



## Natural Environment Board

**Date:** MONDAY, 16 OCTOBER 2023

**Time:** 10.00 am

**Venue:** COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

<b>Members:</b>	Caroline Haines (Chair)	Oliver Sells KC
	Andrew McMurtrie (Deputy Chairman)	James St John Davis
	Eamonn Mullally	William Upton KC (Ex-Officio Member)
	Wendy Mead	Alderman Gregory Jones KC (Ex-Officio Member)
	Benjamin Murphy	

**Enquiries:** Blair Stringman  
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**Ian Thomas CBE**  
Town Clerk and Chief Executive

# **AGENDA**

NB: Certain items presented for information have been marked \* and will be taken without discussion, unless the Committee Clerk has been informed that a Member has questions or comments prior to the start of the meeting.

## **Part 1 - Public Agenda**

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public and non-public summary minutes of the previous meeting held on 10 July 2023.

**For Decision**  
(Pages 7 - 16)

4. **WELCOME TO NEW MEMBER - EAMONN MULLALLY**

Chairman to be heard.

5. **INTRODUCTION TO ASSISTANT DIRECTOR OF OPEN SPACES**

Interim Executive Director, Environment to be heard.

6. **INTRODUCTION TO ASSISTANT DIRECTOR, COMMERCIAL AND CHARITY GOVERNANCE AND FUNDRAISING**

Interim Executive Director, Environment to be heard.

## **Operational Property & Budgets**

7. **RISK MANAGEMENT UPDATE REPORT**

Report of the Interim Executive Director, Environment.

**For Decision**  
(Pages 17 - 46)

8. **\*OPERATIONAL FINANCE PROGRESS REPORT (PERIOD 3 APRIL – JUNE 2023)  
2023/24 – NATURAL ENVIRONMENT DIVISION**

Report of the Chamberlain.

**For Information**  
(Pages 47 - 68)

**City Gardens**

9. **BARBERS SURGEONS HALL CONSULTATION**

Interim Executive Director, Environment to be heard.

**For Discussion**

10. **FINSBURY CIRCUS**

Interim Executive Director, Environment to be heard.

**For Discussion**

11. **COMMEMORATIVE BENCHES AND TREE POLICY**

Interim Executive Director, Environment to be heard.

**For Discussion**

12. **BUNHILL FIELDS COMBINED MANAGEMENT PLAN**

Report of the Interim Executive Director, Environment.

**For Decision**  
(Pages 69 - 176)

**Natural Environment**

13. **NATURAL ENVIRONMENT AWAYDAY UPDATE**

Interim Executive Director, Environment to be heard.

**For Discussion**

14. **LEARNING TEAM UPDATE**

Interim Executive Director, Environment to be heard.

**For Discussion**

15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED**

## **Part 2 - Non-Public Agenda**

17. **EXCLUSION OF THE PUBLIC**

MOTION: That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**For Decision**

18. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the previous meeting held on 10 July 2023.

**For Decision**  
(Pages 177 - 178)

## **Natural Environment**

19. **HERITAGE UPDATE**

Interim Executive Director, Environment to be heard.

**For Discussion**

## **Governance**

20. **NATURAL ENVIRONMENT CHARITY REVIEW**

Managing Director of Bridge House Estates to be heard.

**For Discussion**

21. **NATURAL ENVIRONMENT BOARD DINNER**

Chairman to be heard.

**For Discussion**



- 22. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
- 23. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

### **Part 3 - Confidential Agenda**

- 24. **MINUTES**

To agree the confidential minutes of the meeting held on 10 July 2023.

**For Decision**

- 25. **TARGET OPERATING MODEL - PHASE TWO UPDATE**

Interim Executive Director, Environment to be heard.

**For Discussion**

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## **NATURAL ENVIRONMENT BOARD** **Monday, 10 July 2023**

Minutes of the meeting of the Natural Environment Board held at Committee Room -  
2nd Floor West Wing, Guildhall on Monday, 10 July 2023 at 10.00 am

### **Present**

#### **Members:**

Caroline Haines (Chair)  
Andrew McMurtrie (Deputy Chairman)  
James St John Davis  
Deputy Graeme Doshi-Smith  
Alderman Ian David Luder  
Wendy Mead  
Oliver Sells KC  
William Upton KC (Ex-Officio Member)

#### **In attendance:**

Benjamin Murphy

#### **Officers:**

Emily Brennan	- Environment Department
Neil Chambers	- Chamberlain's Department
Simon Glynn	- Environment Department
Clem Harcourt	- Chamberlain's Department
Elisabeth Hannah	- Environment Department
Stefania Horne	- Environment Department
Joe Kingston	- Environment Department
Jack Joslin	- Bridge House Estates
Ian Hughes	- Environment Department
Amba Nkundo	- Environment Department
Julia Pridham	- Bridge House Estates
Blair Stringman	- Town Clerk's Department
Jake Tibbets	- Environment Department
Edward Wood	- Comptroller and City Solicitor's

### **1. APOLOGIES**

Apologies for absence were received from Benjamin Murphy.

### **2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations of interest.

### **3. ORDER OF THE COURT OF COMMON COUNCIL**

The board received the order of the Court of Common Council held at the Guildhall of the City of London on Thursday 27th April 2023, which appointed the board and approved its Terms of Reference.

Members were provided, upon arrival, with a corrected version to the Court Order. Noting that James Bromiley-Davis took the vacancy left by Catherine McGuinness and has therefore replaced her on the revised Membership.

**RESOLVED** – To note the Order of the Court.

4. **ELECTION OF CHAIRMAN**

The board considered the report to elect a Chairman in accordance with Standing Order No. 29.

The board received an expression of interest from Caroline Haines to be elected as Chairman of the board.

**RESOLVED** – That, Caroline Haines be elected as Chairman of the Natural Environment Board for the ensuing year.

5. **ELECTION OF DEPUTY CHAIRMAN**

The board considered the report to elect a Deputy Chairman in accordance with Standing Order No. 30.

The board received an expression of interest from Andrew McMurtrie to be elected as Deputy Chairman of the board.

**RESOLVED** – That, Andrew McMurtrie be declared Deputy Chairman of the board for the ensuing year.

6. **MINUTES**

**RESOLVED** – That the public minutes and non-public summary of the previous meeting held on 13 February 2023, be approved as an accurate record.

**MATTERS ARISING**

The Chairman informed the board that following the completion of the Charity Review, a new Terms of Reference would be produced for the board to approve. Members were told that this would not stop the board in firming up on its strategic review which the Director of Natural Environment would be leading on.

Members were provided with an update on Finsbury Circus. Officers noted that the schedule of the project was on time and a contractor had successfully been appointed. The board were informed that works were due to begin on site in autumn near October/November of this year, it was noted that there were no significant delays at present.

7. **APPOINTMENT OF A REPRESENTATIVE TO THE STREETS AND WALKWAYS SUB-COMMITTEE**

The board considered the invitation to appoint one Member as a Natural Environment Board representative on the Streets and Walkways Sub-Committee.

**RESOLVED** – That Oliver Sells KC, be appointed as a Natural Environment Board representative on the Streets and Walkways Committee.

8. **FORMAL THANKS TO ALDERMAN IAN LUDER**

The Chairman provided a formal thanks to Alderman Ian Luder for his service and contribution to the board.

I would like to record our sincere thanks and gratitude to Alderman Ian Luder, who is today attending his last meeting of NEB and WHP.

Alderman Ian Luder has, for a period spanning over 10 years, demonstrated the utmost dedication to the City of London Corporation's various Open Spaces committees, now the Natural Environment. He joined the (then) OSCGC in 2014 and in the following years served as Chairman of both OSCG and WHP.

Alderman Luder has also served on the other Natural Environment Committees: Epping Forest and Commons; and Hampstead Heath, Highgate Wood and Queen's Park. Beyond this, Alderman Luder also featured on the Open Spaces Grants Review Working Party; Open Spaces and City Gardens – Finsbury Circus Garden Reinstatement Working Party. This shows just how considerably involved he was at every possible stage.

As Chairman, Alderman Luder was, in many ways, ahead of his time. For example, he was fundamental to developing a partnership with the Lawn Tennis Association. The embers of which have fed into a fully-fledged sports strategy which the City recognises will be fundamental to re-invigorating the Square Mile, and beyond, post-Covid. Furthermore, he championed our volunteer scheme, which is thriving today, as well as ensuring continued improvements accessibility across our open spaces.

Under his leadership, the City received Green Flag and Green Heritage standards, and Gold Awards in both London- and Britain in Bloom. Both exceptional achievements.

This of course is in no way intended to overlook the Ian's contributions as Alderman, and indeed Lord Mayor, but hope it goes some way of capturing Members' sentiments in celebrating his contributions to this particular Committee. These will be made in the usual way at the Court of Alderman and indeed the Court of Common Council in due course and I add my considerable thanks for his immense wisdom in advising me since I became Chair.

We wish you, Lin and the family all the best for the future.

**RESOLVED** – That, the formal thanks for Alderman Ian Luder be noted by the board.

9. **FORMAL THANKS TO STEFANIA HORNE**

The Chairman asked the Natural Environment Director to provide a formal thanks to Stefania Horne for her service and contribution to the board.

The Natural Environment Director noted that Stefania had made an enormous impression adding that her energy, leadership skills and can-do attitude would be greatly missed. The Director added that Stefania had worked through a difficult period during the Target Operating Model, assisting greatly with the new structure of the North London Open Spaces and with the sad passing of Declan Gallagher. The board thanked Stefania and wished her well in her exciting new role.

**RESOVLED** – That, the formal thanks to Stefania Horne be noted by the board.

### **MATTERS ARISING**

The board observed a moment of reflection as requested by the Chairman for the passing of Declan Gallagher. The Assistant Director provided an Obituary.

In his 17 years of service with the City of London Corporation, Declan was a dedicated and professional manager who put his heart and soul into looking after Hampstead Heath and other open spaces in North London.

Thanks to his very positive attitude and extensive experience, he was instrumental in maintaining the highest of standards.

Declan was very passionate about his work and very proud of Hampstead Heath and all the other open spaces he managed, including Queen's Park, Golders Hill Park and West Ham Park.

A lot of the improvements over the years were delivered because of Declan's hard work and determination, starting from the stumpery in Golders Hill Park at the beginning of his career, to the more recent projects such as the renovations of the playgrounds at the Heath Extension and in Queen's Park. He was also involved in the recent transformation of the sport facilities, including the cricket pitches at Parliament Hill and West Ham Park and the Athletics track at Parliament Hill.

Declan was highly respected in the green spaces sector, becoming a judge in the national Green Flag Award scheme. He was very experienced in horticulture and grounds maintenance, and extremely knowledgeable in all the operations needed to maintain our own green spaces to the highest standards. Declan managed a wider team of dedicated staff and under his leadership, the Heath, Queen's Park and – recently - West Ham Park were able to receive awards such as the Green Flag and London in Bloom every year. He was an exemplary manager and leader.

Declan was a lovely man and touched the heart of so many during the years he worked at the City of London Corporation. His funeral, attended by many of his colleagues and friends, was testament to the number of people who loved and respected him. He was respected by staff and stakeholders including the Heath and Hampstead Society, local Friends groups such as QPARA and Friends of West Ham Park, Friends of Kenwood, the Hampstead Gardens Suburb Trust, Heath Hands and many other local groups. He was also

respected by the Members of both the Consultative and Management committees and local councillors from Camden, Haringey, Barnet, Brent and Newham, alongside many other local sport clubs and organisations.

His passing was a shock for all. His staff, friends and colleagues have many fond memories of Declan. He was kind, generous and had a great sense of humour. He will be greatly missed but we will cherish his memory.

**RESOLVED** – That the moment of reflection and obituary be noted by the board.

**10. INTRODUCTION OF THE NATURAL ENVIRONMENT DIRECTOR**

The board received the verbal update from the Natural Environment Director.

The Natural Environment Director informed the board that she had been in post just over a month and had seen firsthand the fantastic variety of work that was being undertaken by colleagues in the Natural Environment Department. The Director explained that she had already visited several sites and looked forward to visiting and meeting colleagues from other areas.

The Director informed the board of her previous work, noting how she had trained previously as an ecologist and had worked for a range of nature conservation organisations such as the London Wildlife Trust, the Butterfly Conservation, and the Zoological Society in London.

The Director noted that her top priority in the first month was to familiarise herself with the Target Operating Model which was taking place and reach out to all those staff affected to ensure consistency across the Corporation.

**RESOLVED** – That, the verbal update from the Natural Environment Director be noted by the board.

**11. NATURAL ENVIRONMENT BOARD DINNER**

The board were informed the item would be taken in the non-public session of the meeting.

**12. ENVIRONMENT ACT 2021 REGULATIONS ON BIODIVERSITY**

The Board received the report of the Remembrancer providing a synopsis of the implementation Regulations that came into force to implement the Environment Act 2021.

In response to a question raised by a Member regarding responsibility for producing biodiversity reports and development in the City to seek biodiversity credits outside the square mile, Officers noted that responsibility for producing reports sits with planning with the Natural Environment Department providing support in terms of advice. In terms of biodiversity credits outside the square mile, the board were informed that the preferred option was always for the developer to enhance their biodiversity protection, however if this was not feasible, then the next option would be to enhance the development locally.

**RESOLVED** – That, the report be noted.

**13. OPEN SPACES BUSINESS PLAN 2022/23 - YEAR END PERFORMANCE REPORT**

The Board received a report from the Environment Director Environment providing Members with a review of the delivery of the 2022/23 high-level Open Spaces Business Plan which was approved by the Open Spaces and City Gardens Committee in December 2021.

The board was informed by the Natural Environment Director that the department had been reviewing strategic work that has been done so far with several draught strategies produced for the Natural Environment Division. It was noted that there was a plan in place to consolidate and finalise these strategies with an away date to be arrange for 21 September 2023 which would focus on finalising the vision, strategic direction, and key objectives for the division and help to enable Members to provide feedback in an appropriate time.

In response to a point raised by a Member, the Director agreed that it would be appropriate to consult with various stakeholder and consultative groups prior to any away day to assist with feeding into strategies moving forward.

**RESOLVED** – That, the report be noted.

**14. REVENUE OUTTURN 2022/23 - NATURAL ENVIRONMENT BOARD**

The Board received a joint report of Chamberlain and Interim Executive Director, Environment comparing compares the revenue outturn for the services overseen by your Board in 2022/23 with the final agreed budget for the year.

In response to a question raised by a Member regarding the cyclical works programme, Officers noted that these budgets were managed by the City Surveyors and set at the start of the year. The board was informed that the technical works programme was a rolling three-year programme and as such any variances and delays in the programme were adjusted accordingly.

In response to a question raised by a Members regarding central risk net expenditure increase from 2023/24, Officers informed the board that there were costs incurred relating to redundancy as well as pension strain costs associated with retirement as such, they were incurred on central risk which did not affect the directorate local risk budget.

**RESOLVED** – That, the report be noted.

**15. COMMEMORATIVE BENCHES AND TREES POLICY**

The Board considered a report of the Environment Director Environment concerning the Commemorative Benches and Trees Policy aims to formalize the existing offer for benches and trees in City Gardens and Public Realm.



Officers noted that Commemorative trees would no longer be regularly offered, except for exceptional cases reviewed by a committee. Members were informed that there would be a separate report later in the year to discuss how individuals and organisations can contribute to tree planting in general.

In response to a question raised by a Member, Officers informed the board the responsibility for sponsoring a bench lies with City Gardens and any concerns about the wording on plaques for commemorative benches would be brought to their attention for a final decision. The board noted that Sponsorship of benches was currently prohibited within the Square Mile, preventing organisations from using benches for self-promotion. Officers recommended returning to the board with a proposal for allowing tree sponsorship in the form of commemorative trees.

**RESOLVED** – That Members,

- a) Approve the adoption of the draft Commemorative Benches and Trees Policy included in Appendix 1 of the report.

**16. KING GEORGE'S FIELD-CITY OF LONDON TRUSTEES ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2022**

The Board received a joint report of Chamberlain and Interim Executive Director, Environment concerning the Trustee's Annual Report and Financial Statements for the Year ended 31 March 2022.

**RESOLVED** – That, the report be noted.

**17. RISK MANAGEMENT UPDATE REPORT**

The Board considered a report from the Interim Executive Director Environment concerning Risk Management Update.

Officers informed the board, since the last report, one risk related to finance and budgets had been eliminated from the register. This risk was specific to the 2022/23 financial year and has been successfully resolved. It was noted that the current Cross Divisional Risk Register primarily comprises risks that are common to all the charities and each charity maintains a specific risk register for their individual site, which may include site-specific risks.

Following a discussion by Members on mitigation of risks, Officers agreed to present detailed risk registers that include specific mitigating actions to the next meeting. Officers agreed to include actions taken to address these risks and Members of the board agreed to remove the word 'mitigate' from the recommendation as outlined in the report.

**RESOLVED** – That Members,

- a) Confirmed, on behalf of the City Corporation as Trustee, that the Natural Environment Cross-Divisional Summary Risk Register satisfactorily identified the key top-level risks to the charities and that appropriate systems are in place to identify risks across the charities.

- b) Note the report, the City Gardens Summary Risk Register (Appendix 2), and the action being taken to effectively manage these risks.

18. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions in the public session.

19. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED**

There were several items of other business.

The Board were provided with an update on St Dunstan's Park.

- **Challenges due to Popularity:** St Dunstan's in the East is experiencing issues related to its increasing popularity.
- **Diverse Uses:** The garden is being utilised for various activities, including photography, filming, weddings, and social media content.
- **Detriment to Garden and Visitor Experience:** The extensive use of the garden for these purposes is negatively impacting the garden's condition and the enjoyment of other visitors.
- **Simultaneous Photo Shoots:** Multiple professional photo shoots are occurring simultaneously, occupying large portions of the garden.
- **Events Policy:** In response to this situation, the city implemented an events policy in 2018. This policy regulates professional photography activities and mandates obtaining a license for such events

The board were provided with an update on Bunhill Fields.

- **Bunhill Fields:** Essential part of city gardens, situated just over the Islington border.
- **Joint Management:** Managed collaboratively by our team, the Environment team, and City Surveyors.
- **Heritage Focus:** Focus on heritage preservation and historical structures.
- **Chair's Visit:** Chair visited the site with the Friends of City Gardens.
- **Challenges and Opportunities:** Despite historical importance, Bunhill Fields faces common challenges.
- **Conservation Management Plan:** City Services is spearheading a comprehensive plan, covering all aspects, including graves and structures.
- **Progressive Approach:** Plan to present it as a dynamic management plan, not a static document to the committee.

The board were provided with a presentation by the Assistant Director/Superintendent, North London Open Spaces on the sports strategy which highlighted the designed which would align with the corporate sports strategy of the Square Mile. Members were informed that the goal was to ensure a cohesive approach, understand user needs, and optimise our facilities within the natural environment.

20. **EXCLUSION OF THE PUBLIC**  
**RESOLVED** – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.
21. **NON-PUBLIC MINUTES**  
**RESOLVED** – That the non-public minutes of the previous meeting held on 13 February 2023, be approved as an accurate record.
22. **CORPORATE CHARITIES REVIEW SCOPING EXERCISE TO SUPPORT THE NATURAL ENVIRONMENT CHARITIES REVIEW**  
The Board considered a joint report of the Managing Director of Bridge House Estates and the Natural Environment Director.
23. **DEBT ARREARS - NATURAL ENVIRONMENT DIVISION PERIOD ENDING: 31 MAY 2023**  
The Board received a joint report of the Chamberlain and Executive Director, Environment.
24. **HISTORICAL INCOME REPORT (2017/18-2024) FOR ASHTEAD COMMON**  
The Board noted the item had been withdrawn.
25. **HISTORICAL INCOME REPORT (2017/18-2024) FOR BURNHAM BEECHES**  
The Board noted the item had been withdrawn.
26. **HISTORICAL INCOME REPORT (2017/18-2024) FOR EPPING FOREST**  
The Board noted the item had been withdrawn.
27. **HISTORICAL INCOME REPORT (2017/18-2024) FOR WEST WICKHAM AND COULSDON COMMONS**  
The Board noted the item had been withdrawn.
28. **UPDATE ON MONUMENT**  
The Board noted that a verbal update would be provided at the next meeting.
29. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**  
There were no non-public questions.
30. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**  
The Board received one item of other business.
31. **TOM PHASE II UPDATE**  
The Board received a verbal update of the Interim Executive Director, Environment.

**The meeting ended at 12.00pm**

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Chairman

**Contact Officer: Blair Stringman**  
**Blair.Stringman@cityoflondon.gov.uk**

<b>Committee(s)</b>	<b>Dated:</b>
Natural Environment Board	16 October 2023
<b>Subject:</b> Risk Management Update Report	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 4, 11, 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Bob Roberts, Interim Executive Director Environment	<b>For decision</b>
<b>Report author:</b> Joanne Hill, Business Planning and Compliance Manager	

## Summary

This report is presented to provide the Natural Environment Board with assurance that risk management procedures in place within the Environment Department are satisfactory and that they meet the requirements of the Corporate Risk Management Framework and, where applicable, the Charities Act 2011. Risk is reviewed regularly within the Department as part of the ongoing management of the operations.

The Natural Environment Cross-Divisional Risk Register includes risks which are managed by the Natural Environment Director at a higher, strategic, level. The Cross-Divisional risks are summarised in this report and the detailed register is provided at Appendix 1.

Each of the Natural Environment charities holds its own risk register which is reported to its respective Committee.

City Gardens is part of the City Operations Division of the Environment Department, and its risks are held in a separate risk register which is summarised in this report and provided in full at Appendix 2.

## Recommendations

Members are asked to:

- A. **Natural Environment Division Risk Register:** Members are asked to confirm, on behalf of the City Corporation as Trustee, that the Natural Environment Cross-Divisional Risk Register (Appendix 1) satisfactorily sets out the key top-level risks to the charities and that appropriate systems are in place to identify and mitigate risks across the charities.
- B. **City Gardens Risk Register:** Members are asked to note the content of this report, the City Gardens Risk Register (Appendix 2), and the action being taken to effectively manage these risks.
- C. **Reporting format:** Risk registers are available in a detailed or summary format. Detailed risk registers are appended to this report. Summary risk registers include the risk title, current and target scores, direction of travel and flight path. Members are asked to decide whether:
  - i. they wish to continue to receive detailed risk registers with each quarterly report; or
  - ii. they would be satisfied with receiving detailed risk registers every six months and summary risk registers in the two interim quarterly reports, with individual risks being reported in detail by exception.

## Main Report

### Background

1. The City of London's Risk Management Strategy, which forms part of its Corporate Risk Management Framework, requires each Chief Officer to report regularly to Committees on the risks faced by their department.
2. The Charity Commission requires Trustees to confirm in a charity's annual report that any major risks to which the charity is exposed have been identified and reviewed and that systems are established to mitigate those risks. These risks are to be reviewed annually.
3. Each Committee to which the Natural Environment Division of the Environment Department reports receives an update on the risks relevant to the Committee every quarter. This frequency aligns with the City of London's Risk Management Strategy and exceeds the requirements of the Charity Commission.
4. The Interim Executive Director Environment assures the Natural Environment Board that all risks held by the Natural Environment Division and the City Operations Division continue to be managed in compliance with the Corporate Risk Management Framework, and, in the case of the Natural Environment Division, with the Charities Act 2011.

5. Risks are regularly reviewed by management teams, in consultation with risk owners, with updates recorded in the corporate risk management information system (Pentana). Risks are assessed on a likelihood-impact basis, and the resultant score is associated with a traffic light colour. For reference, the City of London's Risk Matrix is provided at Appendix 3.
6. The Natural Environment Cross-Divisional Risk Register includes risks which are managed by the Natural Environment Director at a higher, strategic, level. The Cross-Divisional risks are summarised in this report and the detailed register is presented at Appendix 1.
7. Each of the Natural Environment charities holds its own risk register which is reported to its respective Committee.
8. City Gardens is part of the City Operations Division, and its risks are held in a separate risk register which is summarised in this report and provided in full at Appendix 2.

## Current Position

### Natural Environment Cross-Divisional Risks

9. The Natural Environment Director maintains oversight of all risks and holds a Cross-Divisional Risk Register containing risks which are common to most or all Natural Environment charities: individual charities hold their own local risks on these matters, and the Cross-Divisional risk consolidates them for oversight by the Director.
10. The Natural Environment Director reviews the Cross-Divisional risks regularly in liaison with her Senior Leadership Team. A recent, detailed review has resulted in current and target risk scores being updated and three new risks being added to the register. In addition, the risk relating to the Wanstead Park Reservoirs project has been transferred to the Epping Forest risk register as it relates specifically to that charity.
11. The Register, summarised below and provided in full at Appendix 1, contains five RED risks and five AMBER risks:
  - **ENV-NE 003: Repair and maintenance of buildings and structural assets** (*RED*, 32)
  - **ENV-NE 004: Pests and diseases** (*RED*, 16)
  - **ENV-NE 010: Budget pressures** (*RED*, 16)
  - **ENV-NE 012: Wildlife management** (*RED*, 16)  
This new risk addresses the necessary control of wildlife across the Natural Environment site in order to ensure populations remain healthy and in balance with their environment, to conserve biodiversity and protect carbon stocks. A key action is to undertake deer management at Epping Forest.
  - **ENV-NE 014: Lack of asset register** (*RED*, 16)

This new risk includes actions to compile a comprehensive asset register for the Division, so that we can identify ownership and ensure compliance with Charity Commission requirements. The register will also enable us to consider wider opportunities for income generation.

- **ENV-NE 001: Health and Safety** (*AMBER, 12*)
- **ENV-NE 002: Extreme weather and climate change** (*AMBER, 12*)
- **ENV-NE 005: Impact of development** (*AMBER, 12*)
- **ENV-NE 011: Recruitment and retention of staff** (*AMBER, 12*)
- **ENV-NE 013: Increased visitor pressure** (*AMBER, 8*)

This new risk addresses the Division-wide issues related to increased number of visitors. Actions are being undertaken to improve visitor infrastructure and encourage the public to use sites responsibly.

### **City Gardens Risks**

12. City Gardens is part of the City Operations Division of the Environment Department, alongside Cleansing Services. The City Gardens Risk Register, summarised below and presented in full at Appendix 2, contains seven risks (three RED, three AMBER, and one GREEN) which are owned and managed by the City Gardens Manager and his Management Team.

13. Since the last report to the Natural Environment Board, all risks have been reviewed and updated in the risk management information system. The risks are listed below with their current score and notes summarising significant recent updates, where applicable.

- **ENV-CO-GC 016: Staff resources** (*RED, 16*)
- **ENV-CO-GC 017: Decline in condition of assets** (*RED, 16*)
- **ENV-CO-GC 018: Anti-social behaviour** (*RED, 16*)
- **ENV-CO-GC 011: Tree and plant diseases and other pests** (*AMBER, 12*)

- **ENV-CO-GC 009: Health and Safety incidents** (*AMBER, 8*)
- **ENV-CO-GC 012: Climate and weather** (*AMBER, 6*)

Completion of actions including updating the Extreme Weather Policy and the 'working in heat' risk assessment have enabled the current score of this risk to be reduced from AMBER 12 (possible/major) to the target of AMBER 6 (possible/serious).

A new target has been set to reduce the risk to a score of GREEN 3 (possible/minor) through development of a plant species catalogue.

- **ENV-CO-GC 015: Electric vehicles** (*GREEN, 4*)



### **Risk Management Process**

14. Across the Environment Department, risk management is a standing agenda item at the regular meetings of local, divisional and departmental management teams.
15. Between management team meetings, risks are reviewed in consultation with risk and action owners, and updates are recorded in the corporate risk management information system (Pentana).
16. Regular risk management update reports are provided to this Committee in accordance with the City's Risk Management Framework and, where applicable, the requirements of the Charities Act 2011.

### **Identification of New Risks**

17. New and emerging risks are identified through several channels, including:
  - Directly by Senior Leadership Teams as part of the regular review process.
  - In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
  - In response to emerging events and changing circumstances which have the potential to impact on the delivery of services, e.g., changes to legislation, resource availability, severe weather events.

### **Corporate and Strategic Implications**

18. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.
19. The risk management processes in place in the Environment Department support the delivery of the Corporate Plan, our Departmental and Divisional Business Plans and relevant Corporate Strategies, such as the Climate Action; Cultural; Sport and Physical Activity; and Volunteering Strategies. Risks are also being considered as part of the development of the Natural Environment and City Operations Divisions' emerging strategies.
20. Risks which could have a serious impact on the achievement of business and strategic objectives are proactively identified, assessed and managed in order to minimise their likelihood and/or impact.

### **Conclusion**

21. The proactive management of risk, including the reporting process to Members, demonstrates that the Environment Department is adhering to the requirements of the City of London Corporation's Risk Management Framework and, where applicable, the Charities Act 2011.

**Appendices**

- Appendix 1 – Natural Environment Cross-Divisional Risk Register
- Appendix 2 – City Gardens Risk Register
- Appendix 3 – City of London Corporation Risk Matrix

**Contact**

Joanne Hill, Business Planning and Compliance Manager, Environment Department

T: 020 7332 1301

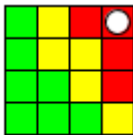
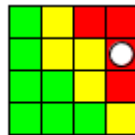
E: [Joanne.Hill@cityoflondon.gov.uk](mailto:Joanne.Hill@cityoflondon.gov.uk)

# Natural Environment Cross-divisional Risk Register

Generated on: 28 September 2023



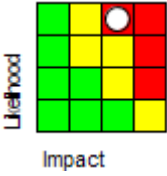
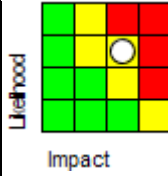

Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
PAV-NE 003 Repair and maintenance of buildings and structural assets	<p><b>Cause:</b> Inadequate planned and/or reactive maintenance; failure to identify and communicate maintenance issues; failure to retain expertise necessary to maintain complex buildings / sites. Reduced CWP budget and limited capital programme.</p> <p><b>Event:</b> Fail to meet statutory regulations and checks. Operational, residential or public buildings deteriorate to unusable/unsafe condition.</p> <p><b>Impact:</b> Potential serious health and safety risks including fatality or serious injury to users. Service capability disrupted; ineffective use of staff resources; damage to corporate reputation and poor customer satisfaction; increased requirement and costs for reactive maintenance and lack of budget to replace. Delays will have operational impact. Poor condition of assets, loss of value, permanent closure.</p>	<div><div>Likelihood</div><div>Impact</div></div>	32	<p>This risk has been assessed as Red 32 (Likely; Extreme) due to ongoing and increasing concerns about inadequate repair and maintenance of operational property across all Natural Environment sites.</p> <p>The Environment Department is Lead Client for its operational property with inspections managed and records kept by the City Surveyor's Department (CSD).</p> <p>The Corporation has acknowledged the significant maintenance backlog, including for the Natural Environment Division. We will produce a comprehensive asset register and investigate different options for tackling this backlog.</p> <p>Officers also continue to seek</p>	<div><div>Likelihood</div><div>Impact</div></div>	24	31-Dec-2024	<div><div></div></div>

# Appendix 1

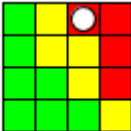
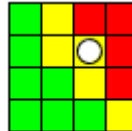

30-Aug-2017 Emily Brennan				alternative funding or other opportunities to enable repair and maintenance works to be undertaken outside the Cyclical Works Programme (CWP).  <b>28 Sep 2023</b>				
							Reduce	Constant

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE 003a	Liaise with City Surveyor's Department and other internal departments to press for action to be taken especially in regard to the most urgent issues.	We continue to work with the City Surveyor's Department to resolve service delivery issues.	Emily Brennan	28-Sep-2023	31-Dec-2024
ENV-NE 003b	Keep risk under regular review and monitor the actions and progress of each Natural Environment site.	This is a standing agenda item for discussion at all Senior Leadership Team meetings.	Emily Brennan	28-Sep-2023	31-Dec-2024
ENV-NE 003d	Create a comprehensive asset register.	A full review of Natural Environment assets is underway. The outcome will be the compilation of a comprehensive, accurate asset register which will enable us to identify ownership of our assets.	Emily Brennan	28-Sep-2023	31-Dec-2024

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 004</b> <b>Pests and diseases</b>  <div>Page 25</div> <div>28 Aug-2017</div> <div>Emily Brennan</div>	<b>Causes:</b> Inadequate biosecurity; purchase or transfer of infected trees, plants, soil and/or animals; ‘natural’ spread of pests and diseases from neighbouring areas. <b>Event:</b> Sites become infected by animal, plant or tree diseases e.g. Oak Processionary Moth (OPM ), foot and mouth, Massaria, Ash Die Back, <i>Salmonella</i> (DT 191a), Bleeding Canker of Horse Chestnut. <b>Impact:</b> Service capability disrupted; public access to sites restricted; tree decline; reputational damage; increased cost of monitoring and control of invasive species; risk to human health from OPM or other invasive or indigenous species; loss of key native species; threat to existing conservation status of sites particularly those with woodland habitats.		<b>16</b>	This risk is currently scored as Red 16 (likely/ major) due to the potential biodiversity, financial and human health impacts associated with this risk across many of our Natural Environment sites.  The regional and national situation is monitored on a regular basis. Staff across all Natural Environment sites are carrying out a range of actions, such as inspections, spraying and pest removal to mitigate the impact of this risk and with the aim of reducing it to the target score.  <b>28 Sep 2023</b>		<b>12</b>	31-Mar-2024	 Constant
							Reduce	

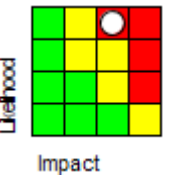
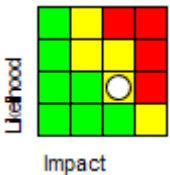

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE 004a	Cooperation and coordination across the Natural Environment Division and wider Department.	Natural Environment sites collaborate to share information and knowledge. This ongoing cooperation and coordination includes other parts of the Environment Department such as City Gardens and the Cemetery and Crematorium.	Emily Brennan	28-Sep-2023	31-Mar-2024
ENV-NE 004b	Regular review and monitoring of sites' local risks.	The risks of each individual site are kept under regular review.	Emily Brennan	28-Sep-2023	31-Mar-2024

## Appendix 1

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 010</b> <b>Budget pressures</b>  <div>Page 26</div> 16-Dec-2022 Emily Brennan	<b>Cause:</b> Reduction in income and the need for greater investment in order to deliver services. <b>Event:</b> Inability to generate income results in insufficient financial resources to maintain the quality of service. <b>Impact:</b> Decline in quality of services; inability to respond to the impacts of other business risks.	 <div> <div>Liability</div> <div>Impact</div> </div>	16	The new role of Assistant Director, Commercial and Charity Governance Fundraising is being recruited to. The post holder will work on development of a Fundraising Strategy, collaborating with colleagues across the Corporation to identify funding sources. The Strategy will include clear targets, define priority income streams and help to develop a coordinated approach.  The Natural Environment Charity Review will also aim to restrict funds for specific use within the Natural Environment Division.  <b>28 Sep 2023</b>	 <div> <div>Liability</div> <div>Impact</div> </div>	12	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-NE 010a	Develop an Income Generation Strategy.	When recruited, the new Assistant Director Charity and Commercial will take this forward and seek approval for the final version.			Emily Brennan	28-Sep-2023	31-Dec-2024

## Appendix 1

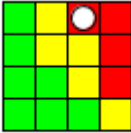
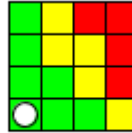

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 012 Wildlife management</b>  <div>Page 27</div>	<b>Cause:</b> Control of wildlife is necessary across the Natural Environment sites to ensure populations remain healthy and in balance with their environment, to conserve biodiversity and protect carbon stocks. For example, deer culling and grey squirrel control. Humane despatch of injured wildlife may also be necessary. These activities often require the use of firearms. <b>Event:</b> Failure to maintain and/or follow robust plans and policies to undertake deer culling and other wildlife controls responsibly, to a sufficiently high standard, in compliance with legal requirements, and with due regard to health, safety and animal welfare. <b>Effects:</b> Injury to staff or members of the public due to non-compliant use of firearms, lone working etc; risk to human health; road traffic accidents; damage to property. Detrimental impact on stakeholder relationships; negative publicity; reputational risk.		<b>16</b>	Deer management is a key issue at Epping Forest - contractors are due to be appointed to carry out a cull in the coming months. This will be managed carefully to ensure the work is undertaken by responsible contractors and in accordance with local policies and legal requirements. We will work with the Media Team to manage communications.  Other wildlife management actions and associated policies are in place across the division and are kept under regular review to manage the risk.  <b>28 Sep 2023</b>		<b>8</b>	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE 012a	Deer management at Epping Forest	Appoint contractors to undertake a deer cull at Epping Forest.  Contractors to be carefully selected to ensure the work is carried out responsibly, safely, and compliantly.  Ensure robust management of staff and contractors and maintain a detailed, accurate, audit trail.	Emily Brennan	28-Sep-2023	31-Mar-2024
ENV-NE 012b	Monitoring programme to assess the impact of grey squirrels.	Undertake a monitoring programme to assess the impact of grey squirrels. Use the outcomes to formulate an appropriate action plan if necessary.	Emily Brennan	28-Sep-2023	31-Mar-2024
ENV-NE 012c	Work with the Media Team to manage communications.	Work closely with the Media Team to manage communications about deer management and other wildlife control.	Emily Brennan	28-Sep-2023	31-Mar-2024

ENV-NE 012d	Keep relevant policies under review.	Review and update Divisional and site-specific Firearms and other relevant policies (e.g. lone working) on a regular basis, and ensure they are communicated to appropriate staff.	Emily Brennan	28-Sep-2023	31-Dec-2024
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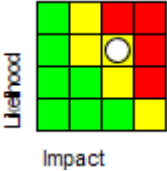
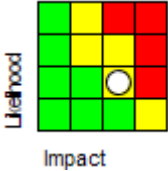



## Appendix 1

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 014</b> <b>Lack of asset register</b>  22-Aug-2023 Emily Brennan	<b>Cause:</b> We do not hold an accurate, comprehensive, asset register for the Natural Environment sites. <b>Event:</b> We do not know the ownership details of all our assets. <b>Effect:</b> Potential to be non-compliant with Charity Commission requirements.	 Likelihood Impact	<b>16</b>	A full asset review is underway which will result in the compilation of a comprehensive, accurate Asset Register. This will enable us to identify the ownership of our assets and ensure compliance with Charity Commission requirements. Once ownership is determined, we will also be able to consider wider opportunities for income generation, repurposing and/or disposal.  <b>28 Sep 2023</b>	 Likelihood Impact	<b>1</b>	31-Dec-2024	 Constant
							Reduce	

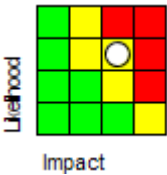
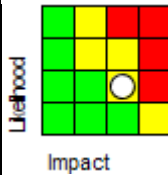

Action no	Action description	Latest Note		Action owner	Latest Note Date	Due Date
ENV-NE 014a	Carry out Natural Environment Asset Review	A full review of Natural Environment assets is underway. The outcome will be the compilation of a comprehensive, accurate asset register which will enable us to identify ownership of our assets.		Emily Brennan	28-Sep-2023	31-Dec-2024
ENV-NE 014b	Establish and monitor protocols to ensure compliance with Charity Commission requirements.	Establish and monitor protocols for ensuring compliance with Charity Commission requirements in relation to charity-owned assets.		Emily Brennan	28-Sep-2023	31-Dec-2024



