

Mitcham Common Management Plan Consultation Submissions Conservators' Responses and Amendments to the Plan

Comments Submitted by the Public	Mitcham Common Conservators' Response
<u>Para 20.7, 27.4, aim 4.</u> States consideration should be given to opening up one side of Arthurs Pond, Arthurs pond is probably the oldest pond on the common dating from the 18th Century and over the last years has been allowed to become overgrown and disappear from view. The pond was an area of amphibian breeding and multiple species of bird and mammal activity. The area has degraded to an area of drug dealing, flytipping and lewd behaviour because the hiding places afforded by the overgrown vegetation. Last week (<i>named Merton officer</i>) and the police discussed the area and the safety of residents using the area owing to the overgrown vegetation blocking the line of sight. The police recommendation is that the vegetation was cut down, enhanced lighting and a camera installed on the lamppost opposite the pond. The pond was previously open, photos available, and should be returned to its previous condition for the sake of residents, wildlife and safety.	Antisocial behaviour relates to activities at the bottom of Watneys Road, not specifically on the Common. Conservators will liaise with Merton Council regarding this matter. The plan proposes consulting on opening-up one side of Arthurs Pond.
<u>Aim 2</u> Not familiar with the 'Mitcham Mile', but always thought the Common could benefit from greenlighting a Saturday morning Parkrun route which, as a voluntary organisation, would increase community engagement without the need for capital spend on a waymarked exercise route: the area is already popular with runners. Seven Island Ponds most suitable sub-site for this as large enough without having to cross any roads – or a combination of Bidder's Pond and Mill House sub-sites.	The Conservators are currently considering a Parkrun proposal.
Distribution of information leaflets in this day and age seems wasteful and are likely to be junked. A wiser use of capital would be to refurb/increase information boards at the entrance to the sub-sites and to make sure the website is more visible on social media and kept updated.	When the current supply of leaflets is exhausted the information they contain will only be available on-line. In future visitors to the Common will be able to access the website via QR codes on interpretation boards.
While I do not oppose the golf course, it should be better signposted and the footpath bordering this sub-site properly maintained as it is narrow and overgrown.	Regarding the footpath, moving forwards this will be maintained to a suitable standard.
<u>Para 10.3</u> A children's playground, while potentially attractive on the edge of the Bidder's Pond site near the BP garage, would cost too much and would soon fall into squalor as I seriously doubt the local authority will be prepared to spend money to maintain it.	It is not proposed to install a playground at this location.
<u>Para 10.4</u>	

Illegal motorbikes are a real and present danger to walkers on the Common, particularly at One Island Pond and Gunsite where the view is obscured by the varying terrain and the sound is masked by the nearby go-kart track. Particularly dangerous for dogs off lead. More pressure should be put on the council and police to prevent this to increase visitor numbers and improve safety.	The Conservators will continue to work with other agencies to target this antisocial issue.
<u>Para 10.5</u> Flytipping is by far the most off-putting aspect of visiting and needs to be addressed if you want to clean up the Common's image. This does fall on the local authority – and more pressure needs to be put on the local authority to take the problem seriously, such as installation of CCTV close to entrance points.	The Conservators will continue to work with other agencies to target this antisocial issue. A good example of collaborative working is the recent Willow Lane project which has involved the installation of CCTV by Merton Council.
<u>Para 11.8</u> While I do not agree with installing tarmac footpaths on the Common, it could use more strategically placed litter and dog poo bins at the entrance to all sub-sites. I am unaware of any besides the Ecology Centre.	The Conservators consider that there is already adequate provision of litter-bins, which can also be used to dispose of dog waste.
<u>Aim 4</u> A small increase in commercial activity at the zones identified would be a good idea, as long as enough space is left around the enclosure for walkers/runners and the proceeds are directed towards the upkeep and promotion of the Common. This would in turn lead to more littering so an increase in bins would be a must. Installation of a public toilet facility near the Ecology Centre would also be strongly advisable if there is going to be more footfall, and you cannot necessarily rely on festival organisers to provide effective sanitation.	Support noted. All major events must provide adequate toilet facilities in order to meet licencing conditions.
<u>Other Notes</u> A Common of this size would benefit from a café. A suitable site for this would be at the existing car park near Miller & Carter. I have no idea if applications have ever been filed and there are probably multiple planning issues but an amenity of this type will be required to make the area more attractive to walkers and will be necessary if you want to attract more people to exercise here.	No such application has ever been received. Buildings cannot be constructed on commonland. Conservators are considering a mobile café near Seven Islands Pond.
One Island Pond is at times used to graze horses. There is little forewarning of this and it is dangerous for dog walkers, particularly given the aforementioned restricted views. Clarity on why horses are allowed to graze here and at what times of the year they are likely to be on the sub-site would be very useful.	The grazing in question is unauthorised. In the past the Conservators have taken legal action to have the horses removed.
<u>Para 12.6</u> Volunteers do exist and our role could be expanded. This of course depends on the rangers' willingness to engage with volunteers. Regular volunteer days to help with tasks such as cutting back could be explored. The more volunteers you have, the more positive engagement there will be with	The role of volunteers is acknowledged in the plan as is the need to provide 'Ranger support' However there is a need to identify what volunteer capacity actually exists.

