# **Coulsdon and Other Commons Risk Register**

**Generated on:** 08 May 2025



#### Rows are sorted by Risk Score

| Risk no, Title,<br>Creation date,<br>Owner    | Risk Description (Cause, Event, Impact)   | Current Risk Rating & Sco | ore | Risk Update and date of update  | Target Risk Rating & | Score | Target<br>Date/Risk<br>Approach | Flight path |
|---|---|---------------------------|-----|---|----------------------|-------|---------------------------------|-------------|
| ENV-NE-COC 009 Decline in condition of assets | Cause: Poor condition of buildings and other structures, combined with inadequate planned and/or reactive maintenance, reduced CWP budget and limited capital programme.  Event: Structures deteriorate to an unsafe condition.  Effect: Potential serious injury to a member of the public, or member of staff; disruption to service delivery/performance; financial loss; reputational damage as a result of legal action and/or negative publicity. |                           | 16  | The key issues at Coulsdon Common are:  • The large, wooden corporate image (byelaw) boards located across the site, and  • The cattle grids on Farthing Downs. Completed  The local team has updated the previous audit of byelaw boards which was carried out by the City Surveyor's Department (CSD) in 2019. Since the 2019 audit, a further eight boards have been found defective and removed. In the last five years, there have been three near-misses where boards have collapsed. Funding has now been approved to replace the byelaw boards in 2024 and 2025. The cattle grid has now been replaced and we will be working with the CSD to introduce annual inspections.  Concerns about the general situation are | Impact               | 12    | 30-Sep-2025                     |             |

|               |  | raised at monthly client liaison meetings with CSD. Issues continue to be raised at the monthly meetings with the Assistant Property Facilities Manager (APFM). |       |   |
|---------------|--|---|-------|---|
| 15-Jun-2022   |  | 08 Apr 2025   | Reduc | 2 |
| Allan Cameron |  |   |       |   |
|               |  |   |       |   |

| Action no,<br>Title,             | Action description |  |                  | Latest Note<br>Date | Due Date    |
|----------------------------------|--------------------|--|------------------|---------------------|-------------|
| ENV-NE-COC<br>009a<br>Monitoring |                    | Continual monitoring of byelaw boards, cattle grids and other structures is undertaken. Approval for funding of bye law boards of £160,000 has been agreed. £80,000 for 2024 and £80,000 for 2025. | Allan<br>Cameron | 08-Apr-2025         | 30-Sep-2025 |

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|--|---|-----------------------------|-------------|--|----------------------|-------|---------------------------------|-------------|
| ENV-NE-COC 002<br>Negative<br>impacts of<br>visitor<br>pressure  24-Feb-2022 Allan Cameron | Cause: The sites are more popular than in previous years, linked to people enjoying local natural environments which are free of charge. Increased population and housing in the local area.  Event: Long-term environmental damage, with a particular focus on protected landscapes and Sites of Special Scientific Interest (SSSI) which are not designed for such high visitor numbers.  Effect: Ecological and environmental damage; reputational damage; loss of grants related to preservation; increased spend required to maintain sites/mitigate damage. | Impact                      | i<br>i<br>i | We are seeing a continual increase in visitor numbers and general population growth which we cannot influence. Therefore, we accept that we cannot reduce the possibility of the risk occurring. However, we continue to encourage people to use the sites responsibly.  The target date shown is the date of the next review.  108 Apr 2025 | Userbood<br>paedul   | 12    | 31-Jul-2025 Accept              |             |

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|---|--------------------|---|------------------|---------------------|-------------|
| ENV-NE-COC<br>002a Establish<br>a Conservation<br>Ranger post | post.              | We have recruited a Conservation Ranger who is monitoring development applications and undertaking detailed ecological surveys. | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |