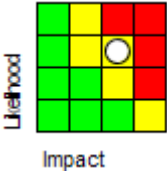
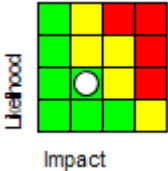

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-NE 002 <b>Extreme weather and climate change</b>  30-Aug-2017 Emily Brennan	<b>Causes:</b> Climate change causes more frequent and severe weather events: storms, wind, rainfall, snow, drought. <b>Event:</b> More frequent and prolonged periods of drought, flooding, storm damage, wildfires etc. <b>Impact:</b> Service capability disrupted; incidents increase demand for staff resources to respond and maintain public and site safety; temporary site closures; increased costs for reactive management. Strong winds cause tree limb drop; prolonged heat results in fires; snow disrupts site access; rainfall results in flooding and impassable areas. Damage/loss of rare/fragile habitats and species. Risk of injury or death to staff, visitors, contractors and volunteers. Damage to property and infrastructure.		12	The Environment Department's Health and Safety Manager is actively engaged in assisting sites to identify and manage their health and safety risks.  Relevant staff are members of departmental and divisional health and safety groups at which issues are discussed, knowledge shared, and advice and support provided.  <b>28 Sep 2023</b>		8	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note		Action owner	Latest Note Date	Due Date
ENV-NE 002a	Develop a Climate Resilience Plan for the Natural Environment Division.	We are working with the Department's Environmental Resilience Team to identify specific climate change related risks and actions for the Natural Environment Division.		Simon Glynn	28-Sep-2023	31-Mar-2024
ENV-NE 002b	Regular review and monitoring of climate and weather risks held by each Natural Environment site.	The risks held by each site on this subject are kept under regular review.		Simon Glynn	28-Sep-2023	31-Mar-2024
ENV-NE 002d	Seek funding for and, if successful, progress the Carbon Removals Project.	Seek funding from the central Corporate fund for a proposed Carbon Removals Project. The project will protect the carbon stored on our open spaces and provide additional carbon storage. If funding is received, the actions within the proposal will be progressed and implemented. These include fencing to protect vulnerable trees; tree and hedge planting, and deer management.		Emily Brennan	28-Sep-2023	31-Mar-2024

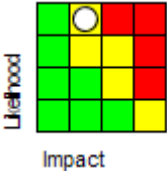
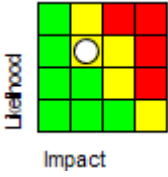

## Appendix 1

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 005</b> <b>Impact of development</b>  30-Aug-2017 Emily Brennan	<b>Cause:</b> Pressure on housing and infrastructure in London and South East; failure to monitor planning applications and challenge them appropriately; unsuccessful challenges; lack of resources to employ specialist support, carry out necessary monitoring/research or consult on Local Plans; lack of partnership working with, and engagement from, Planning Authorities. <b>Event:</b> Major development(s) have a negative impact on our sites through loss and damage to habitats. Increase in visitor numbers. <b>Impact:</b> Loss, damage, destruction or fragmentation of habitats. Increased damage through high visitor numbers. Encroachment/loss of land.		12	Staff at all Natural Environment sites work with their neighbouring local authorities and consult with stakeholders. They seek out opportunities to integrate sustainability into proposed developments, e.g. asking for CIL funds from developers to mitigate the impact where possible. They also do what they can to limit the impact of increased visitor numbers.  <b>28 Sep 2023</b>		8	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-NE 005a	Regular monitoring of the risks held by individual sites and action taken.	The Director keeps the risks held by individual sites under review and is notified by her Assistant Directors of any specific planning issues and concerns that arise.			Emily Brennan	28-Sep-2023	31-Dec-2024

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 011 Recruitment and retention of staff</b>  <div>Page 33</div> <div>19 Dec-2022 Emily Brennan</div>	<b>Cause:</b> There is a lack of appropriately skilled candidates in the wider environment employment market. <b>Event:</b> Difficulty in filling new and existing posts at the right level. <b>Impact:</b> Inability to deliver front-line and back-office services.		12	There is an apparent lack of individuals in the employment market with relevant skills and experience to fill some specialist posts - this is an industry-wide issue.  A key element of delivering the new divisional structure is to offer our existing staff more learning and development opportunities to enable them to fill new and vacant posts in the future.  Vacancies are being advertised across a broad range of recruitment outlets in an attempt to attract suitable candidates.  <b>28 Sep 2023</b>		4	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE 011a	Develop our staff	We will offer staff more learning and development opportunities to enable them to fill new and existing vacancies.	Emily Brennan	28-Sep-2023	31-Dec-2024
ENV-NE 011b	Widen recruitment marketing.	We are advertising vacancies across a wider range of recruitment outlets in order to attract high quality candidates with appropriate skills and experience.	Emily Brennan	28-Sep-2023	31-Dec-2024

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-NE 013</b> <b>Increased visitor pressure</b>  22-Aug-2023 Emily Brennan	<b>Cause:</b> Continual increase in number of visitors due to greater popularity of natural environment sites, population growth and new housing in local areas. <b>Event:</b> Long-term environmental damage, with a particular focus on protected landscapes and Sites of Special Scientific Interest and SACs which are not designed for such high visitor numbers. Increased use of car parks and parking on adjacent roads and land. <b>Effect:</b> Ecological and environmental damage; negative press coverage; loss of grants related to preservation; increased spend required to maintain sites / mitigate damage.		8	Works to improve visitor infrastructure are being undertaken where possible and/or funding to enable this work is being sought.  Education of visitors to encourage responsible use of sites is carried out via publicity, social media messaging and signage. Opportunities to increase this will be sought and taken up.  <b>28 Sep 2023</b>		6	31-Dec-2024	  Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-NE 013a	Improve visitor infrastructure.	Seek ways to improve visitor infrastructure to encourage visitors to stay on designated routes and minimise damage.			Emily Brennan	28-Sep-2023	31-Dec-2024
ENV-NE 013b	Carry out education and messaging campaigns to encourage responsible use of the sites.	Carry out education and messaging campaigns at our sites to encourage the public to use sites responsibly in order to conserve them for the future.			Emily Brennan	28-Sep-2023	31-Dec-2024

# City Gardens Risk Register

Generated on: 28 September 2023



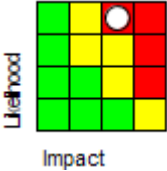

Rows are sorted by Risk Score

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
P001 ENC-CO-GC 016a 04-Aug-2022 Jake Tibbetts	<b>Cause:</b> Aging workforce combined with difficulties in recruitment and retention of younger workforce due to remuneration and benefits package becoming increasingly uncompetitive for the market sector. <b>Event:</b> Reduction in skill and human resources within the service. <b>Effect:</b> Increased staff absence due to sickness; inability to deliver the necessary level of service or meet business objectives; increased number of complaints from the public; negative publicity/reputational damage.	 Likelihood Impact	16	Difficulties in the recruitment and retention of skilled staff are ongoing. Service provision is likely to suffer as a result.  Once the new Corporate People Strategy has been published (in April 2024) we will re-evaluate the situation and determine further actions to address the risk.  <b>28 Sep 2023</b>	 Likelihood Impact	12	30-Jun-2024           Reduce	Constant

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENC-CO-GC 016a	Review the overall work package and consider how the offer can be developed to increase desirability of roles.	Once the new Corporate People Strategy has been published (in April 2024) we will re-evaluate the situation and determine further actions to address the risk.			Jake Tibbetts	28-Sep-2023	30-Jun-2024

ENV-CO-GC 016c	Work towards securing a rolling apprentice programme to ensure continuous apprentices in City Gardens.	We have received approval for three levy-funded apprentices and are currently going through the recruitment process.	Jake Tibbetts	28-Sep- 2023	31-Jan- 2024
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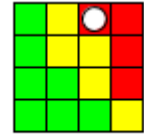
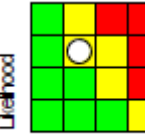



Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-CO-GC 017 Decline in condition of assets</b>  <div>Page 37</div> <div>04-Aug-2022</div> <div>Jake Tibbetts</div>	<b>Cause:</b> Poor maintenance of assets; failure to implement recommendations. <b>Event:</b> Failure to meet statutory regulations and checks. Built assets deteriorate to unusable/unsafe condition. <b>Effect:</b> Poor condition of assets; service failures; loss of value; cost of repair; potential fines from statutory bodies and insurance claims.		<b>16</b>	Lack of investment in building and infrastructure maintenance over the past few years has greatly increased leading to the potential for major failures in the future. We continue to liaise with City Surveyor's Department (CSD) to make them aware of issues and to compile an accurate, comprehensive, asset register for City Gardens.  Current priority concerns which we are seeking to resolve with the assistance of CSD are the lighting columns around the Ball Court at St Botolph's Bishopsgate, and the north-western boundary wall at Bunhill Fields.  <b>28 Sep 2023</b>		<b>12</b>	31-Mar-2024	Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-GC 017a	Undertake an annual review of the 20 year programme of investment and maintenance of all built assets.	The 20-year works programme is reviewed on an annual basis.	Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 017b	Carry out inspections and report defects as they arise. Ensure that unresolved actions are highlighted to City Surveyor's Department.	This is an ongoing action. All necessary inspections are carried out and any defects are reported to City Surveyor's Department.	Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 017c	Undertake regular internal review and monitoring of condition and safety of assets.	Internal checks are carried out on an ongoing basis. These are monitored every quarter to ensure they have been completed.	Jake Tibbetts	28-Sep-2023	31-Mar-2024

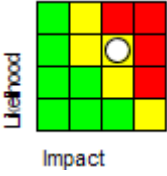
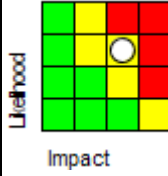
## Appendix 2

ENV-CO-GC 017d	Re-establish regular liaison meetings with City Surveyor's Department (CSD).	Due to the complexity of City Gardens' sites, several teams from the City Surveyor's Department are involved in the repair and maintenance of our assets. We are working to re-establish quarterly meetings with all relevant CSD contacts in order to improve communication and awareness of our requirements.	Jake Tibbetts	28-Sep- 2023	31-Dec- 2023
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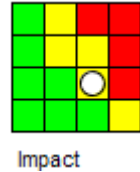
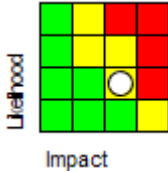

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-CO-GC 018 Anti-social behaviour</b>  04 Aug-2022 Jake Tibbetts	<b>Cause:</b> Anti-social and criminal behaviour. <b>Event:</b> Litter; public urination and defecation (human and dog); dog fouling, dog attacks, street drinking; drug use; vandalism; wanton damage and theft. <b>Effect:</b> Damage and loss of assets; reduction in user experience and satisfaction; increased costs of cleaning and repairing damage; reputational harm.	 Likelihood Impact	16	Irresponsible public behaviour continues to be an issue in and around our sites. Actions are in place to address anti-social, criminal and other problematic behaviours. We are exploring options to increase the enforcement of byelaws within City Gardens.  Due to changes in the Corporate contract with ParkGuard, with whom we work in partnership, our ability to address ASB through this contract has reduced. We are working to find solutions and improve the situation.  <b>28 Sep 2023</b>	 Likelihood Impact	6	31-Mar-2025	 Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-CO-GC 018a	Continue to use Park Guard to engage with ASB offenders, and the Outreach Team in regard to rough sleepers. Maintain and develop relationship with City Police.	We continue to work in partnership with ParkGuard to engage with ASB offenders, and with the City's Outreach Team to engage with rough sleepers. However, due to changes in the Corporate contract with ParkGuard, our ability to address ASB through this contract has reduced. We are working to identify a solution and improve the situation.	Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 018b	Explore the possibility of using Street Enforcement Officers to enforce byelaws within City Gardens.	We have been investigating options for working with the Department's Street Enforcement Officers (SEOs) to enforce byelaws within the gardens. This was trialled over the summer at St Dunstan's in-the-East, using ParkGuard rather than SEOs. The results of the trial will be analysed and an action plan drafted as appropriate.	Jake Tibbetts	28-Sep-2023	31-Mar-2024

## Appendix 2

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-CO-GC 011 Tree and plant diseases and other pests</b> 24-Feb-2022 Nicola Smith; Jake Tibbetts	<b>Cause:</b> Inadequate biosecurity, purchase or transfer of infected plants and soil. Invasion of pests and diseases from neighbouring areas e.g. Oak Processionary Moth, Massaria, Xyella. <b>Event:</b> Sites become infected by plant or tree diseases. <b>Effect:</b> Threat to human health, either directly or indirectly; service capability disrupted; ineffective use of staff resources; damage to corporate reputation; loss of species; site closures (temporary) and associated access; increased costs for reactive maintenance.		12	This risk includes plant diseases such as Xyella which, while not known to be present in the UK, has spread in Europe, including France. <b>28 Sep 2023</b>		12		Constant
							Accept	

Action no	Action description	Latest Note		Action owner	Latest Note Date	Due Date
ENV-CO-GC 011a	Ongoing action: Ensure staff training is kept updated to enable timely identification of pests and knowledge of correct treatment/ prevention.	Provision of staff training is continuing. Information on training is shared through the Departmental Health & Safety Group, Equalities Board, SLT, and other avenues.		Nicola Smith	28-Sep-2023	31-Mar-2024
ENV-CO-GC 011b	Ongoing action: Annual tree inspections undertaken by qualified personnel through framework contract.	An annual programme is in place for cyclical inspections and targets are being met.		Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 011c	Ongoing action: Maintain relationships with industry bodies, internal CoL departments, and neighbouring local authorities to ensure free flow of information.	Relationships with industry bodies, internal partners and neighbouring local authorities continue to be maintained.		Jake Tibbetts	28-Sep-2023	31-Mar-2024

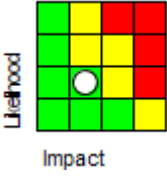
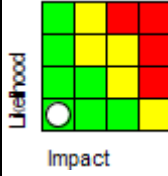
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>ENV-CO-GC 009 Health and Safety incidents/Catastrophic Health and Safety failure</b>  24-Feb-2022 Nicola Smith; Jake Tibbetts	<b>Cause:</b> Failure to adhere to Health and Safety policies and procedures. Failure to link work activity with adequate procedures; risk assessments and safe systems of work not complied with; inadequate appropriate training; failure to implement the results of audits. <b>Event:</b> Staff, volunteers, contractors or licensees undertake unsafe working practices, notably working at roadside or at height in City. <b>Effect:</b> Injury to staff, volunteers, contractors or member of the public; prosecution and fine by HSE and/or Police; increased insurance premiums; reputational damage.		8	While we cannot remove this risk, we continue to take actions to mitigate it as far as possible and maintain the score at the current level.  Health and safety procedures are kept under regular review and the Emergency Plan will be reviewed and updated during the coming months.  <b>28 Sep 2023</b>		8		  Constant
							Accept	

Action no	Action description	Latest Note		Action owner	Latest Note Date	Due Date
ENV-CO-GC 009a	Ongoing action: Continue to develop a good culture of reporting accidents, incidents and near misses.	Officers continue to report accidents, incidents and near misses. Accidents are subject to investigation and review by the Departmental Health & Safety Group.		Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 009b	Ongoing action: Monitor compliance by contractors (City Surveyor's and external) with the Contractor Protocol. Regularly review documentation and processes in light of investigation findings and changes in legislation.	The Contractor Protocol covers works undertaken by City Surveyor's Department and external contractors. All contractors are required to sign up to, and comply with, the Protocol: it has been implemented with existing contractors and is rolled out to new contractors as required. Regular progress meetings are held with City Surveyor's Department and contractors working on larger projects.		Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 009d	Ongoing action: Essential and desirable training needs are identified for each staff role. All staff are required to undertake security and terrorism training, e.g. Project Griffin, Argus and Prevent. Completion of appropriate training is kept under review.	The staff training programme is regularly reviewed and individual training is monitored.  City Gardens staff have attended counter-terrorism training. Mandatory corporate e-learning on ACT ('Action Counters Terrorism') has been rolled out to all staff. The 'Protect UK' App has been downloaded to the mobile phones of all staff.  First Aid training is currently a focus for the City Gardens Team.		Jake Tibbetts	28-Sep-2023	31-Mar-2024
ENV-CO-GC 009f	Review and update the Emergency Plan.	The Emergency Plan is to be updated and reviewed, taking into consideration the revised departmental and divisional structure.		Jake Tibbetts	28-Sep-2023	31-Mar-2024



## Appendix 2

ENV-CO-GC 012c	Ongoing action: Monitor weather warnings: fire severity index, hydrological outlook and water situation reports. Use staff email to advise on reactive reporting of weather warnings received through MET office and Resilience Forum.	An Extreme Weather Policy is in place to monitor extreme weather conditions, and take appropriate actions.  The Policy includes procedures to close sites with trees, where it is possible to do so, when there are severe alerts of amber and red with gusts of 45mph or more. An action log of these decisions is maintained in order to monitor patterns.	Jake Tibbetts	28-Sep- 2023	30-Jun- 2024
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Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
ENV-CO-GC 015 Electric vehicles  04-Aug-2022 Jake Tibbetts	<b>Cause:</b> Replacement of the entire fleet is required in order to meet the corporate requirement to operate an entirely electric fleet. There is a lack of electric vehicle options for the type of fleet we run, and lead-in periods are longer than the current contract runs for. The existing contract has been extended to the maximum permitted spend. <b>Event:</b> Existing contract expires before we are able to receive new vehicles, leaving us without a fleet. <b>Effect:</b> Service failure due to lack of vehicles, or significantly increased costs from procurement of a new temporary fleet.		4	We have awarded a contract for the lease hire arrangement of the new vehicles which will be delivered in Q1 of 2024/25. We now have a contract in place which runs to the end of 2023/24 and bridges the gap between the old and new contracts.  In addition, funding has been approved to enable the purchase of one vehicle which has now been purchased and is in use.  <b>28 Sep 2023</b>		1	31-Mar-2024	Constant
							Reduce	

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
ENV-CO-GC 015a	Negotiate a contract with a supplier who can provide replacement vehicles but also temporary vehicles to bridge the period between the end of the existing contract and delivery of the new vehicles.	We have awarded a contract for the lease hire arrangement of the new vehicles which will be delivered in Q1 of 2024/25. We now have a contract in place which runs to the end of 2023/24 and bridges the gap between the old and new contracts.			Jake Tibbetts	28-Sep-2023	31-Mar-2024



## City of London Corporation Risk Matrix (Black and white version)

Note: A risk score is calculated by assessing the risk in terms of likelihood and impact. By using the likelihood and impact criteria below (top left (A) and bottom right (B) respectively) it is possible to calculate a risk score. For example a risk assessed as Unlikely (2) and with an impact of Serious (2) can be plotted on the risk scoring grid, top right (C) to give an overall risk score of a green (4). Using the risk score definitions bottom right (D) below, a green risk is one that just requires actions to maintain that rating.

### (A) Likelihood criteria

	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
Numerical	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	Less than one chance in a hundred (<10-2)

### (B) Impact criteria

Impact title	Definitions
Minor (1)	<b>Service delivery/performance:</b> Minor impact on service, typically up to one day. <b>Financial:</b> financial loss up to 5% of budget. <b>Reputation:</b> Isolated service user/stakeholder complaints contained within business unit/division. <b>Legal/statutory:</b> Litigation claim or find less than £5000. <b>Safety/health:</b> Minor incident including injury to one or more individuals. <b>Objectives:</b> Failure to achieve team plan objectives.
Serious (2)	<b>Service delivery/performance:</b> Service disruption 2 to 5 days. <b>Financial:</b> Financial loss up to 10% of budget. <b>Reputation:</b> Adverse local media coverage/multiple service user/stakeholder complaints. <b>Legal/statutory:</b> Litigation claimable fine between £5000 and £50,000. <b>Safety/health:</b> Significant injury or illness causing short-term disability to one or more persons. <b>Objectives:</b> Failure to achieve one or more service plan objectives.
Major (4)	<b>Service delivery/performance:</b> Service disruption > 1 - 4 weeks. <b>Financial:</b> Financial loss up to 20% of budget. <b>Reputation:</b> Adverse national media coverage 1 to 3 days. <b>Legal/statutory:</b> Litigation claimable fine between £50,000 and £500,000. <b>Safety/health:</b> Major injury or illness/disease causing long-term disability to one or more people <b>Objectives:</b> Failure to achieve a strategic plan objective.
Extreme (8)	<b>Service delivery/performance:</b> Service disruption > 4 weeks. <b>Financial:</b> Financial loss up to 35% of budget. <b>Reputation:</b> National publicity more than three days. Possible resignation leading member or chief officer. <b>Legal/statutory:</b> Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. <b>Safety/health:</b> Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. <b>Objectives:</b> Failure to achieve a major corporate objective.

### (C) Risk scoring grid

Likelihood	Impact				
	X	Minor (1)	Serious (2)	Major (4)	Extreme (8)
	Likely (4)	4 Green	8 Amber	16 Red	32 Red
	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely (2)	2 Green	4 Green	8 Amber	16 Red
	Rare (1)	1 Green	2 Green	4 Green	8 Amber

### (D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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<b>Committee(s):</b> Natural Environment Board	<b>Dated:</b> 16/10/2023
<b>Subject:</b> Operational Finance Progress Report (period 3 April – June 2023) 2023/24 – Natural Environment Division	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	n/a
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	n/a
<b>What is the source of Funding?</b>	n/a
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	n/a
<b>Report of:</b> Chamberlain	<b>For Information</b>
<b>Report author:</b> Clem Harcourt, Chamberlain's Department	

## Summary

This report provides an update on the operational finance position as @ period 3 (April – June 2023) 2023/24 for the Natural Environment Division's local risk revenue budget to date and projected year-end outturn position, current live capital projects and outstanding debt position. It also provides additional information on the various reserve funds and endowment balances held and other relevant finance information for the Natural Environment Division services which fall within the remit of your Board.

This report does not specifically concentrate on just charity finance in isolation, as this work will be part of the ongoing Charity Review and will be developed in conjunction with that project. As part of the Charity Review, future training sessions will be designed for both Members and Officers on key aspects of charity finance. This report is designed to also report on budgetary management issues that the Interim Executive Director Environment is responsible for to successfully manage the operations and finances of the Natural Environment Division.

## Recommendation

Members are asked to:

- Note the content of this report and its appendices.

## Main Report

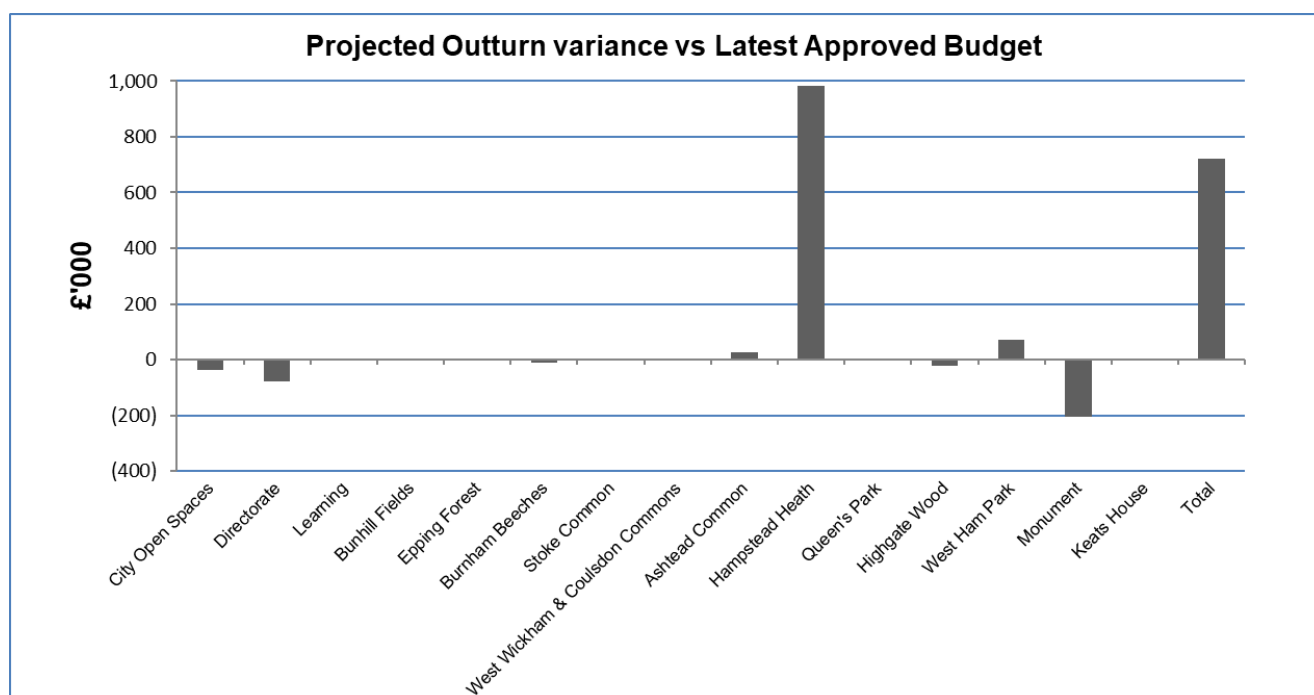
### Background

1. In order to improve financial reporting to Committee, a set of various financial appendices and commentary have been produced to enable greater clarity of revenue budgets and other financial information needed to allow greater scrutiny of the financial performance of the Natural Environment Division to ensure they remain within the Interim Executive Director Environment's local risk resources for 2023/24.

2. To ensure your Board is kept informed, an update on progress made against budgets will be reported to you on a periodic (quarterly) basis. This approach will allow Members to ask questions and have a timely input into areas of particular importance to them.

### Local Risk Revenue Forecast Outturn 2023/24

3. The Natural Environment Division has an overall net local risk expenditure revenue budget of £11.894m. The current forecast outturn for 2023/24 as @ period 3 (June 2023) is £11.174m, a forecast underspend of £720k currently.
4. As at the end of June 2023, the Interim Executive Director Environment was forecasting an overspend of £2.147m within his other Service Committees, giving a total net forecast overspend for the Environment Department of £1.427m overall for 2023/24 when adjusting for other Service Committees within his remit. The overall projected overspend for the Environment Department is primarily attributable to a loss of income from the Heathrow Animal Reception Centre.
5. In the chart below, the forecast budget performance by each Natural Environment individual Division of Service is listed. Appendix 1 sets out a more detailed financial analysis of each individual Division of Service relating to the various Natural Environment Committees, including reasons for significant budget variations.



#### Notes:

1. Zero is the baseline latest approved budget for each Division of Service.
2. Graph shows projected outturn position against the latest approved budget.
3. A variance above the baseline is favourable i.e. either additional income or reduced expenditure.
4. A variance below the baseline is unfavourable i.e. additional expenditure or reduced income.
5. Forecast outturn is £11.174m net expenditure, representing a projected underspend of £720k against the latest approved budget of £11.894m.

6. The overall local risk forecast position is £720k (6.05%) underspent against the approved budget. The main forecast underspend relates to Hampstead Heath which has a projected net underspend of £984k, mainly due to increased income generated from the Ponds and Lido as a result of increased usage of the facilities. This is in addition to lower than forecasted expenditure on salaries and grounds maintenance costs.
7. In addition, West Ham Park is forecasting an underspend of £70k as a result of savings in employment costs attributable to vacant posts.
8. Meanwhile, there is projected to be a year-end underspend of £26k at Ashted Common as a result of additional income forecasted to be generated from government grants.
9. The Natural Environment Division's forecasted underspend is partly offset by a £207k overspend relating to the Monument due to unidentified savings relating to reduced income levels following COVID restrictions on opening the premises that have not returned to pre-COVID levels.
10. There is also a projected overspend of £78k on the Directorate's local risk budget as a result of additional staffing costs incurred from changes related to the new staffing structure.
11. Finally, there is forecast to be a £37k overspend relating to City Gardens. This can be explained by agency costs being required to cover staff sick leave as well as additional materials being purchased to deliver projects.

#### **Local Risk Actual Position to Date**

12. Appendices 2 and 3 set out the year-to-date income and expenditure actual position against year-to-date budget, including notes for significant budget variations. In addition, there is a graphical split of the mix of the type of income and expenditure categories making up these actual figures for the division.
13. Appendix 2 highlights that the Natural Environment Division has received actual income to date of £1.987m against a budget to date of £1.825m, a favourable variance of £162k.
14. The main income variances to date relate to Hampstead Heath where income is £464k ahead of the current budget profile. This is explained by additional income generated from the Ponds and Lido.
15. The increase in income compared to budget is partly offset by income at City Gardens being behind profile. This is due to lower than anticipated income generated from section 106 contributions and fees and charges compared with the budget profile to date as a result of income being received later than originally budgeted. However, income is currently forecast to be on track by the end of the financial year. This is in addition to income at Burnham Beeches being less than budgeted as a result of government grant income from 2022/23 raised as a listed debtor not having yet been physically received.
16. Appendix 3 highlights actual expenditure to date of £4.387m against a budget to date of £4.742m, a favourable variance of £355k.
17. The main expenditure variances relate to Hampstead Heath which has an underspend on its expenditure to date of £107k compared with the budget profile

to the end of June 2023. This can be explained by underspends on staffing costs as a result of vacant posts.

18. Other favourable variances include a £71k underspend to date at Epping Forest due to lower than anticipated salary and transport costs as well as a £59k favourable variance on the Directorate due to the timing of internal legal fees.
19. Variances to date can be incurred due to a variety of reasons including timing differences, incorrect budget profiling, new items of income or expenditure that weren't originally budgeted or planned, as well as genuine increases/decreases in expenditure or income. They do not always mean that these will result in a year-end overspend or underspend, as the Department look to offset ups and downs and make budget adjustments to control unexpected items to remain within overall budget constraints.

### **Capital Projects**

20. Appendix 4 outlines the current list of live capital projects in progress against their currently approved budget. It should be noted that the "current approved budget" is the amount currently agreed by Committee to progress the project to either the next project gateway or until Officers request further release of capital funds to progress the scheme and may not equal the total estimated cost of the project to finalisation.
21. Out of a current approved budget of £11.703m, £9.032m has been spent or committed to date, leaving a remaining budget of £2.671m to progress the various projects to the next project gateway, release of further capital funds or completion.
22. The capital bidding process for 2024/25 is currently underway for new capital projects with a pot of £20m being made available within City Fund and £5m for City's Cash services. New capital bids are to be reviewed against the department's overall capital programme and timescales for delivery with bids only expected to be put forward on a by exception basis and on the assumption that the projects will commence in 2024/25.
23. Four new City Cash bids totalling £1.122m have been submitted to the Chamberlain in this process relating to projects at Epping Forest, The Commons and West Ham Park. A decision on whether these will be agreed and further submitted to Members is yet to be made by Priorities Board.

### **Outstanding Debts**

24. At the end of June 2023, total outstanding debt for the Natural Environment Division (including City Gardens) was £187,056. Of this, £74,359 (40%) was over 120 days, £16,482 (9%) was between 60-120 days and £96,215 (51%) was under 60 days.
25. Appendix 5 shows a graphical representation of the total invoiced debts over 120 days outstanding, which is the maximum age of debt set by the Chamberlain to recover outstanding sums. The first graph shows the time trend of the level of 120-day debt outstanding over the previous 6-month period.

26. The reduction in debts over 120 days over the previous six months illustrated in Appendix 5 can primarily be explained by a reduction in debts owed at Epping Forest in utilities related income.
27. The lower graph in Appendix 5 analyses the split of this debt across the various Natural Environment divisions. The majority of the £74,359 outstanding debt balance relates to Epping Forest (£49,400 / 66%). This includes an amount of £21,736 owed by one individual debtor which is currently being pursued by the Comptroller & City Solicitor's department. This is in addition to £26,342 owed in various rent receivable debtors as well as £1,322 owed by numerous other small debtors.
28. The other main debt relates to Hampstead Heath, Highgate Wood and Queens Park (£16,466 / 22%). This includes £6,434 relating to an individual debtor from storage and licence fees with a Letter Before Action having been issued in relation to this debt. This is in addition to £6,406 owed by an individual debtor for rent and wayleaves which is being chased locally by staff at Hampstead Heath.
29. A further detailed debt report of all outstanding debts (not just the balance over 120 days) will be provided as per normal business practice to report periodic monitoring for Chief Officers on the level of debt arrears to Service Committees for the period ending 30 September 2023 to your Board at your meeting in December 2023.

### **Charity Funds (Restricted, Unrestricted and Endowments)**

30. Appendix 6 (Epping Forest and Commons Committee) and Appendix 7 (Hampstead Heath, Highgate Wood & Queens Park Committee; West Ham Park Committee; and Keats House) lists the various restricted, unrestricted and endowment funds held by each charity. It details the opening balance for the 2023/24 financial year and any movements up to period 3 (April-June 2023).
31. Movements within reserve funds since the start of the current financial year primarily relates to a capital receipt of £99k which was credited to the Epping Forest Fund Reserve (Capital Fund) in relation to a deed of grant easement received for an individual property. This has increased the balance held to £894,162. All other movements in reserve funds in 2023/24 to date relate to the receipt of donations income.
32. It should be noted that the external audit of the 2022/23 accounts for individual Natural Environment charities is currently taking place and the 2023/24 opening balances shown for each reserve fund in Appendix 6 and Appendix 7 may be subject to revision.
33. There are various types of restricted, unrestricted and endowment funds held by the Natural Environment charities which have different rules as to how they can be spent and time periods held. These are categorised in the following way:
  - **Restricted Income Fund** - funds have been given to a charity for application for a specific element of the charity's objects and can only be spent in accordance with the requests of the donor or the specific campaign under which funds were raised. As these are income funds they should be spent within a reasonable period of time.

- **Unrestricted Income Fund** - incoming resources that become available to a charity and can be applied by the Trustee to any of the charity's objects. Unrestricted income funds should be spent within a reasonable period of time and should not be held for the long term, although the Trustee should set a policy for the minimum required level of funds which is a target minimum to be held in case of particular identified risk. In the case of the City's Cash funded charities, the current deficit funding model means that no such minimum can be identified, as at year end the difference between income and expenditure is balanced by the deficit funding grant from City's Cash.
- **Designated (Unrestricted Income Fund)** - are those unrestricted funds which have been set aside by the Trustee for an essential spend or future purpose. Whilst there is no legal restriction on their use for general purposes, and they can be undesignated by those acting on behalf of the Trustee at any time, these funds are effectively 'ring-fenced' and no longer form part of your free reserves/general funds. Designated funds must be spent within a reasonable period of time and should not be held for the long term.
- **Endowment** - these are funds of the charity that must be invested and are to be held for the long term. There are two classes of endowment (see below):
  - **Permanent Endowment** - must be invested and held in perpetuity. These funds can either be invested to provide income to support the charity's purposes e.g. the Hampstead Heath Trust Fund. The other class of permanent endowment is a functional permanent endowment where assets must be retained and used for the charity's purposes.
  - **Expendable Endowment** - an expendable endowment fund is a fund that must be invested to produce income, but the Trustee has the power to convert all or part of it into an income fund which can then be spent.

## Deficit Funding

34. The current funding model is for each charity's total net expenditure (local risk, central risk and recharges) to be funded from City's Cash. The table below details the previous year's levels of deficit funding grant made from City's Cash to the various Natural Environment charities, with a forecast of that sum currently required for 2023/24. The projection for the current financial year is based on the forecast for local and central risk net expenditure (as at the end of June 2023) in addition to latest budgets for recharges and budgets managed by the City Surveyor. Please be aware that deficit funding figures shown for 2022/23 are currently provisional as the external audit for the individual Natural Environment charities has not yet been completed.



**Table 1 – Deficit Funding – 2019/20 to 2023/24**

	Actuals	Actuals	Actuals	Provisional	Estimate
Charity	2019/20	2020/21	2021/22	2022/23	2023/24
	£000	£000	£000	£000	£000
Ashtead Common	512	511	471	524	472
Burnham Beeches & Stoke Common	1,089	1,036	896	1,051	844
Epping Forest	5,257	5,059	4,527	4,879	5,397
West Wickham & Coulsdon	1,071	1,094	1,046	1,264	827
<b>Epping Forest and Commons</b>	<b>7,929</b>	<b>7,700</b>	<b>6,940</b>	<b>7,718</b>	<b>7,540</b>
Hampstead Heath	6,230	6,451	5,356	4,842	3,461
Highgate Wood & Queen's Park Kilburn	1,348	1,364	1,033	1,255	1,243
<b>Hampstead Heath, Highgate Wood &amp; Queen's Park</b>	<b>7,578</b>	<b>7,815</b>	<b>6,389</b>	<b>6,097</b>	<b>4,704</b>
West Ham Park	1,339	1,279	1,250	1,933	1,127
<b>West Ham Park</b>	<b>1,339</b>	<b>1,279</b>	<b>1,250</b>	<b>1,933</b>	<b>1,127</b>
Keats House	553	348	292	394	300
<b>Keats House</b>	<b>553</b>	<b>348</b>	<b>292</b>	<b>394</b>	<b>300</b>
<b>Total</b>	<b>17,399</b>	<b>17,142</b>	<b>14,871</b>	<b>16,142</b>	<b>13,671</b>

35. As can be seen from the table above, there was an increase in the total amount of deficit funding provided for the Natural Environment charities in 2022/23 compared with the previous year. This can be explained by an increase in deficit funding provided to the West Ham Park charity to fund increased capital expenditure associated with the playground project. Under the current model, deficit funding provided to each charity covers both any capital expenditure incurred during the year as well as the charity's total net revenue expenditure. The increase in deficit funding is also explained by increased expenditure incurred across the different charities as a result of the re-phasing of works on projects forming part of the Cyclical Works Programme (CWP), managed by the City Surveyor. Please note that the CWP does not form part of the City Surveyor's local risk budget and is a programme of works over multiple financial years, with any variances carried over to future financial years. The carry-over of unspent balances are reported to the Operational Property and Project Sub Committee as part of closing of accounts.
36. The current forecast for deficit funding for 2023/24 indicates a reduction in the total amount of funding being required by City's Cash to the Natural Environment charities compared with the provisional total for 2022/23. This can be explained by the one-off additional capital expenditure incurred at West Ham Park in 2022/23 noted above as well as a forecasted increase in investment income generated from the Hampstead Heath Trust Fund compared with the provisional outturn from 2022/23. The reduction in deficit funding is also explained by reduced expenditure forecast on the CWP due to the rephasing of projects.

### Other Relevant Financial Issues

37. Members may wish to note that following the implementation of the new Target Operating Model within the Natural Environment Division, local risk budgets have subsequently been amended to incorporate this new staffing structure. These

budget changes will be reflected in the Operational Finance Progress Report to the end of September 2023 (period 6) due to be presented to your Board in December 2023.