the Common and its aim to preserve and manage Mitcham Common for current and future generations.	<i>Amend “AIM 2” (pg 44) “Engagement and Communications Target” New target: “The Conservators will engage with interested parties and organisations to explore the potential for expanding volunteering opportunities on the Common, especially with regard to land management tasks.”</i>
<u>p.51</u> The proposal to increase revenue by allowing events attended by up to 5000 people per. day concerns me. Parking? There is very little parking, and as events at the Ravensbury have shown, people do not arrive on public transport, parking cars dangerously round the Cedars Avenue roundabout and to the side of the main roads. Noise? Again, as events at the Ravensbury have shown, these kind of events result in significant noise disturbance to residents. Toilets? Paragraph 27.2 points to concerns around soil enrichment by animal faeces and urine, anyone who has ever been to an outdoor event knows that whatever toilets are provided they are inadequate to demand. It seems to me that this proposal would directly cause the undesirable effects mentioned in paragraph 4.1 – ‘increased visitor pressure can have a detrimental impact on habitats, through disturbance and degradation, and lead to other issues such as littering, fires and pollution’. I understand the need to attract revenue, but am concerned about large events destroying the very thing we are trying to preserve.	The Conservators have allocated two areas of the Common as potential venues. Both of which could withstand occasional medium size events without sustaining serious harm to local biodiversity. All major events must provide adequate toilet facilities and comply with noise and parking restrictions in order to meet licencing conditions.
<u>Para 6.5</u> Re: commercial events, could corporate activity days not be considered as I understand they can be quite lucrative?	Corporate events are if fact already licenced. Corporate activity days could be advertised. <i>Amend para 6.5.</i> <i>“One such potential funding stream is hiring out specific parts of the Common for commercial, corporate and private events and activities”</i> <i>Amend “AIM 4” (pg 52) “Income Targets”</i> <i>“actively promote and advertised specifically allocated land parcels for small-scale music festivals, commercial, corporate and private events and activities”</i>

<u>Para 11.2</u> Could the MCC consider further shared paths on <u>all</u> boundaries rather than limiting them to those with roads. Also, perhaps it should read something like ‘resist any proposals to install paths with hard surfaces such as tarmac’ to ensure all hard surface types are included.	This might be seen as promoting shared paths through woodlands which would be detrimental. Hard surfacing such as gravel-based substrates are appropriate on the Common.
<u>Para 12.6</u> I think that volunteers should have the opportunity to prove their competence to lead practical land management tasks, without the need for a professional member of the MC team being present. This could be accomplished by requiring volunteers to complete training courses, such as those offered by TCV. To raise them to the status of volunteer task leader they would need to undergo training in leadership, tool use and H&S, as a minimum. Pre task meetings between the MC management team and volunteer task leader would then significantly reduce any risk of habitat damage during scheduled land management tasks.	There is a need to identify what volunteer capacity actually exists. And thereafter suitably qualified leaders or organisations such as TCV <i>Amend “AIM 2” (pg 44) “Engagement and Communications Target” New target: “The Conservators will engage with interested parties and organisations to explore the potential for expanding volunteering opportunities on the Common, especially with regard to land management tasks.”</i>
Taking into consideration the amount of habitat degradation taking place on the common due to a lack of resources, surely the introduction of a team of volunteers, clearing bramble for example, led by a volunteer task leader, must be seen as a positive way forward? Maybe this could form part of the bramble management strategy?	Noted. In the past asking volunteers to clear bramble stands was not well received!
<u>Para 13.1</u> I think it should be highlighted that citizen science relies on ‘volunteer’ contributions.	<i>Amend para 13.1</i> <i>“They will also encourage citizen science projects, involving volunteers from local communities and interested parties”</i>
<u>Gunsite R12</u> There is a significant patch of bracken adjacent to the rail track that should be included in the management plan. <u>Gunsite S10</u> There is a small patch of Russian vine growing near the London Road gate that should be included in the management plan.	Noted. Spread will be monitored and remedial action taken if required Noted. Spread will be monitored and remedial action taken if required

<u>Addition 1</u> I would like to see a general paragraph acknowledging the role of volunteers in the management of the common, from the Friends of MC to those on the acid grass work group and others undertaking citizen science etc. I know they are all included but it is not always clear in the document that they are volunteers.	<i>Amend 12 (pg 19): “Community Representation, Involvement and the Role of Volunteers”</i> <i>Amend para 12.2 “...by far their most significant contribution is the regular volunteer litter-picks that they organise, however over the past 12 months they have also organised a citizen science project.”</i> <i>Re-write para 12.6: “Currently the Friends of Mitcham Common contribute by far the most significant source of volunteer effort on the Common. MCC hope that this will continue and expand in the years to come, nevertheless they acknowledge the need to explore ways of attracting more volunteers to undertake vital maintenance tasks on the Common. One relatively new initiative has been the establishment of an “Acid Grassland Work Group” comprised of volunteers who undertake regular weekday autumn/winter tasks focused solely on the maintenance of grassland habitats. In-house staff organise and supervise this Group and its membership may be expanded in the future. Professional staff time is however limited, so in addition to looking to increase the volunteer capacity on the Common, MCC will also consider how best to support volunteers.</i>
<u>Addition 2</u> With current resources, ensuring that the Common’s key habitats are being appropriately maintained is a significant challenge and concerns that the inevitable consequence will be continued habitat loss, are likely well founded. Perhaps the creation of a biodiversity working group for the Common would help with the decision-making process on where best to focus the Common’s limited resources, to maintain habitats. I see this working group as primarily being science based and its function would be to support the Common’s management team.	The Conservators will discuss with interested parties and organisations the option of forming a biodiversity group.

