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Protect Brockwell Park

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Instruction

To produce a brief arboricultural review of documents relating to the application 25/03733/RG4.

Conclusions

The technical reports provide information useful in guiding the planning of future events at Brockwell Park in ways to lessen damage to the vegetation, but the proposals themselves do not adequately respond to this advice. It is also clear from some reports that well-established guidelines have not been followed in the past, and particularly in 2025. For example, apart from reports of members of the public, it can be inferred from the submitted information that the previous event series gave rise to various instances of non-compliance that were recorded in a log held by the Council. I note that the Council refused to share that log with the applicant; I do not understand why such information should be withheld as it is a relevant consideration in drafting a strategy to avoid harm.

None of the supporting documentation recognises that the most environmentally important feature of any park is mature trees. Their replacement, even with semi-mature trees, takes several decades: they are essentially irreplaceable. This is highly significant at Brockwell Park since, compared with most other London Parks, it has a very low density of mature trees. Those trees play a vital role in the character of the landscape and parkland setting, which I understand is a heritage asset of itself. Planting new trees does not adequately mitigate this loss.

Compaction. The Agrostis reports establish significant cumulative compaction impacts on the soil structures in recent years. The current state of the ground shows that these have not been fully remediated with respect to the grassland and can never be remediated where compaction has occurred to tree roots.

In previous years, two-dimensional trackway has been laid directly on the ground to support the passage of heavy goods vehicles. Although this avoids rutting of the ground it does not prevent soil compression. Indeed, trackway alone is not considered enough even for pedestrians (BS 5837 2012 **6.2.3.3**). In the multiple locations where this has been used in the RPAs of trees, permanent damage of the roots will already have happened.

Surface grass recovery is not indicative of recovery of tree root systems from the impacts of compaction.

Compaction has multiple effects on the health of trees:

- i) It constricts overall growth directly; ii) it renders water, and particularly oxygen, unavailable to roots by destroying soil pore structure; iii) it increases surface water runoff, and hence increases potential drought and flood damage, following rain in the dry periods; iv) it increases waterlogging in wet periods.
- The effects on the soil microbiota are long lasting and detrimental. On the one hand, the key role of their symbiotic mycorrhizal fungi diminishes and, on the other, the trees become more susceptible to pathogens.

These cryptic subterranean effects become clearly manifest above ground; we see branch dieback and fungal infections which ultimately lead to the death of whole trees. There are numerous examples of such above-ground effects evident here, including a recent example being the fungal infection of tree T4.

It must be underlined that **compaction is cumulative**. Even if one episode does not prove fatal, several over time will weaken the condition of the trees until they die, most often after increasingly frequent dry hot summers.

At Brockwell Park there is clear evidence that tree damage has accompanied and followed every large-scale event. As a result, a high proportion of trees are in poor health. As I set out above, many of these trees are mature and are essentially irreplaceable in respect of the role they play in contributing to the character of the landscape and parkland setting.

The proposals require encroachment into the RPAs of at least 19 Category A trees. The erection of steel fencing panels, the storage of material, and the passage of HGVs and plant will cause damage to these valuable trees. The consequence of the damage will be more serious as a result of the damage already sustained through evident incursions in previous years.

The supporting reports do not address the timing of the events. Trees are at their most vulnerable during the period after leaf emergence when shoot growth, root spread and need for nutrients are at their greatest. Any disturbance to the root area will have a significantly more damaging impact to the health of the trees during the proposed period than at other times of the year.

The RPAs have been calculated using the generic British Standard (BS: 5837 2012) formula to derive a basic area. In such a sensitive location, larger RPAs should be established with reference to the individual tree species; in line with the draft BS: 5837 Code of Practice

The ground protection systems suggested as a “rule of thumb” in the Arboricultural Method Statement are not suitable where damage might already have occurred to roots. Without further engineering specification and installation details, they cannot be relied on as adequate protection.

Recommendations for the insertion of multiple metal fence pins (such details being provided within the submitted AIA/AMS) in such a way as to avoid root damage, are unachievable. The fencing is currently planned to cross through multiple RPAs, and requires multiple pins per fence panel. Some of the pins will certainly damage the roots making them highly susceptible to pathogens. Merely logging instances of damage or non-compliance provides no comfort in relation to harm that may be caused; as I note above, the utility of such a log would appear questionable given the AIA/AMS records that the Council refused to share the data from 2025.

The misidentification of a number of trees in the AIA calls into question the soundness of the report and means the planning authority cannot rely on the applicant’s report alone.

The activities and infrastructure proposed in the planning application will lead to further damage to both the mature and most highly valued trees as well as younger specimens. This damage will be on top of the damage already caused and cannot be remedied.

The current proposal for tree protection during the occupation of the park is minimal and, even if strictly adhered to, is certain to lead to damage of the trees.

In such circumstances the Council needs to be clear as to the consequences of these impacts. In my opinion it is clear on the evidence that the long-term health and vitality of many important trees will be harmed by this development, which is accepted to part of a recurring annual series. Harm to the condition of such important trees will undoubtedly, in time, adversely affect one's ability to appreciate the character and appearance of the parkland and its role as the setting for various historic assets.

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Attached: Photographs of typical damage and loading on root areas in previous years.



Brockwell Park Examples of damaging loading to the root systems of trees in previous years - photos from 2024



Brockwell Park

Examples of disease and damage to trees in previous years - photos from 2024 and 2025