NOTICE

KRANKBROTHER AT GUNNERSBURY PARK 2025

DATES:

MAIN BUILD: Friday 6th June – Saturday 14th June
LIVE EVENT DAY: Sunday 15th June
BREAKDOWN: Monday 16th June – Thursday 19th June
Vehicle Route Install: Commences on Tuesday 3rd June
Vehicle Route Removal: Completed by Sunday 22nd June

KRANKBROTHER AT GUNNERSBURY PARK 2025 will celebrate Keinemusik is a collective of internationally renowned DJs and producers. The event will provide catering and bars. The events will take place in Gunnersbury Park, on the South Playing Fields. Where any event infrastructure crosses the park footpaths, there will be crossing points to allow for park flow. The event area will be fenced off, but other areas of the park will remain open to the public, with only the event space being inaccessible to the general park users.

All delivery vehicles will enter via the Blue Gate entrance. There will be vehicles moving between this gate and event site via the route indicated on the map, where a temporary trackway road will be installed. There will be a crossing point for park users mid-way along the route.

The car park will remain open to the public, however we anticipate that the car park will be busier than usual on event days while the taxi pick up and drop off facility is in operation.



For more information on the event, the Community Liaison Manager will be on site throughout the period detailed above and will be contactable on 0203 781 0001 or you can email: gunnersburyparkresidents@krankbrother.com

Pub in the Park

2025 DATES:

MAIN BUILD: Monday 26th May – Friday 30th May (until 6 pm)
LIVE EVENT DAYS: (From 6 pm onwards) Friday 30th May to Sunday 1st June
BREAKDOWN: Monday 2nd June – Wednesday 4th June

Vehicle Route Instal: Commences on Wednesday 21st May
Vehicle Route Removal: Completed by Thursday 5th June

Pub in the Park will celebrate the best of British pub dining, combined with great live music, chef demonstrations, and other festival fun. The events will provide catering and bars. The events will take place in Gunnersbury Park, on the Old Cricket Pitches. Where any event infrastructure crosses the park footpaths, there will be crossing points to allow for park flow. The event area will be fenced off, but other areas of the park will remain open to the public, with only the event space being inaccessible to the general park users.

All delivery vehicles will enter via the Blue Gate entrance. There will be vehicles moving between this gate and event site via the route indicated on the map, where a temporary trackway road will be installed. There will be a crossing point for park users mid-way along the route.

The car park will remain open to the public, however we anticipate that the car park will be busier than usual on event days while the taxi pick up and drop off facility is in operation.



For more information on the event, the Community Liaison Manager will be on site throughout the period detailed above and will be contactable on **0203 781 0001** or you can email: operations@pubintheparkfestivals.com

ADVANCE NOTICE OF SOHO HOUSE FESTIVAL 2025

DATES

Vehicle Route Install: Commences on Monday 23rd June 2025
Build of Event Site: Wednesday 25th June – Wednesday 2nd July 2025
Event Live: Thursday 3rd July
Breakdown of Event Site: Friday 7th July – Thursday 10th July 2025
Vehicle Route Removal: Completed by Friday 11th July 2025

Soho House Festival is a one-day festival taking place in the afternoon and evening of Thursday 3rd July, it hosts a variety of entertainment, food and drink.

It will take place in Gunnersbury Park, mainly on the Old Cricket Pitch and part of the Heritage Parkland area. It shall mainly be contained within the footpaths so as not to obstruct any general park flow, where our activities will cross foot paths, there will be crossing points to continue general park flow, these will be closed on event days only. The area will be fenced off but other areas of the park will remain open to the public with only the event space being inaccessible to the general park users.

On the event live day, a one-way system will be operated in the main car park to facilitate the taxi pick up and drop off facility. The car park will remain open to the public.

All delivery vehicles will enter via Gate E on the corner of Popes Lane and Lionel Road North. There will be vehicles moving between Gate E and the event site via the route as indicated on the map, where a temporary road will be installed.

For more information on the event, a Community Liaison Officer will be on site throughout the period detailed above and will be contactable on **0203 781 0001** or you can email on: shfestival@sohohouse.com



Happy Place Festival

2025 DATES:

MAIN BUILD: Wednesday 9th July - Friday 11th July
LIVE EVENT DAYS: Saturday 12th July - Sunday 13th July
BREAKDOWN: Monday 14th July

Perimeter Fencing Install: Tuesday 8th July
Perimeter Fencing Removal: Tuesday 15th July

The Happy Place Festival, curated by Fearn Cotton, is a two-day wellbeing event designed with one clear ethos in mind: to offer a relatable and accessible version of self-care. The flow between the different areas is designed to help guide inner happiness, uplift and energise you, with a huge array of free talks and sessions as well as additional bookable workshops. Special guests include Davina McCall, Dame Kelly Holmes MBE, Millie Mackintosh, Donna Ashworth, Julia Bradbury and Liz Earle to name just a few. Please check out the full line up <https://www.happyplaceofficial.co.uk/pages/line-up-festival>

There are many opportunities to shop from eco-conscious brands, along with many street food vendors offering an array of delicious vegan and vegetarian food and drink – no alcohol as we are a dry festival! There are currently still some tickets available at <https://www.happyplaceofficial.co.uk/pages/happy-place-festival-2025>

The event will take place on the Heritage Parkland. All delivery vehicles will enter via Gate B from Popes Lane. The vehicles moving between this gate and event site via the route indicated on the map, use the existing tarmac roads and paths without the need for any temporary trackway. The event area will be fenced off, but other areas of the park will remain open to the public, with only the event space being inaccessible to the general park users.

The car park will remain open to the public as usual. We advise all our visitors to use public transport, but the car park may be busier than usual on event days.



The Community Liaison Manager will be on site throughout the hire period detailed above and will be contactable on **0203 781 0001**. Prior to 7th for any details about the Happy Place Festival happyplacefestival@ymugroup.com for any details about the Happy Place Festival.

ADVANCE NOTICE

FESTIVAL REPUBLIC GUNNERSBURY PARK EVENTS

2025 DATES

Vehicle Route Install: Commences on Monday 28th July

Build: Friday 1st August – Thursday 7th August

Event Days: Friday 8th, Saturday 9th, Sunday 10th, Friday 15th, Saturday 16th
August

Breakdown: Sunday 18th August - Saturday 23th August

Vehicle Route Removal: Completed by **Wednesday 30th August**

Festival Republic's Gunnersbury Park Events is a series of one day concerts offering a vibrant mix of genre, attracting a wide audience. The event will provide catering and bars.

The event will take place in Gunnersbury Park, on the Old Cricket Pitches, it shall mainly be contained within the footpaths so as not to obstruct any general park flow, where any activities cross footpaths, there will be crossing points to continue park flow. The event area will be fenced off, but other areas of the park will remain open to the public with only the event space being inaccessible to the general park users.

Annie Mac, Waterworks & DNB Allstars Gunnersbury Park Events 2025 Dates

Vehicle Route Install: Monday 1st September
Build Prep: Monday 1st & Tues 2nd September
Build Days: Weds 3rd -Thurs 11th September
Event Days: Fri 12th, Saturday 13th & Sunday 14th September
Break/Derig Days: Monday 15th - Friday 19th September
Trackway Derig: Friday 19th September

A 3 day weekend series of events offering an exciting mix of music, food, drinks and creative design will be hold in September 2025 in the beautiful Gunnersbury Park.