<u>Aim 1</u> I support all the suggestions listed here.	Support noted.
<u>Aim 2</u> I would strongly support the installation of many more waste bins, plus regular emptying.	The adequate provision of litter bins on the Common and their regular emptying will continue.
Any measures that prevent the blight of fly-tipping would be welcome. Money spent on CCTV cameras near Arthur's Pond, for example, would be well worth the expense, provided they were monitored regularly.	The Conservators will continue to work with other agencies to target this antisocial issue. A good example of collaborative working is the recent Willow Lane project which has involved the installation of CCTV by Merton Council. Antisocial behaviour relates to activities at the bottom of Watneys Road, not specifically on the Common. Conservators will liaise with Merton Council regarding this matter.
I agree that one side of Arthur's pond could be cleared and the paths near Bidder's pond upgraded.	Support noted.
I agree that there could be more 'educational' involvement; it is very sad that children do not wander and play on the common now. If there were more money the Ecology centre should be organising activities for Primary and Secondary pupils that enrich the dreary National Curriculum. I am strongly opposed to children's playgrounds on the Common-this is not the place for them.	Unfortunately there is not the staffing capacity to provide environmental education activities
A limited number of cross-country runs and physical activities might be acceptable but carefully monitored for their effect on the common and its users.	The impact of cross-county runs on the Common's footpaths and wildlife habitats will continue to be monitored.
Anything that gets rid of the joy-riders will be welcome.	The Conservators will continue to work with other agencies to target this antisocial issue.
<u>Aim 3</u> I support all of the suggestions.	Support noted.
<u>Aim 4</u> Again, as long as these are carefully monitored and judiciously used, filming and some private events could be a good source of income. If the ecology centre could organise environmental activities for schools, that could be a source of modest income. Does the Golf club contribute in any way?	Support noted. Unfortunately there is not the staffing capacity to provide environmental education activities.
Does the Golf club contribute in any way?	Yes. £63k per annum.
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.	The Conservators acknowledge the delay in producing the plan and confirm that it will be reviewed no later than 5 years after adoption. The Conservators have been fully engaged in the development on the new plan. The Conservators are of the view that the plan captures the main issues of concern and enhancements that the public would like to see on the Common. This is based on regular reports and meetings with Friends of Mitcham Common and feedback to site-based staff from visitors to the Common. Nevertheless, the Conservators will undertake a user survey during the lifetime of the new plan and this will help shape future plans.
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	Recognised as a matter for future consideration.

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.	In this context the term “preserve” relates to geographical boundaries rather than ecological succession. The role of volunteers is acknowledged in the plan as is the need to provide ‘Ranger support’. However there is a need to identify what volunteer capacity actually exists. <i>Amend “AIM 2” (pg 44) “Engagement and Communications Target” New target:</i> <i>“The Conservators will engage with interested parties and organisations to explore the potential for expanding</i>
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• 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.	<i>volunteering opportunities on the Common, especially with regard to land management tasks.”</i> See pages 39-53.
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	Ongoing Phase 1 and extended Phase 1 surveys, conditions surveys linked to Environmental Stewardship, casual and more structured biological recording have all contributed to the plan. The need for a user survey is recognised in the plan.
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	These may emerge from the volunteer survey proposed above. However collaborative working already exists with the owners of many of the greenspaces mentioned. Unfortunately the WVRP Trust has to date failed to provide the conduit to facilitate more collaborative working on a landscape scale. Pg 13 notes Merton’s Local Plan, it is not necessary to list every relevant policy and/or designation. The remains of the Windmill are not part of the 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,	The response is realistic. Local donations and other voluntary financial contributions might fund one-off capital projects but will not fund essential maintenance. See above response.

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.	Educational activities and community events have been provided in the past but failed to generate sufficient income to make them sustainable. Currently there is not the staffing capacity to develop environmental education on the Common. See above response
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 codesign 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	The Conservators are appointed by the London Boroughs of Croydon, Merton, Sutton and the City of London. They bring with them a wide range of professional skills and amateur interests all of which contribute to the multi-faceted governance of the Common.

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	Noted.

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 or 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.	Any such applications will be carefully considered. Noted. The Common is represented on the relevant body that will advise on future access routes to Beddington Farmlands and the site restoration. These have been subject to Phase 1 habitat surveys. The plan already commits to this provision, including publishing a plan with paths marked. The inclusion of ‘additional’ paths will be subject to financial constraints and user numbers.
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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	Available on request and already provided to user groups Published through Greenspace Information for Greater London.
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	Condition surveys are undertaken and these consider indicator species.
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 and enhance it and to make representations on planning applications which may impact detrimentally upon it	The Conservators have a long history of resisting inappropriate developments but take the view that they should await the details of potential developments rather than have a default position of objecting to the principle of development. The Conservators will work with the WVRP Trust where appropriate.
Please leave the common alone.	
The council doesn't have the finances for spending loads and the upkeep of redevelopment. We already have enough anti social behaviour around and making the common more enticing will not only harm wildlife but attract more anti social behaviour.	Maintenance of the Common is funded by the Mitcham Common Conservators not Merton Council.
Certain groups already put logs across to the pond so they can illegally fish from the island.... where birds nest, so disrupting nature.	Noted.
Dog walkers use the common daily and people use it as a cut through which is great but spending excessive amounts on high faluted plans will just mean more unwanted groups congregating over the common.	Noted.
In the summer some groups had disposable bbq and loud music, leaving their rubbish behind. We were almost daily picking up rubbish and disposing of it.... we do not need more of this.	The invaluable work of local people who litter-pick the Common on a regular basis is acknowledged in the plan.