38. Please also note that Finance Committee agreed on 19<sup>th</sup> September to fund £210k in essential health & safety works on known dangerous trees at Epping Forest through City's Cash contingency monies. These monies were originally requested as a carry forward from underspends in the Environment Department's 2022/23 local risk budget but were unsuccessful.
39. In addition, Members may wish to be aware that the Chairman and Deputy of RASC agreed two carry forward bids relevant to your Board, requested following the overall underspend in the Environment Department's 2022/23 local risk revenue budget. These bids comprised £60k to support the City's Biodiversity Action Plan and £30k to support the Parliament Hill masterplan at Hampstead Heath.
40. It should also be noted that the Chairman and Deputy Chairman of RASC have also approved three central risk carry forward bids relevant to your Board from Priorities Investment Pot (PIP) and Transformation Fund monies for use in 2023/24. This comprises £61k to support the 'Licences, Leases and Wayleaves' project at Epping Forest, £6k for the 'Biodiversity net gain' project at Burnham Beeches and £4k to support an IT transformation project at City Gardens. Please note that this funding is only available until 31 March 2024. Additionally, £80k has been agreed from the Transformation Fund to assist the Environment Department in the Operational Property review.

## **Appendices**

Appendix 1 - Local Risk Revenue Budget Forecast Outturn 2023/24

Appendix 2 - Income Performance 2023/24 as @ June (period 3)

Appendix 3 - Expenditure Performance 2023/24 as @ June (period 3)

Appendix 4 – Natural Environment Capital Projects 2023/24 as @ June (period 3)

Appendix 5 - Outstanding Debt 120 Days+ as @ June 2023 (period 3)

Appendix 6 - Reserve Funds & Endowments Epping Forest & Commons Committee

Appendix 7 - Reserve Funds & Endowments Hampstead Heath, Highgate Wood and Queens Park Committee; West Ham Park Committee; and Keats House

## **Contact**

Clem Harcourt, Finance Business Partner (Natural Environment), Chamberlain's Department

E: [clem.harcourt@cityoflondon.gov.uk](mailto:clem.harcourt@cityoflondon.gov.uk)

**Natural Environment - Local Risk Revenue Budget Forecast 2023/24 - June (Period 3)**

(Expenditure and unfavourable variances are shown in brackets)

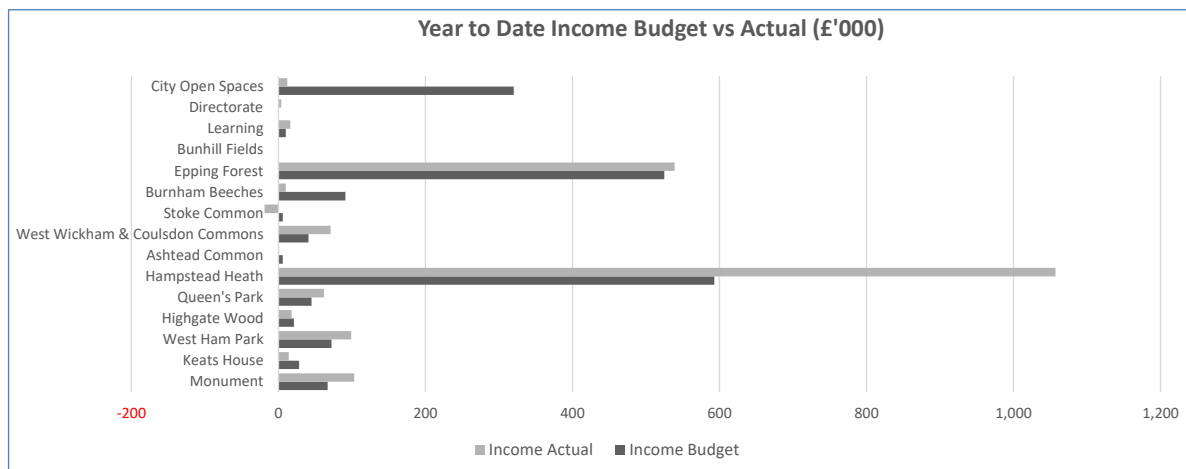
Committee / Division of Service	Latest Approved Budget 2023/24 £'000	Forecast for the Year 2023/24		Notes
		Projected Outturn £'000	Variance from Latest Approved Budget 2023/24 £'000	
<b>Natural Environment Board (City Fund)</b>				
City Open Spaces	(1,183)	(1,220)	(37)	
	(1,183)	(1,220)	(37)	
<b>Natural Environment Board (City's Cash)</b>				
Directorate	(662)	(740)	(78)	1
Learning	(370)	(372)	(2)	
Bunhill Fields	(108)	(108)	0	
	(1,140)	(1,220)	(80)	
<b>TOTAL NATURAL ENVIRONMENT BOARD</b>	<b>(2,323)</b>	<b>(2,440)</b>	<b>(117)</b>	
<b>Epping Forest and Commons Committee (City's Cash)</b>				
Epping Forest	(2,534)	(2,534)	0	
Burnham Beeches	(485)	(497)	(12)	
Stoke Common	(24)	(24)	0	
West Wickham & Coulsdon Commons	(566)	(566)	0	
Ashted Common	(396)	(370)	26	
<b>TOTAL EPPING FOREST AND COMMONS COMMITTEE</b>	<b>(4,005)</b>	<b>(3,991)</b>	<b>14</b>	
<b>Hampstead Heath, QP &amp; HW Committee (City's Cash)</b>				
Hampstead Heath	(4,105)	(3,121)	984	2
Queen's Park	(496)	(497)	(1)	
Highgate Wood	(347)	(370)	(23)	
<b>TOTAL HAMPSTEAD HEATH, QP &amp; HW COMMITTEE</b>	<b>(4,948)</b>	<b>(3,988)</b>	<b>961</b>	
<b>TOTAL WEST HAM PARK COMMITTEE</b>	<b>(639)</b>	<b>(569)</b>	<b>70</b>	3
<b>Culture, Heritage &amp; Libraries Committee (City's Cash)</b>				
Keats House	(187)	(187)	0	4
Monument	208	1	(207)	
<b>TOTAL CULTURE, HERITAGE &amp; LIBRARIES COMMITTEE</b>	<b>21</b>	<b>(186)</b>	<b>(207)</b>	
<b>TOTAL NATURAL ENVIRONMENT LOCAL RISK</b>	<b>(11,894)</b>	<b>(11,174)</b>	<b>720</b>	
<b>Local Risk Summary by Fund:</b>				
City Fund	(1,183)	(1,220)	(37)	
City's Cash	(10,711)	(9,954)	757	
<b>TOTAL NATURAL ENVIRONMENT LOCAL RISK</b>	<b>(11,894)</b>	<b>(11,174)</b>	<b>720</b>	

**Notes:**

- Directorate** - projected overspend largely due to additional staff costs being incurred as a result of staffing changes related to the new TOM2 structure.
- Hampstead Heath** - favourable variance attributable to additional income from the Lido and Ponds as a result of an increase in usage as well as upgraded facilities. This is in addition to underspends on salaries due to vacant posts and reduced expenditure on grounds maintenance costs. The projected underspend is partly offset by additional supplies and services expenditure being required in addition to lower than anticipated income being achieved from filming and licenses.
- West Ham Park** - underspend largely due to savings in employment costs as a result of vacant posts.
- Monument** - forecasted overspend attributable to unidentified savings not being fully achieved as a result of income levels not having yet returned to pre-pandemic levels.

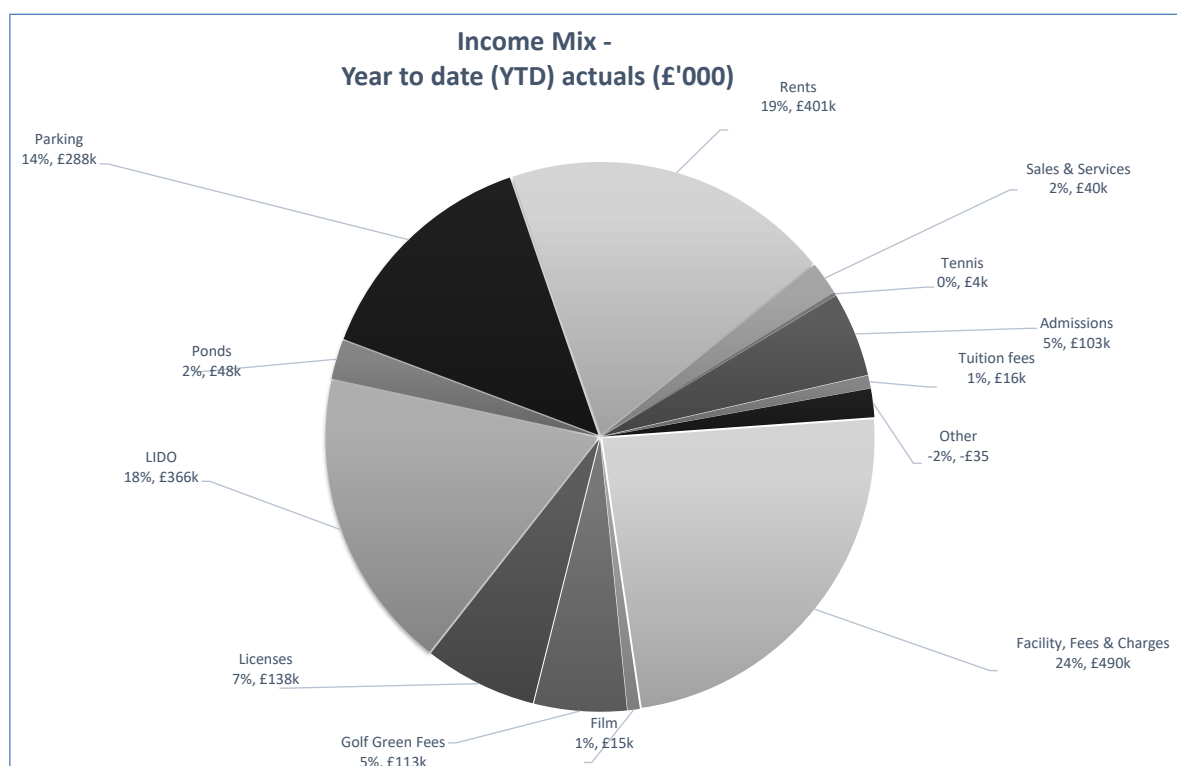
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### Natural Environment - Income Performance 2023/24 - June (Period 3)



**Notes:**

- City Open Spaces** - income to date is currently £308k behind profile due to lower than budgeted income being achieved to date from Section 106 contributions and other fees and charges.
- Burnham Beeches** - unfavourable variance to date of £81k largely explained by income from government grants accrued in 2022/23 not having yet been received.
- Hampstead Heath** - income to date is £464k ahead of profile as a result of increased usage of facilities such as the Lido and Ponds.

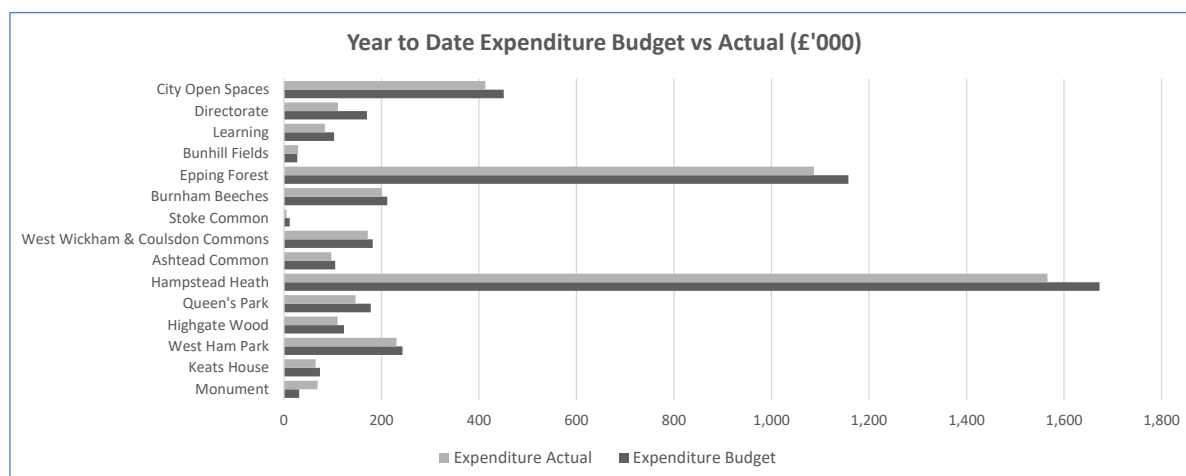


**Notes:**

- Total year to date actual income as @ June (Period 3) = £1.987m
- Other relates to donations, government grants, S106 contributions, transfer from reserves
- Fees & Charges relates to use of facilities and admissions mainly at Epping Forest.
- Sales & Services relates to various sports provided and Visitor Centre shop at Epping.
- Car Parking comprises £172k Hampstead Heath, £83k Epping Forest and £33k Burnham Beeches.

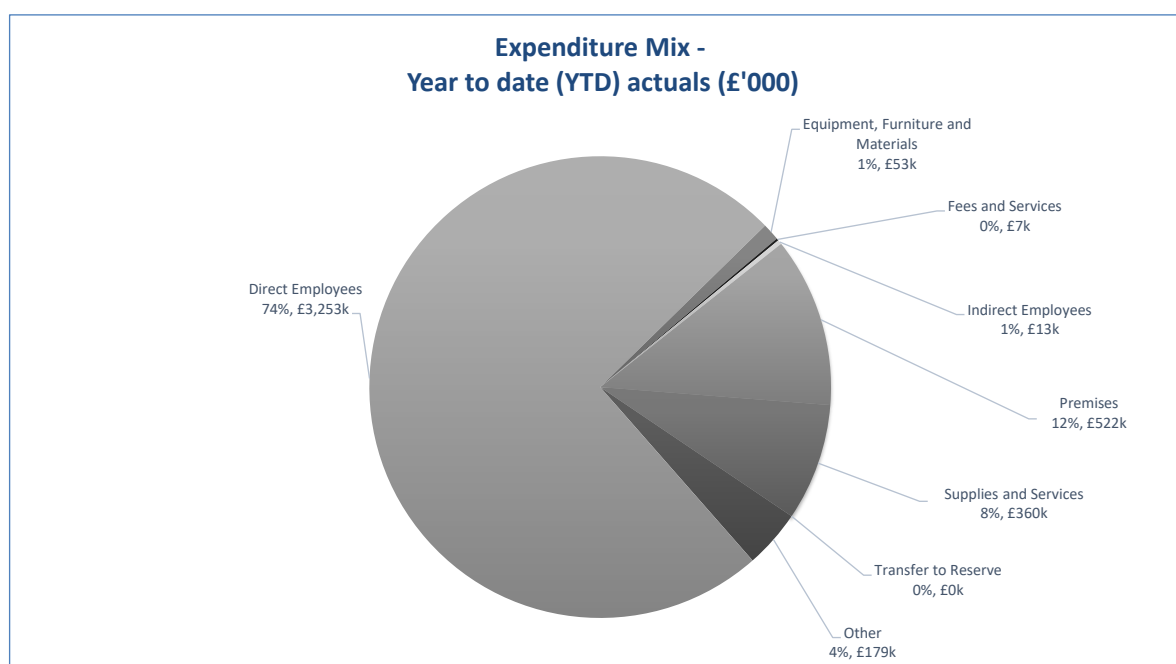
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### Natural Environment - Expenditure Performance 2023/24 - June (Period 3)



**Notes:**

- Directorate** - favourable variance to date of £59k mainly relates to internal legal fees not having yet been incurred.
- Epping Forest** - underspend to date of £71k explained by underspends in salary costs and transport expenditure.
- Hampstead Heath** - £107k underspend against profile primarily relates to lower than budgeted expenditure on salaries as a result of vacant posts.



**Notes:**

- Total year to date actual expenditure as @ June (Period 3) = £4.387m
- Premises costs mainly relate to cleaning & refuse; electricity & gas; rates; repairs & maintenance; water etc.
- Supplies & Services costs mainly relates to equipment; furniture & materials; communication & computing; livestock; professional fees & services; uniforms etc.
- Other costs mainly relate to third party payments and transport.

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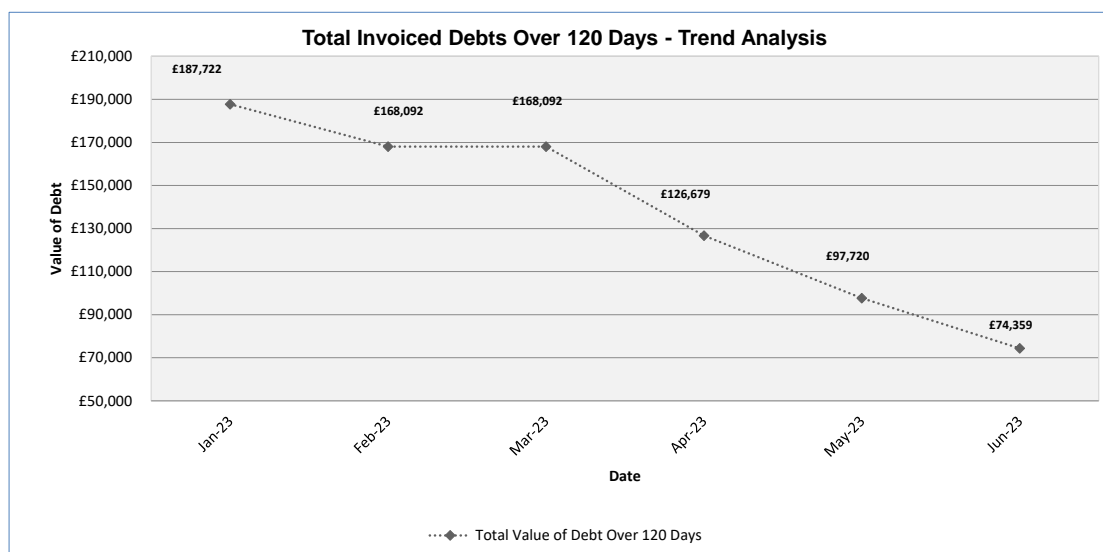
## Appendix 4

### Natural Environment - Capital Projects 2023/24 - June (Period 3)

Capital Projects by Committee	Total Estimated Cost of Project	Current Approved Budget	Prior Year Actual Spend	In Year Actual Expenditure	In Year Committed Expenditure	Current Approved Budget Unspent
	£'s	£'s	£'s	£'s	£'s	£'s
<b><u>Natural Environment Board</u></b>						
Finsbury Circus Reinstatement	5,393,704	5,398,979	671,541	4,400	3,754,681	968,357
St Botolph Ball Court Improvements	171,744	130,000	85,744	0	0	44,256
St Mary At Hill Churchyard	602,816	470,622	135,129	0	0	335,493
Tower Hill Play Area Replacement Project	245,000	16,000	0	0	0	16,000
	<b>6,413,264</b>	<b>6,015,601</b>	<b>892,415</b>	<b>4,400</b>	<b>3,754,681</b>	<b>1,364,105</b>
<b><u>Epping Forest &amp; Commons</u></b>						
Artificial Grass Pitch Provision at Wanstead Flats	10,000,000	70,000	41,426	0	0	28,574
Climate Action Strategy - Carbon Removals Year 1	2,596,924	504,905	132,676	573	0	371,656
Epping Forest - COVID-19 Path Restoration Project	250,000	0	0	0	0	0
Wanstead Park Ponds Project	1,142,501	241,000	166,180	0	0	74,820
Baldwins & Birch Hall Park Ponds	1,760,018	502,600	233,644	0	2,491	266,465
	<b>15,749,443</b>	<b>1,318,505</b>	<b>573,926</b>	<b>573</b>	<b>2,491</b>	<b>741,515</b>
<b><u>Hampstead Heath, Highgate Wood and Queens Park</u></b>						
Hampstead Heath - Parliament Hill Athletics Track Resurfacing	1,999,686	1,999,686	587,297	138,025	1,017,917	256,447
Hampstead Heath Swimming Facilities - Safety, Access & Security Impr.	1,005,564	1,010,564	287,950	104,222	524,089	94,303
Queens Park Sandpit Refurb & Toilet Rebuild	14,000	14,000	0	0	0	14,000
	<b>3,019,250</b>	<b>3,024,250</b>	<b>875,248</b>	<b>242,247</b>	<b>1,542,005</b>	<b>364,750</b>
<b><u>West Ham Park</u></b>						
West Ham Park Nursery	337,048	337,035	249,751	(22,976)	0	110,260
West Ham Park Playground	1,053,977	1,007,519	891,970	0	25,000	90,549
	<b>1,391,025</b>	<b>1,344,554</b>	<b>1,141,721</b>	<b>(22,976)</b>	<b>25,000</b>	<b>200,809</b>
<b><u>Natural Environment Total</u></b>	<b>26,572,982</b>	<b>11,702,910</b>	<b>3,483,310</b>	<b>224,244</b>	<b>5,324,177</b>	<b>2,671,179</b>

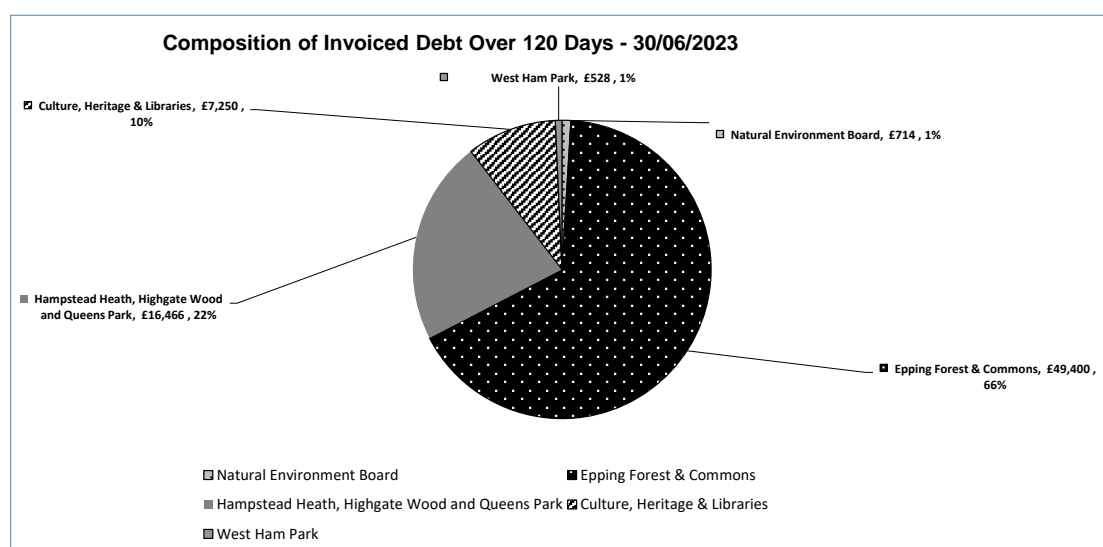
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### Natural Environment - Outstanding Invoiced Debts Over 120 Days - June (Period 3)



**Note:**

1. June total debt over 120 days is £74,359, a decrease of £23,361 from the May debt position. The majority of this debt relates to Epping Forest & Commons (£49,400 / 66%).



**Breakdown of Epping Forest and Commons debt £49,400**

1. £26,342 - Rent Receivables (Lease Agreements)
2. £21,736 – Chingford Festival Chingford Plain
3. £1,322- Numerous other small debtors

**Breakdown of Culture, Heritage and Libraries debt £7,250**

2x individual debtors relating to unpaid invoices for room hire at Keats House amounting to £3,722 and £3,528 respectively.

**Breakdown of Hampstead Heath, Highgate Wood & Queens Park debt £16,466**

1. £6,434 - individual debtor relating to storage and licence fees
1. £6,406 - individual debtor relating to rent and wayleaves
3. £1,008 - filming
4. £2,618- numerous other small debtors

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**Charity Funds (Restricted, Unrestricted and Endowments) - June 2023 (Period 3)**

	Opening Balance 2023/24 £'s	Income £'s	Expenditure £'s	Gains, (Losses) & Transfers £'s	Closing Balance 2023/24 £'s
<b><u>Epping Forest</u></b>					
<b>Restricted Income Funds:</b>					
Campaign Donations	785				785
Countryside Stewardship Scheme	251,147				251,147
<b>Unrestricted Income Funds:</b>					
Unrestricted Income Funds	6,109	3,126			9,235
<b>Designated (Unrestricted Income Fund):</b>					
Tangible Fixed Assets (Land & Buildings, Infrastructure, Vehicle & Plant, and Equipment)	4,619,544				4,619,544
Heritage Assets	377,950				377,950
Epping Forest Fund Reserve (Capital Fund)	795,162	99,000			894,162
Ancient Trees Maintenance Fund	15,000				15,000
Sports Ground Deposit	4,061				4,061
Golf Course Machinery Fund	12,717				12,717
Knighton Wood Maintenance	5,801				5,801
Branching Out Project	42,423				42,423
Future Green Infrastructure fund	5,051				5,051
Cattle Purchase Fund (Grazing Account)	152,788				152,788
Wanstead Park/ Flats future Projects fund	100,000				100,000
South Lodge the Warren (Loughton Golf Course)	496,800				496,800
<b>Total Epping Forest</b>	<b>6,885,339</b>	<b>102,126</b>	<b>0</b>	<b>0</b>	<b>6,987,464</b>
<b><u>Burnham Beeches</u></b>					
<b>Restricted Income Funds:</b>					
Legacy Income - Pond Maintenance	60,014				60,014
Campaign Donations	6,228				6,228
Section 106 Contributions	721,310				721,310
<b>Unrestricted Income Funds:</b>					
Unrestricted Income Funds	2,268	187			2,455
<b>Designated (Unrestricted Income Fund):</b>					
Stoke Common	132,586				132,586
Capital Adjustment Account (Fixed Assets)	470,086				470,086
Infrastructure (Fixed Assets)	137,725				137,725
Furniture and Equipment (Fixed Assets)	232,487				232,487
Plant (Fixed Assets)	50,000				50,000
<b>Total Burnham Beeches</b>	<b>1,812,704</b>	<b>187</b>	<b>0</b>	<b>0</b>	<b>1,812,891</b>
<b><u>West Wickham &amp; Coulsdon Commons</u></b>					
<b>Restricted Income Funds:</b>					
Campaign Donations - Farthing Downs	2,524				2,524
<b>Unrestricted Income Funds:</b>					
General Funds	3,272	847			4,119
<b>Designated (Unrestricted Income Fund):</b>					
Capital Reserve Funds	570,809				570,809
<b>Total West Wickham &amp; Coulsdon Commons</b>	<b>576,605</b>	<b>847</b>	<b>0</b>	<b>0</b>	<b>577,452</b>
<b><u>Ashtead Common</u></b>					
<b>Designated (Unrestricted Income Fund):</b>					
Ancient Trees Reserve	1,660	0	0	0	1,660
<b>Total Ashtead Common</b>	<b>1,660</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,660</b>
<b>Total Epping Forest and Commons Committee</b>	<b>9,276,308</b>	<b>103,160</b>	<b>0</b>	<b>0</b>	<b>9,379,467</b>

**Note:**

The various sub-totals shown above should not give the impression that the individual funds held by each individual charity can be either consolidated or cross-utilised. It is key that individual charity funds are not viewed as available to be 'offset' against each other, bearing in mind the different objects held.

Please note that the external audit of the 2022/23 charity accounts is currently taking place and the above opening balances shown for each reserve fund are subject to revision.

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**Charity Funds (Restricted, Unrestricted and Endowments) - June (Period 3)**

	Opening Balance 2023/24 £'s	Income £'s	Expenditure £'s	Gains, (Losses) & Transfers £'s	Closing Balance 2023/24 £'s
<b>Hampstead Heath, Highgate Wood and Queens Park Committee</b>					
<b><u>Hampstead Heath</u></b>					
<b>Restricted Income Funds:</b>					
Campaign Donations	18,096				18,096
Parliament Hill Outdoor Gym	2,233				2,233
Installation of Non-Turf Pitches	46,845				46,845
<b>Unrestricted Income Funds:</b>					
General Funds	3,818				3,818
<b>Designated (Unrestricted Income Fund):</b>					
Tangible Fixed Assets (Buildings, Infrastructure & Equipment)	19,463,442				19,463,442
Capital Fund	3,331				3,331
<b>Total Hampstead Heath</b>	<b>19,537,765</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>19,537,765</b>
<b><u>Hampstead Heath Trust Fund</u></b>					
<b>Permanent Endowment</b>	34,204,048				34,204,048
<b>Expendable Endowment</b>	769,264				769,264
<b>Unrestricted Income Funds:</b>					
General Funds	730,810				730,810
<b>Total Hampstead Heath Trust Fund</b>	<b>35,704,122</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35,704,122</b>
<b><u>Highgate Wood and Queen's Park</u></b>					
<b>Restricted Income Funds:</b>					
Campaign Donations - Sandpit & Playground Improvements	14,754				14,754
<b>Unrestricted Income Funds:</b>					
General Funds	169,582				169,582
<b>Designated (Unrestricted Income Fund):</b>					
Tangible Fixed Assets (Land, Buildings and Infrastructure)	120,059				120,059
<b>Total Highgate Wood and Queen's Park</b>	<b>304,395</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>304,395</b>
<b>Total Hampstead Heath, Highgate Wood and Queens Park Committee</b>	<b>55,546,282</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>55,546,282</b>
<b><u>West Ham Park Committee</u></b>					
<b>Restricted Income Funds:</b>					
Campaign Donations - Playground Refurbishment Project	1,481				1,481
<b>Designated (Unrestricted Income Fund):</b>					
Tangible Fixed Assets (Equipment)	954,091				954,091
<b>Unrestricted Income Funds:</b>					
General Funds	0				0
<b>Total West Ham Park</b>	<b>955,572</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>955,572</b>
<b>Total West Ham Park Committee</b>	<b>955,572</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>955,572</b>
<b><u>Culture, Heritage &amp; Libraries Committee (Keats House)</u></b>					
<b>Restricted Income Funds:</b>					
Heritage Assets - Keats Lover Letter & Watercolour	101,423				101,423
Grant Funding	12,569				12,569
<b>Unrestricted Income Funds:</b>					
General Funds	166,585	5			166,590
<b>Designated (Unrestricted Income Fund):</b>					
Tangible Fixed Assets (Plant & Equipment)	53,478				53,478
<b>Total Keats House</b>	<b>334,055</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>334,060</b>
<b>Total Culture, Heritage &amp; Libraries Committee (Keats House)</b>	<b>334,055</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>334,060</b>

**Note:**

The various sub-totals shown within Appendix 7 should not give the impression that the individual funds held by each individual charity can be either consolidated or cross-utilised. It is key that individual charity funds are not viewed as available to be 'offset' against each other, bearing in mind the different objects held.

Please note that the external audit of the 2022/23 charity accounts is currently taking place and the above opening balances shown for each reserve fund are subject to revision.

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<b>Committee:</b> Natural Environment Board – For Decision	<b>Dated:</b> 16 Oct 2023
<b>Subject:</b> Bunhill Fields Combined Management Plan	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1/2/4/11/12
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	
<b>Report of: Bob Roberts, Interim Executive Director Environment</b>	<b>For Decision</b>
<b>Report author: Jake Tibbetts - Environment</b>	

## Summary

Bunhill Fields is a very important site historically and environmentally and provides an important resource to the local community around it. A Conservation Management Plan (CMP) was developed in 2020 through consultation with key stakeholder, this provides guidance for the site’s custodians through appropriate conservation, regeneration and ecological management.

## Recommendation(s)

Members are asked to:

- Endorse the Bunhill Fields Burial Ground Conservation Management Plan as a resource to guide management, and to enable the development of a City Gardens operational plan.

## Main Report

### Background

1. Bunhill Fields Burial Ground is England’s foremost non-conformist burial ground. Although located within the London Borough of Islington, it is owned and managed by City of London Corporation. The burial ground survives as 1.6 hectares (3.5 acres) of tranquil public memorial garden on the fringe of the City of London.

2. Its importance is recognised by multiple designations. It is located within the Bunhill Fields / Finsbury Square Conservation Area and included at Grade I on the Register of Historic Parks and Gardens. There are numerous listed structures (8 list entries at Grade II\* and 68 list entries at Grade II, including the boundary walls and railings). The site is also listed as a Site of Borough Importance for Nature Conservation (SBINC). In addition to its heritage and ecological value, the burial ground is a highly-valued amenity for local residents, City workers and other local interest groups.
3. First enclosed in 1665, the current layout of Bunhill Fields Burial Ground was developed in two main phases. The first of these was in the 1860s, when the City of London improved the site. This involved laying out paths, undertaking tree planting and carrying out work to the tombs. In the 1960s the northern part of the site was re-designed as a public garden by Sir Peter Shepherd, one of the foremost landscape architects of the period. The southern area remains dominated by the memorials, fenced off from public access by metal railings.
4. The burial ground contains 2,333 monuments, mostly simple headstones, of which there are 1,920, arranged in a grid formation. Many of the graves are packed closely together, giving an idea of how London's burial places looked before large cemeteries further from the centre of London opened from the 1830s onwards. At the time of closing of this ground in 1852 more than 120,000 bodies had been interred there.
5. Bunhill Fields is the largest public greenspace site within the electoral ward of Bunhill within Islington, providing an important natural resource to the local community. It has rich biodiversity and the site is managed with the help of local volunteers.
6. Purcell were commissioned in November 2019 to liaise with key stakeholders and prepare a review of the CMP for Bunhill Fields Burial Ground. The production of the CMP was overseen by its Project Board, which included representatives of the City Gardens Team, and the Heritage Estate Section (City Surveyor's Department), but also key external stakeholders: Greater London Archaeological Advisory Service, Historic England, London Borough of Islington, Friends of City Gardens, City of London Guides, London Parks & Gardens Trust, London Wildlife Trust, Natural England, The Blake Society, The Lyceum School.

## **Current Position**

7. Bunhill Fields Burial Ground: Conservation Management Plan (CMP) is provided in full, at Appendix 1 and outlined below.
8. The aim of producing the CMP was to provide guidance for the site's custodians through appropriate conservation, regeneration and ecological management over the coming years. It is envisaged to be primarily an internal document, which will benefit those involved with managing the site and planning proposals for change.
9. The purpose of the CMP is to:

- a. Act as a convenient and accessible repository of information about the site's history and development
- b. Provide a balanced assessment of the cultural significance of the site – encompassing its heritage interests, ecological value and public amenity - which will underpin future decisions about change.
- c. Develop a consensus amongst stakeholders about the significance of the site
- d. Guide the future conservation, management and maintenance of the burial ground
- e. Provide guidance for the management team for the next ten years
- f. Suggest actions and projects that the City of London could take forward to meet its vision for the site
- g. Help to clarify consent procedures for works to listed buildings and protected trees.
- h. The scope of the CMP is the entirety of Bunhill Fields Burial Ground. This includes:
  - built fabric: memorials, walls, railings and gates, paths; buildings and site furniture and signage;
  - natural landscape: trees, lawn, shrubberies

## **Options**

- 10. Endorse the CMP which provides a framework and guidance on the management and conservation of Bunhill Fields.

## **Proposals**

- 11. Volume 1 of the Conservation Management Plan (CMP) sets out the site's chronological development in Section 2. Section 3 assesses what is significant about it in terms of its fabric, history, associations, layout, communal value, ecological significance and historic use. For the purposes of this assessment the site is divided into a number of character areas. Section 4 identifies Issues and opportunities for each of these areas. These underpin heritage policies in Section 5 of the CMP. Section 6 and Section 7 contain an Action Plan and a Maintenance Plan, respectively.
- 12. The Gazetteer in Volume Two provides more detailed information about each of the character areas, including the four burial enclosures, the public garden, pathways and boundary walls.
- 13. This Conservation Management Plan puts forward a vision for the burial ground that would, if adopted:
  - a. conserve its essential character as a rare surviving inner-city burial ground with unsurpassed evidence for the cramped appearance of Georgian metropolitan burial grounds
  - b. interpret its role as the pre-eminent historic non-conformist burial ground in England
  - c. enhance its ecological potential whilst respecting the essential aesthetic qualities of the site

- d. balance the various significances it holds – both ecological and heritage
  - e. enhance public access and experience without disturbing the tranquillity of the site
  - f. provide an amenity which is safe, resilient and well maintained.
14. The CMP provides a management plan which City Gardens can implement in conjunction with the Friends of City Gardens.
15. Once adopted City Surveyors and City Gardens can use the CMP to seek funding to achieve aims set in the Action Plan. The annual Cyclical Works Programme (CWP) bidding provides an opportunity for several of the actions to be considered for future funding.
16. The CMP lists opportunities which are categorised into seven key headings:
- Access & interpretation
  - Buildings & monuments
  - Landscape design
  - Archaeology
  - Ecology & wildlife
  - Management & resources
  - Sustainability
17. Within the CMP there is an action plan, which for the purposes of this report is informative. Once the CMP is adopted officers will focus on prioritising these actions and together with the identified maintenance activities, will build a sustainable funding strategy to sit alongside the plan to facilitate its long-term implementation. The funding strategy should highlight the various potential funding streams be it existing budgets, CWP, CIL, capital bids or external sources.
18. Of the 27 actions three are categorised as essential these being:
- B5 Monument repairs and conservation
  - C1 Structural survey of the central east-west path
  - C2 Repairs to the paths within the enclosures
19. The £123,000 of funding for B5 has been secured through the CWP and is currently ongoing. A further commitment of 50k per annum is detailed in the forward maintenance plans addressing the on-going planned conservation works of monuments and will be subject to a bid to the CWP at the appropriate time.
20. A CWP bidding request of 70k has been made across the next three financial years to address investigations and repair work noted under action C1.
21. Another CWP funding bid in the sum of 40k in financial year 24/25 has been made to address path repairs with the enclosures (Action C2).
22. The bidding requests for C1 & C2 are still subject to committee approval and funding being confirmed.

23. In total there are current bids in the CWP totalling 540k over the next three years for Bunhill Fields.

## **Corporate & Strategic Implications**

### Strategic implications

24. The Bunhill Fields CMP aligns clearly with the following objectives:

*4. Communities are cohesive and have the facilities they need.*

*11. We have clean air, land and water and a thriving and sustainable natural environment.*

*12. Our spaces are secure, resilient and well-maintained*

### Financial implications

25. The annual CWP bidding provides an opportunity for a number of the actions arisen from the CMP to be considered for future funding.

26. Therefore, works resulting from the site's statutory protection and need to manage health and safety, must be captured in the prioritisation exercise undertaken for the whole CWP which is carried out annually.

### Resource implications

27. The site is managed by the city Gardens team with the assistance of the Friends of City Gardens. Any objectives within the CMP that would require additional resource to deliver will be factored into the relevant funding bid.

### Legal implications

28. Currently, the owners of listed buildings are under no legal obligation to maintain their property in a good state of repair, even though it is in their interests to do so. Local planning authorities and Historic England can, however, take action to secure repair when it becomes evident that a building is being allowed to deteriorate.

### Risk implications

29. If the CMP is not implemented and appropriate maintenance work is not carried out, the Burial Ground will inevitably deteriorate which may lead to increased H&S concerns and repair costs, as well as reputational risk to the CoL.

### Equalities implications –

30. Whilst the CMP outlines the need for improvement in signage and details improvements that can be made, such as accessible paths that will make the site more accessible to all.

### Climate implications

31. Extreme weather events will continue to impact on heritage assets particularly those that are within open spaces, landscapes, highways, parks, and gardens –

like Bunhill Fields Burial Ground. Hence it is critical to have these sites cyclically surveyed and appropriately maintained.