The 3 events will take place on the same site within the park across Friday 12th, Saturday 13th and Sunday 14th September on the Old Cricket Pitches. It will be contained within the footpaths so as not to obstruct general pedestrian flow in the park and there will be crossing points where the paths meet the event site. The event area will be fenced off and therefore inaccessible to the general public and park users, but other areas of the park will remain open with access to the museum, sports centre and other facilities outside of the event perimeter.

All delivery vehicles will enter via Popes Lane/Lionel Road North entrance and will be managed by professional traffic stewards. There will be vehicles moving between this gate and the event site via the route indicated on the map, where a temporary trackway road will be installed. There will be a crossing point for park users mid-way along the route.

On live event days, the crossing points will not be open and a one way system will be operated in the main car park to facilitate taxi pick up and drop off. The car park will remain open to the public.

For more information about the event,
please contact
info@waterworksfestival.co.uk
or
0203 781 0001

Resident Phone Line will be open from:
8th - 19th September
10am - 6pm (8th - 11th, then 15th - 19th)
8am - 12am (12th, 13th, 14th)



5 January 2024

Summer 2024 – Events at Gunnerybury Park

Dear resident or business owner,

We are writing to notify you of the large scale events that Gunnerybury Park intends to host this year, details of which are below. 100% of the net fees paid by event organisers are for the benefit of Gunnerybury Park and Museum.

We would also welcome your attendance at the 2023 events wrap up session, this will be followed by the launch of our summer events programme for 2024, with a chance for you to meet the event organisers and find out more about the benefits and discounted tickets for our public events.

2023 Events Wrap up Session followed by 2024 Outdoor Park Events Launch:

Date: Sunday 28 January 2024

Time: Two sessions: 10am – 11am and 11am - 12pm

Venue: Gunnerybury Park Museum

Join us for a general debrief session to discuss the events in the park in 2023. We want to hear what went well for our neighbours and what we can improve on in 2024. During this meeting, you can also find out what we are bringing to Gunnerybury Park in 2024, hear from the event organisers, ask questions and get priority access to resident discounts, concessions and offers on event tickets.

Frequently asked questions for each event will be available on the website following on from this meeting, along with information on how you can contact the community liaison representative for each event.

Book your free ticket for the 2023 events wrap up session on the website visitgunnersbury.org under the What's On section > Concerts & Outdoor Events.

2024 event list for Gunnerybury Park:

Please note that plans are still being developed for these events and dates are subject to change. The events are also subject to contract, planning and licensing. However, we wanted to inform you of the schedule at the earliest opportunity.

Immersive cinema screenings:

Plans are still being developed for the return of immersive cinema screenings in Gunnerybury Park. We are working with the same group who hosted similar events in 2022. Event days will be between 12 – 30 June, with up to 6 shows per week.

Soho House Festival:

Soho House will only be hosting one festival day this year on Thursday 4 July, offering food, drink and music for their members. The second event day will be hosted by a different promoter and this will be on Saturday 6 July. This event will use the same site facilities.

Festival Republic:

A series of single stage open-air concerts with artists across a range of popular music genres. There will be up to 8 concerts between Wednesday 7 August – Sunday 18 August.

Waterworks:

Three days of multi-stage music events from Friday 13 to Sunday 15 September.

If you are not already signed up to the Gunnersbury Park Events mailing list and you would like to receive information about event proposals for Gunnersbury Park, please email us at info@visitgunnersbury.org.

If you have already subscribed to the mailing list, you do not need to subscribe again. This is only for people receiving this information for the first time. We commit to storing your data securely. This will only be used by representatives of the Gunnersbury Estate (2026) CIC. We will not pass your information on to a third party. If at any time, you do not want to receive any further emails or post from us you may opt out by communicating your request using the email listed above.

We hope you can join us later this month for our 2023 wrap up session and 2024 Events Launch.

Please do not hesitate to contact us if you need any more information.

Yours sincerely,

A black rectangular box redacting the signature of the sender.

Head of Operations and Commercial
Gunnersbury Estate (2026) CIC

2024 Events Programme

Event:	Hire Period:	Live Event Dates:	Sound Checks (after 10am)	Gates Open:	Live Music Finishes:
Soho House Festival	24 th June to 11 th July	Thursday 4 th July	PA checks: 4pm, 3 rd July. System Checks: 4 th and 6 th July after 10am.	2pm	10.30pm
DLT Presents: The Recipe	As above.	Saturday 6 th July	System Checks after 10am	2pm	10.30pm
Festival Republic Fisher	31 st July to 24 th August	Friday 9 th August	System Checks after 10am	2pm	10.30pm
Festival Republic Tom Grennan	As above	Saturday 10 th August	System Checks after 10am	2pm	10.30pm
Festival Republic Korn	As above	Sunday 11 th August	System Checks after 10am	2pm	10pm
Festival Republic Peggy Gou	As above	Saturday 17 th August	System Checks after 10am	1pm	10.30pm
Festival Republic PJ Harvey	As above	Sunday 18 th August	System Checks after 10am	3pm	10pm
Artist To be Announced	2 nd September – 20 th September	Friday 13 th September	Full sound check: Thursday the 12 th 6-8pm System Checks after 10 on Friday	3pm	10pm
Waterworks	As above	Saturday 14 th September	System Checks after 10am	12pm	10:30pm
DnB All Stars	As above	Sunday 15 th September	System Checks after 10am	11am Doors 12pm Music Starts	10:00pm

How to get in contact with us during events:

There will be a dedicated phone number for the local community to use to discuss any noise-related issues or queries you may have. The number for the Resident Line is **0203 781 0001**.

This will be operational during the construction, deconstruction phases and event days.



CIC's own website shows 98 days of hire and confirms the breaches of both Krankbrother and Happy Place:



Pub in the Park

Park

Festival Republic: The Libertines

Festival Republic: Smashing Pumpkins

Waterworks

DnB All Stars

Hire period:

22nd May to 4th June



Pub in the Park	Krankbrother at Gunnerybury Park
Festival Republic: The Libertines	Festival Republic: Smashing Pumpkins
Waterworks	DnB All Stars

Hire period:

5th June to 20th June



Plan Your Visit

What's On

Museum

Park

Lea

Pub in the Park	Park	Soho House Festival
Festival Republic: The Libertines	Festival Republic: Smashing Pumpkins	Festival Republic: Khruangbin
Waterworks	DnB All Stars	

Hire period:

23rd June to 10th July

Gates open

2pm



Plan Your Visit

What's On

Museum

Park

Learning

Venue Hire

Pub in the Park	Park	Soho House Festival	Happy Place Festival
Festival Republic: The Libertines	Festival Republic: Smashing Pumpkins	Festival Republic: Khruangbin	Festival Republic: MARTIN GARRIX
Waterworks	DnB All Stars		

Hire period:

8th July to 15th July

Gates open

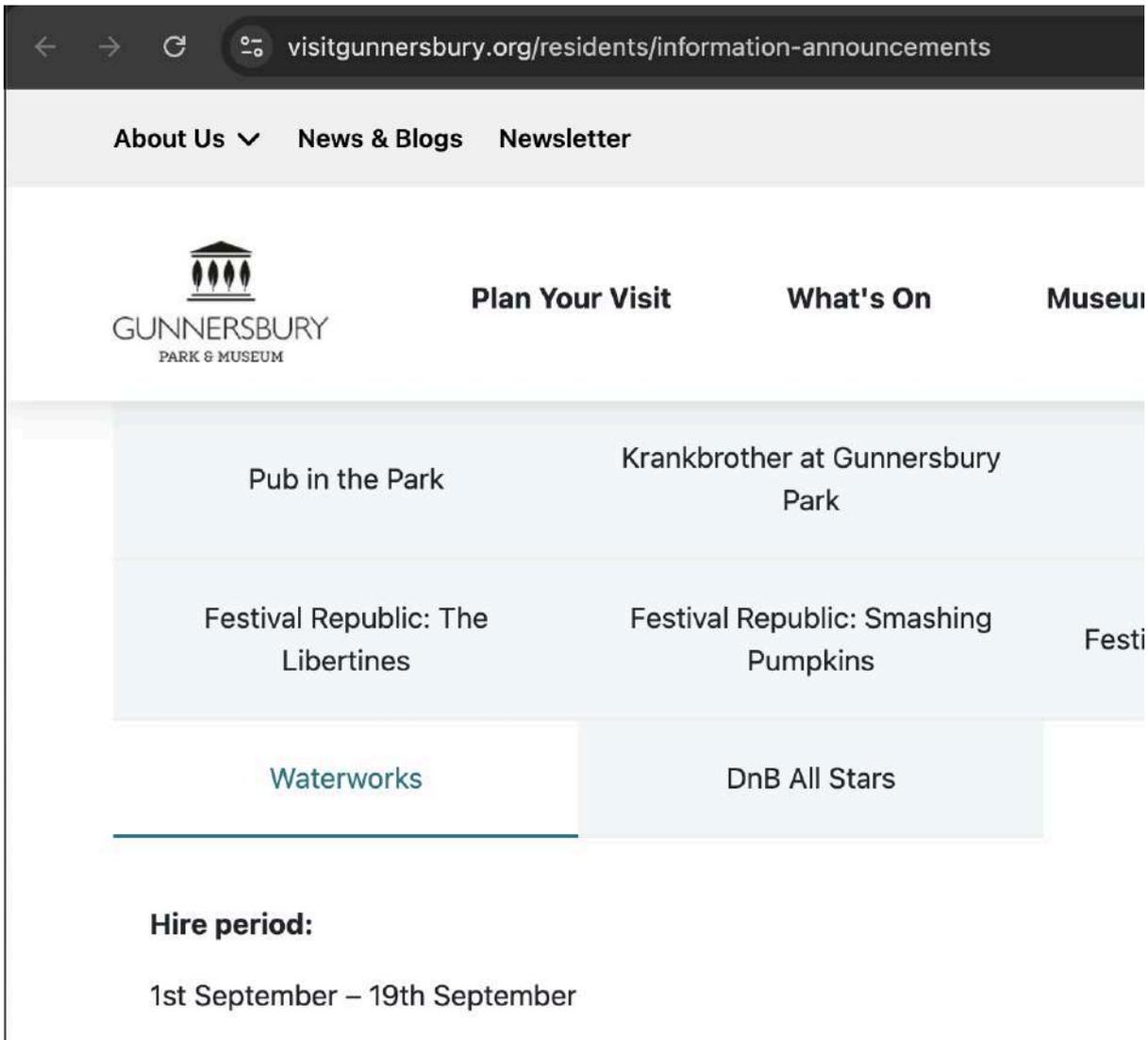
8:30am



Pub in the Park	Krankbrother at Gunnersbury Park	Soho Ho
Festival Republic: The Libertines	Festival Republic: Smashing Pumpkins	Festival Repu
Waterworks	DnB All Stars	

Hire period:

1st August to 23rd August



4. Dangerous noise levels (90 dB bass) and misleading claims about licensing made in planning applications (Waterworks Festival - Planning Application P/2025/1015)

Waterworks’ Sound Management Plan (Vanguardia, 27 June 2025, **P/2025/1015**) confirms that bass **noise levels of up to 90 dB L_Ceq,15min are proposed**, including at off-site residential areas. From Section 4.5, page 17 of the official submission (Gunnersbury Park Events - Waterworks 2025 Sound Management Plan 0065601-0000-0-SMP-0001), it states:

“A maximum overall ‘C’ weighted level of 90 dB L_Ceq,15 mins is also proposed as a cap on low frequency bass noise.”

However, **Vanguardia states that the 90 dB limit is part of the park’s premises licence, but this interpretation is not supported by the actual licence text.** The document states:

“The premises licence for GP applies an overall MNL limit of 75 dB L_Aeq,15min and an additional limit for low frequency i.e. ‘bass’ noise of 90 dB L_Ceq,15min that will apply at noise sensitive premises beyond the site boundary...”

This is factually incorrect. The actual Premises Licence H01288, clause 17.6, clearly states:

“In any event noise from any event (other than a Small Event) shall be controlled and monitored such that it shall not exceed 75dB (LAeq) over a 15minute period at 1m from the façade of the nearest noise sensitive premises (‘NSP’) unless otherwise agreed in consultation with London Borough of Hounslow Enforcement.”

The claim of a 90 dB bass limit is not substantiated by the current wording of the park’s premises licence. Furthermore, the plan **misrepresents Hyde Park’s noise controls as justification**. The submitted materials cite Hyde Park’s limit as 75 dB LAeq,5min, yet the actual Hyde Park Premises Licence (No. 25/01965/LIPDPS, Westminster) states at Clause 61:

“The music noise level shall not at 1 metre from the façade of any noise sensitive premises exceed 65dB(A) over a 5-minute period.”

Vanguardia also references Brockwell Park, yet Lambeth’s current licence does not stipulate a fixed dB limit, and instead relies on separate noise management plans. The only place this 90 dB figure appears is in outdated Event Lambeth 2016 guidance, which is **not recognised by DEFRA, WHO, Pop Code, or any national statutory standard**.

There is no national, statutory, or DEFRA-endorsed framework allowing 90 dB as a safe off-site bass level. None. Approving this application means knowingly overriding statutory licence limits, Local Plan **EQ5**, and putting vulnerable residents-including hospital patients and school children-at risk.

The licence must tighten this regulatory gap where its limits can be easily overwritten by a planning application.

5. Planning Application P/2025/3274: Unlawful Conflict With Premises Licence H01288

Additionally the planning application P/2025/3274 represents a clear attempt to override the existing Premises Licence by introducing a decade long blanket consent that would permit significantly higher noise levels, including bass levels up to 90 dB, as well as an additional ten major events that are not authorised under Licence H01288. Planning law cannot be used to expand, amend or supersede licensing conditions set under the Licensing Act 2003. The current licence contains strict limits, including a maximum of 75 dB LAeq at residential receptors and annual caps on the number and type of events permitted. Any planning document that proposes a different or more permissive regime directly conflicts with these

binding conditions. Such conflict is unlawful in principle and renders the planning proposal incompatible with licensing controls.

The attempt to introduce a decade long planning permission also removes the required annual oversight that licensing law provides. Licensing exists to protect public amenity and public safety on an event-by-event basis. It requires individual Event Management Plans, SAG scrutiny, emergency service consultation and public notice for each event. A ten-year planning consent would function as an attempt to bypass these safeguards. A local authority cannot lawfully approve a planning regime that eliminates the procedural protections built into the licensing system. Doing so would undermine statutory safeguards, restrict public rights under the Licensing Act 2003 and expose the council to challenge for procedural impropriety.

