



DRAFT MITCHAM COMMON MANAGEMENT PLAN 2023-2028
A response to Mitcham Common Conservators
October 2022

1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs, including Mitcham Common. We are the civic society for this part of Merton and part of the wider civic movement through membership of the national charity Civic Voice. We have been closely involved in the development of the Merton Local Plan, Borough Character Studies, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run Mitcham Heritage Day (which has included the participation of Mitcham Golf Club) and Community on the Green. We work closely with Friends of Mitcham Common on matters of shared interest and concern.

2. Mitcham Common is the most significant green space and wildlife habitat in our area of interest. It also has direct physical and historical connections with the network of Mitcham Greens which are a central focus of our work. Our approach to development and change in the area is established in the [Cricket Green Charter](#) which was refreshed in 2019 with the support of London Borough of Merton and local councillors. The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green which includes part of Mitcham Common. The Cricket Green Charter states:

- *"There should be no loss of green space, and the registered town greens and Mitcham Common should have absolute protection, including from new tarmacked paths and cycle ways.*
- *The variety of open space should be positively managed for quiet enjoyment, recreation, sport and nature, and ground markings (such as pitches) and structures kept temporary and to a bare minimum.*
- *Management plans for each of the registered town greens, The Canons grounds and Mitcham Common should be prepared to benefit wildlife and enhance the landscape and public enjoyment."*

Summary

3. We offer the following summary of our views:

- Recognise that the Management Plan needs considerably more work to provide what's needed to guide Mitcham Common's future

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- Extend the period of the Management Plan to 2033 and commit to a refresh after five years
- Provide a meaningful Vision Statement, with a clear Objective and strengthened Aims, supported by targets and a commitment to publishing an annual monitoring report
- Restructure the Management Plan around these Aims
- Agree a set of Values underpinning the Management Plan and the way Mitcham Common Conservators operate, to include transparency and collaboration and to support a more outward looking approach that is not so constrained by the boundaries of ownership and internal process
- Rebalance the ecological focus of the Management Plan to give at least equal weight to its benefits for people
- Extend the focus on "*Biological*" aims to recognise the importance of Mitcham Common's landscape and the ecological services it provides (water, climate change, air pollution)
- Commit to a redefinition of the relationship with users of Mitcham Common that builds a compelling case for their support and a resulting step change in the contribution of volunteer time and donations
- Prioritise making better use of Mill House Ecology Centre and offer different models of volunteer engagement that do not demand the involvement of Mitcham Common staff – to both build support and grow revenue
- Address the exceptionally weak evidence base for the Plan by including commitments to surveys of Mitcham Common's users, wildlife and landscape so as to provide a baseline of evidence for the future
- Address the relationship of Mitcham Common to Wandle Valley Regional Park and the opportunities to strengthen connections with Mitcham's Greens and the large area of open land running south on both sides of the railway to Beddington Park, including Beddington Farmlands
- Adopt a more sustainable approach to meeting Mitcham Common's financial needs than one based on hosting potentially intrusive external events and advertising by transforming levels of public engagement as the route to providing the stronger political, financial, community and volunteer support necessary to implement and improve on the Management Plan
- Undertake an independent review of governance by Mitcham Common Conservators
- Subject the managing agent arrangements to a competitive re-tendering process for a contract able to provide the full range of skills and experience needed to deliver a refreshed management plan, including building community and volunteer support
- Give more attention to outlying areas of Mitcham Common which are often at greatest risk from development and neglect
- Identify the avoidance of clutter and urbanising influences (signs, tarmac, play grounds, bins etc) as a guiding principle
- Provide a commitment to maintaining a network of paths and routes agreed after wide public involvement

Management Plan period and preparation

4. We welcome unreservedly the production of a new Management Plan. There has been no public consultation on the future management of Mitcham Common for 15 years and the previous Management Plan ran only to 2012/13. The aims of the revised Management Plan are long term and we believe its period should run for 10 years to 2033 and include a specific commitment to commencing a revision within five years. We believe the Management Plan should explicitly be led by Mitcham Common Conservators and not be the result of a "*liaison*" with Merton Council's Greenspaces Team. This illustrates a confused understanding of how Mitcham Common should be governed which we address below. The Management Plan also needs to address issues, such as growing the case for support, which go beyond the professional insight of the Greenspaces Team. The Management Plan should also be developed with more and earlier public engagement, involving the local community in shaping the scope and content and not

just responding to a consultation draft. This all points to the Management Plan needing more fundamental change than has been presented. We are asked to respond to the draft Management Plan by making "*comments relevant to specific parts of the draft document*". This implies a belief that the draft is almost there and only need tweaks and adjustments to provide what Mitcham Common needs to guide its future. Instead we believe there are fundamentals still missing and an unduly narrow conception of what Mitcham Common offers and what's needed.