32. Green infrastructure improvements that will be carried out in line with the CMP will be climate resilient and the tree strategy will consider the climate resilience of the current tree stock and how it can be improved.

Security implications - None

## **Conclusion**

33. Bunhill Fields is a very important site historically and environmentally and provides an important resource to the community around it.

34. The CMP prepared by Purcell, in consultation with key stakeholders, draws together an extensive body of research and identified a medium-term strategy that could with the correct fundraising strategy provide guidance for the site's custodians through appropriate conservation, regeneration and ecological management, and therefore "Protect, curate and promote world-class heritage assets' as per the Corporate Plan.

35. It is therefore proposed that the plan be adopted as a resource to guide the investment decisions and fundraising planning of the site.

## **Appendices**

Appendix 1 – Bunhill CMP Volume1

### **Jake Tibbetts**

City Gardens Manager – Environment Department

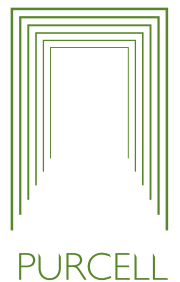
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BUNHILL FIELDS BURIAL GROUND  
**VOLUME ONE: CONSERVATION MANAGEMENT PLAN**  
 FINAL ISSUE - NOVEMBER 2020





## **WILL HOLBOROW**

On behalf of Purcell ®

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**PURCELL**

240227

All survey photos in this report were taken by Purcell in November 2019 except where indicated otherwise

First Draft - Issue 01  
March 2020, City of London

Second Draft - Issue 02  
May 2020, City of London

Final Draft - Issue 03  
July 2020, City of London

Final Draft - Issue 04  
September 2020, City of London

Final Draft - Issue 05  
November 2020, City of London

### **USING THIS DOCUMENT**

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Within the text, references to other sections can be clicked on to navigate to the relevant section.

Clicking the 'Contents' button will return you to the contents page.

Clicking the 'back' button will return you to the page you were previously viewing.

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## EXECUTIVE SUMMARY

Bunhill Fields Burial Ground is England's foremost non-conformist burial ground. Although located within the London Borough of Islington, it is owned and managed by City of London Corporation. The burial ground survives as 1.6 hectares (3.5 acres) of tranquil public memorial garden on the fringe of the City of London. Its importance is recognised by multiple designations. It is located within the Bunhill Fields / Finsbury Square Conservation Area and included at Grade I on the Register of Historic Parks and Gardens. There are numerous listed structures (8 list entries at Grade II\* and 68 list entries at Grade II, including the boundary walls and railings). The site is also listed as a Site of Borough Importance for Nature Conservation (SBINC). In addition to its heritage and ecological value, the burial ground is a highly-valued amenity for local residents, City workers and other local interest groups.

First enclosed in 1665, the current layout of Bunhill Fields Burial Ground was developed in two main phases. The first of these was in the 1860s, when the City of London improved the site. This involved laying out paths, undertaking tree planting and carrying out work to the tombs. In the 1960s the northern part of the site was re-designed as a public garden by Sir Peter Shepherd, one of the foremost landscape architects of the period. The southern area remains dominated by the memorials, fenced off from public access by metal railings.

The burial ground contains 2,333 monuments, mostly simple headstones, of which there are 1,920, arranged in a grid formation. Many of the graves are packed closely together, giving an idea of how London's burial places looked before large cemeteries further from the centre of London opened from the 1830s onwards. At the time of closing of this ground in 1852 more than 120,000 bodies had been interred there.

The Conservation Management Plan (CMP) sets out the site's chronological development in [Section 2](#). [Section 3](#) assesses what is significant about it in terms of its fabric, history, associations, layout, communal value, ecological significance and historic use. For the purposes of this assessment the site is divided into a number of character areas. [Section 4](#) identifies Issues and opportunities for each of these areas. These underpin heritage policies in [Section 5](#) of the CMP. [Section 6](#) and [Section 7](#) contain an Action Plan and a Maintenance Plan, respectively.

The Gazetteer in Volume Two provides more detailed information about each of the character areas, including the four burial enclosures, the public garden, pathways and boundary walls.

The CMP seeks to guide the site's custodians through appropriate conservation, regeneration and ecological management over the coming years.

It is envisaged to be primarily an internal document, which will benefit those involved with managing the site and planning proposals for change.

### VISION FOR BUNHILL FIELDS BURIAL GROUND

This Conservation Management Plan puts forward a vision for the burial ground that would, if adopted:

- conserve its essential character as a rare surviving inner-city burial ground with unsurpassed evidence for the cramped appearance of Georgian metropolitan burial grounds
- interpret its role as the pre-eminent historic non-conformist burial ground in England
- enhance its ecological potential whilst respecting the essential aesthetic qualities of the site
- balance the various significances it holds – both ecological and heritage
- enhance public access and experience without disturbing the tranquillity of the site
- provide an amenity which is safe, resilient and well maintained.

## SECTION 1.0

### INTRODUCTION

#### 1.1 COMMISSIONING AND AUTHORSHIP

This Conservation Management Plan (CMP) has been commissioned by the City of London Corporation. The brief was prepared by the Development Management and Heritage Estate Section of the City of London, represented by Susana Barreto, and the City Gardens Team, represented by Jake Tibbetts, Stephen Leaman and Madhur Gurjar. It has been written by Purcell as lead consultant with contributions from Greengage (Ecology) and Jane Toplis Associates (Access Consultant). It supersedes an earlier CMP for Bunhill Fields Burial Ground which was prepared in 2006 by Land Use Consultants to support a grant application to the Heritage Lottery Fund (HLF).

The CMP has been written by a team of heritage consultants and architects at Purcell: Jhilmil Kishore (Heritage Consultant), Brillianna Harley (Assistant Heritage Consultant), Katharine Barber (Associate), Will Holborow (Associate) and Toby Massawe (Architect).

#### 1.2 PURPOSE AND SCOPE

The purpose of the CMP is to:

- Act as a convenient and accessible repository of information about the site's history and development
- Provide a balanced assessment of the cultural significance of the site – encompassing its heritage interests, ecological value and public amenity - which will underpin future decisions about change
- Develop a consensus amongst stakeholders about the significance of the site
- Guide the future conservation, management and maintenance of the burial ground
- Provide guidance for the management team for the next ten years
- Suggest actions and projects that the City of London could take forward to meet its vision for the site
- Help to clarify consent procedures for works to listed buildings and protected trees.

The scope of the CMP is the entirety of Bunhill Fields Burial Ground. This includes:

- built fabric: memorials, walls, railings and gates, paths; buildings and site furniture and signage;
- natural landscape: trees, lawn, shrubberies

#### 1.3 SITE MANAGEMENT

The site is managed by the City of London Corporation and maintained by managers and gardeners of the City Gardens Open Spaces Department. The City Surveyors Department is responsible for the built environment and is also responsible to look after and maintain the burial ground.

Friends of City Gardens is a community group based in the City; their volunteers have been given access to the west enclosure, which they maintain as a 'Woodland Wildlife Area'.

## 1.4 EXISTING INFORMATION AND RESOURCES

A list of sources used in the preparation of this CMP can be found in Appendix A: Bibliography.

Three documents of particular relevance are:

- *Conservation Management Plan*, Land Use Consultants, 2006
- *Re-Imagining Bone-Hill, Feasibility Study*, City Garden and London Borough of Islington, Aug 2018
- *Bunhill fields Burial Ground Management Plan 2015-2020*, City Gardens, May 2015

Archival research was undertaken at the London Metropolitan Archives, London, and drawings and documents held at City of London Corporation offices were also consulted. Desk-based research involved a study of secondary literature relating to the site, including a pamphlet by Susan Easton Black as well as more general architectural guides such as Pevsner's North London.

Further detailed information has been gleaned from numerous unpublished reports provided by the City of London including reports by conservation consultants, engineers and archaeologists.

## 1.5 CONSULTATION

The production of the Conservation Management Plan has been overseen by the Project Board. This Board includes representatives of the City Gardens Team within Open Spaces, who manage the landscape, and the Heritage Estate Section (City Surveyor's Department) who are responsible for looking after the heritage assets. The individual representatives were:

Susana Barreto	Heritage Estate Officer (City Surveyor's Department)
Julian Kverndal	Senior Heritage Estate Officer (City Surveyor's Department)
Jake Tibbetts	Open Spaces City Gardens Manager (City Gardens)
Stephen Leaman	Open Spaces Project Support Officer (City Gardens)
Madhur Gurjar	Open Spaces Project Manager (Public Realm)
Mark Eyre	City Surveyor's Department – Asset Management
Matthew Wong	City Surveyor's Department – Operations Group

Comments on the first draft of the CMP were received from:

- Susana Barreto, City of London
- Julian Kverndal, City of London
- Jake Tibbetts, City of London
- Stephen Leaman, City of London
- Madhu Gurjar, City of London
- Mark Eyre, City of London
- Laura O'Gorman, Greater London Archaeological Advisory Service
- Christopher Laine, Historic England
- Rachel Godden, London Borough of Islington
- Jake Motley, Sally Strachey Historic Conservation
- Sarah Hudson, Volunteers at the Burial Ground
- Sandra Lea, City of London Guides
- Rose Wakelin, London Parks & Gardens Trust

Other interest groups which were consulted but did not provide comments:

- London Wildlife Trust
- Natural England
- The Blake Society
- The Lyceum School

## 1.6 ABBREVIATIONS

<b>CG</b>	City Gardens
<b>CoL</b>	City of London Corporation
<b>CMP</b>	Conservation Management Plan
<b>EMP</b>	Ecological Management Plan
<b>FoCG</b>	Friends of City Gardens
<b>GIS</b>	Geographical Information System
<b>GLAAS</b>	Greater London Archaeological Advisory Service
<b>GLHER</b>	Greater London Historic Environment Record
<b>HE</b>	Historic England
<b>LB</b>	London Borough of Islington
<b>MA</b>	London Metropolitan Archives
<b>NLF</b>	National Lottery Heritage Fund
<b>NPPF</b>	National Planning Policy Framework

## 1.7 GLOSSARY OF TERMS

**Built Fabric:** A building, structure or man-made feature, whether above or below ground, or the component parts e.g. brick, stone, mortar.

**Burial Ground/Cemetery:** A large burial ground is often also referred to as a cemetery, typically not associated with a church.

**Conservation:** The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

**Conservation Area:** An area of special architectural or historic interest, the character of which is desirable to preserve or enhance. Bunhill Fields Burial Ground is located within Bunhill Fields / Finsbury Square Conservation Area.

**Heritage Asset:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

**Listed Building:** A building or structure which has statutory recognition for its special architectural or historic interest. Listed buildings are graded at Grade I (exceptional interest) Grade II\* (particularly important, of more than special interest) and Grade II (special interest). Over 90% of listed buildings are listed at Grade II.

**Maintenance:** Routine work regularly necessary to keep the fabric of a place in good order.

**Registered Park and Garden:** A designed landscape included in Historic England's Register of Historic Parks and Gardens.

**Setting:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

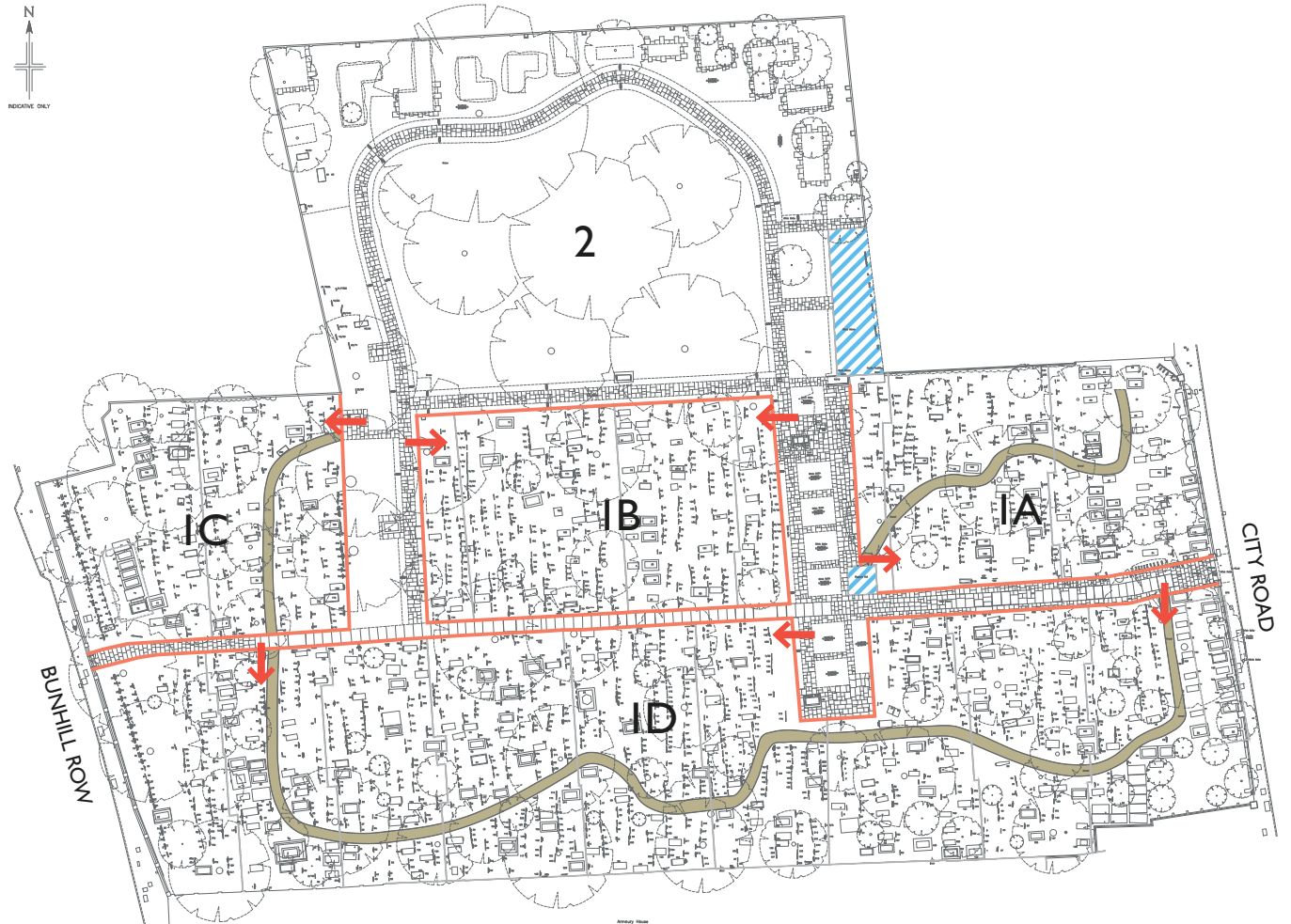
**Significance (or Heritage Significance):** The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

## SECTION 2.0





### UNDERSTANDING THE BURIAL GROUND

#### 2.1 LOCATION AND CONTEXT

Bunhill Fields Burial Ground is located in the London Borough of Islington at 38 City Road, London EC1Y 2BG. It lies between Bunhill Row on its west side and the City Road on its east side. It is approximately 200 metres to the south of Old Street underground station. Although it is in Islington, the site is close to the London Borough of Hackney (to the east) and the City of London (to the south).



#### SITE LOCATION PLAN

- Page 82
-  Access gates to enclosed areas
  -  Metal Railings to demarcate various enclosures from public paths
  -  Paths within the enclosures
  -  Buildings

#### CHARACTER AREAS

- IA East Enclosure
- IB Middle Enclosure
- IC West Enclosure
- ID South Enclosure
- 2 The Garden of Rest

*This plan is not to scale*

## UNDERSTANDING THE BURIAL GROUND

Within the immediate vicinity of the site are a number of listed buildings and structures. To the south of the site is Armoury House (Grade II\*), Headquarters of the Honourable Artillery Company, and Finsbury Barracks and attached railings (Grade II). To the east of City Road opposite the entrance to Bunhill Fields is a cluster of listed items around Wesley's Chapel:

- Wesley's Chapel (Grade I)
- John Wesley's House and Attached Railings (Grade I)
- The Manse (Grade II)
- Chapel Keeper's House (Grade II)
- Benson Building, Abutting Wesley's Chapel (Grade II)
- Statue of John Wesley in the Forecourt of Wesley's Chapel (Grade II)
- Entrance Gates to Wesley's Chapel (Grade II)
- Gates to John Wesley's House (Grade II)
- Memorial to Susannah Wesley In The Forecourt (Grade II)

Since the previous CMP (2006) there have been several large residential developments bordering on the northern half of the site. There has been considerably controversy regarding the scale of these developments and their impact on the setting of the burial ground. At the same time, the buildings which they have replaced were post-Second World War developments of poor or indifferent architectural quality.

Lexington Apartments. This 12-storey building on City Road stands immediately adjacent to the site. It was formerly used as offices before being reclad and converted to residential use. It was described by the Planning Inspector in the appeal decision for the former Moorfields Primary School as 'An intrusive and incoherent element in the townscape'. Islington Council stated in a letter of 2016 to the Greater London Authority regarding development on the Monmouth House site: 'The building [Lexington Apartments] has an overbearing effect on the Burial Ground as it interrupts views of the sky compromising the sense of openness and reprieve from the built environment that the rest of the Burial Ground enjoys.'

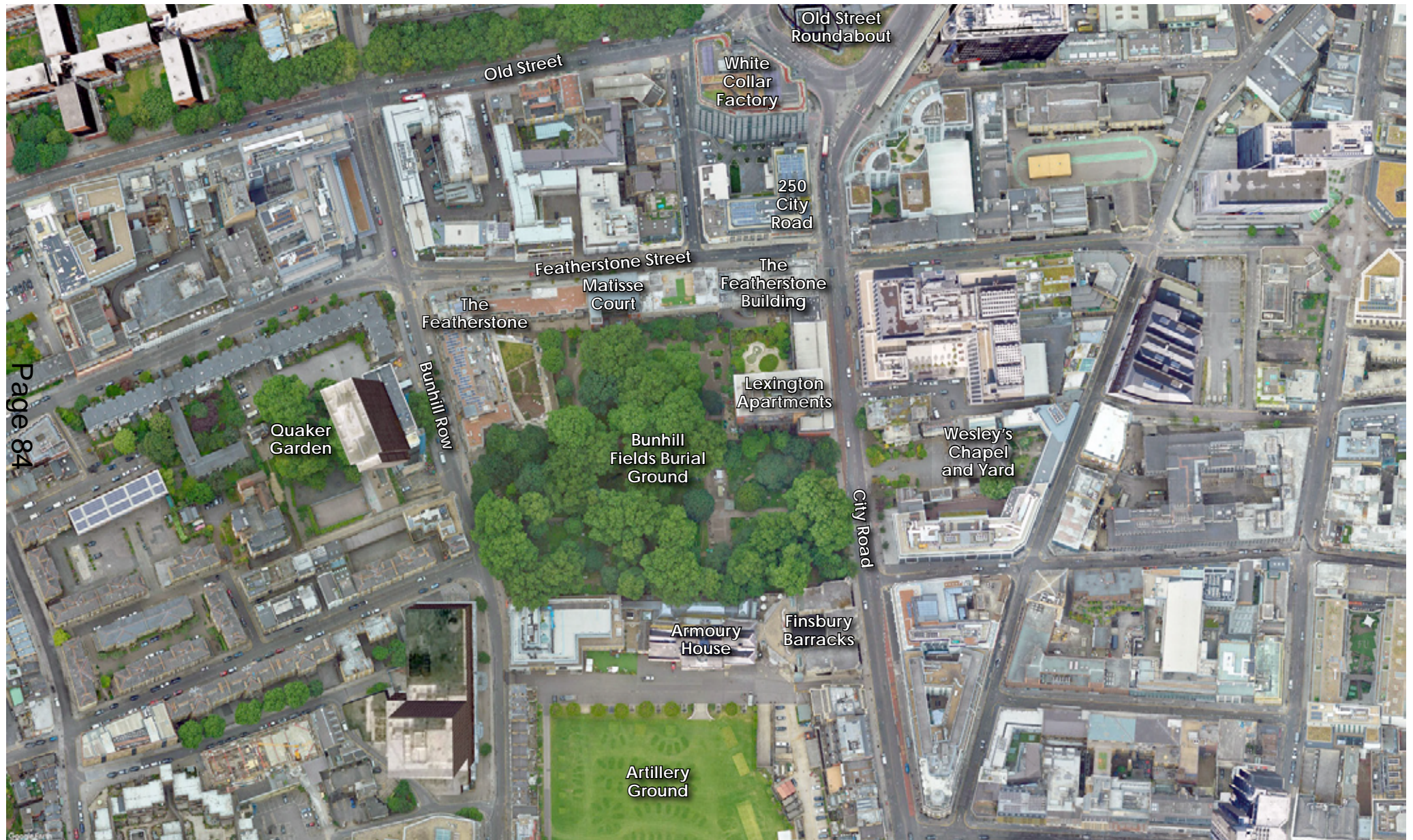
Featherstone House. The recent development at the corner of City Road and Featherstone Street was recommended for refusal by Islington Borough Council

in 2015 on the grounds that replacement of the previous buildings with a much larger buildings would substantially harm the setting of the burial ground, the Conservation Area and the streetscape (16 October 2015 Application No: P2015/3136/FUL). However Historic England's advice was that 'the proposals will result in a much better urban relationship with Bunhill Fields Burial Ground to the north east, and will enhance its setting there' and 'replace buildings of very poor quality that detract from the setting of Bunhill Fields'. Islington's recommendation was overturned by the Mayor of London.

Former Moorfields Primary School, Bunhill Row. Planning was granted in 2012 for a five-storey block housing 65 homes. Prior to this a tall development was the subject of a planning application refused by LB Islington in 2011. An appeal against this refusal was dismissed in May 2012. One of the main issues was the effect of the development on the setting of the burial ground. The inspector found that the height and bulk of the perimeter block would exert a considerable adverse influence over the Burial Ground.

The White Collar Factory on Old Street roundabout, although a tall building, has much less impact on the burial ground being at a greater distance from it and views are blocked by intermediate buildings.





This plan is not to scale. Base plan © GoogleEarth2020.



## UNDERSTANDING THE BURIAL GROUND

The overall layout of the burial ground in the present day is illustrated on the plan on [p.8](#) above.

The urban context was summarised in the Conservation Area Design Guidelines (2002):

*Bunhill Fields (owned by the City Corporation) and Wesley's Chapel are internationally famous sites. Finsbury Square and the playing fields of the Honourable Artillery Company are also ancient open spaces, now surrounded by late-19th century or early-20th century buildings. City Road and Tabernacle Street, both running north connected by several cross streets, are lined with solid late-Victorian, Edwardian or more modern buildings, which are almost entirely commercial. Although buildings of quality are scattered, there is enough to give the area a cohesive character of Edwardian grandeur and Victorian commercialism which relates well to the spaces and streets because of their scale, materials and ornament.*

However, since 2002 there has been significant amount of new development in the area which has eroded its Victorian and Edwardian character.

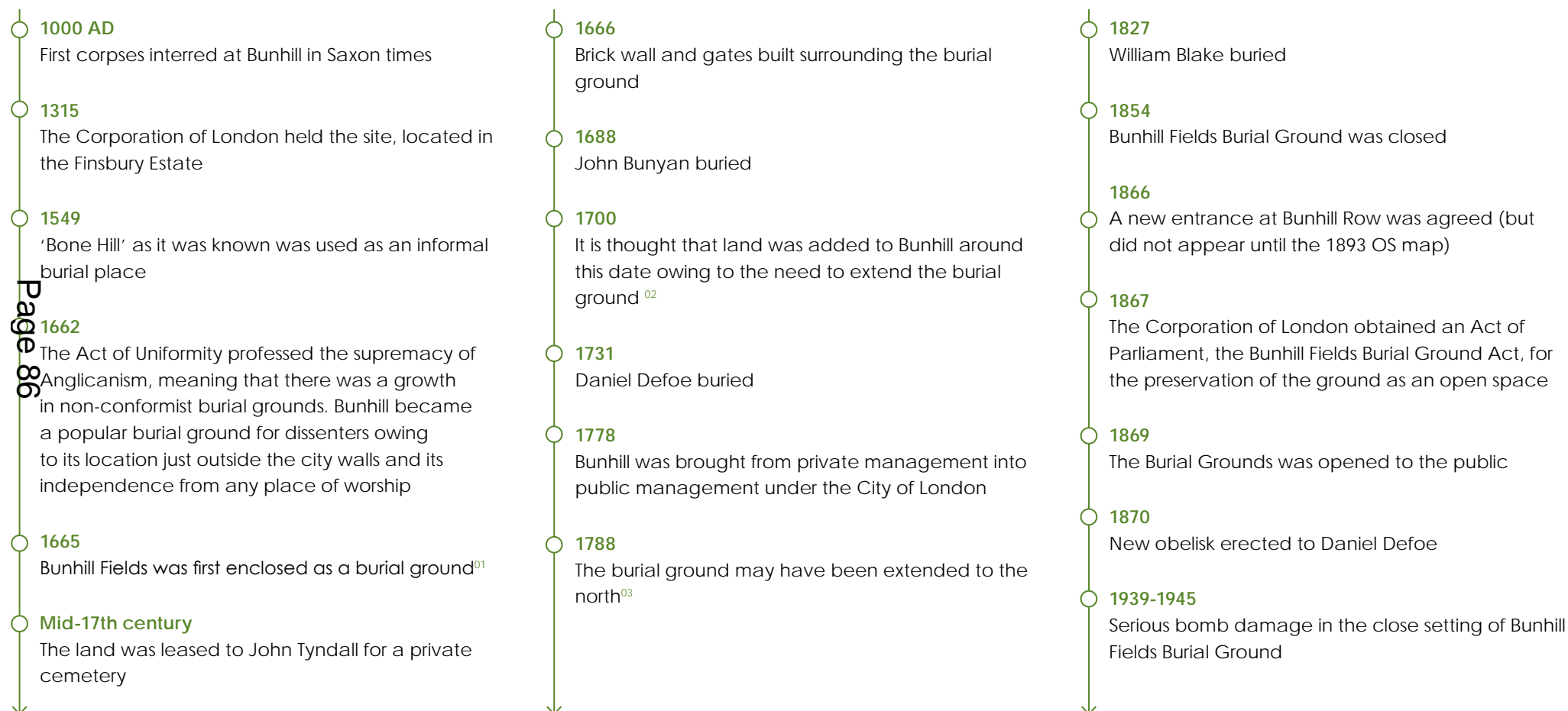
Nearby are two other significant non-conformist sites. Wesley's Chapel, dating from 1777-78, is located directly opposite the burial ground on City Road. It is known as 'The Mother Church of World Methodism' and is listed at Grade I. To the west of the Bunhill Fields Burial Ground on Banner Street are the Quaker Gardens and Bunhill Fields Meeting House. The gardens are the surviving fragment of a former Quaker burial ground in use from 1661 to 1855.

### **Note: Heritage at Risk**

Since 2009 Historic England has maintained an online Heritage at Risk (HAR) Register. Prior to this it published Buildings at Risk (BAR) Registers. The monuments in the burial ground were 'at risk' from 1997-2011, appearing in the published BAR Registers 1997-2008, and the HAR Register 2009-2010. They came off the HAR Register in 2011 following a programme of repairs.

The Conservation Area has been on the HAR Register since 2009, when the 'At Risk' programme was expanded to cover all types of designated heritage asset. It remains on the HAR Register because of inappropriate developments in the wider area. The Registered Park and Garden has never been 'At Risk'.

## 2.2 HISTORICAL BACKGROUND



<sup>01</sup> Susan Easton Black, Historic Overview of the Bunhill Fields Cemetery, p.2.

<sup>02</sup> Bunhill Fields Conservation Management Plan, 2006, p. 23.

<sup>03</sup> Bunhill Fields Conservation Management Plan, 2006, p. 25.

## UNDERSTANDING THE BURIAL GROUND

<p><b>1949</b> Bunhill was in need of refurbishment and several landscape practices were invited to register interest in the project</p> <p><b>1960</b> City of London Various Powers Act gave the City powers to make the changes to the burial ground</p> <p><b>1962</b> Peter Shephard was re-appointed Architect</p> <p><b>1965 - 1967</b> The Garden of Rest was laid out in the north section of the burial ground by Shephard after substantial reworking of the original scheme</p> <p><b>1996</b> A programme of conservation works to the memorials started. Since that time there have been several programmes of inspection and repair, continuing to the present time</p>	<p><b>1997</b> Listed memorials added to the Buildings at Risk Register</p> <p><b>2006</b> First Conservation Management Plan completed</p> <p><b>2009</b> Conservation Area added to the Heritage at Risk Register</p> <p><b>2010</b> Site added to Register of Historic Parks &amp; Gardens</p> <p><b>2011</b> Listed memorials removed from the Heritage at Risk Register</p> <p><b>2009 - 2013</b> Conservation and repair works to the headstones, pavings and boundary railings</p>	<p><b>2013</b> Friends of City Gardens take on management of the west enclosure</p> <p><b>2014</b> The railings either side of the Bunhill Row entrance were conserved and repainted</p> <p><b>2014</b> A structural engineer's report produced on the condition of the listed sections of the perimeter walls</p> <p><b>2013-2020</b> Ongoing programme of conservation work (see details on <a href="#">p.35</a>)</p> <p><b>2015 - 2020</b> Redevelopment of sites adjoining the Garden of Rest with mainly residential apartments</p>
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## UNDERSTANDING THE BURIAL GROUND

### 2.2.1 EARLY HISTORY

Bunhill Fields Burial Ground, known as the 'great dissenters burial ground' is the most celebrated non-conformist burial ground in England.<sup>01</sup> It was first recognised as a burial ground by the Saxons, who chose this place in the Manor of Finsbury owing to its unusual mound on the broad, level terrain of Finsbury Fen, which they saw as resembling a grave. They interred the first corpse here in 1000 AD<sup>02</sup>. Thousands of burials followed in the ensuing 600 years. From 1315, the Corporation of London held Finsbury Estate on lease from a great church property<sup>03</sup>, letting it to a series of tenants until 1781, and sublet it overall in 1867.<sup>04</sup> The land was used for grazing and archery practice. The present name is thought to be a derivation of 'Bone Hill', when from 1549 it was an informal burial place for the contents of St Paul's Cathedral Charnel House.

The Brown and Hogenberg map opposite shows the future site of Bunhill Fields Burial Ground as part of an open, pastoral landscape to the north of the City gates and walls. The site and its setting were characterised by clumps of trees, isolated agricultural buildings, windmills and grazing cattle. 'Fynesburie Fyeld' lay to the east of the site, and 'More Fyeld', which was laid out with washing, to the south-east.



Braun and Hogenberg, Map of London, 1572

<sup>01</sup> Pevsner, *The Buildings of England, London 4: North*, p. 607.

<sup>02</sup> Susan Easton Black, 'Bunhill Fields: the Great Dissenters Burial Ground', p. 3.

<sup>03</sup> Bunhill Fields Conservation Management Plan, 2006, Appendix 1 p. 3.

<sup>04</sup> Bunhill Fields Burial Ground Conservation Management Plan, p. 19.

## UNDERSTANDING THE BURIAL GROUND

### 2.2.2 THE ACT OF UNIFORMITY

The Act of Uniformity in 1662 recognised the Church of England as the established church of the British Isles. Following this Act, local communities could not bury those who would not profess the ecclesiastical supremacy of the King of England or Anglicanism, believing these non-conformists to be disloyal to the British Crown. Bunhill Fields was the only cemetery in Britain that would accept interment of non-conformists who fought against the Act of Uniformity and were often persecuted and imprisoned for their beliefs. In the build up to, and after the 1662 Act, there was a growth of burial grounds attached to non-conformist meeting houses. The Quakers, for example, acquired their first freehold to form a burial ground in Banner Street, just to the west of Bunhill Fields Burial Ground in 1661.

### 2.2.3 THE ENCLOSURE OF THE BURIAL GROUND

The remains of the non-conformist burials at Bunhill were brought by faithful parishioners and followers from far afield, to ensure their corpses would not be desecrated. As more non-conformists were buried in Bunhill, the community surrounding the burial ground grew. This community asked for the ground, which was an open field, to be enclosed. In response, in 1665, the mayor of London, Sir John Lawrence, ordered a brick wall to be erected. The gates were built and finished by the succeeding mayor of London, Sir Thomas Bludworth, in 1666.

Owing to its location just outside the City boundary and its independence from any established place of worship, many notable non-conformists were buried at Bunhill Fields Burial Ground until its closure in 1854. Amongst other leading religious figures, it is the burial place of John Bunyan (buried in 1688 although his tomb was replaced in 1862 with a memorial by Papworth), Daniel Defoe (1731, although a new obelisk was erected in 1870) and William Blake (buried in 1827 in the northern part of the burial ground).

Despite the enclosure of the burial ground, the next century saw the neglect and deterioration of the cemetery under tenant management.

The Faithorne and Newcourt Map of c.1665 on the following page shows that by the mid-17th century, London had spread significantly to the north of the City walls. The formerly open, rural landscape had been developed into residential streets and market gardens. 'Bun-hill' was marked on this map and remained an open field with a single diagonal path across it. In its immediate setting is an orchard (to the south) and six windmills (to the south-east). Moore Fields lies further to the south and was cultivated as market gardens. It has been speculated that land was added to Bunhill in c.1700, owing to the need to extend the burial ground.<sup>05</sup>

<sup>05</sup> Bunhill Fields Burial Ground Conservation Management Plan, p. 23.



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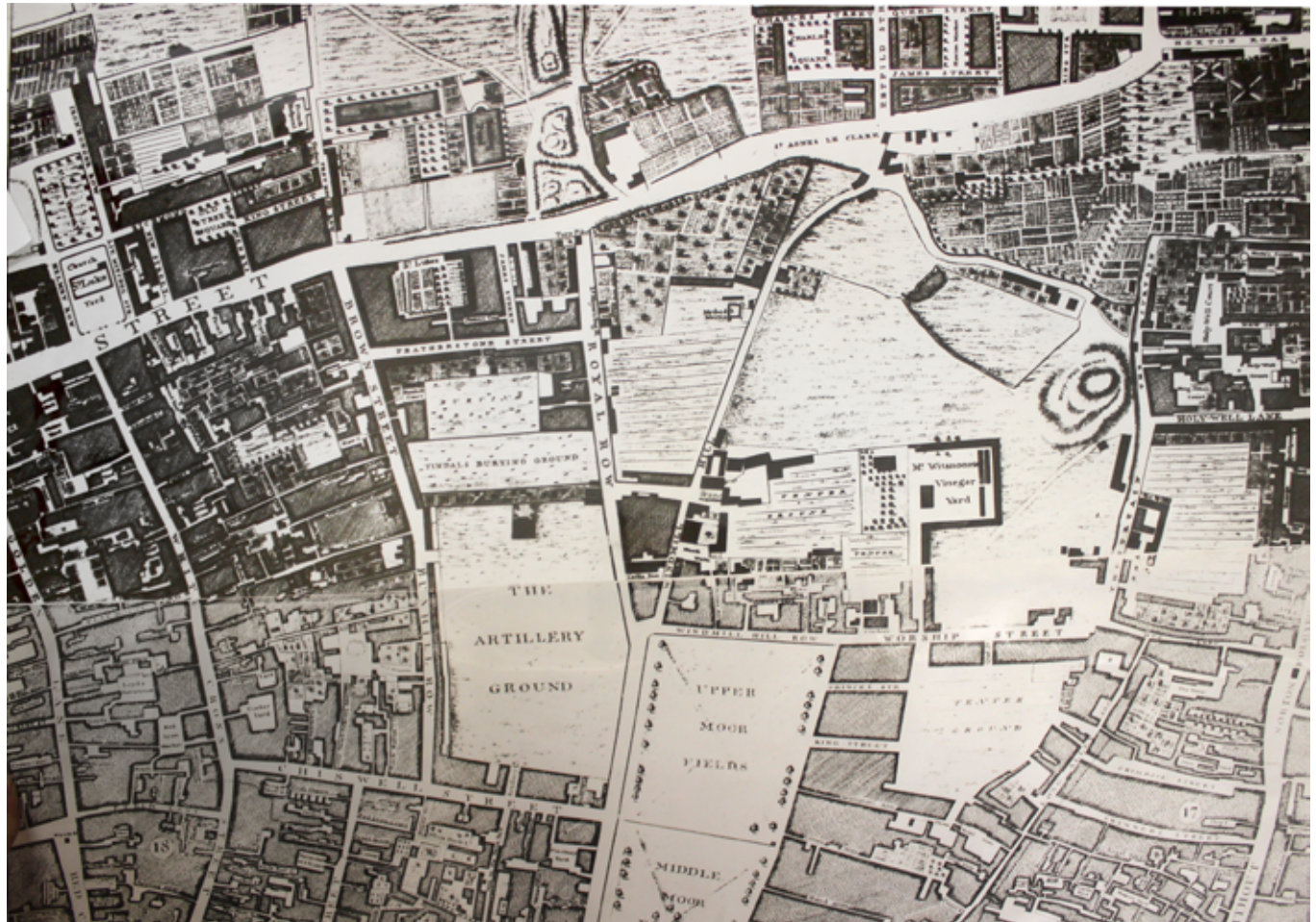
*Faithorne and Newcourt, Map of London, c.1665*



## UNDERSTANDING THE BURIAL GROUND

### 2.2.4 PRIVATE BURIAL GROUND

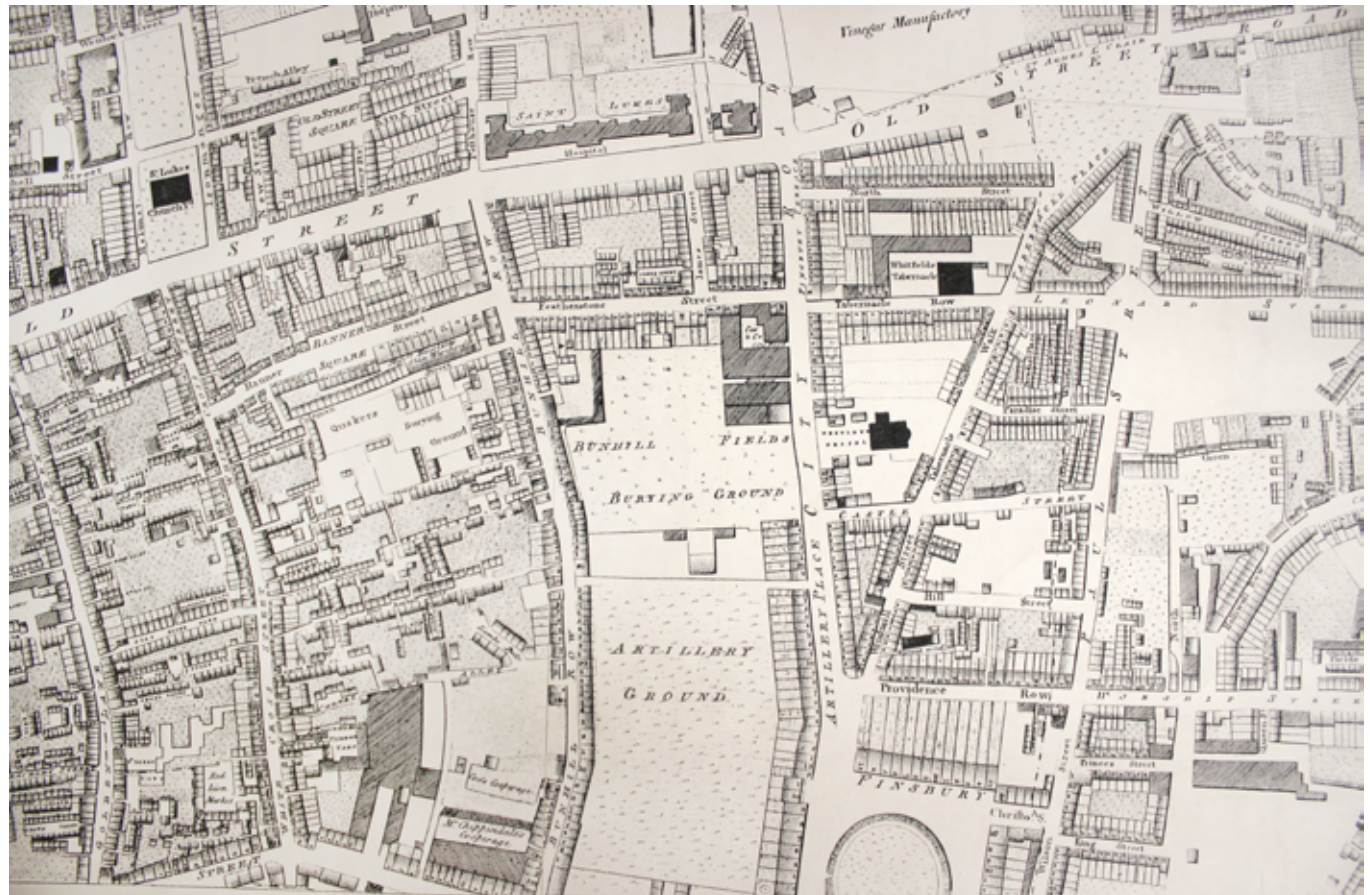
The land was leased to John Tyndall in the mid-seventeenth century for a private cemetery based on subscriptions. Not tied to any established place of worship, it was used by dissenters from the Church of England. Tyndall was followed by subsequent tenants who managed the burial ground until 1781. From this point it was managed by the City of London (until 1852). John Rocque's plan adjacent reflects Tyndall's lease, showing the southern part of the site as 'Tindals Burying Ground' with a separate Burying Ground to the north. The former orchard to the south of the site had been replaced by The Artillery Ground, a training site for the Honourable Artillery Company, leased from 1688. Rocque's map shows the headquarters of the Honourable Artillery Company, Armoury House (1734-1786) at the north end of the Ground. The Artillery Ground was separated from Tindals Burying Ground by small compartments of formal planting and further compartmented cultivated areas lay to the north of the main burying ground. The Quakers' Burying Ground is shown to the west of the site, on the opposite site of Brown Street (today Bunhill Row).