The manner in which this planning application was publicised raises additional concerns. The consultation formally opened on 27 November 2025, yet many affected residents did not receive any letters until 3rd and 4th December. These letters were backdated to 27 November, meaning they arrived six and seven days after the consultation (set at the minimum allowed period of only 21 days) had already begun. No statutory site notices were displayed in or around the park in the first week of the consultation and no wider public announcement was issued. The planning portal was also unavailable for objections for extended periods during the consultation window. These issues combined prevented residents from accessing the legally required routes for comment and objection. A consultation period is only valid if residents are given real and fair opportunity to participate. That did not happen here.

The timing of this application raises procedural fairness concerns. Placing a major ten-year consent immediately before Christmas, without proper notification and during periods where residents are less able to engage, creates the appearance of a process designed to minimise public involvement. Authorities must comply with the Town and Country Planning (Development Management Procedure) Order 2015 and their own Statement of Community Involvement. This requires clear notification, accessible publication and fully functioning consultation systems. None of these standards were met. Determining an application submitted and publicised in this manner would amount to procedural unfairness and would be contrary to lawful consultation practice.

For these reasons, the existing premises licence must remain the controlling instrument for event operations within Gunnersbury Park. The licence cannot be diluted, removed or rewritten through planning consent. Any planning proposal that conflicts with the licence, or attempts to permit activities at a scale or intensity that the licence does not authorise, is legally defective. The council is required to ensure that planning and licensing remain aligned. The submitted planning application does not meet that requirement. The licence should therefore be revised to correct procedural issues in this case and not expanded in

line with the planning proposal. The council is formally requested to reject the attempt to introduce a decade long planning override and to uphold the protections that licensing law provides to residents and the wider community.

5.A. Breaches and Conflicts With the Existing Premises Licence H01288

1. Planning attempts to permit noise levels above the statutory 75 dB LAeq limit

The licence imposes a binding ceiling of 75 dB LAeq at residential receptors. The planning application proposes bass allowances up to 90 dB C-weighted, which exceeds and contradicts the licence. Planning cannot lawfully authorise noise levels above licensing conditions.

Although LAeq and LCEq (C-weighted) measure sound differently, a limit of 90 dB C-weighted is still significantly louder and represents far greater low frequency energy than a 75 dB A-weighted limit. C-weighting captures bass and sub-bass frequencies that A-weighting filters out. This means that a 90 dB C-weighted allowance would permit substantially more intrusive low frequency noise at residential properties. Acoustic regulators recognise that an increase of 15 dB is a major rise in perceived loudness. A 90 dB C-weighted cap therefore exceeds the protective intent and practical effect of the 75 dB LAeq condition in the Premises Licence and cannot be treated as equivalent or acceptable within the licensing framework.

2. Planning attempts to increase the number of major music events beyond licence limits

Licence H01288 authorises a maximum of 14 large live or recorded music events per year and 4 special events for a total of 14 days. The planning application proposes an additional 10 major events (bringing it up to 28 days without any size limitations), which the licence does not permit.

3. Planning proposes multi month construction, dismantling and fencing periods not authorised under the licence

The licence allows limited set up and breakdown hours only. The planning application includes approximately 3 months of build and removal annually. This exceeds the licence and conflicts with its mandatory protections. It effectively turns this protected public green space into a permanent commercial for-profit venue.

4. Planning removes event-by-event SAG and emergency services scrutiny required under licensing law

Licensing requires individual Event Management Plans, security, medical plans, noise management and full SAG oversight. A ten-year blanket consent bypasses

these legal duties and is incompatible with the Licensing Act 2003.

5. Planning attempts to replace annual licensing review with a single decade long approval
Licensing law requires ongoing assessment of each event's impacts. A blanket planning consent would unlawfully substitute a ten-year permission for event specific licensing controls.

5.B. Breaches of Planning Law and Procedure

6. Incorrect characterisation of 118 operational days as "temporary use" contrary to GPDO 2015
GPDO Class B limits temporary use to 28 days per year. The planning proposal totals 118 days per year, far exceeding the statutory limit.
7. Failure to declare material change of use
A decade long commercial events programme constitutes a material change of use requiring full assessment under the Town and Country Planning Act 1990.
8. Internal contradictions and misrepresentation of operational days
The planning form states 28 event days, while technical documents confirm 118 days. A permission granted on inaccurate information is unlawful.
9. Missing statutory ecological surveys
Required Phase 2 surveys for protected species are incomplete. Determining the application without them breaches the NPPF and ecological law duties.
10. Use of outdated 2011 Census data when 2021 Census data is legally required
Decisions must be based on the most up to date evidence. Using outdated datasets invalidates transport modelling.
11. Failure to assess cumulative impact over ten-years
No cumulative assessment of noise, ecology, transport, flooding or public nuisance exists. This breaches the NPPF requirement for cumulative impact analysis.

5.C. Breaches of Consultation Law, Statutory Notice Requirements and Procedural Fairness

12. Failure to display statutory site notices

No site notices were placed in or around the park within the first week of consultation, contrary to the Development Management Procedure Order 2015.

13. Failure to notify surrounding residents

Many households received no letters in the first week of consultation. When finally received the letters were backdated. This breaches neighbour notification requirements.

14. Planning portal malfunction preventing objections

Residents could not submit objections due to system errors on the planning portal throughout the consultation period. A consultation is unlawful if residents cannot access the submission route.

15. Contravention of the Statement of Community Involvement

The SCI requires transparency, adequate notice, and accessible engagement. None were provided, making the consultation procedurally unsound.

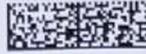
16. Breach of legitimate expectation and the Aarhus Convention

Residents are entitled to meaningful participation in environmental decisions. This did not occur due to lack of notice and an inaccessible consultation process.



374D

Date: 27/11/2025



Dear Owner/Occupier

**TOWN AND COUNTRY PLANNING ACT 1990
PLANNING (LISTED BUILDING AND CONSERVATION AREAS) ACT 1990**

Site: Gunnersbury Park, Popes Lane, Ealing, W3 8LQ

Proposal: Temporary change of use of areas of Gunnersbury Park for the staging of temporary events between May 2026 and May 2036. Up to 28 live event days per calendar year, exclusive of 90 days of set-up, inactive and removal days. Including the erection of associated temporary structures, fencing, ancillary concessions and facilities.

There has been an application for **planning permission to carry out the development** described above. We invite you to comment on the proposal before we make a decision. If you wish to comment:

You can go to <https://www.hounslow.gov.uk/planning-building> for details of the application and to follow its progress. You then enter the reference number at the top of this page.

To give your views please do so in writing **within 21 days of the date of this letter using the 'comment' option on the summary page for the application**. If the consultation period includes a bank holiday, the bank holiday days will be added to the 21 days. If we receive comments after this date we will still take them into account if we have not made a decision. We will not consider objections made on previous applications.

If you would like more information about the application, you can find the case officer's details on the summary page.