Vision, Objective and Aims

5. The Management Plan needs to be based on a clear Vision to be delivered through an Objective and a series of Aims that address the main priorities.

6. The proposed Vision Statement is "*To Preserve and Manage Mitcham Common for Current and Future Generations*". Regrettably this is not a Vision Statement. A Vision Statement describes the desired future state not the process through which it is arrived at. An example for Wimbledon Common is "*Wimbledon and Putney Commons will be recognised as an exceptional and welcoming natural place for visitors where wildlife thrives*". Something similar should be developed, with wide public engagement, for Mitcham Common.

7. An example might be:

"Mitcham Common is known and appreciated by Londoners, managed by respected statutory and community bodies and local volunteers, and widely enjoyed and supported by locals for its improving wildlife and landscape and its growing contribution to lifelong learning, civic pride, health and wellbeing and addressing climate change."

8. The key aspects of this statement are:

- recognition at the London level
- governance has earned respect and is collaborative between statutory and community bodies
- use is diverse in terms of activity and background of users
- the quality of landscape and wildlife is improving
- the Common is recognised and valued for increasing benefits beyond its wildlife

9. The use of "*preserve*" in the proposed Vision Statement is inappropriate. There is no aspect of the Common's management which does not involve the management of change and no aspect that can be "*preserved*" in a static way (regardless of whether or not this is desirable). Where the priority is to minimise change to the significances of the Common then "*conserve*" or "*protect*" are likely to prove more realistic and appropriate terms, and the basis of management should be one of improvement and enhancement. The use of "*preserve*" in the founding legislation is not a reason to use it in the Vision Statement as is evident from multiple other organisations in similar circumstances which have refreshed their language.

10. The proposed Objective of the Management Plan is less clearly presented than the Aim. It appears to be "*to enhance and maintain the Common's biodiversity, provide a recreational resource for local people and fulfil the Conservators' legal obligations required under the Metropolitan Common Act*". This is cited as an "*aim*" in paragraph 2.2 and as an "*objective*" in paragraph 29.1

11. The Plan then includes four Aims – Biological, People, Protection of the Common, Revenue – in paragraph 29.2. The wording of the Aims is not consistent through the document and there are significant differences between that provided on page 39 and that provided against each of the four headings on pages 39-51.

12. Both the Objective and the Aims should be brigaded with the Vision Statement and more directly inform the structure of the final Management Plan which should be aligned to achievement of each of the Aims.

13. The Objective and Aims need to be strengthened by:

- Fundamentally repositioning the relationship of Mitcham Common Conservators with the public who use Mitcham Common to build a compelling case for their financial and volunteer support over the period of the Management Plan – this will also help to provide a more sustainable way to address the financial challenges recognised in the draft Plan
- Extending the Biological focus to address the significance of Mitcham Common's landscape and its role in providing a wide range of ecological services. Mitcham Common is a very significant landscape as well as wildlife resource, including the benefits of its relative tranquillity and dark skies. It also provides a wide range of other environmental benefits in reducing the impact of climate change, managing water resources, reducing urban overheating and mitigating air pollution.
- Embracing a much wider set of People benefits than "*recreation*" to recognise the wide range of educational (formal and informal), cultural, wellbeing, feelings of civic pride and other benefits it provides. Mitcham Common supports a wealth of individual and collective pursuits including healthy walks, art, crafts, photography, wildlife recording, meditation, research, citizen science, foraging and contact with the natural world that should be recognised

14. The Management Plan lacks targets on most issues, key performance indicators and any commitment to its monitoring and review. We suggest an Annual Monitoring Report is published with a formal review period for the Management Plan after five years.

Evidence base

15. The Management Plan has been prepared with a very limited evidence base. The structure of the habitat management approach is based on a 1984 report that doesn't even include the whole common and there is no more than anecdotal information provided on the number, nature and needs of users. Remarkably, the Management Plan states that "*there is no available data for the number of visitors to the Common*" (paragraph 11.5). This is untenable given its location and primary role in serving a vast population on its doorstep.

