



MERTON TREE STRATEGY 2023-2029
Part 1 – Management of Council-owned trees
November 2022

1. Mitcham Cricket Green Community & Heritage takes an active interest in the future of the Cricket Green Conservation Area and its environs. 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 Study, the Conservation Area Appraisal and Management Plan and numerous development proposals in the area. 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 (<https://mitchamcricketgreen.org.uk/cricket-green-charter/>). The Charter has been acknowledged in the Conservation Area Appraisal and Management Plan for Cricket Green. We are members of The Canons Steering Group delivering a £5m Lottery funded project and also undertake practical projects, organise walks and run local events including Mitcham Heritage Day and Community on the Green. We support practical conservation work in the area led by Friends of the Canons, including tree and hedge planting and care. This includes the golden privet hedge around Mitcham cricket ground planted to celebrate the 50th anniversary of Mitcham Cricket Green Conservation Area. We are part of Independent Merton Green Spaces Forum.

2. We unreservedly welcome publication of a draft strategy for the management of trees owned by Merton Council. It has been a long time coming and the importance and value of having a strategy is as acknowledged in the draft – to move from an inefficient and reactive approach to one that "*provides a mechanism for consistent tree management*" and planting. We particularly welcome recognition of the multiple benefits that trees provide and the emphasis on a more data led approach.

3. There is much to welcome in the detail of the Strategy although we believe it can be significantly strengthened and there are important omissions. There are particular opportunities to provide a much clearer approach to implementation and delivery (including identifying resource requirements (staff/contractors, volunteers, capital/revenue funding) and specifying timelines for key outcomes) and to make much more of the opportunities for a collaborative approach with the local community and relevant voluntary organisations. We support the detailed feedback provided by Tree Warden Group Merton.

4. We do not find the constraints of the feedback form helpful in responding to the draft Strategy and address the main ways in which we believe it can be strengthened below.

5. Vision – While a Vision for the Tree Strategy is welcome the approach proposed is limited and lacks ambition. A Vision describes a desired future state and the nearest the

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proposed Vision gets to this is "*the best tree population that we can*". This feels apologetic and too much depends on the understanding of "*best*". It is also inconsistent with the ambition expressed elsewhere in the draft Strategy to "*optimise*" the benefits provided by trees and we believe this would be a more suitable approach with a primary focus on increasing the tree canopy. The Strategy should be underpinned by a monitorable commitment to increase tree canopy on Merton Council land which exceeds the 10% target contained in the London Environment Strategy for the whole capital.

6. Data – The commitment to a data led approach is very welcome. It is particularly unfortunate, therefore, that the key data presented is structured according to out of date ward boundaries. Given the Strategy is looking forward to the end of the decade, it is essential that it is based on the current ward boundaries at the point of final publication.

7. Definitions – The Strategy is unclear as to whether its approach includes hedges and shrubs as well as trees. It should be broadly based. Data on both hedges and shrubs should be available to the same level of detail as trees. Figure 7 is in error in stating Merton Council has no responsibility for shrubs. It is self-evident that the number and range of shrubs on Merton Council land is very significant and this data should be gathered and included (along with hedges).

8. We are also unclear as to what constitutes the full scope of Merton Council's "*owned tree population*". As one example Merton Council is responsible for managing the trees in the churchyard for Mitcham Parish Church but are these included in the definition of trees covered by this Strategy? We believe the definition should embrace all trees (hedges and shrubs) for which Merton Council has direct responsibility, regardless of the formal status of landownership.

9. Delivery – As with all strategies this one will be judged on its delivery. In finalising the Strategy it will be important to increase confidence in the Strategy making a practical difference by providing:

- A high level breakdown of the resources required for the delivery of each of its main components and the mix of sources from which this will be found, including the respective contribution of capital and revenue funding – e.g. from existing Council commitments, through grants and other funding sources, through money raised by others, through volunteers
- An Action Plan that replaces all the "TBC"s for delivery "*by when*" with specific and realistic dates – some of this will require consultation with essential delivery partners, including Tree Warden Group Merton, Friends and like-minded community groups
- An explanation of the differing responsibilities within Merton Council for trees and evidence for how the internal challenges faced when working particularly across the boundaries between Greenspaces, Highways (responsible for a majority of Merton owned trees), Future Merton (planning policy, regeneration projects) and Planning (development management) will be effectively addressed – this will require more evidence of corporate involvement in the development and sign off of the Strategy and a shared commitment to its delivery, including shared use of a single software system for holding data on trees
- An approach which addresses the fact that implementation of much of the Strategy is through multiple contractors, especially idverde and F M Conway, given historic poor performance in contract management and their underperformance in contract delivery.