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|--|--|-----------------------|-------|---|----------------------|-------|---------------------------------|-------------|
| encroachment<br>24-Feb-2022                | Cause: Pressure on Planning Authorities to meet housing targets; failure to monitor and challenge housing and other development plans; lack of partnership working with Planning Authorities and inclusion in Local Development Plans; lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Large housing or other developments on land affecting the sites.  Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increase in air, light and noise pollution; decrease in water availability; increased hydrological pollution risk; increased traffic on local road network. | Impact                | 8     | Local plans continue to be developed and are scrutinised and commented on by officers when required. Staffing capacity has been insufficient to manage the volume of work associated with commenting on local plans. We have recruited a Conservation Ranger who is now monitoring development applications.  08 Apr 2025 | Literhood            | 6     | 30-Sep-2025 Reduce              |             |

| Action no,<br>Title, | Action description |   |                  | Latest Note<br>Date | Due Date    |
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|                      |                    | Investigate options for obtaining support and advice from colleagues in the Environment Department's Planning and Development Division. | Allan<br>Cameron | 08-Apr-2025         | 30-Sep-2025 |

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|--|---|-----------------------|-------|--|----------------------|-------|---------------------------------|-------------|
| ENV-NE-COC 005<br>Negative impacts of pests and diseases | Cause: Inadequate biosecurity; purchase or transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases from neighbouring areas e.g. Oak Processionary Moth (OPM); Ash Dieback; foot and mouth disease; and neospora.  Event: Sites become infected by animal, plant or tree diseases.  Effect: Service capability disrupted; ineffective use of staff resources; reputational damage; loss of species; temporary site closures and associated access; increased costs for reactive maintenance; threat to existing conservation status of sites, particularly those with woodland habitats. | Impact                | 8     | Ash Dieback: The cost of future Ash Dieback management is unknown; local risk budgets are not resourced sufficiently to meet costs. Local tree safety inspections deal with immediate risk, but we are unable to predict with any certainty the condition of trees and their likelihood of infection over the next two to three years.  108 Apr 2025 | Literrood            | 6     | 30-Sep-2025 Reduce              |             |

| Action no,<br>Title,               | Action description  | Latest Note   |                  | Latest Note<br>Date | Due Date    |
|------------------------------------|---|---|------------------|---------------------|-------------|
| 005a Staff                         | Ensure staff training is kept updated to enable timely identification of pest and knowledge of correct treatment/ prevention. | Ongoing. Training needs are reviewed at regular team meetings, and proactively promoted via the Department Health & Safety Group and relevant corporate boards. | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
| ENV-NE-COC<br>005b<br>Inspections  | Annual tree inspections undertaken by qualified personnel.  | This is ongoing action. Inspections continue on a scheduled basis or if/when the need arises.   | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
| ENV-NE-COC<br>005c<br>Partnerships | Active involvement with leading partners such as Forestry Commission and Natural England                                      | This is an ongoing action.  | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
| ENV-NE-COC<br>005d<br>Biosecurity  | Measures in place for staff, volunteers and contractors including public messages   | This is an ongoing action.  | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
|                                    | Review The Commons' Tree Safety Policy tri-annually.  | The Commons' Tree Safety Policy is reviewed every three years. It was last reviewed in July 2021 and will be reviewed again by the end of December 2025.        | Allan<br>Cameron | 08-Apr-2025         | 31-Dec-2025 |

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| ENV-NE-COC 008 Pollution  15-Jun-2022 Allan Cameron | Cause: Continual pollution of Coulsdon Common through defective drainage infrastructure owned by Surrey County Council and managed by Thames Water. Event: High rainfall leads to prolonged periods of pollution from two soakaways located on Stites Hill Road. Contamination of site with sanitary toxic and foul waste. Effect: Health and safety implications for visitors; reduction in quality of land within a National Nature Reserve (NNR); reputational damage and potential legal liability for the CoL. | mpact                       | The Head Ranger attends meetings of the local multi-agency Flood Action Group where this is a standing agenda item.  Thames Water has now accepted responsibility and liability for the drainage structures and the resulting pollution of the site. They committed to develop an action plan to resolve the problem by December 2024 but, despite meetings with Thames Water, the issue has still not been resolved. We will continue to have discussions on this to encourage a solution.  We continue to report any issues to the Environment Agency and Thames Water.  The target date has been extended to 31 December 2025 with the hope that Thames Water will put an action plan in place by that date.  08 Apr 2025 | Impact 4                   | 31-Dec-2025                     |             |

