

# Tree Warden Group Merton



## OPEN SPACES STUDY

A response by Tree Warden Group Merton to the study being carried out by The Environment Partnership on behalf of Merton Council

- 1 Tree Warden Group Merton was one of the first in the country to be formed under the auspices of the Tree Council over 25 years ago. An active core membership of volunteers has been involved primarily in expanding tree canopy cover in the borough's green spaces, carrying out woodland planting and the subsequent maintenance since the millennium in coordination with the council's Tree Officer. Much of this has included accessing and organising funding unavailable to the council (i.e. The Big Tree Plant). The group also supports numerous Friends of Parks groups and several Residents Associations across the borough assisting with specific projects, regular maintenance work and policy explanations. This has led to involvement on policy issues relating to uneven provision of public open space and the need for effective tree planting across the borough. The group is also active within the Independent Merton Green Spaces Forum.
- 2 We welcome the chance to participate in this consultation as part of the review of Merton's Local Plan.
- 3 We are not clear as to the scope of the Open Spaces Study or the purpose of the open-ended questions to which responses have been requested. We feel it would be helpful if a more proactive dialogue with community groups concerned with open spaces across the borough were to be undertaken, perhaps through the Independent Merton Green Spaces Forum.
- 4 Given the consultation questions posed, the scope of the study appears to be unduly focussed on existing use of open spaces by the community. Equally important is the intrinsic value of green spaces from the point of view of climate management, nature conservation, pollution absorption and the need to increase tree canopy cover.
- 5 The consultation questions posed presumably expect a response based on the plans provided. We have concerns about the use of the PPG17 open space classifications and their lack of accuracy in relation to actual use. To apply simplistic designations to spaces that provide multiple uses – some activity related, some habitat related – is misleading and unhelpful and is likely to lead to misjudgements as to the relative importance of any particular space for a particular use or uses. The fact that the 'primary use' column in the table provided is often different from the typology used on the plans merely confirms our concerns.
- 6 Numerous areas that are categorised as 'outdoor sports facilities' are known to the public as local parks or recreation grounds and primarily used as such. Sports use may occur on occasion but is secondary to other uses. Some random examples are Cottenham Park, Dundonald Park, Figges Marsh, Garfield Road Recreation Ground and Sir Joseph Hood Recreation Ground. All have a similar balance of uses to Wimbledon Park, which is categorised as 'park and gardens'. Such a lack of consistency in categorising green spaces is unacceptable.
- 7 The PPG17 classification of the different types of open space has limitations. It takes no account of the planning policy status of different green spaces or the different functions they serve as part of the green infrastructure of the borough. Nor does it differentiate between public and private land ownership.