John Rocque, Map of London, 1746



Horwood's map, dating to the 1790s, shows a roughly similar site outline to Rocque's map but the division between the north and south part is no longer marked and the site has the name Bunhill Fields Burying Ground. By this point the present street names had been adopted to the east and west of the site, Bunhill Row and City Road. Wesley's Chapel immediately opposite the east/ City Road entrance to Bunhill, appears on Horwood's map.



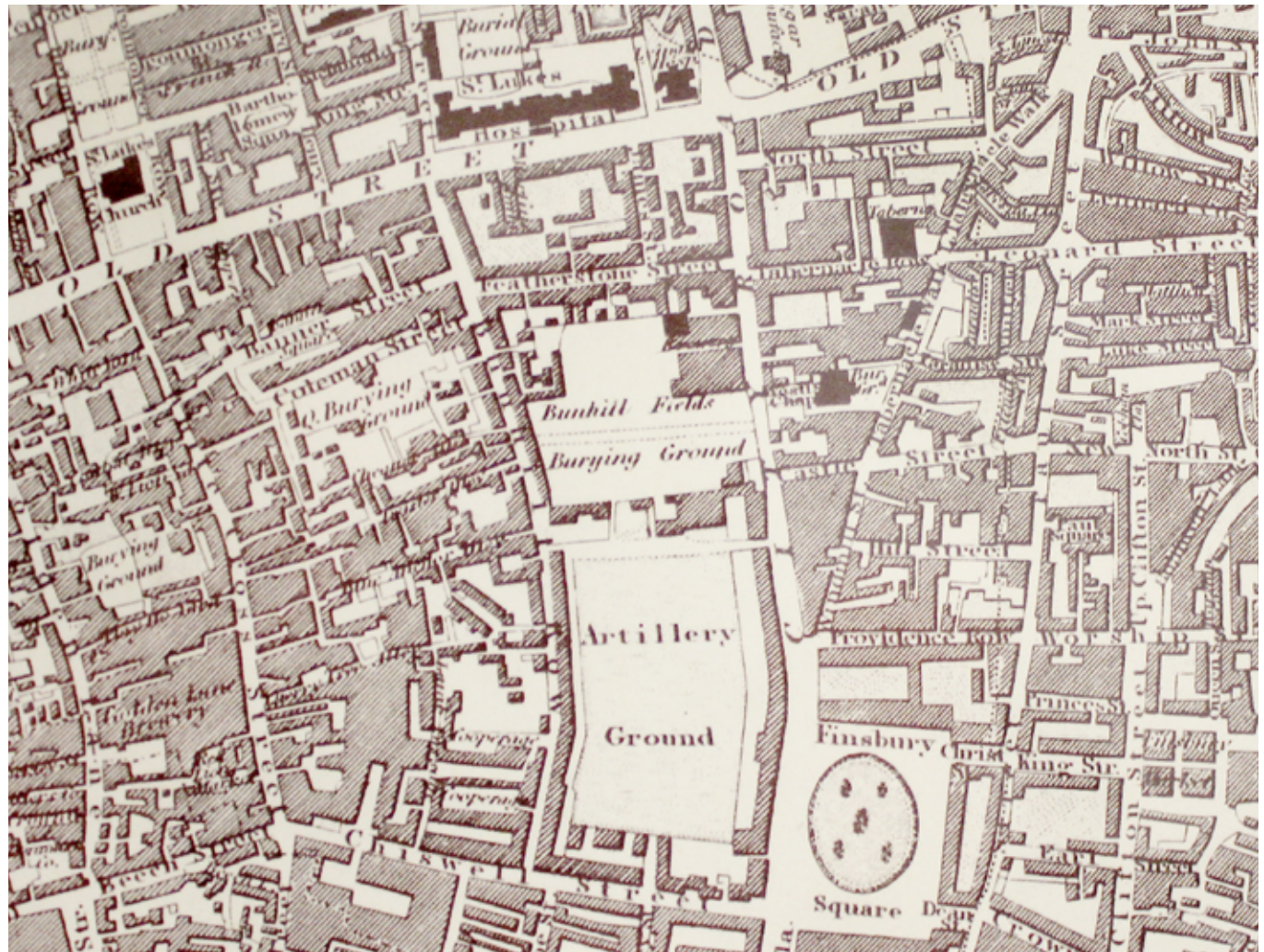
Richard Horwood, *Plan of the Cities of London and Westminster, 1794-1799*



## UNDERSTANDING THE BURIAL GROUND

By 1827 there was a distinct linear walk across the main section of the burying ground on an east-west axis. The ground may have been extended in 1788, making it a total of 4.02 acres.<sup>06</sup> Greenwood's map shows that the boundary had been altered somewhat to the north. At this stage, the burial ground appeared to additional funnel-like entrances between buildings at the north-west (to Bunhill Row) and north-east (to City Road) corners. The early nineteenth century saw the construction of a number of buildings associated with the Artillery Ground, to the south of the site.

Following the transfer of the burial ground to public management, interments began to increase again and in 1852, it was estimated that 124,000 non-conformists had been buried in Bunhill Fields.<sup>07</sup>



Christopher and John Greenwood, Map of London, 1827

<sup>06</sup> Bunhill Fields Burial Ground Conservation Management Plan, p. 25.

<sup>07</sup> Susan Easton Black, 'Bunhill Fields: the Great Dissenters Burial Ground', p. 3.



### 2.2.6 CLOSURE OF THE BURIAL GROUND AND OPENING TO THE PUBLIC

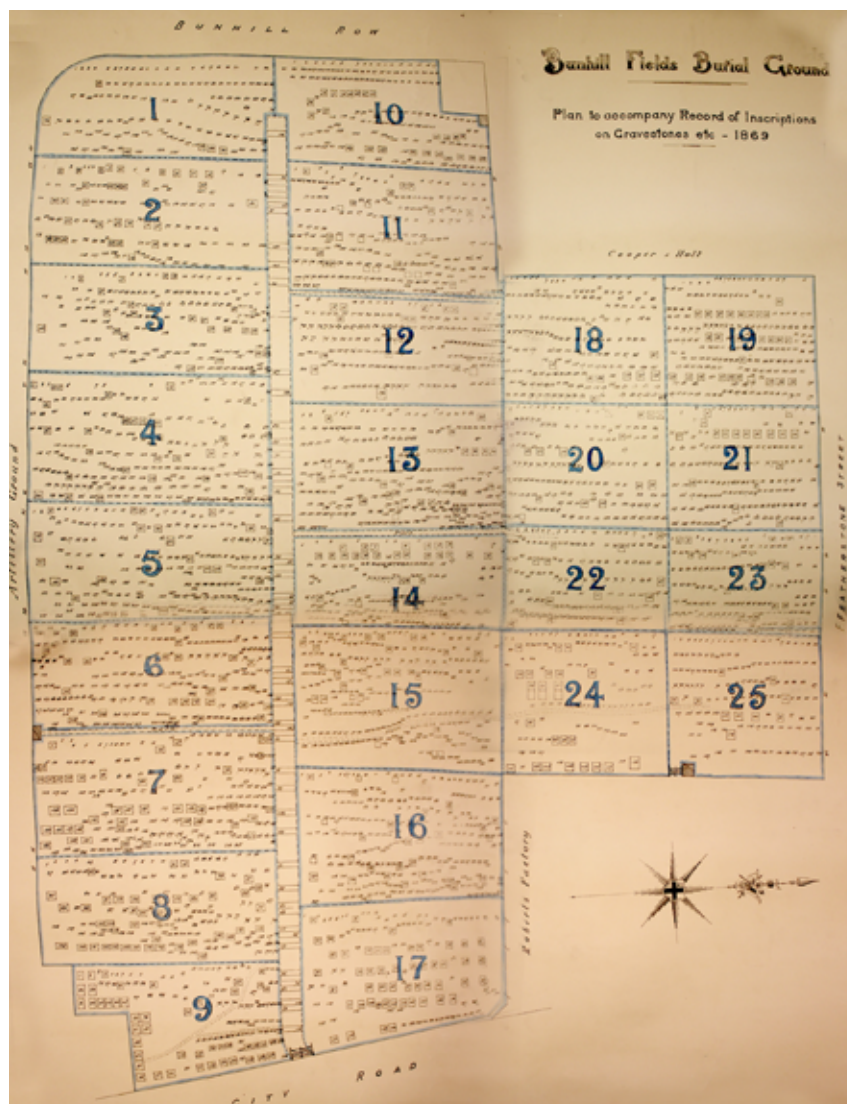
In 1852, Parliament passed an Order of Common Council to stop further interments: the burial ground was to be used as an open, accessible space for the public with no further buildings to be erected. Stanford's map of 1862 shows the 'closed' nature of the burial ground.

A new entrance at Bunhill Row was agreed in November 1866 but it did not appear on OS maps until 1893.



*Edward Stanford, Map of London and its Suburbs, 1862*

In 1867 the City of London's lease was close to expiry. Thus, in order to prevent the land being redeveloped by the freeholders (the Ecclesiastical Commissioners), the Corporation of London formed the Special Bunhill Fields Burial Ground Committee, which became the Bunhill Fields Preservation Committee. The Committee managed to obtain an Act of Parliament, the Bunhill Fields Burial Ground Act 1867, for the preservation of the ground as an open space. From 1867, the burial ground was restored before its opening to the public in 1869: paths were laid, avenues planted, tombs raised from beneath the ground, stones set straight, inscriptions re-cut and decayed tombs restored. Plane trees were planted, as well as ornamental trees and evergreen ornamental shrubs. In addition, a record of the monuments' inscriptions was completed so that some 5,000 tombs were discoverable. This plan is included opposite and shows the burial ground divided into 25 areas with an irregular arrangement of tombs. The north section (18-25) at this point was similar to the rest of the burial ground with an irregular arrangement of paths and tombstones; these were cleared away in the 1960s to create the Garden of Rest.



Plan to accompany record of inscriptions on gravestones, 1869  
(LMA: CLC/271/MS00897/010)



## UNDERSTANDING THE BURIAL GROUND

The present gates with big granite piers and railings to City Road date to 1869. The improvements at Bunhill continued over the following decade. The photographs below, dating to c.1870, show the recently opened burial ground, which is characterised by well-maintained landscaping and paths, prior to the substantial 20th century changes. The burial ground had not yet been divided into railed enclosures.

The upper photograph shows the obelisk memorial to Daniel Defoe. This was surrounded by a number of other tombs and headstones, whereas today it stands alone in an open paved area. The north section of the burial ground, which is today an open space, cleared of tombs (the Garden of Rest), is still densely packed with tombs.

The lower photograph shows a general view of the burial ground with John Bunyan's chest tomb in the background (far right), noticeable owing to the distinct recumbent figure of Bunyan. The photograph, taken from the south side of the graveyard looking north also takes in the populated northern side of the burial ground.



*Daniel Defoe's tomb at Bunhill Fields Burial Ground, c.1870 (LMA: B/FI/BUN)*



*View of Bunhill Fields Burial Ground, c.1870 (LMA: B/FI/BUN)*

## UNDERSTANDING THE BURIAL GROUND

The 1872-1877 OS map shows the site in more detail with 'Bunhill Fields Burial Ground (Disused)'. This had a central path across the main section, on an east-west axis, with a number of paths, both linear and serpentine leading off this central spine. Each path was framed by avenues of trees and some sections of the burial ground were densely planted, especially the south-east corner. The entrance from Bunhill Row at the north-west corner appears to have been infilled, although that on the east side of the north section, now entered through a passage beneath a building off City Road, remained. Important tombs, namely Defoe's and Bunyan's were marked. The Wesley Chapel with its graveyard, lined by trees, is shown on the opposite side of the road from the burial ground. To the south, the Artillery Ground shows the Honourable Artillery Company's Headquarters with associated buildings and St Paul's Church and Vicarage.



OS map, 1872-1877 (National Library of Scotland)



# UNDERSTANDING THE BURIAL GROUND

The 1893-1894 OS map shows the paths in the same layout as the earlier OS map; however, the treed avenues had been depleted meaning the planting adopted a more irregular arrangement than in the 1870s. The new Bunhill Road entrance (agreed in 1866) was indicated, in the form of an extension of the central path across the main section of the Burial Ground. The central path is in fact a continuous line of burial vaults. The graveyard of Wesley's Chapel (now labelled Meth. Chapel) had also lost its trees.

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OS map, 1893-1894 (National Library of Scotland)

## UNDERSTANDING THE BURIAL GROUND

### 2.2.7 EARLY TWENTIETH CENTURY

The number of trees in the burial ground was further reduced in the early 20th century as shown on the 1914 OS map. Otherwise, the burial ground was little altered in plan form and the paths remained.



OS map, 1914 (National Library of Scotland)



# UNDERSTANDING THE BURIAL GROUND

During the First World War, Bunhill was once again in poor condition. This continued in the interwar years with monuments in poor condition, stone lettering decaying and bench provision that lacked uniformity and sensible placement. The 1934-1940 OS map shows nothing new in terms of plan form at Bunhill. During the Second World War, there was serious bomb damage in the close setting of the burial ground; bomb damage in 1940, 1941 and 1944 destroyed most of the Quaker burial ground to the west of Bunhill Row.<sup>08</sup>



OS map, 1934-1940 (LMA)

<sup>08</sup> Bunhill Fields Burial Ground Conservation Management Plan 2006, p. 39.





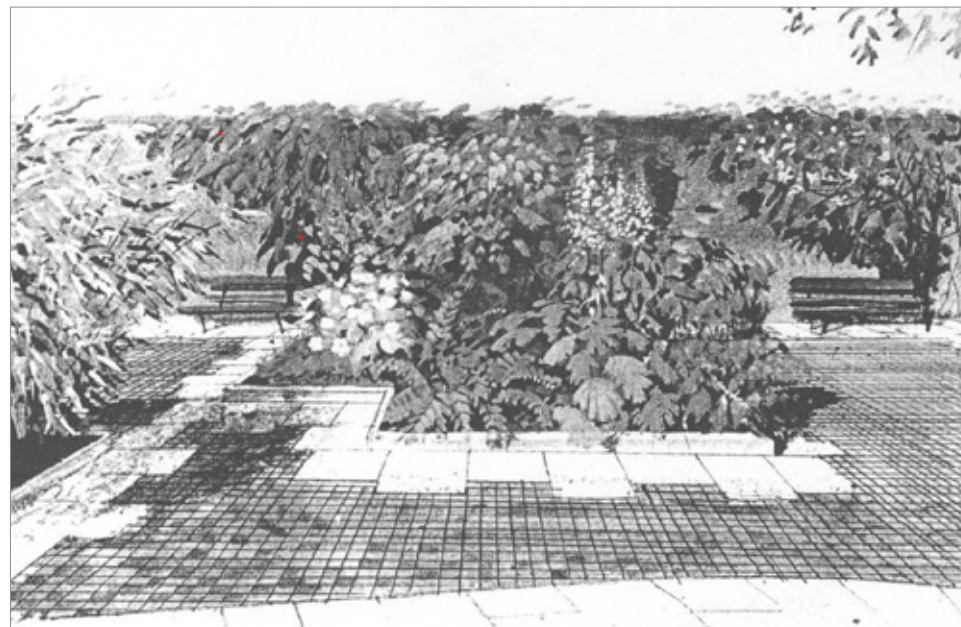
## SIR PETER FAULKNER SHEPHEARD (1913-2002)

Peter Shephard was an architect and landscape architect. He trained at the Liverpool School of Architecture under Charles Reilly and upon moving to London in 1937, worked as an assistant for Bridgwater and Mitchell. From 1943 he worked on the Greater London Plan for post-war regeneration and growth and remained at the Ministry of Town and Country Planning working on early prototypes for the new towns. He formed a partnership with Derek Bridgwater, who had been his first employer, in 1948. His projects

involved working on social housing, extensions to universities, schools and teacher training colleges. He became best known for many landscape projects such as London Zoo, Bessborough Gardens and Bunhill Fields. Shephard designed the Goldsmith's garden in 1962 – the only garden in the City he designed – and the Roper Garden next to the Embankment in Chelsea in 1964. Both gardens are still in existence.

Shephard was elected president of the Architectural Association in 1954, President of the Landscape Institute in 1965 and President of RIBA in 1969. He was appointed CBE in 1972 and knighted in 1980.

Peter Shephard's papers are deposited with the University of Reading, including his office files relating to Bunhill.



*Shephard's sketch for the Garden of Rest*

## UNDERSTANDING THE BURIAL GROUND

### 2.2.8 THE PETER SHEPHEARD SCHEME

By 1947, following war damage, the burial ground needed refurbishment. Whilst the LCC Bomb Damage Maps only provide details of damage to buildings and not 'green space', these maps show that buildings surrounding the burial ground are all marked purple, 'damaged beyond repair'. This may indicate that tombs and planting near to the boundaries, particularly along the entire northern section, were lost.

Besides the general consensus for a refurbishment at Bunhill, the London Plans of 1943 and 1944 had recognised the need for public open space. The City undertook to consider a part of the burial ground as a public Garden of Rest. Four landscape practices were invited to register interest in the project in 1949. It was only much later, in 1962, that Peter Shephard was appointed Architect, after a number of revised proposals.

Shephard delivered his first Proposal for Conversion to Public Garden of Rest in 1950. This radical proposal was to clear the whole of the burial ground and to open it as a public garden. The Society of Antiquaries and the Royal Fine Art Commission, seeking to retain the historical character of the graveyard, objected to this proposal. During the early 1950s, Shephard revised his proposals a number of times, seeking to compromise between preservation of the graveyard and the provision of a garden for the public. He was also asked to simplify the scheme. Towards the end of the 1950s, he proposed

clearing the north side of the burial ground, the area most affected by bomb damage, to develop a Garden of Rest, available to the public as a public open space. The rest of the site was to be protected behind railings. These works were authorised under the City of London Various Powers Act 1960.

The photograph dating from 1964 shows the burial ground immediately before the works. The view, taken from the west end of the burial ground, looking east, shows a small section of the north side of the ground, which was soon to be cleared and opened out into the present Garden of Rest. The image shows the degraded nature of the burial ground prior to the works: tombs were dirty and deteriorating and paths were worn and poorly paved.

The initial £25,000 quote for the work in 1954 was revised in 1962 to £39,460. The actual works were carried out between 1965 and 1967. Shephard developed the paths, widening sections and opening out a large area of paving towards the east end; the hard landscape detailing for the paving consisted of York stone slabs and red bricks. Shephard also added buildings for the keeper and gardeners' storage. The planting comprised many ornamental shrubs. The following image shows Daniel Defoe's tomb after the works, which in contrast to the c.1870 image, shows his tomb standing isolated in an open paved area with railed boundaries around the main gravestone enclosures behind.



*Aerial view of Bunhill Fields, 1964 (LMA: B.FI/BUN)*



# UNDERSTANDING THE BURIAL GROUND

## 2.2.9 LATE TWENTIETH CENTURY TO PRESENT

Following completion of Shepherd's work, during the 1970s, the tombs were inspected for condition and, where relevant, repaired. During the 1980s, storms brought significant tree loss, including plane trees planted in 1897.

During the 1990s, the condition of the burial ground was again rundown with broken slabs and defaced inscriptions. Conservation work to the memorials started in 1996 and continued at intervals in 2002-2003 and again during 2004. Surveys of the memorials were carried out in 2005.

Between 2009 and 2014, works at the burial ground included: <sup>09</sup> the restoration and conservation of headstones and paving, selective tree thinning and pruning in the northern section and the re-painting and restoring of historic and internal railings.

From an ecological perspective, bird, bat and insect nesting boxes were installed at several locations across the burial ground and, in 2009, bee hives were introduced.

Since 2013, the west enclosure, which takes up an eighth of the site, has been managed by Friends of City Gardens who take an active interest in the planting and wildlife within the enclosure.

In 2009, Bunhill Fields / Finsbury Square Conservation Area was added to Historic England's Heritage at Risk Register. The inclusion of the Conservation Area on the Heritage at Risk Register reflects the need to protect both the burial ground itself and, significantly, its setting,

from largescale developments in the wider area. At about the same time a programme of conservation works was undertaken. Several further programmes of inspections and works have been undertaken since 2009, and a contract is currently in place with a specialist stone conservation contractor. Details are provided on [p.35](#). The Conservation Area remains on

the Heritage at Risk Register (fair condition, medium vulnerability, trend deteriorating).

Today, the northern section of the burial ground is still laid out to Shepherd's design but the condition of the hard landscaping and the planting scheme is deteriorating.



Daniel Defoe's tomb, 1968 (LMA: B.FI/BUN)



Daniel Defoe's tomb, November 2019

<sup>09</sup> City Gardens, Bunhill Fields Burial Ground Management Plan 2015-2020, pp. 6-8.

## UNDERSTANDING THE BURIAL GROUND

### 2.3 SITE DESCRIPTION

#### 2.3.1 PHYSICAL ACCESS

The site is approached via pavements alongside Bunhill Row and City Road. The narrow pavement at the City Road entrance has a sloping dropped kerb where maintenance vehicles enter the site. Because of the line of burial vaults under the central path no vehicle bigger than a transit van is allowed. From City Road on the east side and Bunhill Row on the west side there are gentle ramps up to the east-west stone flagged path running through the site.

Physical access within the burial ground is reasonable, due to the level topography. However the stone slabs along the central path have a heavily weathered surface.

The secondary semi-circular path through the northern part of the site is the same width as the main path, but for most of its length it has brick aprons on both sides. This path runs around an open area of grass and there are wider brick-paved areas with benches. There are localised areas where the stone flags and brick paving are uneven.

The open grass area is used for recreation, especially by a local school, and as a lunchtime picnic spot. The grass suffers every year from various factors: dry shade, heavy footfall and surface water flooding.

The burial areas to the south and north of the main path are cordoned off with railings and locked gates. Members of the public are permitted into these areas when accompanied by a member of the Bunhill Fields staff team or a volunteer. The narrower paths within these areas are defined by concrete edging strips, but the paths tend to have a surface of uneven loose gravel or earth. There are trip hazards caused by fox holes and tree roots.

There is a WC, used by staff and volunteers, but not open to members of the public.

The entrance gates at both sides of the burial ground are opened on weekdays at 8am and are closed at 7pm or dusk, whichever is earlier. At weekends and bank holidays the hours of opening are from 9:30am to 7pm or dusk, whichever is earlier. Staff are usually on site between opening times and 15.30 on weekdays but are not on site at weekends. There is no street lighting within the burial ground, so the open paths are quite dark in the period just before dusk.

# UNDERSTANDING THE BURIAL GROUND

## 2.3.2 CHARACTER AREAS

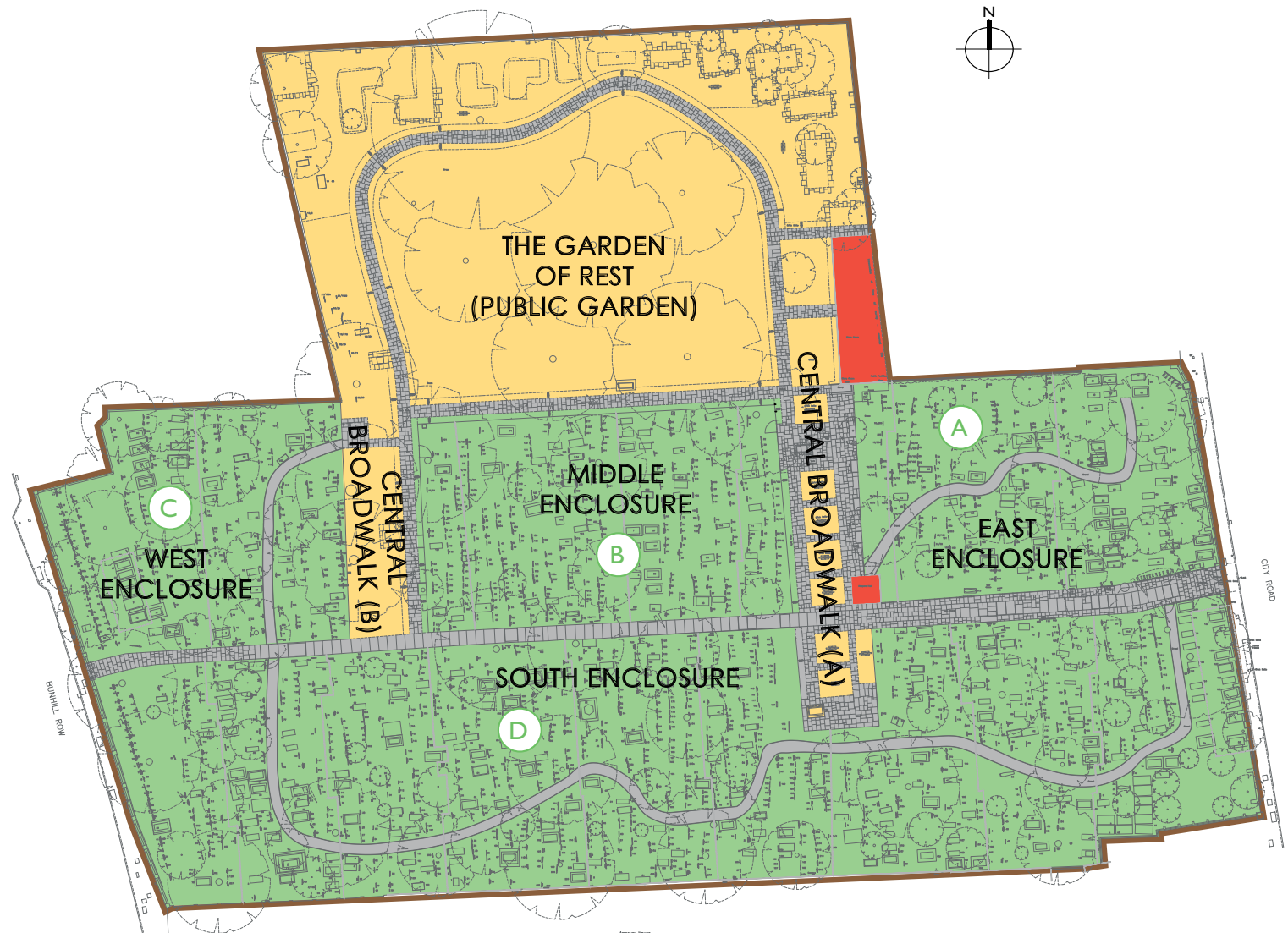
For the purposes of this CMP, the site has been divided into five character areas.

A more detailed description and analysis of these areas is contained in Appendix B.

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- Character Area 1: The Burial Ground\*
- \*Character Area 1 has four Sub-Character Areas
- A East Enclosure
- B Middle Enclosure
- C West Enclosure
- D South Enclosure
- Character Area 2: The Garden of Rest
- Character Area 3: Boundary Treatments
- Character Area 4: Paths
- Character Area 5: Buildings

*This plan is not to scale*





## UNDERSTANDING THE BURIAL GROUND

### Character Area 1: The Burial Ground

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The burial ground area of the site is divided into four railed-off grave plots with intersecting paths. All four plots are essentially open grass spaces densely occupied by numerous memorials in an irregular grid layout. Headstones make up the majority of the monuments. The four burial plots are enclosed by metal railings, originally installed in the 19th century but altered in the 1960s to suit Peter Shephard's plan.



*South enclosure (November 2019)*



*East enclosure (November 2019)*



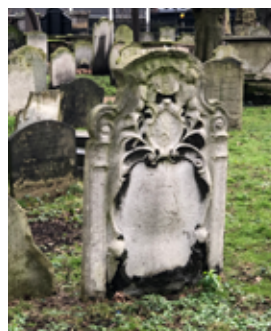
*Middle enclosure (November 2019)*



*West enclosure (November 2019)*

The main types of memorial found at Bunhill Fields are:

- **Marker stones or Headstones** at the 'head' and/or the 'foot' of the grave. In the non-conformist tradition they are rarely decorated and usually give only the name and dates of the person. However, there are some that have inscriptions and decorative low relief motifs. Sometimes kerbstones (delineating the boundary of the grave) survive but often these have been lost or removed to make grass cutting easier.
- **Ledger slabs** are large stones laid flat over the grave. There are three body-form ledgers, dating from the late eighteenth century.
- **Chest tombs** are of varying heights and rectangular and hollow. The side panels are fixed at the corners with metal (usually iron) cramps or the panels are fixed to brick core walls.
- **Table tombs** (as in altar table) are a variation of the chest tomb
- **Obelisks** are also a feature of which there are several.
- **Memorials** to John Bunyan, Daniel Defoe and William Blake are Victorian. There is new one to William Blake that is on the site of his burial place (installed in 2018).



Example of a headstone



Example of a ledger stone



Sunken chest tomb (Pottenger memorial in south enclosure)



Open-sided chest tomb, re-erected in 2005



Example of a chest tomb



Example of a chest tomb with obelisk (Henry Hunter Memorial)



Example of an obelisk (Daniel Defoe memorial)

All photos taken November 2019

# UNDERSTANDING THE BURIAL GROUND

## CONSERVATION OF VAULTS AND MEMORIALS

### SOURCES OF GUIDANCE

Historic England's guidance on the care and conservation of cemeteries, churchyards and burial grounds is contained on its website on the 'Caring for Cemeteries' pages. This guidance replaces the English Heritage publications 'Paradise Preserved' (2007) and 'Caring for Historic Graveyard and Cemetery Monuments' (2011). Additionally, the 'Parks, Gardens and Landscapes' pages offer further guidance on various aspects of appropriate management within historic designed landscapes, e.g. wildlife, trees/veteran trees, etc.

The current approach to repairs adopted at Bunhill Fields is set out in Volume 3 – Appendix G – "Specification – itf\_COL\_9321 – Repairs to memorials at Bunhill Fields Burial Ground – Appendix 1 – Definition of Repair Codes' and Appendix 2 – Materials and Workmanship. These set out in detail the adopted techniques for conservation, repairs and cleaning of memorials, based on current best practice.

This approach was established in the 2006 CMP and has been refined following best conservation practices. It is adopted as part of the contract currently in place for memorial inspections.

### GENERAL APPROACH

The Repairs Codes confirm the conservation approach to repair at Bunhill:

*'Due to the large amount of damaged or unsafe memorials present at Bunhill Fields the approach taken for these works is to only repair structural damage and to consolidate any damage that might, in time, lead to renewed structural damage (such as open cracks). Ongoing natural decay of the tomb stones is accepted at Bunhill Fields in line with the nature and character of the site. Conservation works will be reduced to the minimum required to slow down the natural decay.'*

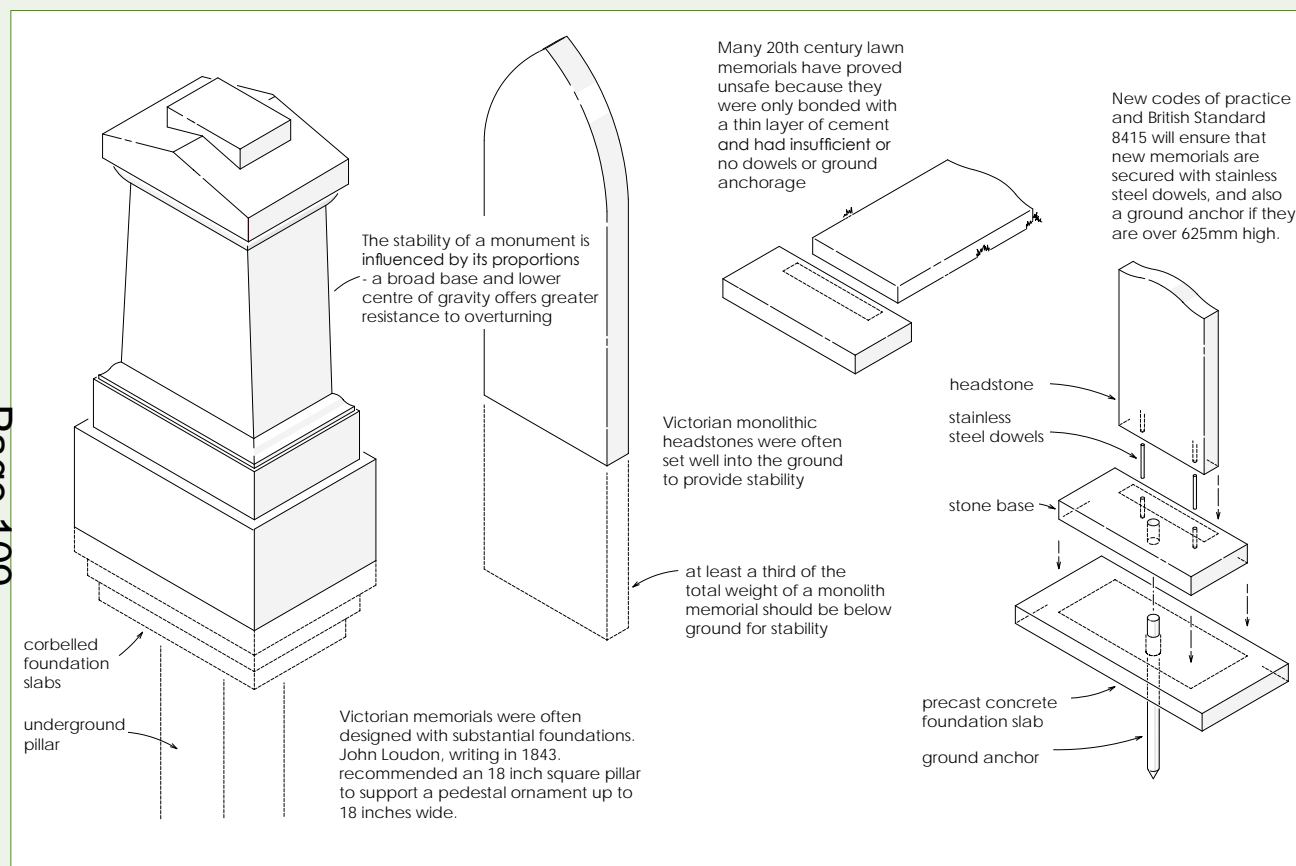
The specification advises that cleaning of stone and brickwork will generally be limited to the removal of damaging pollution crusts – large scale masonry cleaning will not be undertaken.

Further general considerations to be borne in mind when managing repair

projects are:

- A range of options may need to be considered to solving complex structural problems, bearing in mind that a long-term solution is likely to cost considerably more than a short-term 'fix'.
- Stakeholders will need to be consulted at an early stage and kept informed throughout the project. In addition to officers of the City of London and the London Borough of Islington, the stakeholders are likely to include representatives of Historic England.
- Listed Building Consent may be required for works affecting listed structures.
- Repair solutions may be subject to ecological constraints such as the impact on tree roots, nesting birds, etc. The growth of mosses and lichens can have a significant impact on appearance and legibility of memorials. A careful balance is necessary between ecological and aesthetic considerations.
- Project teams for complex projects will require a range of professional disciplines including architect, engineer, archaeologist and conservator.
- The method and timing of working should be carefully planned to avoid or minimise disturbance to the rest of the site, both in terms of visual, ecological and physical impacts.
- The repair solution may need to be flexible to adapt to unforeseen circumstances or constraints once work has started (for example due to the presence of burials or unexpected ground conditions).
- Repair projects are an opportunity to engage members of the public by explaining the reasons for the work and the repair techniques adopted.
- Works involving disturbance of human burials will require archaeological recording. MOLA, a commercial consultancy, have been employed previously to record such works. They may also require consultation with family representatives, archaeological recording of coffins and human remains, and the involvement of Environmental Health officers.
- Lessons can be learnt from other conservation projects (for example the structural repair of two collapsed vaults below the Letts and Thomas memorials at the West Norwood cemetery, completed in 2018). Issues here included the temporary removal of coffins and partial infilling of one of the vaults with pea gravel.





Stability of graveyard and cemetery monuments - illustration from Historic England's online guidance *Caring for Historic Cemetery and Graveyard Monuments*

## PROGRESS WITH CONSERVATION WORKS

Several programmes of repair have been undertaken since 1996. The repair programmes undertaken since 2013 have been:

- **2013:** Repairs undertaken to 107 memorials, most of them located in Areas 9, 16 & 17
- **2014:** Repairs undertaken to 59 memorials, widely distributed throughout the burial enclosures
- **2015:** Repairs undertaken to 32 memorials, most of them in Areas 10 & 11
- **2015 - 2018:** Repairs undertaken to 191 memorials
- **2018-Feb 2019:** Repairs undertaken to 17 memorials
- **2019-2024:** Before lockdown in March 2020 and site closure, repairs undertaken to 76 memorials, most in Areas 8, 12 & 13, plus emergency repairs to a further 10 memorials identified as unsafe

As part of this Conservation Management Plan, a brief survey was undertaken of all the memorials in July 2020, noting any changes since the previous condition survey of 2017. The results of this survey are contained in Volume 5, Appendix K.

