



**NEW MERTON LOCAL PLAN – Public Examination – Stage 2  
MATTER 10 – Biodiversity and Trees**

**Submission from Mitcham Cricket Green Community & Heritage  
September 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 and its evidence base and we made detailed representations in September 2021, January 2021, January 2019 and January 2018 on Merton Council's call for sites at Stage 1 of the Local Plan review; the draft Plan for consultation at Stage 2 and Stage 2a; and the submitted Plan at Stage 3. We contributed to Stage 1 of the Public Examination into Merton's new Local Plan

2. This submission confirms our wish to participate in the Examination's hearing session on Matter 10.

3. We welcome the strengthening of the Plan's approach to biodiversity proposed in the Main Modifications but continue to believe it is not sufficiently robust to achieve the desired outcomes for protecting trees and increasing the tree canopy.

4. Research we undertook in 2020 showed planning applications within just 800m of Mitcham cricket ground would result in 138 trees being lost, including in Mitcham Cricket Green Conservation Area:

Mitcham Bridge – 22  
Melrose School expansion – 7  
Flats in Preshaw Crescent garden – 8  
Flats and houses in former Canons nursery – 44  
The Canons project – 38  
Flats in Raleigh Gardens car park – 19

Total tree loss = 138

5. Additional applications have since come forward which will result in further loss.

6. We believe the Local Plan needs to be further strengthened including by:

- Addressing the need to increase the tree canopy in Policy O15.1

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- Addressing the importance of identifying, protecting and enhancing the “landscape” in Policy O15.1 alongside “*nature*” and “*open spaces, green infrastructure and the natural environment*”
- Recognising Merton’s important inheritance of common land and registered town and village greens, including in and around Mitcham, in Policy O15.1 and the environmental policy maps (e.g. Mitcham Common, Cricket Green, Three Kings Piece, Cranmer Green, Figges Marsh)
- Designating all “*Open Space*” as Local Green Space, supported by an assessment of how it meets the requirements of paragraph 102 of the NPPF to afford greater protection
- Addressing the important contribution of ponds to Merton’s blue infrastructure and identifying Three Kings Pond, The Canons pond, Cranmer Green pond and the ponds on Mitcham Common as sites for protection – this is a serious policy omission

7. We believe there are significant changes to Policy O15.4 in relation to trees needed for it to be sound:

- Establish a policy intention to increase tree canopy – we propose at least 10% by 2040
- Convert the expressed intention that development proposals should “*minimise impacts on existing trees*” (paragraph 15.4.10) into policy by including it in Policy O15.4b and adding “and cannot be delivered in any other way, including an alternative design” to the end of Policy O15.4e v
- Recognise the value of trees lies in more than their “*amenity value*” as posited in Policy O15.4e.v. including their role in reducing the impacts of climate change, reducing air pollution, managing run off and supporting wildlife
- Require a net increase in tree canopy and the overall value of trees where development proposals require their loss, including accounting for lost tree years when replacing mature trees with saplings
- Extend requirements for the evaluation of individual trees in development proposals to include assessments of the value of the tree canopy and its amenity and ecosystem benefit, including a financial assessment of the value of any trees to be lost in accordance with i-Tree Eco UK and CAVAT – as used already by Merton in its parks and schools and by Camden, Richmond and other local planning authorities in London and as supported by the London Plan– which should be specifically referenced in Policy O15.4e
- Mandate planning conditions requiring all new trees provided by new development to be planted in generously sized tree pits, to be bio-secure (including avoiding invasive species) and to be maintained or replaced for a minimum of five years from completion
- Recognise that the species mix also needs to adapt to a changing climate and not be restricted to native species
- Support the use of Tree Preservation Orders in Conservation Areas, where Merton currently takes an inconsistent approach and states that TPOs are not required in Conservation Areas, including on its own land
- Support succession planting of mature trees in relevant locations
- Protect and replace street trees, including in relation to crossovers and utilities