If you want to comment, please consider the following advice on what are relevant PLANNING considerations that the Council can take into account in deciding whether to **grant or refuse** planning permission:

1. A planning application must be evaluated against Council planning policies, set out in the Local Plan (see <https://www.hounslow.gov.uk/planning-building>)
2. The Council also has other adopted guidelines against which planning applications might be judged, such as guidelines on House Extensions. You can find these at: <https://www.hounslow.gov.uk/planning-building>

3. Other planning matters such as overlooking, loss of light, visual appearance and traffic and parking are important. We cannot consider loss of property values, the personal circumstances of the applicant (except in exceptional cases) or property boundary disputes.

We acknowledge automatically and take account of any comments we receive through our website but, because of the large volume of correspondence we get, we do not send any other communication. We will summarise all the comments made (excluding personal details) in the planning officer's report about the application.

If anyone objects to an application and we intend to recommend approval, we place it on a weekly list called the Pending Decisions List, which is posted on our website at the end of each working week. Councillors can then ask officers to engage in a dialogue to help decide the final outcome.

Should we send an application to Planning Committee as a result, we will tell anyone who has written to us when the meeting will be so that they can attend if they wish, and how they can be represented there.

We publish planning applications decisions online in our Weekly Lists of Decisions.

If the applicant appeals against our decision, we must send your comments to the Secretary of State. There may be no further opportunity for you to comment at the appeal stage.

IF YOU ARE NOT THE OWNER OR SOLE OCCUPIER, please note this information and pass our letter to anyone you think may have an interest in your property and/or may be affected by the proposal.

You can view the Council's privacy notices on our web site:

https://www.hounslow.gov.uk/info/20110/open_data_and_information_requests/1368/privacy_notice/10

Yours faithfully
Planning Services

NEIGH21

5.D. Breaches Related to Public Land, Open Space Law and Covenants

17. Conflict with the Gunnersbury Park covenant

The covenant requires preservation of the land for public recreation and prohibits long term commercial occupation that restricts public access.

18. Contravention of the Open Spaces Act 1906

Public open space held in trust must remain available for public enjoyment. Annual closures of several months for commercial events conflict with this duty.

19. Effective conversion of public parkland to exclusive commercial use

Fencing off and closing large areas for long periods replicates the legal effect of a lease and is incompatible with statutory trust obligations.

5.E. Public Law Failures

20. Wednesbury unreasonableness

Approving a plan with contradictory data, missing surveys, misrepresented days, and licensing conflicts would be irrational and outside the range of lawful decisions.

5F. Allowing planning decisions to override licensing safeguards **places Grade II listed heritage assets at risk** without the legally required assessment

The Premises Licence cannot be treated as secondary to an undetermined planning application, particularly where the planning process has failed to provide a Heritage Impact Assessment. Gunnersbury Park is a Grade II listed landscape and includes the setting of Grade II listed buildings constructed from traditional materials such as lime mortar, brick and stone which pre date modern reinforcement methods. These **structures require statutory protection under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and under NPPF paragraphs 194 to 202**, all of which require the council to assess the impact of any development on heritage significance before authorising activities that may cause harm.

The proposed event **noise levels of up to 90 dB C weighted bass, combined with prolonged construction periods, fencing, heavy machinery and crowd movements of up to ten thousand people per hour, create recognised risks of vibration, ground compaction and structural stress** that can accelerate deterioration in historic fabric. In the absence of a Heritage Impact Assessment, the licensing regime should not be used to facilitate or permit activities whose potential harms have not been lawfully assessed under the planning and heritage legislation. Allowing licensing decisions to fill this gap undermines

the council's statutory duty to give great weight to the conservation of designated heritage assets and exposes listed structures to avoidable physical and vibrational impact.

Construction for large scale events typically involves repeated vehicle movements, steel trackway installation, piling for temporary structures, mechanical lifting equipment and ground compaction to stabilise stages and heavy loads. These activities generate low frequency vibration that travels efficiently through soil and historic landscaping. Unlike modern reinforced buildings, the Grade II listed structures within Gunnersbury Park were built using lime mortar, soft brick and stone, which rely on flexibility rather than structural reinforcement. This makes them more sensitive to incremental vibration and cyclical loading.

Repeated shaking from heavy machinery and trackway installation can loosen mortar bonds, widen micro cracks and increase settlement stress within historic fabric.

These effects must be assessed through a full Heritage Impact Assessment before any consent is granted, because the listed buildings and the wider Grade II landscape require statutory protection from preventable mechanical and vibrational harm.

Sources: <https://historicengland.org.uk/listing/the-list/list-entry/1000808#:~:text=Made%20from%20cement%2Drendered%20brickwork%20with%20stone%20imposts.of%20both%20Gunnersbury%20Park%20and%20Gunnersbury%20House.>

<https://thegardenhistory.blog/2025/07/12/gunnersbury-park/#:~:text=To%20the%20north%20of%20the.stone%20which%20matched%20the%20house.>

<https://ealing.moderngov.co.uk/Data/Planning%20Committee/20071219/Agenda/Agenda%20Item%2006%20-%20Ealing%20Green%20Conservation%20Area%20Appendix.pdf>

Appendix F

Supporting Sources and Legal References:

1. Finsbury Park / Wireless Festival- Licence Appeal Withdrawn:

“Festival Republic withdraws appeal against Wireless licensing conditions”

IQ Magazine:

<https://www.iq-mag.net/2019/01/festival-republic-withdraws-appeal-wireless-licensing/>

Details the 2019 legal decision and appeal withdrawal following resident complaints.

2. Resident-Led Petition and Council Pressure in Finsbury Park:

“Petition launched against large music events in Finsbury Park”

Ham & High

<https://www.hamhigh.co.uk/news/20684723.petition-launched-large-music-events-finsbury-park/>

Two similar petitions have been launched against Hounslow council:

<https://you.38degrees.org.uk/petitions/hounslow-review-your-premises-license-with-gunners-bury-park>

<https://www.change.org/p/we-want-our-gunnersbury-park-back-our-peace-restored>

3. Highbury Magistrates' Court ruling on Wireless Festival:

Discussed in the above article and confirmed by Hackney Citizen:

<https://www.hackneycitizen.co.uk/2016/04/12/finsbury-park-residents-take-legal-action-wireless-festival/>

4. Crystal Palace Park Trust Statements and Community Response:

Park Trust forced to issue apology after raucous rap weekend

Inside Croydon:

<https://insidecroydon.com/2021/09/14/park-trust-forced-to-issue-apology-after-raucous-rap-weekend/>

5. Hyde Park Licencing sub-committee:

https://westminster.moderngov.co.uk/mgAi.aspx?ID=16465&utm_source=chatgpt.com

https://committees.westminster.gov.uk/documents/s45854/2.%20LSC%20Report%20-%20Hyde%20Park_Redacted.pdf

6. Standard Brockwell Park

https://www.standard.co.uk/news/london/brockwell-park-mighty-hoopla-field-day-legal-challenge-b1223476.html?fbclid=IwY2xjawJ0RNRleHRuA2FibQIxMQABHkXNH2hdd3E6LgDhkRWcXmJKvXcYkVljOKfmy_FsMbL2Ps1LdlIBZ33dNFyH_aem_J5ZBDtyJeidCk9aGfL06XQ

7. Heath and Hampstead Society v. Camden LBC [2008]

This case addressed the issue of whether a replacement dwelling on Metropolitan Open Land (MOL) was "materially larger" than the existing one, which would render it inappropriate development under planning policies.