## UNDERSTANDING THE BURIAL GROUND

### Character Area 2: The Garden of Rest (The Public Garden)

This Character Area comprises the open northern section of the site, the hard-landscaped open area to the south-east of the Garden of Rest (known as the central broadwalk) and the minor open area to the south of the west section of the Garden of Rest. The northern section is laid out as open garden space with a central lawn surrounded by brick paving and intermittent shrub planting. This part of the burial ground was laid out to designs of Peter Shephard in the 1960s. The paths and surface treatments are discussed in detail in Character Area 4 (Paths).



Garden of Rest looking west



Garden of Rest looking south east

All photos on this page taken November 2019

### Character Area 3: Boundary treatments

The oldest boundary is that to the south (late 18th/ early 19th century), a stock brick wall marking the boundary between Bunhill Fields and the Honourable Artillery Company buildings to the south. A series of cast-iron numbered plaques are attached to this wall. See photos on p.45 of the Gazetteer. The east boundary facing City Road (1868) comprises two entrance piers with iron gates and a low coped wall of dressed stone topped with railings. The west boundary (1878) comprises a brick wall with iron railings above. The design drawings for this boundary are shown on the following pages. There are central entrance gates on Bunhill Row. The north boundary, which is unlisted, is a modern brick wall with brick piers at intervals.



West boundary to Bunhill Row



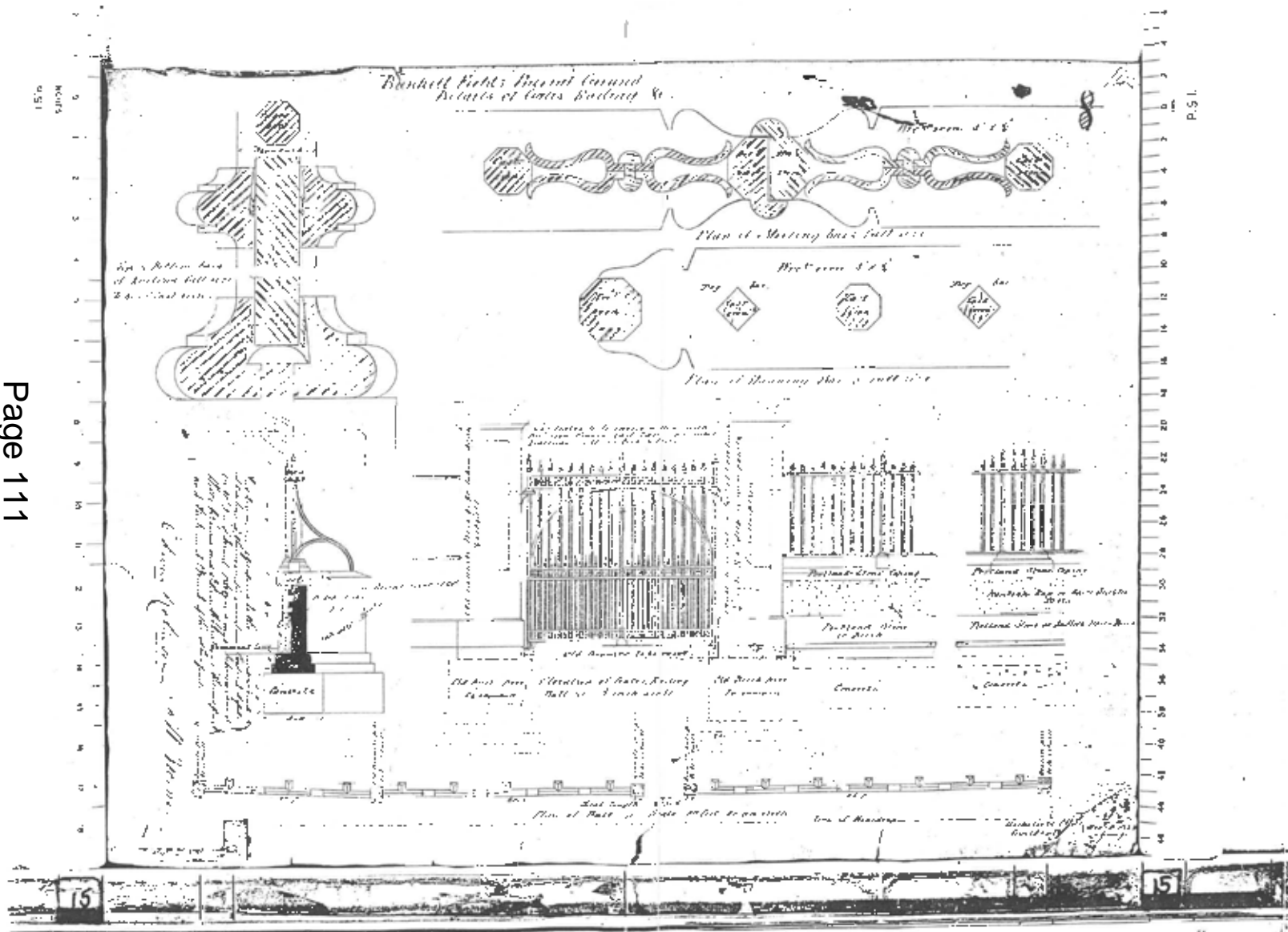
West boundary to Bunhill Row



East entrance facing City Road

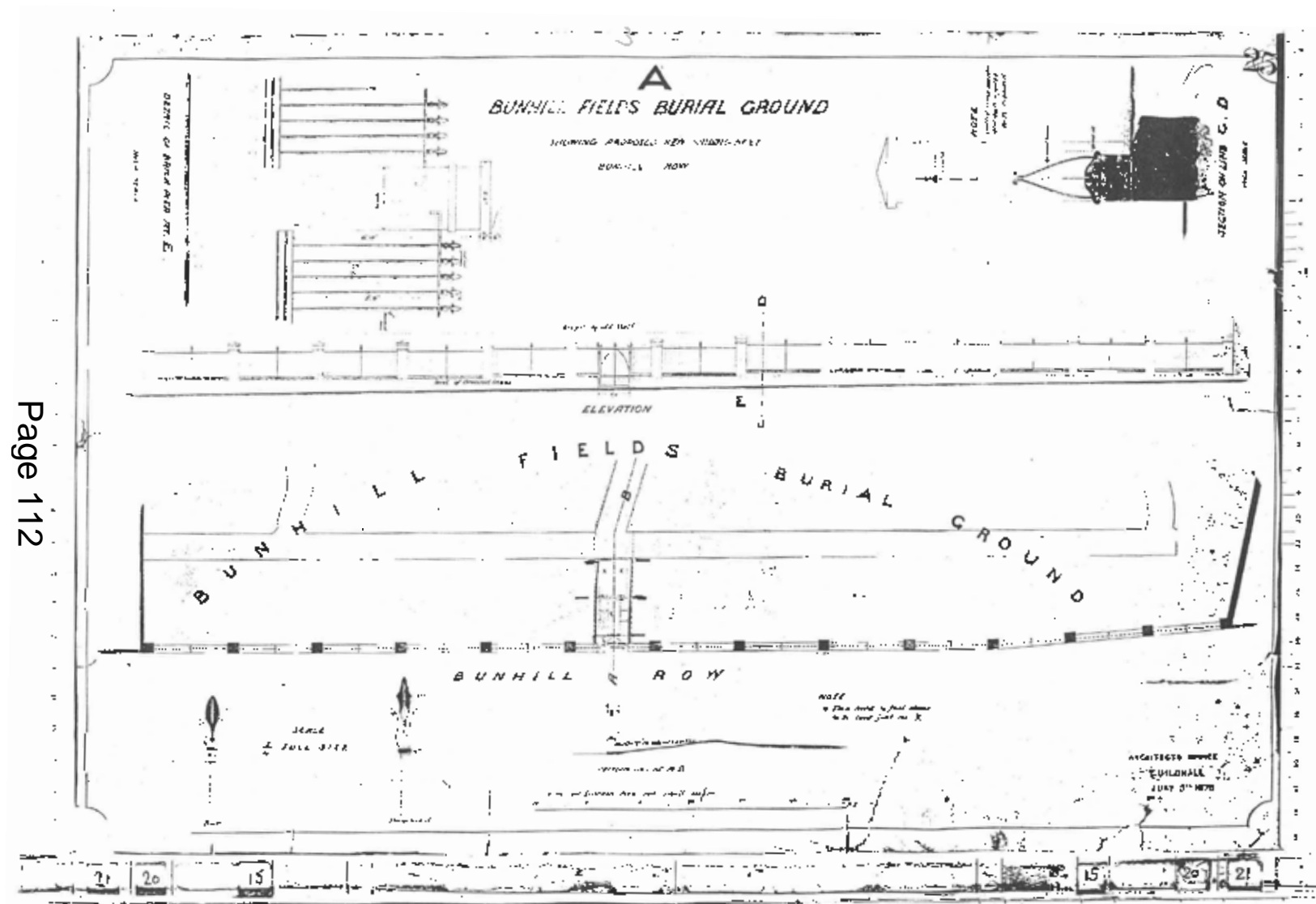


East boundary railings



Designs for the Bunhill Row railings and gates (November 1878) City of London Archives





Designs for the Bunhill Row railings (November 1878) City of London Archives

# UNDERSTANDING THE BURIAL GROUND

## Character Area 4: Paths

There are essentially three broad types of paths (in varying states of preservation):

- Gravel paths meandering through the four burial plots;
- Path paved with large stone slabs that forms the central spine of the burial ground running east to west connecting City Road to Bunhill Row;
- Brick-paved paths laid out in the 1960s following Shepheard's re-design



Western end of the main east-west path



Central broadwalk, looking south



Central path, east end



Path in the Garden of Rest



Serpentine path in the south enclosure



Gravel path in the west enclosure

All photos on this page taken November 2019



## UNDERSTANDING THE BURIAL GROUND

### Character Area 5: Buildings

The two buildings in the burial ground date to Shephard's 1960s scheme. The brick enclosure, designed to blend into the east boundary wall, comprises a north block, a maintenance yard and a south block. There is a lockable covered storage building including a WC within the enclosure which is used by Friends of City Gardens volunteers and a WC externally which is used by the gardeners. The gardeners' hut is positioned just to the north of the central path where it meets the central broadwalk. It functions as an office base for the gardeners and rest room for contractors working on site in memorial conservation and an information point for visitors.



*Gardeners' hut, east side*



*South end of the south block*



*Gardeners' hut from the south west*



*North end of the north block*

## UNDERSTANDING THE BURIAL GROUND

### 2.3.3 SITE FURNITURE AND SIGNAGE

Site furniture consists of timber benches, litter bins and freestanding sign boards. There are three types of park benches: standard timber benches around the perimeter path of the Garden of Rest and two different types of standard timber benches on the central broadwalk.

Signage is in a range of styles. Large signs at the entrances convey a lot of information. They are at high level, are set back from the path, and much of the text is in a small font. Notices mounted on the railings and gates also have small text. These indicate how to contact the staff to obtain entry to the burial and

monument areas. There are older-style interpretation boards fixed to the buildings, offering useful information.

Issues regarding the accessibility of the signage and suitability of the site furniture are explored in the Access report – see Appendix J.



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Timber bench seat with two arms



Timber bench seats with four arms



Freestanding sign board



Signage at the west end of the east-west path



Signage at the east end of the east-west path



Bins (July 2020)



Signage on the gardeners' hut



## UNDERSTANDING THE BURIAL GROUND

### 2.4 ECOLOGY

Note - for a more detailed assessment of the site's ecology, see the Ecological Management Plan by Greengage. This is reproduced in Appendix H, Volume 4.

#### 2.4.1 NATURAL HABITATS

The habitats on site comprise amenity grassland, hardstanding, introduced shrub, native species-rich hedgerow, improved grassland, mature scattered trees and ephemeral/short perennial vegetation. These combined habitats therefore provide an important ecosystem. The monuments are generally limestone and in complete contrast to the neutral pH of the soil. As such they host a different flora of lime-loving plants, mosses, lichens and ferns.

The site lies within an extremely urbanised area of central London where there is very little opportunity for wildlife to thrive. The graveyard therefore acts as a stronghold for a variety of bird, bat, invertebrate and small mammal species. The many mature trees and natural habitats on site contributes towards climate resilience, by mitigating against the urban heat island effect and acting as a carbon sink.

The site contributes to health and well-being by providing a greenspace which allows visitors to reconnect with nature in an area so far removed from it.

#### 2.4.2 TREES

Across the site the large mature canopy trees are London planes. Other canopy trees including lime and oak species are also noted but tend to be either younger or showing less developed crowns as a result of struggling to establish themselves beneath and between the wide-spread open crowns of the London planes. To inform the CMP, a tree survey was undertaken in November 2019. This is reproduced in Appendix I, Volume 4. In total, 109 trees were identified within the burial ground with all but one being broadleaved species. They include a mix of species, life stages and condition.

Physiologically the tree stock is shown to be in good to fair condition with few significant defects (such as from decay or disease) that suggest the need for urgent or short-term arboricultural works. They are included within a routine tree survey and maintenance programme.

Unfortunately, whilst historic site planting has resulted in the relatively well-spaced majestic structures of the London planes, many of the more recent plantings are suffering structurally from phototropic growth. This has led in many cases to the development of asymmetrical and imbalanced crowns, fastigate structures (with underdeveloped lower limbs and small upper crowns). In some cases there are dead and dying sections, resulting from over shadowing.



Summer tree canopy in the South Enclosure (July 2020)



Some mature and early mature trees (trees with significant future growth potential) are clashing with standing gravestones and tombs. Key observations here include:

- a Fully mature trees that have partially enveloped or lifted graves or monuments, however, these have little future growth potential, so will not significantly worsen the existing situation/damage.
- b Large trees that are in the process of enveloping or lifting graves or tombs with remaining future growth anticipated that will most likely continue to damage the adjacent graves/tombs.
- c Early mature trees with significant growth potential close to graves or tombs, where future damage can be anticipated.
- d Early mature trees with significant growth potential close to graves or tombs, where the above ground root spread is already causing damage to graves or tombs. Significant damage is likely to occur as a result of future growth.

The following observations were also noted:

- a Large mature trees (mainly London planes) have grown up close to graves or tombs with only superficial impacts (suggesting that not all trees with future growth potential next to graves or tombs will result in significant damage).
- b A number of site trees are noted to be in locations where their future growth potential is not considered to present significant impacts or damage to graves or tombs.

It is also noted that in a number of areas across the site, trees are pushing up and through paths and fence railings, which will no doubt require maintenance and repair. The extent of repair then depending on the age, size and proximity of the trees/obstacles in question and the anticipated future growth and therefore potential damage to these structures.



*Fully mature tree with little growth potential*



*Tree with significant growth potential*





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*Only mature tree with significant growth potential*



*Root spread causing damage to tomb*



*Minor potential for future damage from a mature tree*



*Tree sufficiently spaced from tombs*



*Damage to pavement from buttress roots.*



*Example of proximity of tree roots to headstone. (photos by Sally Strachey Historic Conservation, Feb 2020)*



## 2.4.3 BIRDS

Bunhill is known to support a range of species which are otherwise uncommon in central London. Bird species known to nest and forage on site include great tit (*Parus major*), blue tit (*Cyanistes caeruleus*), wren (*Troglodytes troglodytes*), robin (*Erithacus rubecula*) and spotted flycatcher (*Muscicapa striata*), a UK BAP species. Other bird species observed using the bird feeders include wood pigeon (*Columba palumbus*), goldfinch (*Carduelis carduelis*), and carrion crow (*Corvus corone*).

Several of the trees on site were found to have birds' nests present within the canopy. The size, shape and distribution of the nests identified were indicative of several species, although due to the time of year in which the survey took place (November 2019) it is not possible to say this with any certainty. Several bird boxes were also present on site. They provide additional nesting space along with the many trees and areas of introduced shrub.

The site also has value for foraging birds. Several berry-producing shrubs identified provide a valuable winter foraging resource for birds. The mature trees and grassland also provide habitat for a range of invertebrate species which in turn provided a food for birds. The site is particularly vital resource for birds in an area where other feeding grounds are scarce.



Blue Tit



Great Tit



Spotted Flycatcher



Wren



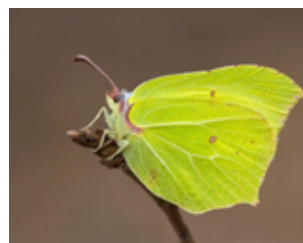
Carrion Crow



Robin



Goldfinch



Brimstone Butterfly

## 2.4.4 BATS

The site is of considerable value for bats (EMP, 3.43 – 3.47). The site provides suitable habitat for commuting and foraging bats. The scattered trees, grasslands and introduced shrub are all likely to provide habitat for invertebrate prey populations in an area where such resources are typically limited. The site also potentially forms a stepping-stone habitat link for commuting bats. Eight trees with potential to support roosting bats were identified on site, features were mostly found on the mature London planes.

## 2.4.5 INVERTEBRATES

The site has log piles and leaf compost bins that encourage invertebrates. The partially buried deadwood piles have potential to support species such as stag beetle. The site is important for pollinators, including bumblebees, solitary bees, and hover flies as well as butterflies, including the brimstone butterfly. The Shepherd beds provide forage for early emerging pollinators and the West enclosure is rich in forage and nest sites. Data on pollinators has been collected for the last three years and the site is included in a Bee Walk transect for the Bumblebee Conservation Trust.

All images of birds  
© Royal Society for the Protection of Birds

Brimstone Butterfly  
© Butterfly Conservation



# UNDERSTANDING THE BURIAL GROUND

## 2.5 LEGISLATIVE FRAMEWORK

This section provides a brief overview of current relevant legislation. It focuses on heritage legislation and policies relevant to the special elements of Bunhill Fields. The legislation and guidance are updated at intervals and the most up-to-date information should always be sought from the relevant website.

### 2.5.1 THE CITY OF LONDON VARIOUS POWERS ACT 1960

This is perhaps the most relevant legislation in relation to this site. To make any significant changes to the layout of the burial ground, it would be necessary to obtain a new Act of Parliament. The Act is reproduced in Appendix E. Part III of the Act confers powers to the City of London Corporation to 'hold and administer Bunhill Fields as a memorial burial ground'. Details of these powers and duties are set out in paragraphs 20 – 28 of the Act and cover such matters as:

- enclosures with walls, gates and fences
- laying out of paths
- providing structures and conveniences
- planting and lighting
- 'maintain, lower, cover up and remove tombstones' Para 24(1)
- levelling or raising the surface of the ground
- recording of tombstones Para 24(2)
- deposit of items of geological or antiquarian interest (Para 27)

The Act specifically authorised the scheme of improvement (Para 25) and made provision for future changes to this scheme, subject to Ministerial approval (Para 26).

Advice has been obtained from the Comptroller and City Solicitor's Department regarding the application of the 1960 Act in relation to subsequent legislation requiring Listed Building Consent. The advice received is that the Corporation would not be exempt from the requirement to obtain Listed Building Consent when carrying out improvement works under Section 25 of the 1960 Act. Section 26 which requires the Secretary of State's approval to the variation of the scheme of development in Section 25 is still in force.

Therefore Listed Building Consent is required for any works which affect the special character of any of the listed structures at Bunhill Fields Burial Ground, and applications will be made to the London Borough of Islington.

In addition, if any significant alterations or improvements were proposed, the Secretary of State's approval to the variation of the scheme of development detailed in City of London (Various Powers) Act 1960 would be required.

### 2.5.2 HERITAGE DESIGNATIONS

The following statutory designations apply to Bunhill Fields Burial Ground:

- It contains 8 list entries at Grade II\* and 68 list entries at Grade II. The majority of these listings refer to individual monuments. One entry (List Entry No.1195541) includes the eastern, southern and western boundary walls and railings. Details of all list entries are included at Appendix F.
- It forms part of the Bunhill Fields Burial Ground and Finsbury Square Conservation Area (designated by the London Borough of Islington).

Note: The majority of the list entries refer to individual memorials. However, two of these entries are for groups of tombs (List Entry no.1396555 is for group of nine chest tombs in the south enclosure. List Entry no.1396533 is for group of five chest tombs in the west enclosure. List Entry no. 1396551 includes a sarcophagus tomb and a tomb stone. There are a number of other listings which are a combination of headstone and foot stone, chest tomb and a head stone. These ones are typically for members of the same family.

In addition, the burial ground has some non-statutory designations:

- In 2010 the site was added to the Register of Historic Parks & Gardens at Grade I. This means that the local planning authority must consult Historic England and notify the Gardens Trust regarding all planning applications affecting the registered site or its setting. The Register Entry is reproduced in Appendix C.

## UNDERSTANDING THE BURIAL GROUND

- It is included within the Moorfields Archaeological Priority Area (Tier 2). Tier 2 is defined as 'a local area within which the GLHER holds specific evidence indicating the presence or likely presence of heritage assets of archaeological interest'.
- It is a Site of Borough Importance for Nature Conservation (SBINC) Grade 2. Current site code: ISBII09. SINCs are non-statutory designated sites identified by local authorities. In London, sites are categorised of importance at a Metropolitan, Borough and Local level.

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### 2.5.3 NATIONAL LEGISLATION

Listed buildings and conservation areas are protected under the *Planning (Listed Buildings and Conservation Areas) Act 1990*. There is no separate consent system for sites included in the Register of Historic Parks and Gardens, however, their significance is a "material consideration" for the local planning authority when considering any proposed development affecting these sites or their settings.

The National Planning Policy Framework (NPPF) introduced in March 2012, and revised in February 2019, sets out the Government's planning policies for England and how these are expected to be applied in the presumption in favour of sustainable development. The NPPF is a material consideration for local planning authorities in determining planning and

LBC applications. Of relevance for Bunhill Fields Burial Ground is Section 16 ('Conserving and enhancing the historic environment') and Section 15 ('Conserving and enhancing the natural environment').

### 2.5.4 THE LONDON PLAN

At the time of writing (July 2020) the adopted Development Plan is the 2016 London Plan. A draft new London Plan was published by the Mayor for consultation in December 2017. This is a material consideration in planning decisions and gains more weight as it moves through the process to adoption.

### 2.5.5 ISLINGTON LOCAL PLAN

The burial ground is located within London Borough of Islington, therefore policies adopted by London Borough of Islington will apply to development, whereas the City of London's role is that of owner and manager.

The overarching policy for the borough is contained in the London Borough of Islington Local Plan which was adopted in 2010. The Core Strategy was adopted in February 2011. Out of the 20 core strategies listed in the Local Plan, Policy CS7 is specific to Bunhill and its neighbouring area of Clerkenwell. In addition to this, Policy CS 8 (Enhancing Islington's character), CS9 (Protecting and enhancing Islington's built and historic environment) and CS15 (Open spaces and green infrastructure) will apply.

The Council submitted a revised version of the Local Plan to the Secretary of State in February 2020. Once adopted it will replace the existing Local Plan which was adopted in 2011 and 2013.

Information and guidance relating to the conservation area can be found in the *Bunhill Fields/ Finsbury Square Conservation Area Design Guidelines (CA22)*. This is available on Islington Borough Council's website.

### 2.5.6 HISTORIC ENGLAND GUIDANCE

Historic England provides a range of guidance on the historic environment, how to care for it and how to develop proposals for change. The overarching document is *Conservation Policies, Principles and Guidance* (2008).

Other key documents include:

- *Historic England Advice Note 2: Making Changes to Heritage Assets* (2016)
- *Good Practice Advice Note 3: The Setting of Heritage Assets* (2017)
- *Statements of Heritage Significance: Historic England Advice Note 12* (2019)

Historic England's website has a range of detailed advice on looking after historic cemeteries, churchyards and burial grounds - see text box on [p.34](#).

## UNDERSTANDING THE BURIAL GROUND

### 2.6 PLANNING HISTORY

The City of London has been working in close liaison with the London Borough of Islington and Historic England on matters regarding works affecting the heritage assets in the burial ground. For example, the existing repair codes used for the repair of memorials were established in the previous CMP, and since that time the codes have been adopted in consultation with the LBI and HE. The LBI have always been notified of works carried out to memorials done under the existing and previous measured term contracts.

On 12 May 2017, the Secretary of State for Communities and Local Government gave consent for the 'plaque' marking the site of William Blake's grave.

There are no records of any applications for planning permission or Listed Building Consent on the planning portal (covering the period 1980 – 2020). All works to memorials in the current and past measured term contracts and all repairs done to railings and gates were agreed with the London Borough of Islington via email exchanges rather than formal applications for Listed Building Consent. However there have been application for works to trees as noted below:

Application Ref.	Nature of application	Date of decision
P2014/3903/TRE	Tree works in a Conservation Area	[Not recorded]
T110060	Tree works in a Conservation Area	Approved 24-02-2011
T090060	Tree works in a Conservation Area	Approved 24-02-2009
T070573	Tree works in a Conservation Area	Approved 27-11-2007
P051143	Tree works in a Conservation Area	Approved 09-05-2005

### 2.7 ARCHAEOLOGY

The Burial Ground lies within a Tier 2 Archaeological Priority Area which covers the historic area of Moorfields, Islington. The APA is classified as Tier 2 because it is a historic urban area with late medieval origins which includes the post medieval sites of St Luke's Hospital, Bunhill Fields and other historic burial grounds. It also has demonstrated potential for prehistoric and Roman finds (Source: *London Borough of Islington Archaeological Priority Areas Appraisal* July 2018).

GLAAS (Greater London Archaeological Advisory Service) is part of Historic England's London local office. They are advisers to the Local Planning Authorities within London (excluding City and Southwark). They strongly recommend that applicants engage with them at an early stage in order to identify any potential archaeological requirements. Information about GLAAS, including their *Guidelines for Archaeological Projects in Greater London*, can be found on the Historic England website. MOLA are a commercial organisation who have been employed previously to carry out archaeological work at Bunhill Fields Burial Ground.

The current procedure for engaging with archaeology is fit for purpose and in accordance with standard practice. Prior to any works which require ground reduction a method statement (Written Scheme of Investigation/WSI) is submitted which sets out the archaeological method and the aims and objectives.

## SECTION 3.0

### ASSESSMENT OF SIGNIFICANCE

The following section provides an assessment of the heritage and ecological significance of Bunhill Fields Burial Ground. It forms the foundation of understanding and decision-making about the site because conservation is based on the principle of preserving and enhancing significance. This section considers the entire site, whereas the Gazetteer provides a brief statement of significance for each sub-area. The heritage significance of groups of monuments or individual monuments (where relevant) has also been included in the Gazetteer.

#### 3.1 DEFINING HERITAGE SIGNIFICANCE

Significance is defined in the National Planning Policy Framework (first published 2012, as amended 2019) as ‘the value of a heritage asset to this and future generations because of its heritage interest’. Such interest may be archaeological, architectural, artistic or historic and it may derive ‘not only from a heritage asset’s physical presence, but also from its setting’. Guidance on how to interpret these interests is contained in *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England, October 2019.

The analysis of significance presented in this section is based on the four heritage values defined in Historic England’s *Conservation Principles, Policies and Guidance* (2008): Evidential, Historical, Aesthetic and Communal. In addition, the ecological significance is noted at para 3.6, based on the Ecological Management Plan (Appendix G).

#### ‘Heritage values’ compared with ‘Heritage interests’

**Heritage values** as defined in *Conservation Principles* (2008)

**Evidential value.** The potential for a place to yield evidence about the past which could alter or enhance the perception of why it is significant. This could, for example, be in the form of intact below-ground archaeology not yet known or excavated.

**Aesthetic value.** The ways in which people draw sensory or intellectual stimulation from a place. This can, for example, be as a result of good design, the use of suitable materials in buildings or the character of the setting or landscape.

**Historical value.** The ways in which past people, events and aspects of life can be connected through a place to the present - it can be illustrative or associative.

**Communal value.** The ways in which the site brings people together as a community. It encompasses commemorative, symbolic, spiritual and social values.

**Heritage interests.** Terms used in the NPPF (2012) and explained in Historic England’s guidance on Statements of Heritage Significance (2019)

**Archaeological interest** There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point

**Architectural and artistic interest** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

**Historic Interest.** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Note: Historic England is due to update the *Conservation Principles, Policies and Guidance* document to align with the NPPF definition of significance and Advice Note 12 - *Statements of Heritage Significance* published in October 2019.

## ASSESSMENT OF SIGNIFICANCE

### 3.2 ASSESSMENT OF SIGNIFICANCE

The degree of significance of Bunhill Fields Burial Ground is assessed using the following ratings:

#### Very High:

A theme, feature or space which is important at national or international level, such as highly graded Listed Buildings and landscapes. It will have high heritage value and form an essential piece of the history of a building or site, while greatly contributing towards its character and appearance. Large scale alteration or removal of features of this level is likely to be strongly resisted.

#### High:

Themes, features or spaces which are important at regional level or sometimes higher. They will have some heritage importance and play an important role in defining the character and appearance of the building or site. Efforts should be made to retain features of this level, though a greater degree of flexibility in terms of alteration would be possible than for those items of very high significance.

#### Medium:

Themes, features or spaces which are usually of local value only but possibly of regional significance for group or other value. Items have heritage importance and add something to the character or appearance of the buildings or site. A potential for enhancement of the feature is more likely to exist this scenario, though a medium value does not necessarily mean a feature is expendable.

#### Neutral:

These themes, spaces or features have little or no heritage value but do not detract from the character or appearance of the building or site. Alteration is likely to be possible.

#### Intrusive/detracting:

Themes, features or spaces which actually detract from the values of the site and its character and appearance. Efforts should be made to either completely remove these features or alteration is proposed that is in keeping with the cultural significance of the site.

#### 3.2.1 EVIDENTIAL VALUE

The evidential value of the burial ground lies in its archaeological potential, including potential to reveal further information regarding burials. There have not been any major archaeological investigations of the site, however there have been a number of archaeological records by MOLA – as listed in Appendix A. There is high potential for the recovery of buried archaeological evidence. For example, should it be decided to relay the central pathway, this could be an opportunity to record any vaults beneath it.

There is a large corpus of documentary evidence chronicling the history of the burial ground. Much of the information has been collated at the Guildhall and London Metropolitan Archives. The original registers for the burial ground are held at The National Archives (TNA). The complete record collection comprises approximately 71,100 burials for the

period 1704-1854. The London Metropolitan Archives hold interment order books (1789-1854) and a list of inscriptions visible in 1869 on gravestones of persons buried 1700-1854, with an index and map.

The evidential significance of Bunhill is **high** in terms of its burial archaeology potential, and the potential of documentary records to further enhance understanding of the site.

#### 3.2.2 HISTORICAL VALUE

The historic value of the burial ground lies predominantly in its far-reaching historic associations and its documented past. As England's foremost non-conformist burial ground, Bunhill is the last resting place for a large number of historically significant personalities. The restoration of the burial ground following wartime bomb damage and the improvements made from 1960 by Peter Shephard's designs are a significant aspect of its history. The historical value in terms of historical associations is considered to be **very high**.

#### Historic figures buried at Bunhill Fields

**John Bunyan (1628-1688).** He began as a tinker from the village of Elstow, near Bedford, but turned to religion and became a travelling preacher. He was imprisoned for unlicensed preaching (1660-72). During this time he wrote a spiritual autobiography, *Grace Abounding to the Chief of Sinners*, before starting work on *The Pilgrim's Progress*. Bunyan is buried in Bunhill Fields. In 1862 a recumbent statue was created to adorn Bunyan's grave; it was restored in 1922 and 1996.



## ASSESSMENT OF SIGNIFICANCE

**John Owen (1616-1683)** was an English non-conformist church leader ‘prince of the puritans’, theologian and academic administrator. During the English Civil War he sided with Parliament and became Oliver Cromwell’s chaplain in Ireland in 1649. Later he became Vice Chancellor at Oxford University. He helped to get John Bunyan out of jail.

**Daniel Defoe (1660-1731).** Daniel Defoe born Daniel Foe, was an English trader, writer and journalist. He is most famous for his novel Robinson Crusoe and has been seen as one of the earliest proponents of the English novel. Defoe was a prolific and versatile writer on diverse topics, including politics, crime, religion, marriage, psychology, and the supernatural. Defoe was interred in Bunhill fields on his death in 1731 and a monument was erected for him at Bunhill fields in 1870.

**Hannah Wesley (1669-1742)** Mother of John Wesley, the founder of Methodism who is buried at Wesley’s Chapel on City Road.

**Rev. Thomas Bayes (1702-1761).** A British mathematician and Presbyterian minister, known for having formulated a special case of Bayes’ probability theorem.

**William Blake (1757-1827).** An artist, poet and visionary. He was not widely recognised in his time, but today he is considered a major reference point in British culture.

**Thomas Pringle (1789-1834)** was a Scottish writer, poet and abolitionist. Known as the father of South African poetry, he was the first successful English language poet and author to describe South Africa’s scenery, native peoples, and living conditions.

### Listed memorials

Details of the listed memorials and structures at Bunhill Fields Burial Ground are contained in Volume 3 of the CMP. Eight of the memorials are listed at Grade II\* indicating that these have particular importance, being of more than special interest. They are:

- Monument to Sarah and John Wheatly (Burial 18/44, East Enclosure, Area 15), an exceptionally well-preserved late-18th century headstone, with decorative lettering and carving of excellent quality.
- Tomb of Mary Boyle (Burial 32, South Enclosure, Area 4). A well-preserved tomb of c1816, in an elegant neoclassical design.
- Monument to Dame Mary Page (Burial 34, Broadwalk B). This is an exceptionally large and imposing early-18th century chest tomb which bears a remarkable and moving inscription.
- Monument to Henry Hunter (Burial 88, Middle Enclosure, Area 14). A highly imposing architecturally-conceived monument, using Coade stone, commemorating a prominent writer and translator of the late 18th century.
- Monument to Daniel Defoe (Burial 97, Broadwalk A), dated 1870. It commemorates a pivotal figure in English literary history, whose work shaped the growth of periodical journalism and laid the foundations for the development of the novel.
- Monument to Joseph Denison (Burial 145, South Enclosure, Area 4). A well-preserved tomb of c1806 in an elegant Neo-Grecian design.
- Monument to Thomas & Hannah Miller (Burial 164, South Enclosure, Area 7). An unusually fine example of Baroque monumental sculpture, the best of its kind in the burial ground.
- Monument to John Bunyan (Burial 195, Broadwalk A), dated 1862. This commemorates the author of one of the most enduringly popular and influential works in English prose. It is a rare example of a public work by the prominent Victorian sculptor George Papworth.

## ASSESSMENT OF SIGNIFICANCE

### 3.2.3 AESTHETIC VALUE

The aesthetic value of the burial ground derives both from the varied design of individual memorials and the landscape quality of the burial ground as a whole. Its preservation with cramped memorials is a unique insight into the character of central London cemeteries of the 18th and early 19th centuries. Historic England's register entry refers to it as 'a rare surviving inner-city burial ground with unsurpassed evidence for the cramped appearance of Georgian metropolitan burial grounds'. The layout of the Garden of Rest in the northern part of the burial ground, dating from the early 1960s, offers a contrasting landscape character. See box adjacent.

Bunhill Fields has a distinct and different aesthetic character compared to the new London cemeteries which emerged in the 1830s and 1840s (e.g. Kensal Green, opened 1833, and West Norwood, opened 1837). These were laid out afresh as formal, well-maintained garden cemeteries and memorial landscapes. At Bunhill, the landscape design of the 1860s was superimposed on a pre-existing cemetery of tightly packed graves and memorials (shown on the 1869 plan on [p.21](#)). A further distinction is that the majority of memorials at Bunhill are of a generally simpler and less ornate character than the ones in Victorian cemeteries, as befitting their non-conformist associations, the majority being of limestone headstones.

Bunhill was in a haphazard state when it was repurposed for public amenity in the 1860s, and a new layout of tree-lined paths superimposed on the site. However, unlike in other schemes for converting urban burial grounds to public gardens, every effort was made at Bunhill to preserve the fabric of the existing vaults and memorials. At the opening in 1869 it was stated:

*not a fragment of stone has been taken away, nor has any portion of the soil been removed. Tombs have been raised from beneath the ground, stones have been set straight, illegible inscriptions have been deciphered and recut, hundreds of decayed tombs have been restored, paths have been laid, and avenues planted... (Illustrated London News, 23 October 1869)*

It is worth comparing Bunhill to other burial-grounds-cum-public-gardens elsewhere in the City and in London. Following the foundation of the Metropolitan Gardens Association in 1882, many of the London burial grounds were reopened as gardens. St George's Gardens in Camden (Registered Park and Garden Grade II\*) originated as a burial ground in 1714 and was laid out as a single garden between 1884 and 1889.

The gardens were laid out with a system of meandering paths amidst scattered trees, with shrubberies along the north and south sides. Some table tombs and other selected monuments were kept in situ here otherwise most memorials on this site were cleared away. St George's Gardens in Tower Hamlets originated as the graveyard to the Church of St George in the East. The churchyard was cleared of headstones and opened as a public garden in 1886 and remains in this use.

The current aesthetic character at Bunhill has evolved during the past 150 years since the Burial Ground was reopened, with the density of tree canopy much greater than shown in photographs of 1870 (see [p.22](#)), and the Garden of Rest introducing a feeling openness in the northern section of the site. The calm and tranquil character of the site is an important aspect of its appeal. This is enhanced by its greenery and generous canopy of trees, contrasting with the busy urban environment of the surroundings.

Notwithstanding a number of detracting features, as identified on [p.54](#), the overall aesthetic heritage value of the site is **Very High**.

### Significance of Shepheard's work at Bunhill

Many of Shepheard's landscape schemes survive - his work at Pennsylvania, Lancaster University, London Zoo and Bessborough Gardens are all largely intact as are his interventions and additions to countless cemeteries maintained by the Commonwealth War Graves Commission. In the context of this extensive oeuvre, his work at Bunhill was relatively minor and suffered from a reduction in scope due to client pressure. Nonetheless, his work there did express the subtle pragmatism that lay behind many of his designs, whether architectural or landscape.

Within the context of an altered brief, Shepheard's decision to create an open garden contributed to the continued survival of the rest of the burial ground as a cemetery - at a time when many authorities were being more wholesale about the conversion of cemeteries into public parks. The scheme has survived well as a direct result of the pragmatic approach and it has allowed the planting to evolve around and within it.

The public part of the burial ground has historic importance for its relationship to Shepheard as a notable twentieth-century designer. It illustrates the sensitive, modern approach for which he is recognised and celebrated. It demonstrates a new style of public space which combines semi-enclosed 'external rooms' defined with planting, leading onto a central communal lawn space. Landscape design became an important part of architectural design in the post-war period and this is recognised by the 29 designated post-war landscapes currently on Historic England's Register of Historic Parks and Gardens. Bunhill's qualities are understated, but it remains a carefully considered scheme by Shepheard that successfully reconciled a need for public amenity with a desire to retain the antiquarian character of the burial ground. Shepheard's landscape scheme at Bunhill Fields is of high aesthetic significance in its own right; in addition the Garden of Rest has high evidential value (primarily for its burials), very high historical value (primarily for its associations with notable people) and very high communal value (primarily as a public amenity). These aspects of significance are explained in more detail in the Gazetteer entry for Character Area 2.