Leave the common as a natural area with the council continuing to empty the bins, check on trees and periodically cutting the grass.... let us not develop another natural space enjoyed by the community.	Support is noted, however habitat management is vital to maintain and enhance the Common's biodiversity.
<u>Pg 1</u> The quoted area of 455 acres is not the same as the 460 acres in Eric Montague's book from where the quote is stated to be from. <u>Para 5.1.1</u> 182 hectares is 450 acres, not 455 acres. <u>Para 27.1</u> 182 hectares is 450 acres, not 455 acres. <u>Para 5.3.6</u> The Kings Piece should read Three Kings Piece.	The 460 acres probably includes openspace in Mitcham which is not regulated by the Conservators. Error will be corrected. Error will be corrected. Error will be corrected.
<u>Para 5.3.11</u> The map shown in this paragraph shows that the wooded area in Wingate Crescent is not part of the Common. This statement is false, as Magpie Newsletter 25, May 1993, said that the Wingate Crescent plot had been added to the Common in exchange for Common land which had been given up for the Cedars Avenue roundabout.	The parcel of land in question is not and never has been managed and regulated by the Conservators and is therefore not part of Mitcham Common.
<u>Para 6.3</u> If the investment portfolio were to be wiped out, by either a crash or the collapse of an institution, could the Conservators become insolvent? If that happened, who would manage the Common? Are procedures in place to deal with this worst case scenario?	The investment portfolio is well-managed with a low-medium risk strategy. Nevertheless, long-term finances are a concern and the plan seeks to address this issue in "AIM 4".
<u>Para 11.9</u> Treatment, e.g. with decking oil, should be applied to all 13 current benches annually.	This treatment was not a manufacturers' recommendation. Given the age of the benches, applying such a treatment is unlikely to prolong the time they can be retained.
<u>Para 11.19</u> While it is accepted that the number of benches at Seven Islands Pond has a limit, when a bench has to be removed, a replacement should be permitted.	The plan does not suggest otherwise. Update Para 11.9: " In response to requests from users of the Common, over the past decade or so MCC have adopted a policy of permitting rustic-style wooden benches to be sponsored and installed at appropriate locations on the

	Common. MCC will continue this policy however, Seven Islands Pond is now well-served with seating and no further ones will be permitted at this location. “Many of these will soon need replacing. The Conservators will seek public sponsorship and prioritise the replacement of benches at existing locations before considering new locations. Furthermore, future potential sponsors will be advised of the sponsorship terms and maintenance responsibilities.” <i>Amend “AIM 2” (pg 45) “Safe and welcoming Targets” “continue to encourage the sponsorship of seats at appropriate locations.” “stage a public sponsorship campaign to seek funding for replacement benches on the Common. Target date: 2024”</i>
<u>Para 12.6</u> Volunteers do exist and their role could be expanded. This of course depends on the rangers’ willingness to engage with volunteers. Regular volunteer days to help with tasks such as cutting back could be explored. The more volunteers you have, the more positive engagement there will be with the Common and its aim to preserve and manage Mitcham Common for current and future generations.	The role of volunteers is acknowledged in the plan as is the need to provide ‘Ranger support’ However there is a need to identify what volunteer capacity actually exists. <i>Amend “AIM 2” (pg 44) “Engagement and Communications Target” New target: “The Conservators will engage with interested parties and organisations to explore the potential for expanding volunteering opportunities on the Common, especially with regard to land management tasks.”</i>
<u>Para 20.7 and 27.4</u> Arthurs pond is probably the oldest pond on the common dating from the 18th Century and over the last years has been allowed to become overgrown and disappear from view. The pond was an area of amphibian breeding and multiple species of bird and mammal activity. The area has degraded to an area of drug dealing, fly-tipping and lewd behaviour because the hiding places afforded by the overgrown vegetation. Last week Merton Council’s Anti-Social Behaviour officer and the police discussed the area and the safety of residents using the area owing to the overgrown vegetation blocking the line of sight. The police recommendation is that the vegetation was cut down, enhanced lighting and a camera installed on the lamppost opposite the pond. The pond was previously open, photos are available, and should be returned to its previous condition for the sake of residents, wildlife and safety. The concrete blocks that ASB perpetrators use for seating into the	Antisocial behaviour relates to activities at the bottom of Watneys Road, not specifically on the Common. Conservators will liaise with Merton Council regarding this matter. The plan proposes consulting on opening-up one side of Arthurs Pond. The concrete blocks prevent vehicular incursions in to Watneys Road. To remove them would leave the area vulnerable to fly-tipping and other antisocial behaviour.