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# Tree Warden Group Merton

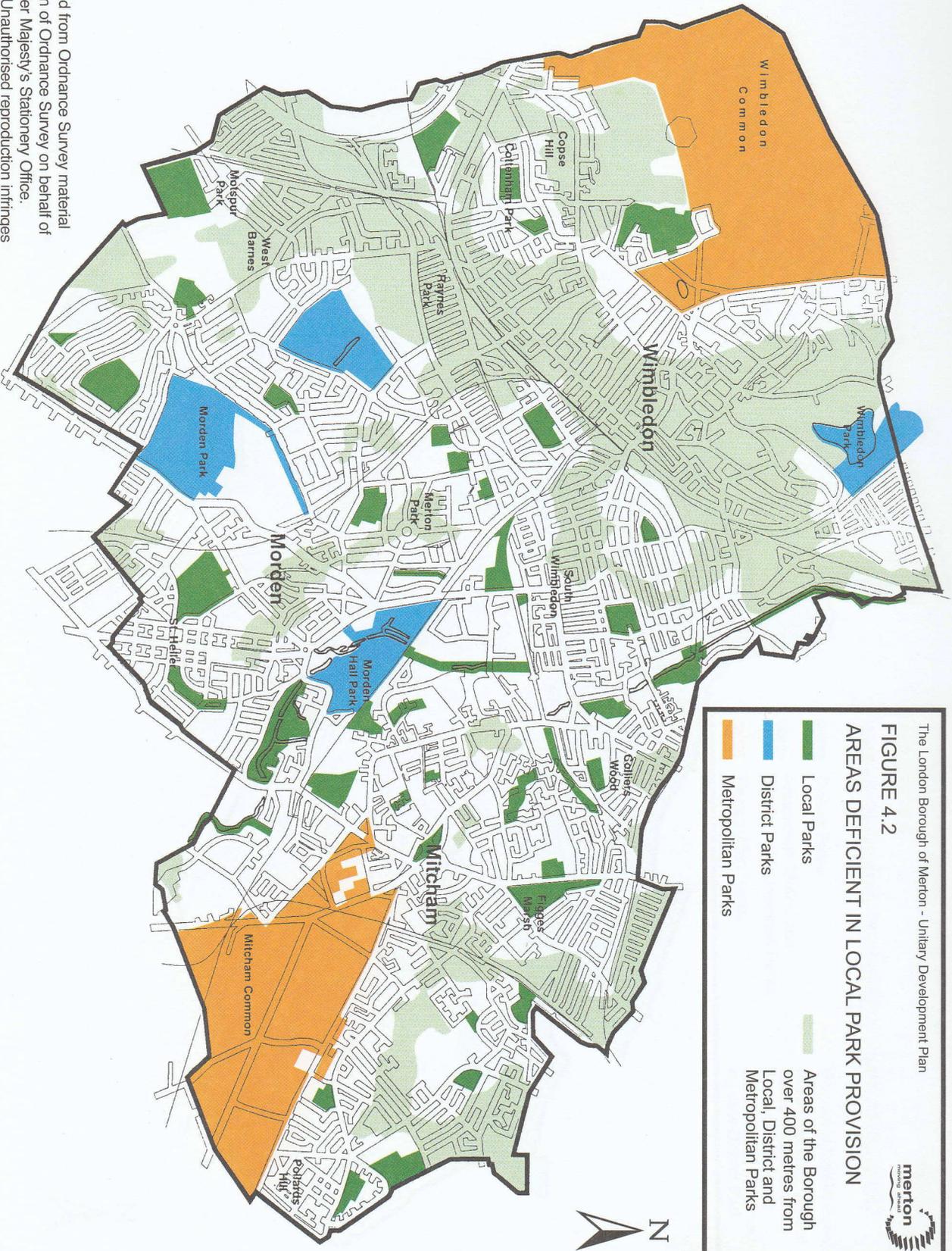


- 8 The Merton UDP of 2003 contained a key policy regarding the deficiency of park provision in parts of the borough. Attached is a copy of the plan relating to deficiencies in local park provision. The current Local Plan chose to blur the difference between public and private open space and implies that private playing fields, for example, are 'publicly accessible' even if one has to pay to use them (club membership) and they have no children's play facilities. The claim that over 99% of the borough therefore has good access to publicly accessible open space is disingenuous. The deficiencies recorded in the 2003 UDP still exist. The rectification of this deficiency should at the least be an aspiration of the new Local Plan.
- 9 Although the current Local Plan acknowledges the importance of a Tree Strategy, the council has so far not found the funds or staff time to produce one. We see the urgent development and production of a Tree Strategy as an essential element in making our green spaces more resilient to climate change, more attractive for the community and an essential tool to ensure that losses of mature trees to the intensification of development are adequately compensated for. Clearly we would prefer that a net increase in London's tree canopy cover was a clear policy that individual boroughs are required to deliver. This should include the monitoring of losses due to development pressures to determine what has to be delivered and areas of the borough's green infrastructure in the borough's control identified that can meet this provision. We understand that boroughs have been asked to identify areas to provide increased canopy cover, but we are not aware whether individual boroughs have addressed this as yet. Clearly this would need to be part of the council's Tree Strategy and might impact on how some green spaces are used.
- 10 Whilst it is not clear whether the study covers this, policies need to be in place to improve/provide green corridors between existing green spaces, to improve access and enable residents to travel off road to work and school away from traffic pollution and to benefit wild life and nature conservation.
- 11 In recent years a lack of funding and in house staffing means that there are no up to date management or maintenance plans for the majority of green spaces, although nature conservation management plans have until now continued to be implemented. As a consequence of this and reducing revenue budgets green space maintenance standards have declined over the years, even before being outsourced to private contractors two years ago. Since then the loss of knowledgeable staff and the seeming reduction in staff numbers has led to uneven standards of maintenance. Updated and simplified management plans are a necessary part of council policy to dovetail with a Tree Strategy in order to ensure appropriate and effective management of the borough's green spaces in the future.
- 12 We believe that all green space currently in the council's control must be protected and no losses allowed. Its use and maintenance needs to be better managed. The underfunding of green space is a national issue and in our view outside the scope of this study.

TWGM/18.01.19



**FIGURE 4.2**  
**AREAS DEFICIENT IN LOCAL PARK PROVISION**



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## NEW LOCAL PLAN CONSULTATION

Volunteer Coordinator, Tree Warden Group Merton (TWGM)

I am responding to the Local Plan Consultation on behalf of TWGM.