# ASSESSMENT OF SIGNIFICANCE

## Detracting Features

There are some features which tend to detract from the aesthetic quality of the site:

- the metal shutters which cover the doors and windows on the buildings
- staining on the brickwork of the maintenance area
- worn areas of grass and muddy patches in the Garden of Rest
- litter, most noticeable on the boundary
- weeds and natural debris within the burial enclosures
- inconsistency in the presentation of different burial areas
- the tall railings along the central pathway, obscuring views of the monuments
- occasional intrusion of temporary building works
- leaf storage bins and bags, especially noticeable in the west enclosure

The setting of the burial ground has been harmed by prominent new development close to the boundaries of the Garden of Rest on its west, north and east sides.



*Monuments in poor state of repair*



*Worn areas of grass and muddy patches in the Garden of Rest and enclosures*



*Railings and turf erosion along the central pathway*



*Metal shutters to the doors and windows on the buildings*



*Litter from the street, most noticeable on the east and west boundaries*



*Intrusive new development close to the boundaries of the Garden of Rest*



*Staining on the brickwork of the maintenance area*



*Leaf storage bins*



*'Dead' space on the northern border of the Garden of Rest*



## ASSESSMENT OF SIGNIFICANCE

### 3.2.4 COMMUNAL VALUE

The burial ground provides a tranquil haven used by a wide cross section of the local community. Islington has a very low proportion of green space. Some local households live in overcrowded conditions and a high proportion of these have little or no access to private or communal open space. Thus for some local residents it is their nearest green space. Therefore Bunhill Fields contributes towards alleviating the deficiency in access to public open space in the area. For city workers it provides a place of retreat during breaks from work. Its value to the local community is demonstrated by the support it receives from the Friends of City Gardens. The burial ground also attracts visitors, both from the main and overseas, on account of its non-conformist associations.

Various events and activities are held in the burial ground. These have included:

- annual Green Garden Lunchtimes talks
- workshops for local businesses and organisations
- City Guides' walks (Spring to Autumn) across the site discussing Bunhill's historical and horticultural significance
- Victorian Family Games Day (2014)
- participation in Open Garden Squares Weekend

Links with local schools and community groups have also been retained and fostered through a series of talks and events.

The communal value of the burial ground both historically and in the present day is considered to be **very high**.

### 3.3 ECOLOGICAL SIGNIFICANCE

Bunhill Fields Burial Ground is important within the local context for its Biodiversity. It is a Site of Borough Importance for Nature Conservation, with mature trees providing habitat for birds and bats and the shaded memorials provide habitats for lichens, bryophytes and ferns. Some of the brick walls have a partial covering of climbing ivy which provides nesting sites for birds so is valuable from an ecological point of view.

A detailed assessment of the site's ecological value and potential is provided in the Ecological Management Plan by Greengage, reproduced in Appendix H. This states that:

*Opportunities for wildlife are limited in central London. Bunhill therefore likely acts as a stronghold for a range of bird, bat, invertebrate and small mammal species, as well as providing a sheltered greenspace*

*which allows visitors to reconnect with nature in an area otherwise far removed from it. The site is also an important space for flora with a relatively diverse assemblage of flowering species and locally notable populations of lichens, bryophytes and ferns.*

*In addition to the value the site offers to biodiversity and user's health and wellbeing, the many mature trees and natural habitats on site are likely to contribute to the climate resilience of this small part of Islington, through mitigating the urban heat island effect, reducing surface flood risk and acting as a carbon sink.*

The EMP explores the potential for enhancement of ecological value in detail, see Section 5 of the EMP, pp.21-49.

The ecological value of the burial ground is considered to be **high**, with high potential for enhancement.



## ASSESSMENT OF SIGNIFICANCE

### 3.4 SUMMARY OF SIGNIFICANCE

Bunhill Fields Burial Ground is nationally important as the pre-eminent non-conformist burial ground in England between the second half of the seventeenth century and the middle of the nineteenth century, when burials ceased. The preservation of the majority of the burial ground with cramped memorials is a unique insight into what central London cemeteries of the 18th and early 19th centuries would have looked like. Many of the individual memorials are listed as being of special architectural or historic interest in their own right. They record notable non-conformist figures including [John Bunyan](#), [Daniel Defoe](#) and [William Blake](#), along with many other clergymen, scientists and free-thinkers. The importance of this unique landscape, including the Garden of Rest designed by Peter Shepheard in the 1960s, is recognised by it being registered as a Grade I Historic Park and Garden. The burial ground is also important as a natural habitat, as a green oasis in the city and as a valued amenity for people living and working nearby.

## SECTION 4.0

### ISSUES AND OPPORTUNITIES

This section provides an analysis of the issues and opportunities across the burial ground, encompassing both heritage and ecological issues. These underpin the policies which follow in [Section 5](#). References are provided to the appendices where a more detailed analysis or description can be found in the Gazetteer (Appendix B), Ecological Management Plan (Appendix G) and Access Plan (Appendix H).

The topics in this section are organised thematically:

- A Access and interpretation
- B Buildings and monuments
- C Landscape design
- D Archaeology
- E Ecology and wildlife
- F Management and resources
- G Sustainability

Topic	Context and Issues	Opportunities and Recommendations
<b>A Access and interpretation</b>		
Access within the site	Access within the site is fairly straight-forward due to the level topography and absence of steps or long ramps.	There is potential to improve the gates into the burial enclosures to make them accessible for wheelchair users. See Access report, para 2.5.
Access to burial enclosures	<p>The burial enclosures are not open to the public. Access is only permitted by contacting a member of the site staff to unlock the gates.</p> <p>Previous experience of allowing access to the south enclosure suggests that even with some form of temporary fencing, members of the public would stray off the path, dogs would be let off leads, there would be people sitting on tombstones and increased litter. Therefore using the serpentine path as a relief for the congested central path is not recommended.</p> <p>The condition of the paths within the enclosures is variable and inhibits safe access.</p>	<p>Create a new gateway access into the south enclosure from the central section of the main east-west footpath. If some open access is allowed, this would need to be at limited times and under careful supervision in order to monitor the safety of anyone entering the enclosure.</p> <p>The serpentine path in the south enclosure could be opened to the public for a trial period under controlled conditions.</p>

Topic	Context and Issues	Opportunities and Recommendations
Site interpretation	The existing interpretation is not sufficiently informative, engaging or accessible.	<p>There is potential to interpret the history on non-conformism by linking the history of the burial ground with Wesley's Chapel and the Quaker Burial Ground.</p> <p>The existing guide book is considered to be too academic in style and is out of print. There is potential to produce a more popular guide book which could be sold to visitors.</p> <p>The signs at the entrances from Bunhill Row and City Road could be re-designed to make them easier to read (thus at a lower height and with text in a larger font).</p> <p>New information boards could be introduced regarding flora and fauna including bats, invertebrates, bird and plant species (Ecological Management Plan 4.81 – 4.84).</p> <p>A chalk board sited next to the gardeners' hut could be introduced to record any notable/interesting wildlife sightings (EMP 4.85 – 4.87) and to advertise daily walks/talks during the summer months.</p> <p>Provide information about the conservation programme so visitors can understand any works which are in progress or planned</p>
Website	The website is clear and well organised <sup>01</sup> .	<p>Potential improvements to the website could include:</p> <ul style="list-style-type: none"> <li>• A direct link to the map of burials</li> <li>• Information about individual graves and notable people buried on the site</li> <li>• Information about walks and talks</li> <li>• An interactive map of the site with the option of clicking on some of the memorials for further information</li> </ul> <p>(Access Plan 2.1).</p>

<sup>01</sup> <https://www.cityoflondon.gov.uk/bunhillfields>

Topic	Context and Issues	Opportunities and Recommendations
Signage (Access report 2.9)	<p>There are large City of London notice boards located near the City Road and Bunhill Row entrances. These are set back from the central path at high level and some text is very small.</p> <p>The interpretation boards on the attendant's hut and notices mounted on the railings and gates have poor legibility.</p>	<p>There should be a consistent format for signs, notice boards, way-markers and interpretation panels (Access report 2.9). A framework of signage styles and formats already exists in the form of the Open Spaces Identity. A format suitable for Bunhill Fields simply needs to be selected, applied and funding identified.</p> <p>The large notice boards at each entrance could be relocated so they are at a lower level and closer to the path.</p> <p>The legibility and consistency of all signage could be improved.</p>
Intellectual access	<p>The legibility of the inscriptions has been diminished over time which lessens public engagement with the heritage, history and stories behind the people to whom these memorials are dedicated.</p> <p>Access to information regarding individual graves is not readily accessible.</p>	<p>There are many fascinating and historic characters buried at Bunhill. Monuments and memorials are now increasingly viewed as not only about history and heritage but about cultural values. This lends added contemporary interest to the memorials at Bunhill.</p> <p>There could be a facility for carrying out research using an on-line database of the memorials. Ideally this facility would be available in a convenient location on site, such as an accessible computer terminal within the attendant's hut or an external touch screen.</p>

Topic	Context and Issues	Opportunities and Recommendations
Engaging the public	<p>City of London Guide Lecturers lead guided walks, on a turn-up-and-go basis, every Wednesday throughout the summer. They also conduct walks for pre-booked groups at other times. Their standard walk is two hours long and covers both the history of the site, the people buried there, and the horticulture.</p>	<p>In addition to the existing heritage walks programme undertaken by volunteers, initiatives could include 'bat walks', run during the summer, which could be led by Friends of City Gardens, and special feature walks offered by City Guides around specific topics. For example, walks could be arranged in conjunction with Open House London and other special weekends to celebrate Blake/Defoe/Wesley in collaboration with relevant societies. There may be an opportunity to run more guided tours where participants would buy a ticket in advance. The existing City Guides could be paid out of the proceeds and more guides could be recruited either volunteers or paid. Potentially a joint arrangement with the Wesley Chapel could be investigated.</p> <p>Currently the FoCG are focussed on practical 'hands on' activities. However, there is potential for the Friends Group to broaden its scope to those who may wish to help in other ways eg research, or simply to be kept informed about the site.</p> <p>Participation in Open Garden Squares Weekend could be restarted – but with a refreshed group of Guides (Bunhill has not been participating in OGSW for the last 5 years).</p> <p>Schools could be encouraged to engage for example bug surveys, plant surveys, the 'Big Garden Birdwatch' organised by the RSPB. (EMP 5.26 – 5.29)</p> <p>Young people could be encouraged to engage with Bunhill through regular heritage skills and drawing workshops. These have been carried successfully at other sites as part of National Lottery-funded programmes. These can combine education workshops and the history of the monuments with the ecology of the site, led by ecologists and volunteers. Engagement with heritage skills can be offered through sessions with the Conservators working on site.</p> <p>There are opportunities for links to be established with the Monuments and Mausolea Trust and the National Federation of Cemetery Friends.</p>



Topic	Context and Issues	Opportunities and Recommendations
<b>B – Buildings and monuments</b>		
Public facilities (Access report 2.6)	<p>The current building does not support the public use and enjoyment of the site.</p> <p>The WC facilities are currently closed to the general public and there are no plans to reopen them.</p> <p>There is no shelter when the weather is bad. There are also no refreshment facilities or children's play equipment.</p>	<p>Use of the burial ground could be encouraged through provision of improved facilities:</p> <ul style="list-style-type: none"> <li>• accessible toilets for use by volunteers and people participating in activities</li> <li>• a kiosk for sale of tea, coffee and soft drinks. However this is a relatively low priority and would need to be carefully managed to avoid disturbing the tranquil character of the site.</li> </ul>
Buildings  See also Appendix B – Gazetteer – Character Area 5	<p>The feasibility study (<i>Reimagining Bonehill</i>, 2018) proposed demolition of the Gardener's Hut and rebuilding the existing stores and maintenance yard (138m<sup>2</sup>) on a larger footprint of 170m<sup>2</sup>. This new facility would have incorporated a kiosk for sale of refreshments and a new activity space. It would have re-provided the stores and a smaller maintenance yard.</p> <p>The existing toilet building, maintenance store and yard are in need of refurbishment.</p> <p>The existing site water supply has inadequate capacity and is prone to leaks. The stores in the depot area do not have electric power supply.</p> <p>The gardeners' hut is not wheelchair accessible, having a step at the entrance and a narrow doorway.</p> <p>Contractors on site are currently using the gardeners' hut as their resting area which is not ideal but this minimising the impact of their presence on site. In the past there was a welfare unit on site.</p>	<p>The existing maintenance building could be re-designed to accommodate improved facilities for staff and contractors.</p> <p>Assess potential for improving services (water, electricity and drainage) and refurbish. Consider using roofs for collecting rainwater.</p> <p>Replacement of the existing facilities with a new accommodation would be an opportunity to incorporate a living roof (EMP 4.45 – 4.51) to enhance biodiversity.</p> <p>The external security shutters could be replaced with a less visually intrusive security solution eg an internal shutter.</p>

Topic	Context and Issues	Opportunities and Recommendations
Monument repairs	<p>CoL maintain the memorials, working with a team of specialists including conservation contractors, structural engineers and archaeologists. CoL's Heritage Estate Section maintains close liaison with the City Gardens team, the London Borough of Islington and Historic England. Recording procedures are in place.</p> <p>Currently there is a repair programme scheduled to take place over an initial 3 years with the option to extend by a further 2 years, from 2019 to 2024. Conservation repairs have been carried out to a high standard by a specialist conservation contractor (Sally Strachey Historic Conservation Limited). All work is carried out according to the methodology set out within the Specification (see Appendix G) - the Definition of Repairs Codes. See box on <a href="#">p.34</a> regarding conservation of memorials and vaults.</p> <p>A brief survey was undertaken of all the memorials in July 2020, noting any changes since the previous condition survey of 2017. The results of this survey are contained in Volume 5, Appendix K.</p> <p>Currently (July 2020) CoL intend to appoint a consultant to undertake inspections to address conservation and safety issues.</p>	<p>Expand the existing database of memorials to provide a more complete and up-to-date record of repairs, noting their scope, date implemented and existence of more detailed records.</p> <p>Adopt a plan for a rolling programme of monument conservation. The south side of Area 7 is a priority for attention as much of the area is in a poor state of repair. See Appendix 5 for further information regarding the condition of all the memorials.</p> <p>Introduce a storage area and/or contractors' workshop to enable repairs to be carried out with less visual intrusion.</p>
Monument Cleaning	<p>The specification advises that cleaning of stone and brickwork will generally be limited to the removal of damaging pollution crusts – large scale masonry cleaning will not be undertaken.</p> <p>However, allowing biological growth to blur out the profiles of the headstones will have an adverse impact on the overall aesthetic value of the site and the ability to engage with the memorial inscriptions. The re-soiling of historic stonework with biological growth is accelerating due to the changes in climate and reduced levels of pollution. In contrast, incidence of carbon deposits on stonework is likely to decrease.</p>	<p>A balanced approach needs to be adopted which allows the sensitive removal of biological growth on the memorials to retain their profile and legibility of their inscriptions whilst retaining wherever possible the wide variety of lichens and mosses.</p> <p>The biological growth should continue to be monitored to inform the maintenance plan.</p> <p>A review of the performance of the repair mortars is advisable to monitor their durability and effectiveness.</p>

Topic	Context and Issues	Opportunities and Recommendations
New memorials	Proposals to add memorials are received from time to time. These have an implication for management resources (officers' time; need to secure funding to look after the new memorials, etc). There is a risk that new memorials could adversely affect the existing character of the burial ground.	There is no opportunity for new memorials unless an exceptional case can be made. An official policy from the City could be developed, supported by very strict design standards dictating materials, styles and dimensions as well as agreement of non-negotiable fixed locations. The City could also consider alternatives to erection of new memorials as appropriate methods of commemoration.
Monument safety	<p>While several monuments across the burial ground have been stabilised and restored, a large number of monuments are at risk of being damaged due to the following factors:</p> <ul style="list-style-type: none"> <li>• Proximity to mature trees.</li> <li>• Fox Infestation has resulted in destabilising several memorials and in some instances completely toppling them over. Repair works to stabilise memorial(s) have had to be undertaken several times in quick succession due to damage caused by foxes.</li> <li>• Decay of the roots from trees which have been removed. This has resulted in several past instances of damage to vaults.</li> </ul> <p>The headstones are checked annually by a consultant (the latest was done by Taylor Pearce Ltd in November 2018).</p> <p>CoL are currently (July 2020) preparing to appoint a conservation consultant to undertake safety and general condition inspections to memorials in a cyclical basis.</p> <p>Re-setting the headstones lower in the ground is one means of improving their stability but may compromise their appearance.</p> <p>The fox earths and holes also present a trip hazard to the public.</p>	<p>Annual inspections need to continue to identify conservation works as well as safety issues. These can provide the basis for a forward work programme of prioritised works spread over a 5-year period. Where any monuments are found to be unstable, temporary support should be provided until such time as a permanent solution can be implemented.</p> <p>A zoning approach could be taken to assessing risks, whereby higher risk is recognised in areas which are frequently used or visited such as pathways and notable monuments. A radar survey could focus on these areas as a priority to help identify any hidden voids.</p>

Topic	Context and Issues	Opportunities and Recommendations
Public safety	<p>There are various risks to public safety, including falling branches from trees, collapsing vaults and animal dug holes within the enclosures. The City of London guides only allow a maximum of 15 walkers into the enclosures at any one time with a guide and strongly advise the walkers not to stray from the path. The slabs to the central path need re-laying where they are uneven or have wide joints for safety reasons – see below.</p> <p>The safety of the central east-west pathway is critical and the stability of the vaults underneath is therefore an important safety issue.</p>	<p>Managing or reducing the fox population would help to mitigate the risk of injury to members of the public and undermining the stability of monuments. Specialist pest control advice may be required. See topic about foxes on <a href="#">p.75</a>.</p> <p>All paths should be regularly inspected for safety. A structural survey of the central east-west path is recommended as essential, as part of a phased approach to maintaining its safety (see Action Plan, <a href="#">Point C1</a>).</p>
Boundary walls and railings See also Appendix B – Gazetteer – Character Area 3	<p>The walls and railings have been subject to various works of analysis, repair and conservation during the past twenty years. Details are provided in the Gazetteer. The most recent structural condition survey was carried out in 2014.</p> <p>The brick boundary wall along the west side of the Garden of Rest has signs of differential movement between the panels of brickwork. The wall is leaning into Bunhill Fields. A structural survey of this section of wall was carried out by a structural engineer, Mason Navarro Pledge, in 2019. The recommendations have not yet been carried out (August 2020).</p>	<p>It would be desirable to replace the cement pointing with a more porous mortar which will be more aesthetically pleasing and less damaging to the brickwork.</p> <p>A regime of quinquennial condition surveys of the boundary walls and railings should be continued.</p>

Topic	Context and Issues	Opportunities and Recommendations
<b>C - Landscape design</b>		
Site presentation	<p>The site combines two distinct characters being in part a public Garden of Rest and in part a historic burial ground.</p> <p>The presentation of the site needs to strike a balance between maintaining and enhancing its heritage value, improving its biodiversity and optimising its amenity value.</p> <p>The involvement of volunteers in managing the west enclosure has changed its appearance in comparison to the other enclosures.</p> <p>Bunhill Fields is the only site within the City of London with such a large output of fallen leaves. The leaf storage bins, enclosed in chicken wire, tend to detract from the appearance of the burial enclosures.</p>	<p>There could be a more consistent approach to the management of the enclosures. A guidance manual is recommended to help volunteers contribute towards a consistent approach to landscape presentation. This should be developed in consultation between City Gardens and the Friends of City Gardens. The issues to be covered should include:</p> <ul style="list-style-type: none"> <li>• location and appearance of bird feeders, nesting boxes, bat boxes, bee posts, log piles etc.</li> <li>• advice on planting of bulbs, ferns and shrubs</li> <li>• guidance on grass cutting, leaf clearance and storage</li> <li>• health &amp; safety</li> </ul> <p>A regime of cutting twice a year within all the enclosures could be adopted, as set out in the Maintenance Plan in Section 7. More regular cutting is required for the lawn in the Garden of Rest and may be required adjacent to any regularly used paths within the burial enclosures. Currently, the west enclosure maintained by FoCG is cut by hand once a year after the wildflowers have set seed. This has allowed the natural woodland flora to return and there over 100 species of plant in this area compared to a handful in the rest of the site. Cutting twice a year, no lower than 15 cms say in later spring after the bulbs have died down and again in autumn would keep the site looking tidy and consistent but have a hugely beneficial effect on the number of invertebrates including pollinators. And consequently, would also have a positive impact on birds and bats.</p> <p>Consideration should be given to reducing the visual impact of the existing leaf storage bins and locating them away from memorials if possible. The use of a leaf shredder should reduce the storage requirement by 60% over the coming years.</p>



Topic	Context and Issues	Opportunities and Recommendations
Central east-west path (Access report 2.4.1)  See also Appendix B: Gazetteer – Character Area 4	<p>The central path is formed of large stone slabs over brick vaults below. It is used as a thoroughfare by local office workers throughout the year, especially at lunchtime. As a result of this heavy pedestrian traffic and weathering, the stone slabs have eroded areas where rainwater accumulates.</p> <p>Grooves have been cut some time ago in the edges of these slabs to allow rainwater to drain away. Also, drainage holes have been drilled in the joints between the slabs.</p> <p>There is a sign at each entrance asking cyclists to dismount. This is often ignored, leading to conflict between cyclists and pedestrians.</p> <p>Several areas of the path have been lifted by tree root growth.</p> <p>The safety of the central path is a matter of concern - see topic on <a href="#">Public Safety</a> above.</p>	<p>The possibility of lifting the stone slabs, incorporating drainage outlets and re-laying the slabs could be explored. This could be done initially in a trial area to allow the effectiveness of this solution to be tested, and to examine the condition of the vaults below.</p> <p>The large Yorkstone slabs are about 150mm thick and therefore it should be possible to cut some drainage channels at the sides of the path, to drain the worn areas that catch rainwater.</p> <p>A survey of the central path is recommended - see topic on <a href="#">Public Safety</a> above.</p>

Topic	Context and Issues	Opportunities and Recommendations
Paths within the enclosures  (Access report 2.5).  See also Appendix B: Gazetteer – Character Area 4	<p>The paths have a loose gravel or exposed earth surfaces, which are often uneven. The path surfaces are not wheelchair accessible or suitable for ambulant disabled people or for someone pushing a wheelchair.</p> <p>Consideration has been given to opening up some of the burial enclosures to public access. This would require measures to ensure the safety of visitors and to discourage them from walking amongst the graves. If any additional barriers were needed, these could be a trip hazard and visually intrusive.</p> <p>Access to the serpentine path through the south enclosure is unsatisfactory.</p>	<p>A new gate and short section of pathway could be introduced in to the south enclosure, south of the Bunyan monument.</p> <p>The serpentine path in the south enclosure could be opened to the public for a trial period under controlled conditions. This would enhance public enjoyment of the site.</p> <p>Further work could be undertaken to establish the original width, camber, edging, and construction of the paths which can be used as blue print for future repairs.</p> <p>The Access report has recommended that all paths could be upgraded to have a firmer surface. A balance needs to be struck between the desire for a surface such as self-binding gravel, suitable for wheelchair users and other disabled people, and maintaining the current informal aesthetic character of the site. Naturally self-binding gravel eg Breedon gravel is a traditional surface in historic parks and could be considered for use on some of the paths within the enclosures.</p> <p>Consideration could be given to design some form of temporary fencing along the serpentine path, so that it can be opened to the public at certain times.</p> <p>It is recommended that a detailed survey of all the paths is undertaken to identify opportunities to improve their condition, safety and accessibility. Some paths, including the main path through the south enclosure, could be upgraded to have a firmer surface such as a naturally self-binding gravel, with a camber to improve drainage. However these changes need to be balanced with maintaining the aesthetic value of the character of the enclosures.</p>

Topic	Context and Issues	Opportunities and Recommendations
Seating  (Access report, 2.8)	There is insufficient seating in the publicly accessible areas.  The existing wooden benches in the Garden of Rest are not in keeping with the 1960s design idiom and tend to create a barrier to the garden beyond.	There is potential to add some new seating in the vicinity of the planting beds in the Garden of Rest.  Simple wooden benches matching the designs shown in the sketches by Shepheard could be introduced in place of the standard City of London benches. There are examples of Shepheard-designed benches in the Goldsmiths Company Garden – another Shepheard design. However this design is not compliant with accessibility standards as they lack arm rests, therefore there may need to be a variation to the original design.  Seating could also be added in the central paved area.  For accessibility reasons, there should be a variety in the height of seating and the means of support (back and arm rests).
Brick paving  See also Appendix E Gazetteer – Character Area 2	The brick paving in Shepheard's landscape has developed large gaps over the years and gets clogged with moss/ weed and is a trip hazard if not cleaned regularly.  The paving in the central area has some uneven slabs with wide joints and uneven brick paving which need to be replaced and relaid. Rainwater pools near the William Blake monument.	Consider introduction of perennial plants (eg thyme, wild marjoram, chamomile) in the joints between the paving units. A trial area is recommended to assess the success of this approach in terms of its impact on the aesthetic appearance of the Garden of Rest as well as practicality (durability, ability to withstand foot traffic and maintenance requirements). As an alternative, relaying the pavements with a porous filler material in the joints to match the original appearance should also be considered.  As Jersey cudweed has been identified growing on the brick paving, herbicide should no longer be used to clear 'weeds' throughout the site.  Relaying the the stone slabs and brick paving is needed where they are uneven, have wide joints, or have a poorly drained surface.

Topic	Context and Issues	Opportunities and Recommendations
Public garden / Garden of Rest	The current layout has deviated slightly from Shephard's original design. The line of the path in the original design ran closer to the wall in the north-east corner and had planting between the path and the boundary wall. Shephard's plan shows 18 benches located against the boundary walls (1 on the west wall, 13 on the north wall and 4 on the east wall). None of these remain.	As an integral part of the Grade I registered historic landscape, any changes to the Garden of Rest will require very careful consideration. As noted in the previous section, it is rated as being of medium significance within the context of the site at Bunhill, with potential for enhancement. Before embarking on any detailed design work, it is recommended that an options study is commissioned, including more detailed research on Shephard's design intentions and consultation with key stakeholders. This would allow the potential changes to be explored before any detailed design costs are incurred.
See also Appendix B: Gazetteer – Character Area 2	The lack of wall planting detracts from the garden area and some planting beds restrict circulation.	The current layout of the Shephard beds could be improved. One option is to retain and restore the original layout of rectangular and L-shaped beds which form semi-enclosed informal spaces. Another suggestion is to create a single bed with a consistent substantial width, stretching the entire length of the north wall with planting right up to the wall. This would discourage anti-social behaviour in this area.
	The large expanses of brick paving between the path and the outer walls have a sterile character.	A compromise solution is recommended which is to amend Shephard's layout to reduce the area of brick paving and to extend the planting beds to meet the north boundary wall, thus replacing some of the 'dead' space in this area. The existing bench seating on the perimeter path around the central lawn could be replaced with new seating to match Shephard's original seating design and relocated within the areas of brick paving.
		A pond or water feature has been suggested in the north-west corner of the Shephard garden to add interest and enhance biodiversity. The form of the pond could echo the existing Shephard beds and be raised above ground level to avoid disturbing any burial remains below. The addition of a pond or water feature raises a number of issues, both in terms of its heritage impact, ecological value, practicality and future maintenance. A feasibility study is required to assess the constraints and opportunities associated with introducing a pond, and to consider any other means of introducing a source of water for wildlife. This should consider any lessons learnt from other urban ponds eg in Portsoken Street Garden. Test pits or trial trenches would be necessary to establish the ground conditions in the area proposed for the pond before any detailed design work is undertaken. The implications for future maintenance and safety would need to be considered.
		Other historic cemeteries (e.g. Nunhead, Tower Hamlets) contain examples of well-intentioned wildlife ponds that have management issues affecting their appearance and performance for wildlife. An alternative may be to provide some form of water habitat linked to drainage from the roof of the existing (or improved) structures, keeping any raised feature closer to the buildings.
		Wall planting could be introduced to add visual interest and support greater biodiversity (EMP4.23).

Topic	Context and Issues	Opportunities and Recommendations
Shrub planting	The largest area of shrub planting is adjacent to the northern site boundary set amongst the brick paving area. A second area of shrub planting has been established by Friends of City Gardens adjacent to the west enclosure. See EMP, 3.34 – 3.36. The Shepherd beds now look rather small and ‘bitty’. Currently there is a lot of defecation and urination behind the shrub beds because the planting screens the space between the beds and north boundary wall.	<p>The layout of the Shepherd beds could be improved - <a href="#">see above</a> under Public Garden / Garden of Rest.</p> <p>The EMP recommends shrub species (see Appendix 4, Table 4.4) for their wildlife value, aesthetic interest and in many cases ability to withstand drought.</p> <p>At present the shrub beds around the northern perimeter of the gardens are watered by an ad hoc system of hoses and sprinklers. It would be more effective and efficient in terms of water usage to install an irrigation system particularly to support enhanced planting in these beds. In this way the use of water for irrigation could be minimised and waste avoided increasing the sustainability of the management of the site. Installing the standard City upright secure taps should be considered as the current ground-level outlets are very prone to leaking.</p>
Grassed areas	The condition of the lawn in the Garden of Rest and the grassed areas within the enclosures suffer from various problems: compaction, poor drainage, excessive shading and erosion from foot traffic. This has resulted in numerous bare patches and the amenity lawn tends to become muddy in winter. The EMP provides details of the grassland plant species present in the Garden of Rest (paras 3.28 - 3.29) and in the burial enclosures (para 3.37 - 3.40).	Areas of wildflower meadow could be created within the lawned area in the Garden of Rest. Detailed recommendations for how to create and maintain these areas is included in the EMP (paras 4.10 - 4.15).



Topic	Context and Issues	Opportunities and Recommendations
Trees	<p>The current dense tree canopy encourages shade-tolerant plants and creates a humid atmosphere which encourages lichens and mosses. This also results in a quicker build up of algae and deposits of natural debris on the memorials.</p> <p>109 trees were identified in the Tree Survey report by Greengage's arboriculturist - James Wallington (reproduced as Appendix I in Volume 4). The report states that 'Physiologically the tree stock is shown to be in good to fair condition with few significant defects (such as from decay or disease) that suggest the need for urgent or short term arboricultural intervention works. This being as a result of their natural good health and that the trees are included within a routine tree survey and maintenance programme'. The dominant established species are London Planes. More recently Oak trees have been introduced, many planted in the 1990s, and these cast a heavier shade.</p> <p>Planting of new trees will need to factor in the future ground disturbance, particularly to burials from the growth of tree roots.</p> <p>Due to the large number of trees already in Bunhill Fields, no commemorative trees are currently accepted.</p> <p>There are no individual or group Tree Preservation Orders at Bunhill Fields, but all trees are protected as they are within the Bunhill Fields and Finsbury Square Conservation Area. Climate change and plant diseases are likely to require a different approach to selection of new tree species.</p>	<p>Maintain a regime of regular tree pruning to reduce over-shading.</p> <p>The Tree Report by Greengage contains detailed recommendations for works to trees including:</p> <ul style="list-style-type: none"> <li>• a review of trees T35 to T49 in West Enclosure, T65 to T68 in East Enclosure and T80 to T88 located at the east end of the South Enclosure.</li> <li>• removal of trees (T40, T44, T49, T51, T54, T64, T81, T82, T86, T88, T90, T91, T92, T109, T112).</li> <li>• individual works of crown reduction and limb removal</li> <li>• monitoring of decay</li> </ul> <p>The opportunity exists to provide additional tree planting in the north-west corner of the Garden of Rest which currently has little or poor tree cover.</p> <p>Consider a broader variety of tree species with ability to withstand urban conditions and climate change. Adopt a replacement tree strategy – see EMP 4.33. – 4.39. An outline tree strategy is included in the EMP (paras 4.34 - 4.39). A tree succession survey is recommended in the Tree Survey report to review the structural condition of all trees considered as succession trees. A more detailed long-term tree management strategy is required which balances ecological and heritage considerations in the short, medium and long term. The tree strategy should be developed in consultation with the LB Islington Tree Officer and Historic England. It should allow carefully considered works to thin and open up tree canopies and remove weak limbs. This will open up the ground to more sunlight, with associated opportunities to improve maintenance of surfaces and diversify grass sward in the Garden of Rest and the herb layer in the railed enclosures.</p> <p>Explore with LB Islington the possibility of a streamlined or expedited consent procedure for works to trees.</p>

Topic	Context and Issues	Opportunities and Recommendations
<b>D – Archaeology</b>		
Excavation for ground works	Any ground works would need to consider the impact to human remains. The aim should be to ensure that the burials are not disturbed and instead are left <i>in situ</i> .	Agree procedure for re-burying any exhumed human remains and disarticulated remains on site (See note below).
	The proposed pond should keep ground excavation to a minimum. A raised pond would be preferable.	A detailed method statement should be prepared and agreed before carrying out any works involving ground disturbance. An experienced archaeological contractor should be involved for anything other than routine works.
	The procedures for liaison with GLAAS are explained in <a href="#">para 2.7 above</a> .	Liaise with Museum of London Archaeology (MOLA) regarding the appropriate level of watching brief and need for any targeted intrusive archaeological investigations

Note: There is detailed guidance in *Guidance for Best Practice for the Treatment of Human Remains Excavated from Christian Burial Grounds in England*, published by the Advisory Panel on the Archaeology of Burials in England, Second Edition 2017. Although this states that burials from post-reformation non-conformist burial grounds are beyond the strict scope of the document, its recommendations may still be of some value in informing decisions at Bunhill.