early hours at Watney's barrier should also be removed. The removal of these blocks will not allow unauthorised access to Watneys Road.	
<u>Para 27.4b</u> Involve the public in fish population monitoring as a Citizen Science project.	Noted. However fish population monitoring can realistically only be undertaken by professional survey methodology. <i>Amend para 27.4b to read:</i> <i>"However, the fish populations will be monitored, possibly by a citizen science project, and if, after public consultation...."</i>
<u>Aim 1 / biological</u> Fallen leaves and structures such as log piles, should remain on site, along with areas of suitable undergrowth, brambles and tussocky grass in order to retain and enhance habitat suitability for nesting.	See para 27.2f and (see below) amended para 18.3 and 27.2a This is best practice with regard to managing habitats for small mammal and reptile species and is already observed and undertaken on the Common.
<u>Aim 1 / biological</u> Any areas that are to be cut, should have an initial cut with a strimmer or brush-cutter at a minimum height of 20cm (8 inches) which should protect the majority of nests. The area should be searched for nests and if a nest is found no further cutting should take place.	Agreed in principle although it is not always possible to strictly control the height of the cut. However maintaining a matrix of cut and uncut areas in any given parcel will provide habitat continuity for small mammal and reptile species. This is already alluded to in "Maintenance Task Prescription" "Cut and clear selected grassland areas"
<u>Aim 1 / biological</u> One third of undergrowth should be retained uncut in any one year to maintain a suitable nesting habitat. This will not only help protect hedgehogs, but other wildlife, such as mice, voles and frogs. <u>Aim 1 / biological</u> Hedgehogs forage predominantly within 5 metres of cover and short grass can be attractive foraging site. Therefore, a matrix of grassland and scrub habitat can be important to hedgehogs and this should be considered when re-establishing acid grassland.	"Maintenance Task Prescription" (pg 65-78) amend to read; "Cut and clear selected grassland areas to maintain a mosaic of cut and uncut areas in any one parcel in any one given year"
<u>Aim 1 / biological</u> Training on Hedgehog ecology and management, which can be provided by People's Trust for Endangered Species (PTES) and the British Hedgehog Preservation Society (BHPS) to help with the management of the Common. Training on hedgehog first aid could also be considered for the grounds staff at Mitcham Golf Club.	Noted. However site-based staff and contractors already have a sound understanding of the ecology and habitat requirements of small mammal and reptile species found on the Common.
<u>Aim 1 / biological</u>	

Collaboration with local authorities and the Wandle Valley Regional Park to establish a green connectivity corridor to support hedgehogs.	Noted.
<u>Aim 3/ Roadside Boundary Targets</u> Work with the local authorities could include roadside 'no littering' signage, aimed at passing occupants of vehicles. This should focus on, but not limited to, Cedars Avenue and Beddington Lane.	Roadside signage is a matter for the Local Highway Authority. The Conservators will raise this suggestion with said Agency.
<u>Aim 3/ Roadside Boundary Targets</u> For any sightings of an injured hedgehog or hedgehog out in the day contact should be made with Wildlife Aid Foundation in Leatherhead, the nearest wildlife rescue. For sightings of dead hedgehogs, thought to have died from disease, can be reported to Garden Wildlife Health (www.gardenwildlifehealth.org), which is a collaborative project working to monitor the health and identify disease threats to British Wildlife based at the Zoological Society of London (ZSL).	Noted.
<u>Aim 3/ Roadside Boundary Targets</u> Work with local authorities on the control and clearance of roadside fly-tipping and regular litter-picking throughout the common. Litter and fly-tipping can be a potential hazard for hedgehogs as it can result in injury, death and disturbance to nesting sites.	Noted.
<u>Aim 4 / Realising income potential of the Common</u> The proposal to increase revenue by allowing events attended by up to 5000 people per. day concerns us	All major events must provide adequate toilet facilities and comply with noise and parking restrictions in order to meet licencing conditions.
<u>Aim 4 / Realising income potential of the Common</u> <i>Parking?</i> There is very little parking, and as events at the Ravensbury have shown, people do not arrive on public transport, parking cars dangerously round the Cedars Avenue roundabout and to the side of the main roads.	See above response.
<u>Aim 4 / Realising income potential of the Common</u> <i>Noise?</i> Again, as events at the Ravensbury have shown, these kind of events result in significant noise disturbance to residents.	See above response.
<u>Aim 4 / Realising income potential of the Common</u> <i>Toilets?</i> Paragraph 27.2 points to concerns around soil enrichment by animal faeces and urine, anyone who has ever been to an outdoor event knows that whatever toilets are provided they are inadequate to demand.	See above response.
<u>Aim 4 / Realising income potential of the Common</u>	

It seems to us that this proposal would directly cause the undesirable effects mentioned in paragraph 4.1 – ‘increased visitor pressure can have a detrimental impact on habitats, through disturbance and degradation, and lead to other issues such as littering, fires and pollution’. We understand the need to attract revenue, but are concerned about large events destroying the very thing we are trying to preserve.	The Conservators have allocated two areas of the Common as potential venues. Both of which could withstand occasional medium size events without sustaining serious harm to local biodiversity.
<u>Appendix 1 / Bidder's sub-site</u> “New Zealand pigmywort” should read “New Zealand pigmyweed” <u>Appendix 1/ One Island Pond</u> To ‘Annual’ add a second option of ‘during long dry periods when pond water levels are low and pond edges have receded’ <u>page 43</u> ‘Once’ Island should read ‘One’ Island	Error will be corrected. Noted. Error will be corrected.
strategy Key issues for wildlife management: • Wildlife assets are being lost at an alarming rate for a variety of reasons including invasive aliens (Armenian Bramble & Honeysuckle cultivar); native invasives (Bracken – a developing issue in various places north of Seven Islands Pond, the Gun Site, adjacent to Carshalton Road and in one of the Golf Course ditches) and wider scrub invasion (hawthorn, blackthorn, oaks and gorse). In places, the poplars that were planted along the boundaries are suckering and spreading out into remaining good quality acid grassland – especially so on the Fair Site. Beware, near the Beehive Bridge suckers are getting dangerously close to the railway track. • Some of the problems arise from uncontrollable factors (atmospheric nitrification and climate change) but also from one that puts the conservators at odds with local communities (dog fouling). • Management lacks foresight – the scrub and bramble problem has been developing for 40 years but there has been little sense of urgency. There is a lamentable attitude towards the key asset that is available to the conservators: volunteers. A body that is short of money and argues that volunteers cannot be used because the	The plan recognised all of these issues and recommends long-term management prescriptions which seek to address them. The role of volunteers is acknowledged in the plan as is the need to provide ‘Ranger’ support’ However there is a need to identify what volunteer capacity actually exists.