<https://www.casemine.com/judgement/uk/5a8ff8d260d03e7f57ecdac>

8. National Planning Policy Framework (NPPF)- Paragraph 150

https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

9. Policy G3 of the London Plan 2021- Metropolitan Open Land (MOL)

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

10. Brockwell park:

<https://www.bbc.co.uk/news/articles/c20nkqd30dgo>

<https://www.theguardian.com/uk-news/2025/may/16/campaigners-win-court-case-that-could-ban-festivals-from-london-park-brockwell>

<https://www.standard.co.uk/news/environment/justice-london-lambeth-council-brockwell-park-high-court-b1228227.html>

11. Brockwell park case:

<https://caselaw.nationalarchives.gov.uk/ewhc/admin/2025/1372?query=Lambeth>

12. Richmond council Park Events policy (under consultation as of Aug 2025):

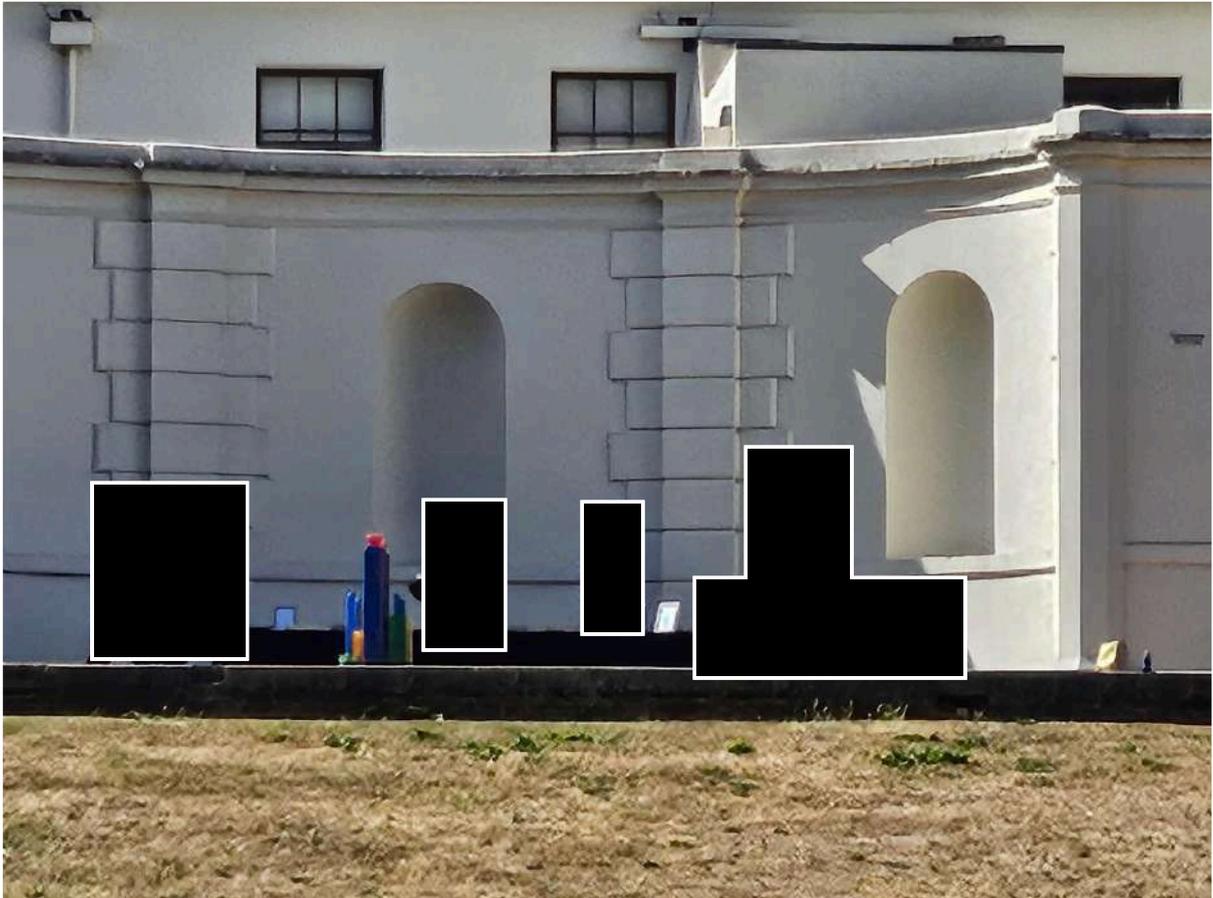
https://haveyoursay.citizenspace.com/richmondecslbruteventsinparks/user_uploads/events-policy-appendix1-2.pdf

Appendix G

Photographic evidence of drugs, anti-social behaviour, litter and limited public access (fencing):

1. The first floor and terrace of the museum are often closed for private events:











With museum halls kept empty of artifacts on first floor to facilitate private events:



Instead the museum is now a permanent venue as allowed by the current licence:

Rothschild Rooms & Orangery Hire Fees	
<i>Based around Peak Summer season</i>	
Rothschild Rooms & Orangery	from £8,250
Rothschild Rooms Only	from £7,000
Orangery Only	from £4,600
Ceremony Only Package	from £3,500

Prices dependent on season & availability
All prices are non inclusive of VAT

 Super Peak: 1st April - 30th Sept, Fri - Sun & Bank Holidays;
 Peak: 1st April - 30th Sept, Mon - Thurs / 1st Oct - 31st March, Fri - Sun & Bank Holidays;
 Off-Peak: 1st Oct - 31st March, Mon - Thurs

Source: <https://www.visitgunnersbury.org/media/xutkyoi3/wedding-brochure-4th-mock-up.pdf>

With 50k artifacts sitting in storage instead of in the museum:

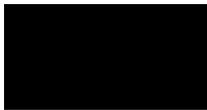
Thank you for your enquiry.

Gunnersbury's collections are owned by Ealing & Hounslow Councils. The vast majority of the 50,000+ objects are stored off site with the agreement of the councils and we meet that cost from our funds.

The two councils are working with us on a scheme to repatriate the collection to Gunnersbury but the current estimated cost of that project is in the region of £8m and is dependent on external funding. We also have an ongoing project to add collections to our online database so they can be searched and viewed so please watch this space.

Please could you let us know which collections specifically you are looking to locate so we can be of further assistance?

All the best,



Collections Assistant (working days Monday to Thursday)

Gunnersbury Park and Museum

Gunnersbury Park

Popes Lane

London, W5 4NH

www.visitgunnersbury.org

Financial Viability of £8 Million Target Under Current Licence

The CIC has publicly stated as written by the collections assistant above that £8 million is required for the museum to function as a museum again (although it is unclear why this money is required to bring back items into an existing space that is designated for museum purposes as they are currently stored at cost and worryingly not full list of items has been made publicly available to our knowledge, we can only assume this is target set up in accordance with the council but that is for Hounslow council to confirm the exact use of the £8 million). On the most generous assumptions (treating all event revenue as pure profit, with no costs deducted - a position that is inherently unrealistic, but necessary given the absence of full publicly available accounts or audits), the following number of events would be required to generate that sum under the current wedding and events licence:

970 events at £8,250 (Rothschild Rooms & Orangery)

1,143 events at £7,000 (Rothschild Rooms Only)

1,739 events at £4,600 (Orangery Only)

2,286 events at £3,500 (Ceremony Only Package)

To illustrate the scale:

Using the highest-value package (£8,250), the CIC would need to host approximately 485 weekends of back-to-back weddings, equivalent to 9.3 years of uninterrupted, fully-booked weekends.