| Action no,<br>Title,                     | Action description |   |                  | Latest Note<br>Date | Due Date    |
|--|--------------------|---|------------------|---------------------|-------------|
| ENV-NE-COC<br>008a Flood<br>Action Group | =                  | 8 | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
|  | plan.              | , | Allan<br>Cameron | 08-Apr-2025         | 31-Dec-2025 |

| plan | unable to resolve the issue. We will continue to have discussions on this to encourage a resolution. The due date of this action has been extended to the end of December 2025 as the original target for an action plan has been missed.  |  |  |
|------|--|--|--|
|      | On 20 February 2025, officers met with Thames Water and the Flood Action Group (FLAG) regarding Thames Water's proposed scheme to reduce flooding on Stites Hill Road. Their proposal would mean the City "accepts" additional (contaminated) storm water on Coulsdon Common. The City of London is unable to accept this proposal. Thames Water's focus needs to be on resolving the issue of foul water entering the drainage system and polluting the Common during high rainfall events. |  |  |

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| ENV-NE-COC 001 Budget pressures            | Cause: Potential reduction in budget and income: reduction of income from car park charging; loss of income from rental properties.  Event: Reduced budget and income.  Effect: Potential staff reductions and inability to provide key services; financial failure; failure to achieve strategic objectives; significant reduction in service to users; reputational damage. | Impact 6                    | A Countryside Stewardship grant has been secured until 2026 and two vacant properties have been rented out, one with a long-term tenant until 2027, and the other on a rolling residential annual contract. These help to offset previous budget cuts.  Car parking income was lower than estimated during 2022/23 (52% of estimated levels).  The Assistant Director is currently reviewing income generation opportunities for The Commons.  We will review the current and target risk scores again when the revised 2025/26 budget estimates are confirmed. In the meantime, we accept the risk at the current level. The target date shown is the date of the next review.  08 Apr 2025 | Impact                     | 30-Sep-2025 Accept              |             |

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| 001a Risk            | situation.         | Business Partner. The due date of this action is the date when we will submit revised budget | Allan<br>Cameron | 08-Apr-2025         | 30-Sep-2025 |
| review               |                    | estimates for 2025/26.   |                  |                     |             |

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| 24-Feb-2022                                | Causes: Severe wind events, prolonged precipitation or restricted precipitation. May be climate change influenced.  Event: Severe weather/climate impacts; fire, flood and storm events (potentially increasing in frequency).  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and maintain site safety; loss of species; temporary site closures and associated access; increased costs for reactive management; injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species. | Impact                | 6       | We are unable to reduce this risk but work on site continues to mitigate the impact of extreme weather events should they happen.  The target date shown is the date of the next review.  08 Apr 2025 | <u> </u>             | 6     | 31-Jul-2025 Accept              |             |

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|---------------------------------------|--|--|------------------|---------------------|-------------|
| ENV-NE-COC<br>006a Fire<br>management | annually.  | The next review of the Fire Management Plan will be undertaken an external contractor appointed by | Cameron          | 08-Apr-2025         | 31-Jul-2025 |
| ENV-NE-COC<br>006b Storms             | Storm monitoring and management and closure policies are in place at the site and linked to high staff awareness and training. | The sites continue to monitor and respond to warnings of extreme weather.                          | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |
| 006c Climate                          | Understand the potential impacts of climate change on Coulsdon Common. Engage in climate change research and debate.           | Officers engage in ongoing research and dialogue.  | Allan<br>Cameron | 08-Apr-2025         | 31-Jul-2025 |