16. It is imperative that any future Management Plan is based on a clear evidence base and the operational aims of the Plan should be extended to prioritise completing the following within the next three years:

- *User survey* – providing baseline data on the number and type of visitors, where they live and how they use and move through the Common. This should support some basic segmentation of users to inform future plans. The Plan references the Common's "*catchment area*" but does not define it. A User Survey was identified as necessary in the previous Management Plan but not delivered and it is now essential. It will also provide important evidence underpinning the case for support from external funders
- *Habitat and wildlife survey* – to bring together the eclectic range of different data and provide a consistent basis for future monitoring, including opportunities to support this through citizen science. There are opportunities, for example, to connect with and extend the citizen science work that has provided a rigorous ecological record for Beddington Farmlands as part of the wider connections between Mitcham Common and other parts of the Wandle Valley
- *Landscape Character assessment* – to address this lacuna in the Management Plan and recognise the special qualities and significance of Mitcham Common to inform its management and protection from inappropriate development

Context

17. Mitcham Common sits within the Wandle Valley Regional Park. This is not as described in paragraph 5.1.2 and extends from Croydon to the Thames in Wandsworth. Within the context of Wandle Valley Regional Park there are particular opportunities to develop ecological, physical and volunteering connections with the immediately surrounding green space, including Beddington Farmlands, Beddington Park, the Mitcham Greens, and the land west of the railway line running south to BedZed in Hackbridge. These opportunities should be directly addressed in the Management Plan given the benefits for ecological resilience and public access. As the Lawton Review recognised in order to address the nature emergency we need a more landscape-scale approach where wildlife habitats are bigger, better managed and more joined-up. The opportunities for doing this in and around Mitcham Common are immense and the focus should not be constrained by legislative arrangements for who manages which areas or the quirks of land ownership boundaries.

18. The Management Plan understates the significance of Mitcham Common in terms of designations in the current and revised Merton Local Plan. These embrace its landscape and open space role as well as it being important for wildlife and include:

- Green Corridor
- Protected Open Space
- Metropolitan Open Land (MOL)
- Site of Importance for Nature Conservation (SINC) – recognised as a Site of Metropolitan Importance
- Partly within Mitcham Cricket Green Conservation Area
- Archaeological Priority Zone

19. The old windmill is also a Grade II listed structure (at risk) in addition to the Bidder Memorial and is located in an enclave at the heart of Mitcham Common.

Building support

20. The Management Plan identifies a range of threats to Mitcham Common, including a decline in available resources. Its response to the financial challenges is extremely limited – provide QR codes for individual donations and support potentially intrusive music festivals, private events and advertising. We do not believe this provides a sustainable approach. It is locked into something of a “local authority mindset” when Mitcham Common Conservators are free to act more like an independent charity or trust. This would allow it to capitalise on Mitcham Common’s unique situation being located on the doorstep of millions of people and with a growing awareness of the importance of green space to people’s lives.

21. In the long term the Common's future, including its biodiversity, relies on transforming the level and nature of public engagement with the Common’s future and better recognition of the public’s needs. Healthy public engagement is the route to providing the stronger political, financial, community and volunteer support necessary to implement and improve on the Management Plan. It depends on a good understanding of current and potential future users of Mitcham Common and the development of some basic segmentation that provides the basis for developing strategies (“customer journeys”) that engage them and build their support. This will provide volunteers, funds, partnerships, grants, evidence and other benefits that provide the foundation for future management. The Management Plan provides the basis for investing in this approach. It is an approach which goes well beyond the Forest Schools and use of the Mitcham Common Education Trust proposed.

22. There are particular opportunities to make much better use of Mill House Ecology Centre as a focus for community activity. This is a massively underused resource which should be providing both a focus for increased support and directly generating income. The current management approach is obstructive, with high user charges and disproportionate rules and regulations discouraging use.

23. There are significant opportunities to support volunteer management and activity on Mitcham Common through different models. The current approach – described as requiring "*guidance and supervision by professional staff with limited time availability*" – is a major constraint. There are multiple other ways in which green space is managed across London and beyond, for example through the involvement of TCV Green Gyms and other voluntary organisation arrangements which place no requirements on staff time.

Governance

24. This emphasis on building support will also require an evolution in the culture and behaviour associated with Mitcham Common's management. It is notable that the Management Plan is not supported by any agreed Values that underpin the approach. Mitcham Common Conservators risk being seen as shadowy and unaccountable figures with no public profile, contact details or obvious means to raise issues with them for debate or influence how they are appointed. Mitcham Common Conservators will need to operate in a more transparent and accountable way and seek collaboration and co-design as ways of achieving what cannot be delivered through their own resources. As drafted the Management Plan offers only the most limited, even grudging, commitments to transparency and engagement, such as continuing to hold Conservators meetings in public.

25. Delivery of the Management Plan is dependent in large part on the way Mitcham Common is governed by Mitcham Common Conservators and the contractual arrangements it puts in place for its management. We believe these both need review to ensure they are fit for purpose and cost effective.