Using the lowest-value package (£3,500), the CIC would require approximately 1,143 weekends, equivalent to 22 years of uninterrupted, fully-booked weekends.

This assumes two weddings every weekend, 52 weeks per year, with no seasonal variation, no cancellations and no maintenance downtime - conditions that are clearly unrealistic.

Licence Implications

Even under the most optimistic model, the CIC would need to sustain over 100 events per year for a period of 9 to 22 years.

Such levels of intensive commercial use are incompatible with the character and preservation obligations of a Grade II listed heritage building* whose principal designation as per legally applicable covenant is as a museum.

The current licence, therefore, cannot be said to be “fit for purpose” in achieving the £8 million target. On the contrary, if a licence was to be amended to allow for over a 100 small events a year it would formalise the shift in emphasis from museum use toward commercial events..

Lease Constraint

The CIC’s lease commenced in 2018 and runs for 25 years, expiring in 2043. This leaves only 18 years remaining. By their own figures, the CIC’s £8 million goal would take between 9.3 and 22 years to achieve in an optimistic scenario- the longer scenario already exceeding the lease term. This demonstrates that the target is structurally unachievable within the legal timeframe available, even on the unrealistic assumption that all revenue is profit.

*Source:

[https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://ealing.mode.rngov.co.uk/Data/Cabinet/201802131900/Agenda/Gunnersbury%2520Park%2520and%2520Museum%2520Service%2520Transfer%2520to%2520the%2520Gunnersbury%2520Estate%2520\(2026\)%2520CIC.pdf&ved=2ahUKEwigmo2a7bmPAxXxQUEAHddYJ9AQFnoECCQQAQ&usq=AOvVaw3sZB7F9uwLHf-JO_nKwHm1](https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://ealing.mode.rngov.co.uk/Data/Cabinet/201802131900/Agenda/Gunnersbury%2520Park%2520and%2520Museum%2520Service%2520Transfer%2520to%2520the%2520Gunnersbury%2520Estate%2520(2026)%2520CIC.pdf&ved=2ahUKEwigmo2a7bmPAxXxQUEAHddYJ9AQFnoECCQQAQ&usq=AOvVaw3sZB7F9uwLHf-JO_nKwHm1)

Conclusion

The CIC’s reliance on private events inside the museum and Orangery to raise £8 million is financially and legally unsustainable. In practice, the museum will remain a de facto private hire venue for the duration of the lease, with heritage preservation subordinated to commercial events activity. Granting a licence to hold in excess of 100 small events per year to facilitate the needed activity would therefore:

- 1.1. Fail to deliver the stated public benefit, since the £8 million cannot be raised within the lease period.
- 1.2. Risk permanent damage and accelerated wear to a listed heritage site.

1.3. Undermine the building's statutory and cultural role as a museum, effectively re-designating it by practice into a long-term events business.

For these reasons, the current licence cannot be justified as an appropriate or proportionate mechanism for achieving the stated goal of raising £8 million.

2. Nitrous oxide drug canisters are often found in the park and surrounding residential streets:



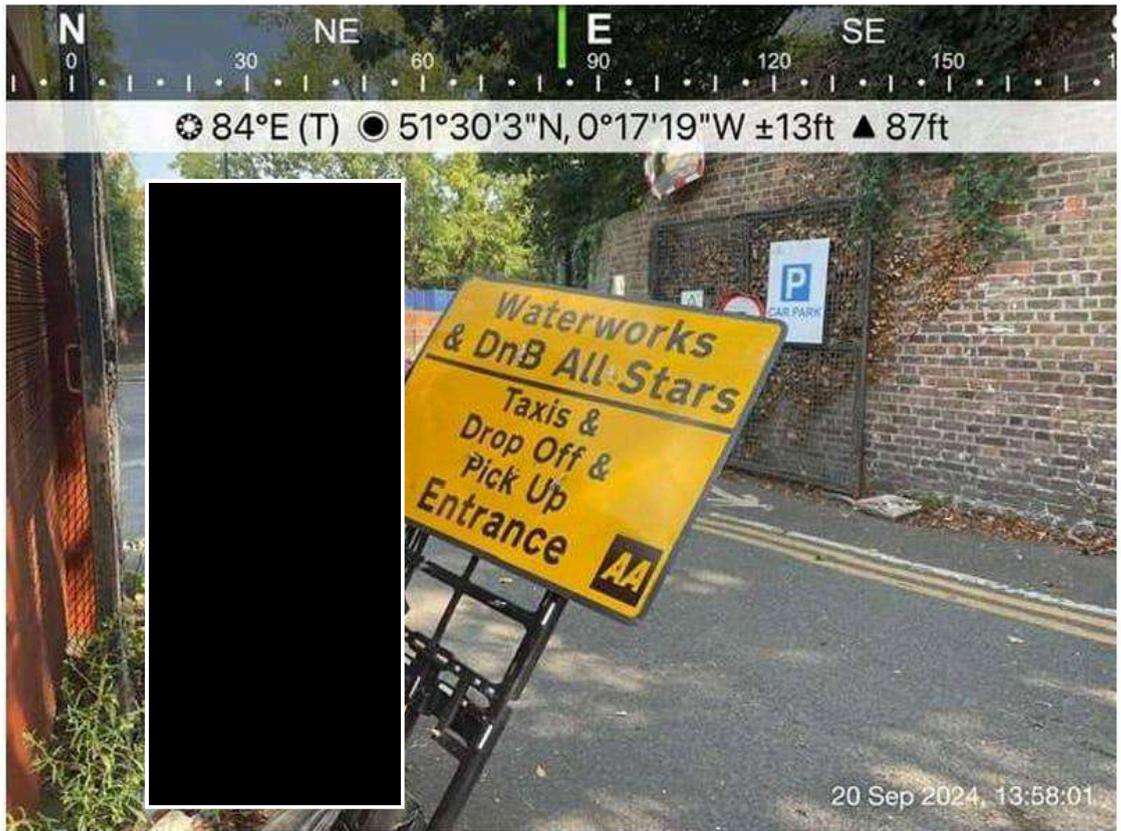


As well as residents private bins in 2025:



Organisers (Waterworks) boast of collecting trolleys of nitrous oxide canisters as a benefit of their clean up- a claim that openly contravenes the *Psychoactive Substances Act 2016* and *Misuse of Drugs Act 1971*. Page 53 of *Gunnersbury-Park-Event-Restoration-Plan---WW24-with-Appendix-1*, planning application number P/2025/1574
<https://planningandbuilding.hounslow.gov.uk/NECSWS/ES/Presentation/Planning/Onl>

[inePlanning/OnlinePlanningOverview?applicationNumber=P%2F2025%2F1574:](https://inePlanning/OnlinePlanningOverview?applicationNumber=P%2F2025%2F1574)