site is too 'fragile' is effectively giving up. Mitcham Common once had botanical assets that would have made it a strong contender for SSSI status (in parts) but those assets are fast disappearing. Its entomological assets are holding up better but with some losses and some gains (most of the losses relate to climate change). Bearing in mind that volunteers are the mainstay of land management NGOs (National Trust, RSPB, The Wildlife Trusts) and are also fundamental to management of National Nature reserves, it is odd that Mitcham Common is deemed too sensitive to use volunteers and yet it does not have the same conservation status as innumerable SAC, SPA, SSSI and NNR owned and managed by NGOs. This anomaly lies at the heart of the problems facing the common.	<i>Amend "AIM 2" (pg 44) "Engagement and Communications Target" New target:</i> <i>"The Conservators will engage with interested parties and organisations to explore the potential for expanding volunteering opportunities on the Common, especially with regard to land management tasks."</i>
Finance There is a need to think more creatively about how to stretch existing resources as well as bring in new funding streams. • There are many jobs undertaken by contractors that could be undertaken in a hybrid form – contractors doing the work that requires mechanical intervention (flails, trimmers and chainsaws) and volunteers doing the clearance of cut material or lighter clearance. • Setting up pre-emptive action – for example a 'footpath squad' to keep major pathways open, and a 'goats team' that ranges across grasslands at regular intervals throughout the year clearing recently established and small-scale scrub. This approach could be extended further to making sure that bramble edges are cut back <u>before</u> they root. • Thinking about the most effective timing of expensive contractor work. For example, major bramble patches are flailed long after rooting runners have extended their grip on adjacent grassland – this work needs to be done in late August and not during the winter. The chances of this having a negative effect on breeding birds is very low, especially as there is developing evidence that Armenian Bramble supports lower numbers of breeding birds. • Using volunteers to weaken big bramble patches before applying herbicides. If cut regularly, brambles do weaken and it would be possible to selectively weaken patches by several times a year. Once weakened, herbicide will be more effective. • Finishing the job! Recent gorse clearance was not followed up by removal of the under-lying debris – in places this material is suppressing fine grasses and will inevitably lead to coarse vegetation growth. It is a job that could have been done by volunteers without any damage whatsoever to the 'fragile' ecology of the common. Similarly, sprayed vegetation is simply	There is merit to some of the suggestions however, as stated above volunteer capacity is currently unknown. See response above.

left – such thorny material acts as a trap for leaves and litter, which in turn increase the humic content of the soil and thus grassland shifts towards mesotrophic communities rather than the fine sward of genuine ‘acid grassland’ that are aspired for. Grasslands are often a morass of semi-moribund bramble that is just waiting to burst back into life (very little sprayed vegetation is completely killed). Whatever is proposed to raise money must bring in significantly more money than the time expended by the Head Warden in managing the process. Consideration needs to be given to the multipliers of administrative costs to the income generated. In commercial terms profit multipliers need to be at least double or treble costs, but unless the money raised will pay for at least twice the lost work of the Head Warden it is time wasted and the only objective is to pay the wage of a Head Warden whose job has changed from site management to event management. One possible revenue stream is corporate events – developing ‘team-building’ programmes. Such events can raise significant income but need to be designed to create an experience that the client feels is consistent with their objectives – think client not how much money can be generated. Again, there are people locally that understand funding generation and would be ‘volunteers’ but the general attitude towards volunteers is such that nobody in their right mind would offer their services at the moment. Bequests – you need to think about your relationship with the community – your website has a donate button but who on earth would donate to a body that regards volunteers with such disdain? I was planning to make a legacy but have decided not to because the past and ongoing antipathy towards volunteers means that it would be wasted money – it will go to one of the Wildlife Trusts instead!	Professional fees and administration cost are already an additional fee charged to the event organiser. It is also worth noting that in the recent past, planned corporate volunteer workdays have all failed to generate any volunteers. People have indicated that they would be prepared to donate towards the annual maintenance of the Common.
Biology I have previously mentioned the discovery of the hoverfly <i>Callicera spinolae</i> a ‘BAP Priority Species’ recorded from the common. Shortly afterwards, despite my advice, the old Black Poplar hulks that were likely breeding sites were all cut down! There is a further ‘BAP Priority Species’ – <i>Dorycera graminum</i>, another fly, that occurs in several places – it is a dry grassland species and has been found in numbers on several occasions (i.e., it is certainly resident).	Standing dead timber will always be retained where possible, however public safety is an over-riding concern. Noted. Biological records are obviously always gratefully received.