26. We are not aware of any internal or external review of Mitcham Common Conservators having ever been undertaken in 130+ years. This raises fundamental questions over accountability as well as missing opportunities to learn from experience and external insight. Completing a review and acting on its recommendations will provide reassurance to the public and community groups wishing to get more involved. It will also help reassure Merton Council in its continuing role making financial contributions to the running of Mitcham Common. It may also help rekindle support from other neighbouring local authorities and be an assurance to future external funders.

27. It is a matter of basic good practice for any organisation to subject itself to such a review on a regular basis. A desirable outcome would be that Mitcham Common Conservators become a more outward looking and responsive body, including adopting more collaborative and less authoritarian behaviours and democratising the way in which the Conservators are selected. The Conservators should be made up of many more independent and community voices and fewer local authority councillors. This can all be achieved within the framework of the current legislation. It may also highlight areas where legislative change could be helpful.

28. Merton Council has acted as managing agent for Mitcham Common Conservators for a considerable period of time and we are not aware of this arrangement being put out to competitive tender in recent times. There is much that is positive about the current arrangements and there are undoubtedly some advantages in the close understanding between Merton Council officers and Mitcham Common's management that results from the current arrangements. Nevertheless, it is another matter of basic good practice to subject such arrangements to a re-tendering process to ensure they are effective and cost efficient. This would also allow the tender to evolve to address the priorities in the Management Plan, including the case for growing visitor and volunteer support and income.

Other considerations

29. We welcome the commitments to avoid unnecessary clutter and urbanising influences which would harm the character of Mitcham Common, including tarmac paths,

excessive litter bins, formalised sports pitches, play grounds, and intrusive signs and benches (individually and collectively). We agree the Conservators should continue to resist calls for more warning signs and litter bins and believe those currently on the Common can be rationalised. Litter bins should be an exception and only made available in the most heavily used parts of the Common. Many existing bins simply act as generators of littering problems as well as adding servicing costs.

30. The avoidance of clutter and unnecessary structures should be more visibly identified as a guiding principle of the Management Plan. Where infrastructure is essential it should be provided in a low key, informal manner with careful choice of materials. This principle is not consistent with the intention to "*consider granting licences for appropriate advertising*" which has the potential to create significant visual intrusion.

31. We recognise and support the opportunities for further tree planting on Mitcham Common being limited. This is an area where public communications will benefit from a much more involving and participatory approach to the local community.

32. We support a restricted approach to cycle routes across Mitcham Common, while noting these need not involve tarmac paths (paragraph 11.2). A significant issue to be addressed is the demand for cycle connections running along the south edge of Mitcham Common from Beddington Lane across the railway to Goat Road and connecting with an upgraded permissive path to Beddington Park and the new routes being developed over Beddington Farmlands where we acknowledge the merits of providing better east/west connections. There are important opportunities for collaboration with neighbouring landowners in providing a suitable approach.

33. The Plan should give particular attention to outlying parts of Mitcham Common, especially where they were not included in Morris' 1984 ecological report. We have particular concerns for the land west of Carshalton Road. This includes a significant area which lies within Mitcham Cricket Green Conservation Area. It has been threatened by an access road to Willow Lane Industrial Estate and is subject to significant and persistent flytipping. Other parts of the Common in need of more attention include other areas west of Carshalton Road (both between Goat Road & Aspen Gardens and bounded by the railway, Cranmer Road and Commonsides West) and land north of Commonsides East.

34. The Plan should include a commitment to maintaining a defined network of paths and routes. The extent of this network should be developed through external engagement and user surveys. It should include the route between Mitcham Junction and Willow Lane Industrial Estate, a north/south footpath between Cedars Avenue and the railway and effective access south east from the major junction of Beddington Lane/Croydon Road/Windmill Road.

35. The Management Plan should include commitments to publish and make available online:

- Definitive maps of the Mitcham Common boundary
- Biological data held on Mitcham Common, including on RECORDER

36. Given the ecological emphasis of the Management Plan it is surprising that it does not identify target species as well as habitats and establish appropriate KPIs to be achieved during the Plan period

37. We welcome the commitment to "*challenge inappropriate development that would adversely impact on the Common*". There have been a number of recent cases where this has not been the case, including proposals in the Local Plan review for a major access road to be constructed across Mitcham Common to access Willow Lane Industrial Estate on which the Conservators did not express a view. The Conservators should be

concerned to protect the character of large parts of the Common where it is possible to escape the view of buildings in the surrounding suburbs. This requires consideration of some of the more distant views and impacts, including proposals for tall buildings in central Croydon, Hackbridge and Mitcham Village. The Wandle Vista identified by Wandle Valley Forum and Wandle Valley Regional Park Trust should be recognised in the Management Plan with a view to both managing the surrounding landscape to protect and enhance it and to make representations on planning applications which may impact detrimentally upon it.