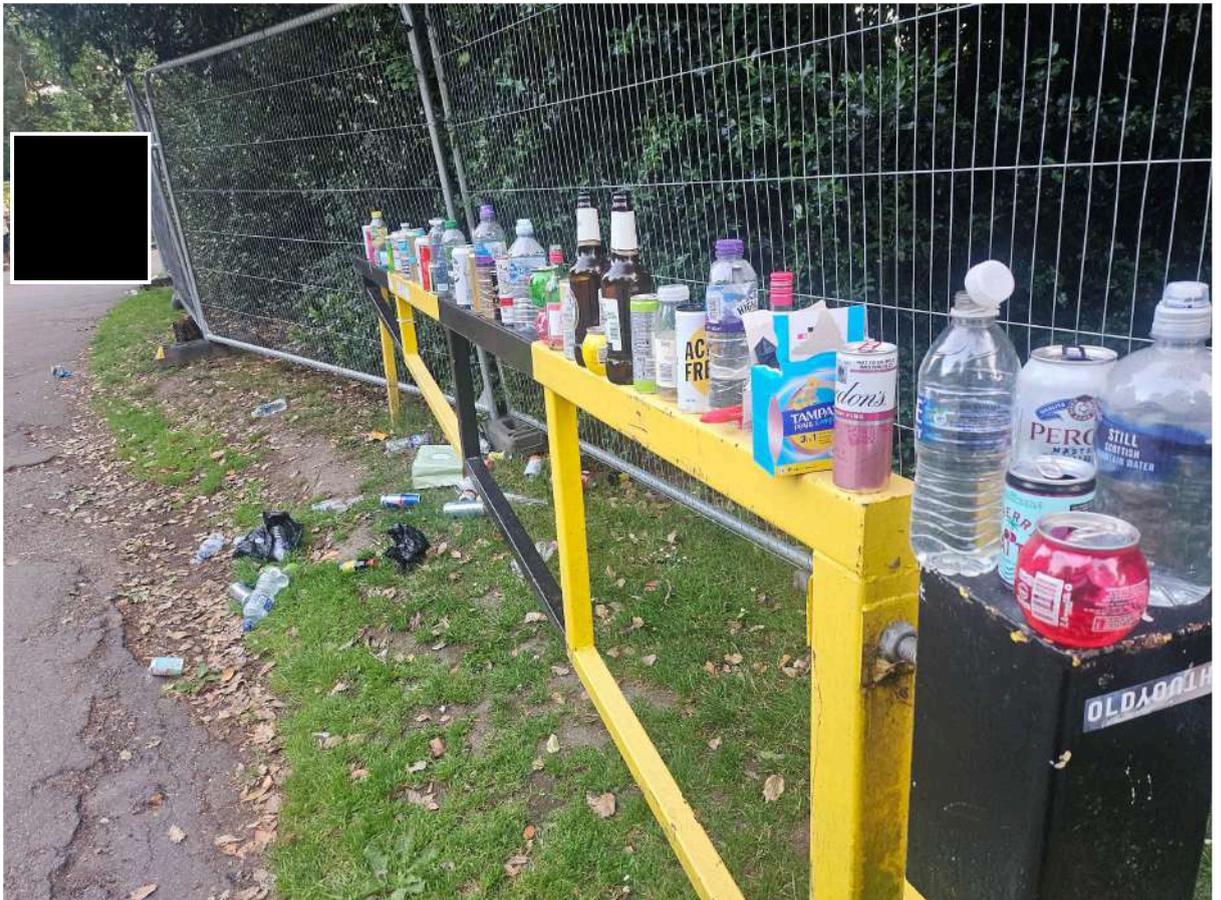


3. Drug sale stickers in front of the London International School next to the park in 2024 during festivals:



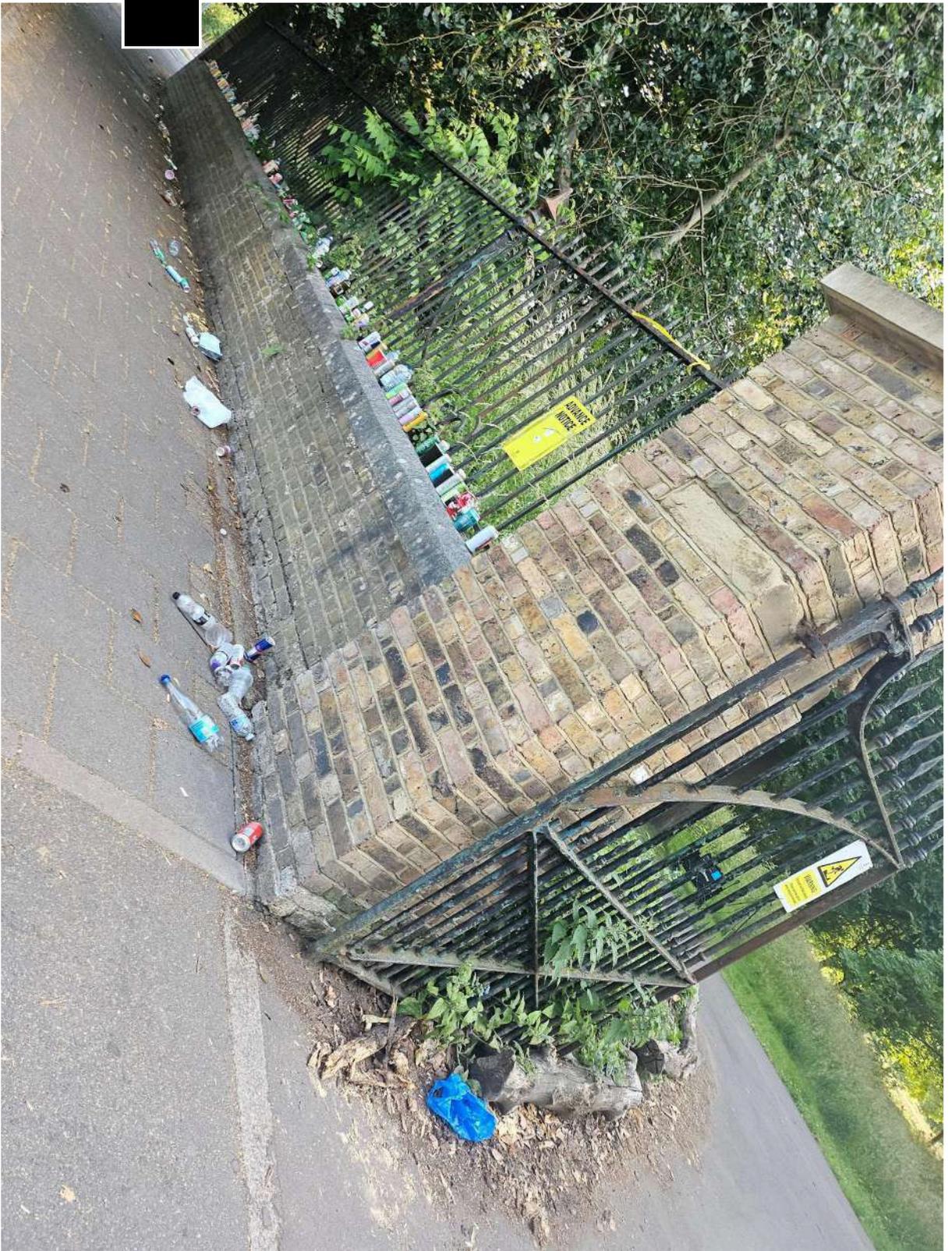


4. Garbage after Krankbrother 2025









5. Gardens, garages and side roads are regularly used as toilets during events.



6. Sand used on grass in 2025 and soil damage in 2023/24