Topic	Context and Issues	Opportunities and Recommendations
<b>E – Ecology and wildlife</b>		
<p>Natural habitat</p> <p>See also 3.7 – Ecological Significance</p>	<p>Several habitats are found throughout the site. For details refer to EMP in Appendix G.</p> <p>The western plot contains a different mix of plant species to the east, south and central plots, reflecting its active management for nature conservation by the Friends of City Gardens (EMP, 3.39).</p>	<p>An aspiration may be to increase the biodiversity value of the site so it is recognised and upgraded from a SBINC Grade 2 to Grade 1 as part of any future SINC Review by Islington Council. Actions to enhance biodiversity at Bunhill may need to align with the Draft Islington Council Biodiversity Action Plan 2020-2025.</p> <p>The EMP has recommended various ways in which to enhance the biodiversity of the site:</p> <p>Provide habitat structure and focused enhancements for notable invertebrate species.</p> <p>Provide enhanced nesting and roosting opportunities for London, City of London and Islington Biodiversity action plan species.</p> <p>Living Roofs (see p.36 of Greengage Report in Appendix I). A ‘Living’ or ‘Green’ roof could be added to the flat roof of the maintenance building. This would be made up of several layers, typically a waterproof/root barrier layer to protect the existing roof, a drainage layer, water retention mat, then the growing medium and vegetation such as sedum.</p> <p>It is recommended that leaf blowing in the burial enclosures should cease due to its adverse impacts, including on flora and invertebrates. Leaves could be allowed to lie in the enclosures and then be gathered by raking in one or two sessions – probably with corporate volunteers to rake, bag, shred and compost.</p>
Grassland: Garden of Rest	The grassland in the Garden of Rest is currently reseeded every year following periods of heavy footfall. However, the condition of the lawned area suffers from heavy footfall and surface water flooding after heavy rainfall. See EMP, 3.27 – 3.28.	<p>Increase diversity of grassland species to include a greater abundance of low growing flowering plants (eg white clover). This would still allow for recreational use and arguably improve its aesthetic appeal, plus would benefit pollinators. (EMP 4.20 – 4.22)</p> <p>Recommend mowing to no less than 5 cms on the amenity grassland and to no less than 15cm in the burial enclosures - see topic on site presentation <a href="#">on p.65</a> above and Maintenance Plan in <a href="#">Section 7</a>.</p>

Topic	Context and Issues	Opportunities and Recommendations
Grassland: grave enclosures	The grass areas amongst the grave plots are allowed a taller sward height and diversity of species.	Carefully selecting grassland and bulb species to be introduced into the grave plot areas (EMP 4.16 – 4.19).
Bats	The site is of considerable value for bats (EMP, 3.43 – 3.47).	<p>The EMP suggests measures to improve the habitat for bats:</p> <ul style="list-style-type: none"> <li>Planting to encourage better foraging environment for bats;</li> <li>Enhance bat roosting opportunities, for example by providing bat boxes;</li> <li>Ensure lighting conditions do not deter bats (EMP 4.78 – 4.80).</li> </ul>
Birds	<p>The site is of considerable value for nesting and foraging birds (EMP, 3.48 – 3.51).</p> <p>Bird feeders are already provided on site both in the western and eastern plots.</p>	<ul style="list-style-type: none"> <li>Provide and enhance the current shrub and tree cover to provide additional food and shelter resources for birds;</li> <li>Provide specialised bird boxes for house sparrows, black redstarts, woodpeckers, starlings, swifts, kestrels (EMP 4.61 – 4.74).</li> <li>Bird feeders and nesting boxes should be sited discreetly and away from key views including views from the main east-west path.</li> <li>Bird feeders should be moved around to prevent pigeon compaction under the feeder. FoCG could install more bird feeding cages where there is no spillage.</li> </ul>
Invertebrates	The site is of considerable value for invertebrates such as beetles and butterflies (EMP, 3.52 – 3.54).	<ul style="list-style-type: none"> <li>Consider whether to create a wildlife pond with associated wetland planting and rain gardens (EMP 4.40 – 4.41). See topic on Garden of Rest on <a href="#">p.69</a> above.</li> <li>Enhance the current beetle habitat currently on site by providing larger and more varied loggeries within the enclosures (EMP 4.52 – 4.55).</li> <li>Encourage bumble bees, solitary bees, pollinators and other invertebrates, for example by providing wall-mounted bee bricks/boxes (EMP 4.56 – 4.60). Note: Honey bees compete with wild bees for forage and honey bee hives should not be allowed in Bunhill in future.</li> </ul>

Topic	Context and Issues	Opportunities and Recommendations
Plants	<p>Buddleia and cherry laurel are noted as Invasive Species (EMP, 3.55).</p> <p>Jersey cudweed, a protected plant species has been observed growing in cracks between brick paving around the Shepherd Beds (EMP, 3.56).</p> <p>The shaded areas of the site also provide habitat for various species of ferns, lichens and mosses (EMP, 3.57 3.58).</p>	<p>The site has the potential to support a wide range of locally notable species.</p> <p>There is potential for creation of a wildflower meadow within the amenity lawn of the Garden of Rest.</p> <p>Addition of shrub planting to provide habitat suitable for bumblebees, butterflies (EMP 4.27 – 4.33). A review of the historic planting within the Shepherd beds would provide an opportunity for restored and replacement planting to create a more appealing, biodiverse and drought resistant planting scheme.</p> <p>Addition of fern species in shaded areas.</p>
Foxes	<p>Foxes are a cause of disturbance to the memorials – <a href="#">see Monument Safety above</a>. They are not afforded protection for their conservation interest, however they are protected against intentional acts of cruelty.</p>	<p>Neither culling nor physical exclusion of foxes are likely to be successful in permanently removing them. The only long-term solution is to cut off the food supply – which is also impossible, although installing litter bins with lids and removing waste off site every evening might cut down on access for foxes and rats.</p> <p>Backfilling of fox holes will simply cause them to dig elsewhere within the site which would lead to a larger cumulative impact to burials over time. By accepting their presence and trying to encourage them to use one part of the site this would limit the overall cumulative impact and be easier to manage through regular monitoring and collection of any disturbed human bones to be reburied elsewhere on the site.</p> <p>Therefore, it is recommended that foxes are encouraged to move to an area where their activities would have least adverse impact. Historic England have advised that none of the chemical deterrents are very effective and all of them wear off very quickly, especially after rain. Filling in fox holes as quickly as possible is certainly worthwhile although this has to be done carefully taking animal welfare into consideration, and may be most effective when combined with meshing because they are likely to come back to the same spot the next night and start again. Pre-emptive meshing around particularly important or vulnerable areas would also be worth considering and this can be very effective and could work well with directing them towards particular parts where they could perhaps be allowed to set up home; however, consideration would have to be given to the physical and visual impacts (as well as archaeological implications) of implementing and maintaining such measures within such a highly sensitive and publicly accessible site. A trial is proposed of a ‘fox toleration’ approach in one area, using chemicals and meshing to discourage them from using other areas.</p>

Topic	Context and Issues	Opportunities and Recommendations
<b>F – Management and resources</b>		
Funding and resources	<p>The burial ground has received Green Heritage Site Accreditation under the Green Flag Award scheme, in recognition of its historic features and high standard of conservation.</p> <p>The cost of maintaining the burial ground and keeping it in good condition is borne entirely by the City of London.</p> <p>The presence of garden staff on site throughout the hours of opening is crucial to maintaining the security and maintenance, as well as managing access to the enclosures.</p> <p>The previous application 'Re-imagining Bonehill'. Round 1 submission to HLF's Heritage Grants Programme, August 2018, was unsuccessful.</p> <p>The site has generated a small amount of income from photography events and location filming in previous years.</p>	<p>The Action Plan in this CMP provides a rough order of cost for implementing its recommendations. Fully informed business and cost plans will need to be prepared to ensure that the recommended actions in this CMP are viable and sustainable.</p> <p>Given the ongoing works required, the City of London must continue to secure funding to undertake all required cyclical works. Other funding opportunities should also be explored, including from the following sources.</p> <ul style="list-style-type: none"> <li>• National Lottery Heritage Fund (NLHF)</li> <li>• Community Infrastructure Levy (CIL)</li> <li>• Section 106</li> <li>• Commercial support through sponsorship</li> <li>• Location filming</li> <li>• Events</li> </ul> <p>A more modest application could be made to the NLHF, based on community engagement, schools etc</p> <p>Lottery funding has been obtained for the repair of memorials elsewhere. For example West Norwood cemetery received a £4.6m National Lottery grant in 2019 to help save many of its listed monuments from ruin and to support community activities.</p>
Statutory processes	<p>The City of London consults the LB Islington's Conservation Officer regarding what type of work requires Listed Building Consent. Where proposed works are agreed by LBI to be 'like-for-like' repair, it is sometimes sufficient for them to be covered by an exchange of letters. To date there are no records of LBC having been made.</p>	<p>Seek agreement from LB Islington that like-for-like repairs carried out in accordance with the repair specification in Appendix G do not require LBC.</p>



Topic	Context and Issues	Opportunities and Recommendations
Gaps in knowledge	There are numerous sources of information regarding the burial ground, as listed in Appendix A. However there is no comprehensive history of the site.	<p>Subject areas which would potentially benefit from further research are:</p> <p>Survey of underground structures. There is limited information available regarding the vaults under the main central path. Locating specific buried structures or tombs would assist managing change and ongoing maintenance at the burial ground.</p> <p>Survey of paths - their condition, construction and historical development.</p> <p>Further research by volunteers into people buried at Bunhill other than those already documented would enhance understanding of the site.</p>
Staff and volunteers	<p>Current staffing levels are considered sufficient to maintain the burial ground in its current state.</p> <p>Trees are inspected by an expert consultant arborist on a regular programme. Any recommended arboricultural works are carried out by specialist contractors. (TBC by City of London).</p> <p>The garden team is supported by volunteers with Friends of City Gardens who look after the west enclosure and are occasionally (approx. 15 days in a year) assisted by corporate volunteers.</p>	<p>Improved facilities could encourage a greater level of voluntary engagement, both from corporate volunteers and Friends of City Gardens.</p> <p>A policy could be adopted of clearing leaves manually, and engaging volunteers to a greater degree.</p> <p>A regular schedule of corporate volunteer sessions could be set up to carry out leaf clearing and some maintenance – such as mulching. The regular FoCG volunteer session could be extended to include the Shepherd beds (in a new expanded form) and a new dry shade bed area.</p> <p>A manual could be developed in consultation with City Gardens Team and FoCG to set out best practice for volunteer activities.</p>
<b>G – Sustainability</b>		
Recycling of waste	This is currently not carried out and should be.	Separate rubbish bins could be introduced for cans, glass and paper. Recycling of green waste on site can now take place using the leaf compost bins and the leaf shredder. This is something that volunteers can help with.
Water and drainage	It should be possible to collect water from existing roofs.	Water collection and recycling should be actively investigated.

## IDENTIFIED ISSUES

'Dead' space between the planting beds and the boundary wall.

The existing wooden benches in the Garden of Rest are not in keeping with the 1960s design idiom and tend to create a barrier to the garden beyond.

The lawn in the Garden of Rest suffers from compaction, poor drainage, excessive shading and erosion from foot traffic.

The involvement of volunteers in managing the west enclosure has changed its appearance in comparison to the other enclosures.

Fox Infestation has resulted in destabilising several memorials and in some instances completely toppling them over.



The large expanses of brick paving between the path and the outer walls have a sterile character.

The existing maintenance stores, toilets and yard are in need of refurbishment.

Some of the more prominent leaf storage bins especially in the south and west enclosures, detract from the site's appearance.

Sought after rest space. Not enough seating provided.

Heavy foot traffic on the main east-west pathway. The stone slabs have developed a rutted surface and there are puddles in wet weather.

Gate leads onto the grass rather than a pathway.

## OPPORTUNITIES

The layout could be improved to reduce the area of brick paving and to extend the planting beds to meet the north boundary wall, thus replacing some of the 'dead' space in this area.

New benches matching the original Shepherd designs could be introduced in the Garden of Rest to replace of the standard City of London benches.

A detailed survey of all paths is needed to assess their safety and stability. A particular priority is the main central pathway, to assess the best means of improving its drainage and to confirm the condition of the vaults below.

The serpentine path in the south enclosure could be opened to the public for a trial period under controlled conditions.

The leaf storage bins could be reduced in size and moved to more appropriate locations.



Sunniest spot on the site with views across the open lawn - would benefit from additional seating.

The existing maintenance building could be re-designed to accommodate improved facilities for staff, contractors and volunteers.

There is potential to incorporate a kiosk selling refreshments.

Consider using roofs for collecting rainwater.

The freestanding signs at the entrances from Bunhill Row and City Road could be re-designed to make them easier to read.

A chalk board could be introduced next to the gardeners' hut to record any notable wildlife sightings and to advertise guided walks during the summer months.

A new gate and short section of pathway could be introduced into the south enclosure, south of the Bunyan monument.

## BIODIVERSITY

Potential location of a raised pond.

The opportunity exists to provide additional tree planting in the north-west corner of the Garden of Rest which currently has little or poor tree cover.

Areas of wildflower meadow could be created within the Garden of Rest.

The species mix within the current area of amenity grassland should be augmented to provide hardier and more biodiverse species.

Install an irrigation system to support enhanced planting in the Garden of Rest.

Install discreetly located bird boxes to target London and Islington BAP species (see EMP, Table 4.1)



Introduce wall planting to add visual interest and support greater biodiversity.

Consider introduction of perennial plants (eg thyme, wild marjoram, chamomile) in the joints between the paving units.

Opportunity to retrofit a biodiverse green roof to the existing maintenance block. Vertical planting utilising a trellis system could also be implemented on the building's western facade.

Install appropriately located habitat panels, log-piles and stag beetle logging.

Enhance bat roosting opportunities by providing bat boxes.

Carefully selected grassland and bulb species to be introduced into the grave plot areas.

## SECTION 5.0

# CONSERVATION FRAMEWORK AND POLICIES

### 5.1 INTRODUCTION

The following section provides an overall strategy, conservation principles and numbered policies linked to management actions. Collectively, these provide an approach to the future management of Bunhill Fields Burial Ground and a basis for any decisions about change or development.

The policies are grouped under overarching themes:

- A Managing heritage assets using best practice
- B Communication and engagement
- C Education, interpretation and research
- D Balancing ecology and heritage
- E Improving visitor experience
- F Funding and resources
- G Managing risk
- H Sustainability

### 5.2 OVERALL STRATEGY

The conservation strategy for Bunhill Fields Burial Ground is to conserve and enhance the essential character of the burial ground, through repair of its fabric, the memorials, paths and boundaries and restoration of the 20th century landscape designed by Peter Shephard. The biodiversity of the site will be enhanced through measures to diversify grassland and provide shelter and roosts for birds and bats. Sensitive enhancements to access and interpretation, increased and improved links to Wesley's Chapel and Quaker Gardens and more active public involvement through the Friends of City Gardens and volunteering will widen the audience for the burial ground, bringing benefits for local people, workers and those with a special interest in the burial ground.

### 5.3 CONSERVATION PRINCIPLES

#### Conservation Principles

- 01 Any change will be informed by a robust understanding of the significance of the site and its components, both in terms of their heritage interest and ecological value.
- 02 Given the site's very high heritage significance, the conservation and restoration (where appropriate) of the designed landscape will be of paramount importance. Any proposed changes to it will need to be subject to detailed assessment.
- 03 Regular and appropriate maintenance is essential to keep heritage assets in good repair. See Maintenance Plan in [Section 7](#). A forward work plan should allow for routine maintenance and inspections to be carried out at regular intervals, alongside repair and other works recommended in inspection reports.
- 04 An appropriate balance of resources and importance will be maintained between the various uses of the burial ground, while ensuring the retention and enhancement of cultural (heritage & ecological) value.
- 05 Communication and training is needed to ensure that staff and volunteers understand the significance and sensitivity of the site and are willing to support the adopted conservation approach to its management.
- 06 Users need to be engaged through consultation and active involvement, as well as being informed of any decisions made to enhance or alter the site.
- 07 Improvements to the public realm and presentation of the site will be used to encourage visitors, improve safety, and create an environment that can be used by all for different needs.

## 5.4 MANAGEMENT POLICIES

The following Conservation Policies should be used to guide all decisions made about proposed changes and management actions carried out within the Bunhill Fields Burial Ground.

POLICY NO.	POLICY	ACTIONS
<b>A: MANAGING THE SITE USING BEST PRACTICE</b>		
P1	Use the CMP as baseline document to manage and maintain the site.	<ul style="list-style-type: none"> <li>a The CMP and its policies to be adopted by the relevant committees of the City of London on the joint recommendation of the City Surveyors Department and the Open Spaces Department.</li> <li>b Update the Conservation Management Plan when major change occurs or at least every five years.</li> <li>c Collect information between updates for inclusion in the Conservation Management Plan as new information becomes available.</li> </ul>
P2	Ensure due consideration is given to the relative significance of heritage assets and their relationship with ecological significance.	<ul style="list-style-type: none"> <li>a Use the heritage significance section in this Conservation Management Plan to provide a baseline understanding.</li> <li>b Carry out further research on specific heritage assets and ecological value if a more detailed understanding is required.</li> <li>c Consider the impact on heritage and ecological values of any changes, including repairs and maintenance.</li> <li>d Carry out a formal heritage impact assessment when planning any works of alteration or development.</li> </ul>
P3	The burial ground is a single entity and any plans for the different character areas will only be acceptable if considered appropriate for the whole of the site.	<ul style="list-style-type: none"> <li>a Work with FoCG to agree a consistent approach to presentation across all of the enclosures.</li> </ul>



POLICY NO.	POLICY	ACTIONS
P4	Ensure that the cumulative impact of minor additions and alterations will not erode the character and appearance of the site.	<ul style="list-style-type: none"> <li>a Consider the impact of any minor additions or alterations on heritage assets and their setting.</li> <li>b Evaluate each proposal; it will not be presumed that because a minor change has been acceptable previously that it will be acceptable repeatedly.</li> </ul>
P5	Maintain records of maintenance and changes carried out.	<ul style="list-style-type: none"> <li>a Record and archive changes to built fabric and landscaping.</li> <li>b Develop a log for maintenance works for each of the main areas of the site.</li> </ul>
P6	Maintain all the structures on site on a plateau of good repair through regular repair and maintenance	<ul style="list-style-type: none"> <li>a Undertake regular condition surveys and implement the recommendations of the surveys.</li> <li>b Implement planned and coordinated programmes of repairs and maintenance.</li> <li>c Carry out conservation and repair works in accordance with the adopted Repair Specification.</li> <li>d Ensure that works are planned and carried out by skilled and experienced staff, consultants and contractors.</li> </ul>
P7	When planning any change, ensure compliance with statutory procedures relevant to protected assets.	<ul style="list-style-type: none"> <li>a Obtain all relevant consents in advance of carrying out works.</li> <li>b Seek pre-application advice prior to developing proposals at an appropriate point in the design process.</li> <li>c Seek agreement from LB Islington that like-for-like repairs carried out in accordance with the repair specification in Appendix G do not require LBC.</li> <li>d Ensure all relevant staff understand the designations and requirements for consents for the heritage assets for which they are responsible.</li> </ul>

POLICY NO.	POLICY	ACTIONS
P8	Carry out archaeological assessment and evaluation prior to commencing any below-ground works.	<ul style="list-style-type: none"> <li>a Liaise with Museum of London Archaeology (MOLA) regarding the appropriate level of watching brief.</li> <li>b Employ a consultant with relevant expertise to carry out the archaeological investigation and to report and analyse the results.</li> <li>c Undertake non-invasive archaeological investigations to enhance understanding of the archaeology within the project area.</li> <li>d Where there is an appropriate opportunity or need, undertake targeted intrusive archaeological investigations as agreed with MOLA.</li> <li>e Ensure the full recording, archiving and publication of archaeological investigations.</li> </ul>
<b>B COMMUNICATION AND ENGAGEMENT</b>		
P9	Continue and maintain good working relationships between stakeholders through regular communication.	<ul style="list-style-type: none"> <li>f Maintain regular contact with key stakeholders, including LB Islington, Historic England and Friends of City Gardens, to share knowledge and information about any proposals for change.</li> <li>g Develop a manual for volunteers.</li> </ul>
P10	Engage with the wider community regarding major proposals for change and development.	<ul style="list-style-type: none"> <li>h Engage with the local community and visitors regarding what they would like to see for the public areas of the site.</li> <li>i Consult with the public regarding proposals at an early stage in the design process and incorporate public feedback where possible.</li> </ul>

POLICY NO.	POLICY	ACTIONS
<b>C: EDUCATION, INTERPRETATION AND RESEARCH</b>		
P11	Maximise the educational potential of the site.	<ul style="list-style-type: none"> <li>a Develop a co-ordinated heritage/ ecological interpretation strategy for the site.</li> <li>b Consider new ways to interpret the site through digital media, including the existing website.</li> <li>c Continue to provide tours that facilitate individual engagement by visitors.</li> <li>d Encourage research and the production of publications about the site and its history.</li> <li>e Maintain the current documentary archive and catalogue any new information in an official archive space within the Guildhall/ LMA.</li> <li>f Provide the guides with improved visual aids for visitors (eg enlarged copies of historic plans and photographs)</li> </ul>
P12	Improve interpretation of the site	<ul style="list-style-type: none"> <li>a Improve the quality and accessibility of the on-site signage and information display panels.</li> </ul>
<b>D: BALANCING ECOLOGY AND HERITAGE</b>		
P13	Balance potential improvements to biodiversity with the requirement to pay special regard to the desirability of preserving any features of special architectural or historical interest (whether listed or not).	<ul style="list-style-type: none"> <li>a Maintain an ongoing dialogue between the ecological and heritage guardians of the site.</li> <li>b Ensure that all staff, consultants, contractors and volunteers are properly briefed regarding the site's heritage and ecological significance.</li> <li>c Adopt a planting strategy that promotes biodiversity whilst preserving or enhancing the special character and appearance of the site and the setting of the designated heritage assets within it.</li> <li>d Review the methodology of repair codes to clarify the approach to management of biological growth on memorials.</li> </ul>

POLICY NO.	POLICY	ACTIONS
P14	Adopt an approach to managing the trees which balances their ecological value, visual amenity, and safety whilst avoiding damage to memorials.	<ul style="list-style-type: none"> <li>a Undertake regular tree condition surveys and implement the recommendations of the surveys.</li> <li>b The location of any proposed new tree planting will be selected with due consideration for potential impact on heritage assets and buried archaeology.</li> </ul>
<b>E: IMPROVING VISITOR EXPERIENCE</b>		
P15	Improve the facilities for visitors and volunteers to enable them to have longer and more rewarding experience.	<ul style="list-style-type: none"> <li>a Consider introducing better facilities for visiting school groups, volunteers and visitors.</li> <li>b Improve seating provision in the public areas.</li> </ul>
P16	Improve the pathways throughout the site to make them safer and more suitable for people with disabilities.	<ul style="list-style-type: none"> <li>a Introduce improved access arrangements, including better-maintained paths in the burial enclosures.</li> <li>b Undertake a risk assessment related to increased access to the south enclosure, and consider opening it for a trial period under strict monitoring.</li> </ul>
<b>F: FUNDING AND RESOURCES</b>		
P17	Identify sufficient funding to ensure that the site can be maintained and enhanced in a sustainable manner.	<ul style="list-style-type: none"> <li>a Ensure that there are sufficient funds allocated, both for planned conservation or repair works and for unexpected or emergency works.</li> <li>b Investigate sources of additional funding for improvements identified in this CMP.</li> </ul>

POLICY NO.	POLICY	ACTIONS
<b>G: MANAGING RISK</b>		
<b>P18</b>	Ensure the safety and security of visitors, volunteers and staff	<ul style="list-style-type: none"> <li>a Ensure all public areas have a regularly updated risk assessment.</li> <li>b Provide sufficient signs to warn of dangers without compromising the appearance of the site.</li> </ul>
<b>H: SUSTAINABILITY</b>		
<b>P19</b>	Promote environmental sustainability and resilience to climate change.	<ul style="list-style-type: none"> <li>a Identify measures to reduce water consumption and to recycle water where possible.</li> <li>b Where sustainable urban drainage systems are proposed, ensure the impact on archaeological remains is carefully considered.</li> <li>c Encourage recycling of waste.</li> </ul>

## SECTION 6.0

### ACTION PLAN

#### 6.1 INTRODUCTION

The opportunities identified in [Section 4](#) lead to a number of further actions which would improve the condition, appearance, amenity, safety and management of the site. The table in this section lists these further actions together with an approximate cost and level of urgency (essential, advisable desirable). These costs are indicative and based on our experience of other similar projects. They will need to be reviewed and revised according to detailed requirements, phasing, timescale, inflation etc.

This table provides the City of London Corporation with a checklist of next steps to take. The timescale for achieving these actions and the practicability of implementing them will be affected by the City of London Corporation's Fundamental Review and the impact that COVID-19 might have on the available resources to implement them.

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
<b>A. ACCESS AND INTERPRETATION</b> (See related Issues & Opportunities on <a href="#">pp.57-60</a> and policies <a href="#">P4</a> , <a href="#">P7</a> , <a href="#">P11</a> , <a href="#">P12</a> & <a href="#">P16</a> )					
A1 Create a new gateway access into the South enclosure	Medium-term	Requires a simple feasibility study to scope the work required and confirm practicability.	TBC	Feasibility and design: £2k Implementation: £10k	Desirable
A2 Implement a trial opening of the South Enclosure	Medium-term	Subject to detailed risk assessment and mitigation measures, including suitable staff supervision, allow trial opening of the enclosure for limited hours and monitor the results.	TBC	No direct cost other than CoL staff time and associated safety improvements	Desirable



OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
A3 Improve interpretation of the site	Medium-term	A signage interpretation consultant will need to be appointed to review the existing signage and design a new scheme.	New signs supplied by City Gardens with maintenance offered by FoCG	Design: £4k  Manufacture and install new freestanding signs at east and west entrances: £6k. Allow £10k for each new freestanding sign.  Manufacture and install new wall-mounted signs on buildings: £4k.	Desirable
	Short-term	Produce a leaflet or trail linking the non-conformist sites in the area.	TBC	Research: No cost if done by volunteers.  Printing costs / website design: £1.5k	Desirable
	Short-term	Sightings board	FoCG	Sightings board: £250	Desirable
	Medium-term	Produce a new guide book	TBC	Allow a provisional sum of £10k for professional production. Costs could be offset by grant aid or commercial sponsorship	Desirable
A4 Website enhancement	Short-term	Improved information about events, burials etc.	TBC	Research: No cost if done by volunteers.  Website design: Could be absorbed by COL in-house? If outsourced, allow £2.5k.	Desirable
A5 Access to online information	Medium-term	Create an online database of the memorials	TBC	Research: No cost if done by volunteers.  Website design: Could be absorbed by COL in-house? If outsourced, allow £2.5k.  Computer hardware on site, assumed in gardeners' kiosk: £750	Desirable

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
A6 Visual aids	Short-term	Produce visual aids for use by volunteer guides	TBC	Design and printing: £200	Desirable
A7 Friends of City Gardens	Short-term	Explore the potential for the Friends Group to broaden its scope to those who may wish to help in other ways eg research or simply to be kept informed about the site	TBC	No cost	Desirable
A8	Medium-term	Offer heritage skills training through sessions with the Conservators working on site	TBC	Provisional allowance for professional delivery: £3k	Desirable
<b>BUILDINGS AND MONUMENTS</b> (See related Issues & Opportunities on <a href="#">pp.61-64</a> and Policies <a href="#">P2</a> , <a href="#">P4</a> , <a href="#">P5</a> , <a href="#">P6</a> , <a href="#">P7</a> & <a href="#">P8</a> )					
B1 Building refurbishment	Medium-term	Feasibility and design study to examine options for the existing buildings and yard	TBC	Feasibility: £4k Design costs: £12k	Desirable
	Long-term	Refurbishment and/or reconstruction of the existing buildings and yard	TBC	Provisional allowance: £120k (dependent on scope of works)	Desirable
B2 Building services	Medium-term	Improvements to water and electricity supply	TBC	Provisional allowance: £15k for new mains water supply Provisional allowance: £10k for upgrading electricity supply	Advisable
B3 Building repairs	Medium-term	Building fabric repairs (if existing buildings remain unaltered)	TBC	Provisional allowance: £10k	Advisable
B4 Building enhancements	Medium-term	Replacement of existing security shutters and rooftop wire with less visually intrusive measures	TBC	Provisional allowance: £10k	Desirable

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
B5 Monument repairs and conservation	Long-term	Re-set and repair all damaged memorials, tombs and headstones. Continue with the ongoing programme of repair and conservation (currently 2019 – 2024) with priority given to the south side of Area 7 where much of the area is in a poor state of repair.	TBC	Urgent works to ensure safety and stability £50k per annum	Essential
				Conservation works to arrest decay £50 per annum	Essential
B6 Vaults and voids	Medium-term	Commission a radar survey focussing on areas which are most heavily used or visited to help identify any hidden voids.	TBC	Provisional allowance £10k	Advisable
B7 Review the repair codes	Medium-term	HES officers will liaise with the London Borough of Islington and Historic England to review the methodology of repair codes used under the existing and future Measured Term Contracts for Memorial Repair and Conservation.	HES Officers	No cost except CoL staff time	Advisable
<b>C. LANDSCAPE DESIGN</b> (See related Issues & Opportunities on <a href="#">pp.65-71</a> and Policies <a href="#">P13 &amp; P15</a> .)					
C1 Structural survey of the central east-west path	Medium-term	Works to ensure the long-term stability and safety of the central path. Recommend a staged approach.	TBC	Investigation (Year 1): £5k	Essential
				Trial repairs (Year 2): £15k	
				Comprehensive repair programme (Year 3): Provisional sum £50k	
				Note: The actual cost will depend on the results of investigation and trial repairs.	

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
C2 Repairs to the paths within the enclosures	Medium-term	Works to ensure the stability, accessibility and safety of the paths and to restore their original width, camber, edging and construction.	TBC	Comprehensive repair programme £40k  Note: Works could be phased and/or reduced in scope to limit works to those necessary for safety and stability. Essential in South Enclosure if Serpentine path to be reopened for a trial period.	Essential
C3 Improvement to bench seating	Long-term	Investigate whether existing benches need to be replaced, depending on their design, location and condition. This will clarify the requirement for replacement benches and their design.	TBC	Allow for addition of 12 new benches to Peter Shepherd design £15k	Desirable
C4 Potential for conserving and enhancing the Garden of Rest	Long-term	Explore the potential for enhancing the Garden of Rest, including amendments to the layout of the beds and paved areas.	TBC	Options study for changes to Shepherd beds: £4k  Design: £8k  Implementation: £30k	Desirable
		A feasibility study is required to assess the constraints and opportunities associated with introducing a pond, and to consider any other means of introducing a source of water for wildlife. Linked to this study, trial pits or trenches will be necessary to identify any constraints on ground works	TBC	Allow £10k for feasibility study and ground investigation  Allow £35k for implementation (subject to feasibility study and consents)	

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
C5 Paved areas	Medium-term	Repairs and maintenance to the areas of brick paving and paving slabs in the Garden of Rest and broadwalks to ensure their stability and safety.  Trial area of planting herbaceous plants in the joints of the brick pavements.  Obtain a licence from Natural England for the management of Jersey Cudweed with a view to identifying an area for it to flourish and of removing it other areas.	TBC	Repairs: £12k (one-off cost)	Advisable
C6 Refresh and enhance the planting beds	Medium-term	Specify, select and plant new shrubs and flowers in accordance with EMP recommendations. Note: Implementation dependent on outcome of C4 above.	City Gardens with FoCG	Allow £6k for new plants and replanting in existing beds and addition of wall planting. (FoCG offer to seek funding)  Assume volunteer involvement in planting.	Desirable
C7 Improvement of grassed areas	Medium-term	Creation of areas of wildflower meadow within the lawn in the Garden of Rest  Preparation and reseeding of bare areas in the Garden of Rest and enclosures	City Gardens with FoCG	Allow £3k for wildflower meadow areas  Allow £4k for grassland improvement  (FoCG offer to seek funding)	Desirable  Advisable
C8 Irrigation system	Medium-term	Install new irrigation system to shrub beds and lawn	TBC	Allow £25k for an irrigation system  Note: Cost of new water main included <a href="#">above in B2: Building Services</a>	Desirable

OBJECTIVE	TIMESCALE	DESCRIPTION	DELIVERY	APPROX. COST	URGENCY
C9 Tree management plan	Short-term	Commission a tree succession plan and detailed long-term tree management plan	TBC	Allow £5k for tree management plan	Advisable
C10 Arboricultural works	Medium-term	Consider the recommendations of the Greengage tree report, carry out priority works and assess those trees recommended for removal due to damage to memorials.	TBC	Allow £20k for implementation	Advisable
C11 Volunteer activities	Short-term	Develop a guidance manual for volunteers to assist them in contributing towards a consistent standard of landscape presentation	TBC	No cost	Advisable
C12 Leaf storage	Short-term	City Gardens team to meet with volunteers to agree best locations for leaf storage bins and to consider improvements to their appearance	TBC	Allow provisional sum of £1.5k for improved leaf storage bins	Desirable
<b>E. ECOLOGY AND WILDLIFE</b> (See related Issues & Opportunities on <a href="#">pp.73-74</a> and Policies <a href="#">P13 &amp; P14</a> )					
E1 Natural habitat	Medium-term	Provide additional specialised bird boxes, bat boxes and bee bricks/ boxes/posts – as recommended in the EMP	FoCG	Allow £1.8k for habitat boxes (FoCG offer to seek funding for this and liaise with City gardens team on installation where appropriate.)	Desirable
E2 Foxes	Medium-term	A trial is proposed to ascertain the effectiveness of a 'fox toleration' area - <a href="#">see P.75</a>	TBC	Allow £2k for specialist pest control advice	Desirable



## SECTION 7.0

### MAINTENANCE PLAN

TOPIC	TIMING	MAINTENANCE TASK	DELIVERY	APPROX. COST	START / END DATE
Site presentation	Daily	Checking for litter, vandalism, weather-related damage, potential health & safety hazards.	On-site gardener	Routine	Daily / ongoing
Redecoration of all metal railings and gates	Every five-ten years	Brush down, prepare and re-paint	Contractor	High	No later than 2025
	Annual	Cleaning and repair of any badly worn areas	Contractor	Medium	Spring 2021
Monument safety inspections	Annual	Ongoing annual safety inspections of the monuments	Specialist contractor	High	Summer 2020
	Every five years	Structural inspection for large memorials	Specialist conservation engineer	High	As necessary
Condition surveys of boundary walls	Every five years	Continue 5-year cycle of condition surveys of the boundary walls and railings, last carried out in 2014	Specialist conservation architect or surveyor	Medium / High	2020
Tree survey and maintenance	Annual	Routine inspections of all mature trees	Arboricultural consultant	Medium	Annual basis
	Every four years	Routine inspection of all trees, last carried out by Greengage in Nov 2019	Arboricultural consultant	Medium	2024
	Three times per year	Massaria inspections, with a works schedule carried out accordingly	Arboricultural consultant	Medium	Ongoing
Tree works	Annual (outside nesting season)	Tree works as an outcome of the annual inspection	Arboricultural contractor	Medium	Annual basis
Grounds inspections	Weekly	Routine visual inspections. Responsive inspections to be carried out after heavy rains or wind to check for fallen or hanging branches.	City Gardens staff	Routine	Ongoing

Cost: Low - £0 to £500, Medium - £500 to £5,000, High – over £5,000. 'Routine' indicates that the activity is undertaken within the scope of existing routine activities by City of London staff.

TOPIC	TIMING	MAINTENANCE TASK	DELIVERY	APPROX. COST	START / END DATE
Notice boards	Monthly	Ensuring that information boards are updated on a regular basis. Remove out-of-date information.	City Gardens staff / Friends of City Gardens	Routine	Ongoing
Planting	Bi-Annual	Planting of spring and autumn flowering bulbs	Friends of City Gardens	Funding dependent	Every Spring and Autumn
	As required	Replacement plants in the Peter Shephard beds as part of plant replacement programme including vertical planting.	City Gardens staff and Friends of City Gardens	Funding dependent	Every Spring
Clean and refurbish benches	Weekly	All park furniture is inspected on a weekly basis.	City Gardens staff	Routine	Ongoing
	Annually	Hot steam cleaning of benches	City Gardens staff	Low	Ongoing
Bird, bat and insect boxes	Annual (outside nesting season)	Checking, cleaning and replacing. Survey to record usage, species etc.	With the help of Friends of City Gardens	Low	Every Autumn
Pathways	Regular	Maintenance to clear fallen leaves, weed control and other debris. More intensive in Autumn and after high winds. Jet washing a minimum of once a year.	City Gardens staff	Routine	Ongoing
Gravel Pathways	Annual	Weeding and clearing	City Gardens and Friends of City Gardens with corporate volunteers	Routine	Ongoing

Cost: Low - £0 to £500, Medium - £500 to £5,000, High – over £5,000. 'Routine' indicates that the activity is undertaken within the scope of existing routine activities by City of London staff.

TOPIC	TIMING	MAINTENANCE TASK	DELIVERY	APPROX. COST	START / END DATE
Block paving areas	TBA	Obtain Natural England licence/ consent to determine maintenance approach of Jersey Cudweed.	City Gardens staff	Routine	Ongoing
		Hand weed Jersey Cudweed areas	Friends of City Gardens	Routine	Ongoing
	Trial areas	Apply an alternative maintenance regime to a trial areas in the Garden of Rest: In one area, planting the gaps between the pavements with fragrant herbaceous plants.	City Gardens staff with the help of FoCG volunteers	Low	2021
Paved areas	Throughout the growing season	Regular removal of weeds growing in the joints between the brick pavements and ledger stones. Natural England licence dependent and agreement of mitigation plan.	City Gardens staff	Routine	Ongoing
Leaf clearance	Annual, from October to December	Full leaf clearance is carried out by hand in shrub and flower beds, and by machine from paths and grass areas, with all leaf piles cleared as soon as reasonably practicable and shredded. Leaves are allowed to accumulate under the tree canopy and collected by hand for on-site composting. Leaf blowers only used on grass and paved areas.	City Gardens staff and Friends of City Gardens with corporate volunteers	Routine	Every Autumn
Leaf Bins	Ongoing	Reduce down over the numbers of leaf bins and consider alternative designs.	City Gardens staff and Friends of City Gardens	Ongoing	Ongoing
Mulching	Annual	Mulching all shrub beds and hedge bases with leaf litter	City Gardens staff and FoCG volunteers	Routine	Every Spring

Cost: Low - £0 to £500, Medium - £500 to £5,000, High – over £5,000. 'Routine' indicates that the activity is undertaken within the scope of existing routine activities by City of London staff.

TOPIC	TIMING	MAINTENANCE TASK	DELIVERY	APPROX. COST	START / END DATE
Formal Grassed Areas	Once a week in the growing season	Grass cutting on the lawn in the Garden of Rest and gated areas adjacent to paths. Composting of arisings.	City Gardens staff	Routine	Ongoing
	Annual in Spring	Spike, top-dress and re-seed poorly developed shaded grass areas in the garden area in time for summer use.	City Gardens staff	Routine	Every Spring
	One off	Develop grassland management plan. Identify areas where bulbs can be planted or seeds sown and grass cutting regime changed.	City Gardens staff and volunteers	Low	Ongoing
Develop management approach of grass and herbaceous vegetation within the burial enclosures.	Ongoing for 4 year period	Identifying trial areas which can be marked out and various (reduced frequency) mowing regimes applied. Successful trials can then be scaled up.	City Gardens staff with the help of local volunteers	Low	2024
	Once every two weeks in growing season	Carry out more frequent mowing to not less than 5 cms to 75cm verges besides paths and identified routes/ desire lines to frequently visited graves.	City Gardens	One Off	Ongoing
	One Off	Identify areas for specific management and controls e.g. Nettles to be controlled to a set area	City Gardens staff and Friends of City Gardens	Low	2021
	Seasonally over trial period	Carry out a plant survey prior to any interventions taking place and repeat at least annually on same sample basis to demonstrate the improvement in plant diversity. Report observations to GiGL.	Friends of City Gardens	Low	2021
	One Off	Quantify shade levels at plant sampling sites to identify areas which receive greater light to see variations of species that establish.	City Gardens staff and Friends of City Gardens	Low	2021
	Annual	Pilot areas with spring bulbs/seeds to be managed as a 'spring meadow' (once initial trials have been established?).	City Gardens staff and Friends of City Gardens	Medium	2026

Cost: Low - £0 to £500, Medium - £500 to £5,000, High – over £5,000. 'Routine' indicates that the activity is undertaken within the scope of existing routine activities by City of London staff.

TOPIC	TIMING	MAINTENANCE TASK	DELIVERY	APPROX. COST	START / END DATE
Woody plants and self-sown trees.	Ongoing	Remove woody plants and self-sown trees from site	City Gardens staff and Friends of City Gardens	Low	Spring and summer
Maintenance log	Daily	Record any defects, maintenance issues and actions in a logbook or digital equivalent.	City Gardens staff	Routine	Ongoing
Review Meeting	6 months	Meeting to discuss progress and actions for the CMP.	City Gardens staff and local volunteers	Routine	Ongoing
Bird feeders	Ongoing.	Maintain and clean bird feeders and rotate locations to mitigate pigeon trampling. Install additional cage bird feeder.	FoCG volunteers	Low	Ongoing
Bird Bath	Ongoing	Clean and maintain 2 bird baths. Relocate bath in dry shade bed to central enclosure.	FoCG volunteers	Routine	Ongoing
Taps	Weekly	Regular checks for leaks; and report for remedial action	On site gardener	Routine	Ongoing
Native Hedges	Annually	Cut by hand once a year	FOCG	Routine	Ongoing
Pollinator survey	Monthly in summer	Regular BeeWalks to record bee observations for Bumblebee Conservation Trust. Reporting observations to GiGL	FOCG	Low	Ongoing
Bat Survey	Ongoing	Recording bats using static monitor; reporting observations to GiGL	FOCG	Routine	Ongoing

Cost: Low - £0 to £500, Medium - £500 to £5,000, High – over £5,000. 'Routine' indicates that the activity is undertaken within the scope of existing routine activities by City of London staff.

# APPENDIX A

## BIBLIOGRAPHY

Items in the Bibliography are listed in date order.

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- Plan to accompany records of inscriptions on the graves. Late negative 433 – Date 1869
- Railings next to Bunhill Row, Section CD 1"/1'. 1"/2' details. Bars and standard. Drawing 2152. Late plan 437. – Date 1878
- Layout prior to development, showing lands to be acquired. Date 1960
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- Burial Ground Sections 10 & 11 3268/1 – Date 1973
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- Existing & proposed layout of Gentlemen's Lavatory Area. Drawing No. BHF/01/1 – Date 1983
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- Note on Bunhill. 19 July 1998 revised 31 July 2000 by Sally Jeffrey, Department of Technical Services, Corporation of London
- Schedule of individually listed memorials – Date 21 Feb 2011
- BFBG Memorial inspection- 2016, 2017, 2019
- Structural engineering report on the condition of the perimeter walls and railings, Stand Consulting Engineers, October 2014
- 2016 BHFBG Memorial Repair Database
- 2017 BHFBG Memorial Database
- Photographic folder of Areas 1, 2 & 3 – dated 2017
- Specification and Repair Codes – 2019
- Draft Schedule of works for BFBG – 2019/2020
- BFBG Repair code survey 2018 Rev 1
- BFBG Topple Test 2018 Rev 1
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- BFBG Schedule of Listed Monuments - Drawing no – 4-C-37575 Last updated Dec 2019.
- Appendix 7 – 2019-20 Draft Schedule of work



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SC/GL/PHO/B/F1/BUN-F1/CHA: photographs of Bunhill Fields Burial Ground

SC/PHL/02/538: photographs of Bunhill Fields Burial Ground

CLC/271/MS38987: Plan of Bunhill Row Burial Ground giving location of stones and surnames on graves, 1973

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*Islington Borough Council, Bunhill Fields/ Finsbury Square Conservation Area Design Guidelines (CA22)*, 2002

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SC/GL/PHO/B/F1/BUN/p5367538: photograph, Bunhill Fields, Cemetery, a general view, 1870

SC/GL/PHO/B/F1/BUN/p5367656: photograph, monument of Daniel Defoe, Bunhill Fields Cemetery, 1870

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

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