The following are our observations and comments in relation to Section: Policy 8 : Environment.

### Strategic Policy O8.1

1. If the '*protection and enhancement*' mentioned in O8.1.a and O8.1.d are to have any positive benefit then item O8.1.f is currently inadequately worded, particularly if climate change is taken into account. Item O8.1.f needs to go beyond merely '*protecting and retaining trees and other landscape features of value*'.
2. Given the expected level of intensification on development sites and the consequent losses of established trees on these sites as a result, a tree planting programme on public land to offset these losses is necessary and should be an explicit commitment in strategic policy to support the Mayor of London's policy of increasing London's tree canopy cover.
3. Consequently part of the policy should explicitly include for monitoring all planning applications for resulting tree losses, with a value assessment of loss of canopy cover (pollution mitigation/shade) and amenity (visual/health & well being) using i-Tree and/or CAVAT assessment tools.
4. Monitoring would allow a rolling tree planting programme to offset the assessed losses to be planned and implemented.
5. Monitoring and tree planting would be paid for by community levy based on the losses assessed using the i-Tree and/or CAVAT assessment tools.

### Policy O8.2 Open Space and Green Infrastructure

1. Given the policies on health and well being, the expected increases in Merton's population and, as a consequence, increased pressure on public open space use, no public open space can be considered surplus to requirements and should be inviolable. Should any public open space be of no practical recreation value then it should be planted with trees to contribute to increasing London's tree canopy cover.
2. We therefore believe that para. O8.2.b.i should be struck out and only paras. O8.2.b.ii and O8.2.b.iii retained.
3. Given the extent to which existing trees in '*undesignated open space*' are a key proportion of the council's tree canopy cover we believe strongly that these spaces are relevant to this policy and should be noted as such. Any losses should be treated in the same way as on development sites and compensated for using i-Tree and/or CAVAT assessment tools. Without this there is a risk that Merton's extent of tree canopy cover will decline.

### Policy O8.3 Biodiversity and Nature Conservation

1. In O8.3.12 the reference to '*removing* physical barriers such as railings and built form that disrupt continuity and access in and around the park' should be amended to read '*rationalising* physical barriers such as railings and built form that disrupt continuity and access in and around the park' as there may be good reason for physical barriers in some places to channel movement or define public and private boundaries.

### Policy O8.4 Protection of Trees

1. Frankly, this reads as if it has been lifted from some obsolete document from the 1980s or 1990s and makes no reference to how climate change and current pest and disease threats are likely to affect planting methods and species choice.
2. Much of what is proposed is too general to give adequate guidance and lacks regulatory teeth.
3. For example, 'suitable replacements' (O8.4.b) and a tree's 'amenity value' (O8.4.f.ii and O8.4.g) have no meaningful definition. Reference needs to be made to utilising i-Tree and /or CAVAT assessment tools to define loss of 'amenity value' and thus decide the appropriate extent of

'suitable replacement'. Replacing a 60 year old tree of say 15m height and 12m spread with a single 4m high heavy standard tree is just not acceptable any more, particularly when there is currently probably a year-on-year decline in Merton's overall tree canopy cover.

4. O8.4.h and justification O8.4.4 indicate a basic lack of understanding of species choice. Whilst the use of native tree species is appropriate in what might best be termed 'semi natural' plantings, the majority of the borough's street trees is probably non-native, usually for good reasons. The range of native trees is quite narrow and often not suitable in urban street situations. The use of the term 'exotic' implies the unusual and a far more practical and common term is non-native. Chestnut and Plane trees are not native but hardly what one might call exotic, being so ubiquitous.
5. Given the likely impact of climate change and pest and disease threats, O8.4.h should at its most extreme say no more than '...to consist of species native to the British Isles **where appropriate**'.
6. Regarding O8.4.4 it would be more appropriate to say that species selection should have regard to location and that suitable species should take note of current advice from the Government and /or the 'London Tree Officers Association (LTOA)'. The latter is after all in the front line of dealing with the health of London's trees.
7. British Standards are updated periodically and it is better to refer people to the 'latest edition' of the basic standards quoted.
8. The reference in O8.4.3 to semi-mature replacements implies an attitude of one for one replacement. Given how semi mature trees can be overtaken in size and vigour within 5 to 10 years by much smaller stock, any inference of a one for one replacement should be avoided. Value the tree as indicated above and get multiple plantings that will replace the canopy loss in the shortest possible time. Semi mature trees are not the best value in that regard.