10. Benefits – Recognition of the very wide range of benefits provided by trees is welcome. Nevertheless Appendix 1 and Section 3.1 do not fully recognise the important contribution of trees to Merton's rich heritage and landscape. This is particularly

significant in Cricket Green and the contribution of "*many mature trees*" is acknowledged by the Mitcham Cricket Green Conservation Area Appraisal and Management Plan as a source of special interest. It is one of the main reasons why we stress the importance of succession planting and this is not effectively addressed in the draft Strategy. Such planting should be informed by the need for greater resilience, especially as a result of climate change, in the selection of species.

11. Community engagement – The importance of community engagement in EO1 is welcome but this needs to be integrated into the rest of the Strategy if it is to be effective. For example, we would identify the critical role to be played by the community in the study of Merton's urban forest (TR1). This is not a technocratic exercise to be undertaken behind closed doors but one that can be informed by citizen science and community input. There are also significant opportunities for community collaboration in identifying sites for new planting (EO3), nominating new street trees, and in providing insight into the future monitoring and review of delivery of the Strategy (section 7) among others. TMM8 should include a commitment to extending online reporting tools – FixMyStreet – to tree-related matters as a further way of engaging local people.

12. Celebration – The Strategy should do more to recognise the importance of celebrating the quality and diversity of Merton's trees. The character and the diversity of individual species in The Canons and the surrounding area is, for example, the basis on which we are developing plans for a tree walk and recognition of an arboretum.

13. We also offer the following comments:

- The tree canopy map (Figure 1) is significant for showing the contribution of the Wandle Valley in addition to Mitcham Common and Wimbledon Common and this should be recognised in the text. It also demonstrates the lack of tree canopy in many of Merton's extensive industrial estates (including Willow Lane) where there are planting opportunities that can bring significant benefits to the streetscape, help manage summer heatwaves and reduce air pollution
- While there is merit in quantifying some of the benefits provided by trees (TR1) it is equally important that this is not presented in a way that can be misused either to suggest that all benefits can be quantified or that they can be traded away
- The value of trees underpinning implementation of the planned presumption in favour of retention (TMM1) needs to be broad based and to address the full range of benefits identified in the Strategy. This goes well beyond normal planning considerations and the very limited assessments of "amenity" value which feature in arboricultural assessments accompanying planning applications
- The commitments to aftercare, watering and long term maintenance presented in EO4 and EO5 would be more appropriately located in the section on Tree Maintenance and Management. The approach lacks conviction given the scale of the current problems and the existing lack of infrastructure and management systems needed to support effective tree and hedge maintenance and watering across the borough. This includes a need to provide taps and mobile bowsers for use by local volunteers; change the mowing regime for parks, green spaces and road verges to avoid tree damage; and require contractors to undertake planting, watering and maintenance of new trees and hedges in streets, parks and green spaces in collaboration with Friends and like-minded groups
- There is a need for Merton Council explicitly to commit to meeting the highest possible standards for tree protection, management and care in relation to development on its own land as part of the Strategy. This is especially important given the renewed focus on development of council land for new housing and the recent experience of planning consents granted to Merantun Development Ltd. These involved significant and unnecessary loss and damage to trees and were

supported by poor quality arboricultural information which damages Merton Council's reputation for both understanding and caring about trees in its care. It further illustrates the challenge of working in a consistent way across the different part of Merton Council and this Strategy provides an opportunity to draw a line under this and move forward in a consistent way

- The approach of Merton's new Local Plan to trees was strengthened during the Public Examination hearings in response to our representations – Appendix 2 will need to be updated to reflect the modified plan and the new commitments to requiring long term care of trees planted as a result of new development
- TPR1 is flawed for not addressing the opportunity for serve Tree Preservation Orders on both private land and Merton Council's own trees in Conservation Areas. Protection through a TPO is more robust than that afforded under Conservation Area legislation which merely requires notification. Merton Council's approach should be proactively to protect trees that make a positive contribution to Conservation Areas through use of TPOs, including on its own land, and not be limited to their use for trees most at risk. This is normal practice in many other local authorities
- The Strategy should be underpinned by a much more vigorous approach to enforcement against those who damage trees for which Merton Council is responsible, including prosecuting individuals and through use of planning enforcement powers where trees are damaged as a result of new development. This will require more active recording of trees and monitoring of impact and damage
- Reliance on BS5837 (e.g. in TPR6) is not sufficient to afford the required level of protection to trees during building works. A particularly significant issue is the expected size of the Root Protection Area which is widely recognised by arboriculturalists to be smaller than needed in many instances
- The approach to education (EO2) should look beyond schools and recognise the importance of lifelong learning. Where planting takes place in schools as part of an educational programme then, contrary to much current practice, the school should continue to play an active role in long term maintenance involving the current and subsequent students
- The attention given to key arboricultural features and irreplaceable trees in EO6 is welcome. This should include a commitment to preparing and maintaining an inventory and assessment of the state of Merton's Veteran Trees and of commemorative trees and planting (e.g. Dunblane memorial tree in Mitcham Village centre, Jubilee planting at Jubilee Corner, King George VI Avenue). The Canons is notable by its absence from the sites identified in EO6 and the implication of the inclusion of the Wandle Trail is unclear.