I did suggest that in advance of the development of the management plan, it might be useful to have an updated species list of invertebrates. As I was never contacted, that update has not happened – it is quite a big job and as a ‘volunteer’ I would only do so if it was actually valued. There is very poor appreciation of ways in which biological features might be enhanced. For example, recent surface scraping (i.e., the last 20 years) has led to the creation of bramble infested mounds that are zero biological interest. Those mounds could have been managed to minimise rough vegetation development as ‘bee banks’ – a contribution to ‘pollinator’ conservation (perhaps nobody has picked up on the alarming decline in pollinators, especially solitary bees, for which Mitcham Common is a site of at least regional importance).	Wherever logistically and financially possible spoil from scrapes will be used to create roadside bunding, or stored on-site for future use. However this is not always possible but it is agreed that more ‘imaginative’ use must be explored in future project planning.
Access There has been a growing problem in which access points around the common have been allowed to become overgrown with brambles. Partly this is doubtless due to diminishing resources but there is also an underlying impression that people are being prevented from accessing the common by allowing the edges to become impenetrable. Inevitably, under this scenario, a proportion of the community will regard the common as a wilderness that is dangerous to visit and is best built on. This attitude has translated in the past into statements by the local MP that ‘scrub sites’ should be built on. It may also have contributed to the view that funding for Mitcham Common dropped off the priorities of the three local authorities. In biological terms, calls to surface access points would be disastrous for the pollinator assemblage for which the common is noteworthy. However, there may be places where surfacing might be achieved using the soil stores created by topsoil stripping. This material is often very sandy and ideally suited to creation of hot dry compacted ground that is favoured especially by solitary burrowing bees. There may be scope to reduce the problem of deep ruts using some of this material (which should not develop rank mesotrophic vegetation because of footfall).	The main sub-sites of the Common, with the possible exception of a path on to the golf course sub-site, are all accessible and a network of paths will continue to be maintained. Nevertheless there are requests from visitors to upgrade the path surfaces, but for reasons outlined in the plan and alluded to in the comments below, there are often good reasons why expectations cannot always be met. Although at some locations, as specified in the plan, hard-surfacing using imported material cannot be avoided if year-round access to the Common is to be provided. The use of locally extracted gravel based material is already used to infill ruts. However soil stripped from recent scrapes is not suitable for such purposes because there is insufficient quantities of sandy material in the spoil.
Governance The Conservators, with one notable exception, bring no biological skills to the management table and are reliant upon their officers to advise. There are quite a number of experienced ecologists in	The appointment of Conservators is a matter for the nominated bodies.

the area that could provide some additional skill if constituted as an advisory group. Similarly, skills such as fund-raising might be embraced by involving suitably experienced people. Meanwhile, I would urge that you look at the general point of governance – currently, the Conservators are very largely appointed on political allegiance rather than skills. I think it is time that consideration was given to a more modern governance framework in which non-executives (which is what Conservators are) are appointed for the additional skills that they can bring to the business (and yes you are a business if you are considering fund-raising and have no direct grant from the three Local Authorities).	The Conservators bring with them a wide range of professional skills and amateur interests all of which contribute to the multi-faceted governance of the Common.
<u>11.1</u> The common is almost inaccessible for wheelchair users or people with large buggies because there are no drop kerbs and there are width restrictors in the form of bunds. E.g. to access the common from near the boundary of Commonsides East and Manor Road, I have to enter near the Tamworth Park bus stop, half way down the road, making use of the raised road that forms the speedbump. The entrance is only just wide enough even then. Please could these entrances be widened, and more drop kerbs added? I support the continued effort to prevent unauthorised vehicular access to the common, the bunds only need to be slightly wider, so would not open up access to any other unauthorised vehicles (beyond the illegal motorbikes, which obviously already come through anyway) <u>11.1</u> Linked to the above, crossing the road (Commonsides East) to access the common is extremely difficult on any part of Commonsides East other than the junction with cedars avenue, and is very risky with small children in tow. Please could some safe crossings be added (e.g. zebra, pelican) closer to the manor road entrance, which is a popular entrance but is very dangerous to use.	This is largely a matter for the Local Authorities (Merton and Sutton). However the Conservators will continue to work with Local Authorities to improve safe access to the Common as confirmed under the targets outlined in “AIM 3: “Roadside Boundary Targets” <i>Amend “AIM 3” (pg 49) “Consider granting easements and/or licences for appropriate utilities services and/or infrastructure including safe highway crossing points”</i> The Conservators are currently in discussion with Merton Council regarding the design of a pedestrian crossing at the Manor Road junction.
<u>Para 11.8 7 PG 18</u> We notice that the bins around the Common are not covered, which seems to lead to rubbish flying around even when people do use the bins (which we appreciate they sometimes do not). Would MCC consider covered bins?	The Conservators consider that the current design and provision of litter-bins is adequate.
I write as a member of the local community who has lived by Mitcham Common for well over fifty years and is a regular user of the Common – having watched many developments in that time. I am highly experienced in the not for profit sector and government having been a CEO of three organisations and I am currently a Chair of an international charity and Non-Executive Director and	

Trustee of local organisations. I have also a track record in local, regional and national government as well as the higher education sector. I have focussed my comments on the governance and funding sections of the Mitcham Common Consultation Plan. <u>6.1-6.8</u> The plan is clear that the Conservators now rely primarily on income generated from a small investment portfolio, wayleaves and licences, and a Countryside Stewardship grant of circa £6,000 per year. The latest financial accounts clearly demonstrate that the Conservators rely on an investment portfolio; a strategy which contains inherent risks and constrains the activities that the conservators can undertake in the best interests of Mitcham Common – in terms of conservation, public engagement and education. Mitigations on the financial portfolio do exist by way of creating income generation programs and extending the use of volunteers which are commented on under sections 12.5 and 12.6. A strategic fundraising program should also be considered as a matter of importance and urgency – the plan suggests there is considerable scope to do so It is appropriate that MCC acknowledge that they are aware of the need for greater engagement with local and wider community groups. This consultation on the Management Plan would have been an ideal opportunity to reach out to under-represented groups who may or may not use the common and to capture their views and comments as well as to engage and create a dialogue about the usage and its ecological importance. A paper exercise in this format does not represent best practice in terms of consultation. Creating a mechanism where people could use video or other accessible mediums to make comments would have demonstrated inclusivity as would the offer to create the consultation documents in community languages. I hope that members of the local community who have expertise in conservation and governance will be able to engage with the Conservators on a much more regular basis. <u>12.6</u> Again, it is appropriate to acknowledge the role of community groups in undertaking volunteering tasks on the Common and that this potential resource could be further utilised. However, the decision not to significantly expand volunteering activities is questionable for several reasons:	The Conservators recognise the need to explore further funding streams and will be promoting the Common as an event venue. The Conservators have established an Investment Sub-Group with financial expertise and fund management experience. The Conservators are a small organisation with limited resources, however they acknowledge the need for greater future public engagement and will conduct user surveys in the future. However the Conservators are of the view that the plan captures the main issues of concern and enhancements that the public would like to see on the Common. This is based on regular reports and meeting with Friends of Mitcham Common and feedback to site-based staff from visitors to the Common. There is a need to identify what volunteer capacity actually exists. <i>Amend “AIM 2” (pg 44) “Engagement and Communications Target” New target: “</i>
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Volunteers are widely used to work in very sensitive habitat management within organisations such as the Wildlife trusts and Natural England. The Woodland Trust trains volunteers to lead working groups to undertake a wide range of tasks to manage woodlands – some of which are clearly sensitive habitats. This model is undoubtedly adaptable to Mitcham Common and would provide resource for management of the habitat, saving on professional costs, taking the opportunity to engage the local community as well as potentially generating income. I am a Trustee of the South London Botanical Institute based in Tulse Hill. We work with a wide range of volunteers who deliver skilled botanical work, identifying and recording plant species across South London, as well as training and developing new volunteers to take on these tasks and there is a level of oversight from our scientific advisory group. The impacts that these projects have is high - our income and engagement is increasing, as is our reputation. I am also a former CEO of charities which worked with volunteers to deliver high skilled tasks; including those which required a high level of adherence to health and safety protocols. I know that there are sources of external financial support for developing volunteer programmes. These include providing training and management to volunteers as well as creating the potential to develop a model for income – which I have successfully done working within corporate social responsibility initiatives and created a significant income stream. I would hope that the Conservators would consider these as a way of increasing their financial capacity, reducing the stress on their financial reserves, as well as demonstrating good value for money to Mitcham Common’s remaining funders. <u>13.1</u> Many of the same comments apply to increasing the capacity of the common to serve schools and other formal and informal educational outlets – there is so much capacity within the habitat to use in teaching. The reinvigoration of Mitcham Common Education Trust would increase capacity to lever grant money for Mitcham Common and provide leadership on engagement with the local community.	<i>“The Conservators will engage with interested parties and organisations to explore the potential for expanding volunteering opportunities on the Common, especially with regard to land management tasks.”</i> Currently there is not the staffing capacity to develop environmental education on the Common.
AIM 4: Realise the income potential of the Common by consolidating existing, and exploring alternative sources or revenue to fund the implementation of the management plan	

I am concerned about two parcels of land which have been allocated to house site based events which could accommodate up to 5,000 people per day. Removal of trees and presumably flora and fauna for the introduction of a road or entrance into the site will have to be undertaken, otherwise what other means will vehicles have to access the area. This will lead to major disturbance and ultimate destruction of small mammals and their habitat including hedgehogs, who have been found nesting and breeding in this area. Parking, noise and people intrusion will all add to a very large area being affected and ultimately destroyed.	The Conservators have allocated two areas of the Common as potential venues. Both of which could withstand occasional medium size events without sustaining serious harm to local biodiversity.
15.1 Public Expectation For those calling for MC to have children's playgrounds, should be mindful that MC is a common not a park. There are numerous parks where people can go to sit, cycle and play and one is very close and easy to reach, namely Beddington Park. MC is a little gem, housed between busy Croydon and Mitcham, with unique and differing areas of habitat plus a large variety of mammals and birds. Everything should be done to keep MC as wild and natural as possible in order for wildlife to flourish and for people to enjoy its natural beauty.	Concerns noted.
16.2 Biological Features There is no mention of keeping certain areas free of scrub clearance to protect hedgehog habitat in any of the sub sites. Gorse and bramble are a favourite for hedgehogs to find cover and provide nesting areas.	See para 18.3-18.4. Nevertheless, the plan will be amended to specifically reference habitat requirements of small mammals and reptiles. "Appendix 1: Work Programme 2023-2028" refers to the 'control' of scrub in various sub-sites, not its eradication. <i>Amendment to para 18.3 " Birds, small mammals, reptiles and insects all utilise and rely on this habitat and as such it will continue to be provided and appropriately managed as an important ecological component on the Common."</i> <i>Amendment to para 27.2a "Although occasional patches of scrub add structure and diversity to the habitat and will continue to be provided and maintained, if left unchecked....."</i> <i>"Maintenance Task Prescription" (pg 65-78) amend to read "Cut and clear selected grassland areas to maintain a mosaic of cut and uncut areas in any one parcel in any one year"</i>
Bidders Pond Sub-Site: Construction of temporary road necessitated by the closure of Galpins Road.	Amended plan to include new paragraph after 10.5 "In summer 2022 a tragic accident lead to the closure of Galpins

	Road to vehicular traffic for a long period of time. In order to allow residents access to properties at the southern end of Galpins Road during this period, a temporary road was constructed on the Common. At the time of writing the road is still operational but by spring 2023 it should be deconstructed and the land returned to the Common. As part of this restoration, MCC have resolved that the sub-base road material will be re-used to surface a long section of footpath running from Arthurs Pond to the bottom of Galpins Road that has been identified as being very muddy and at times flooded in the winter months.”
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