ENV NE - Coulsdon and Other Commons Risk Register

Generated on: 24 October 2025



Rows are sorted by Risk Score

Risk Code	ENV-NE-COC 002	Risk Title	Negative impacts of visitor pressure

Descri	iption

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.

Current Risk	Impa Impa	olict
Risk Score	Likelihood	Impact
12	Possible	Major
Amber	Trend	Constant

Target Risk	Impa	ct	
Risk Score	Likelihood	Impact	
12	Possible	Major	
Amber	Target Date	31-Dec- 2025	

Original Risk	po de la	o l
Risk Score	Likelihood	Impact
12	Possible	Major
Amber	Creation Date	15-Jun-2022

The target date shown is the date of the next review.		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.	23-Sep-2025
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Risk Level	Service
Department	Environment

Risk Approach	Accept
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-NE-COC 002b Monitoring and reporting		Officers undertake ongoing monitoring and reporting on environmental issues. Actions to mitigate the risk include putting limits on the number of events and activities permitted – this is written in the Events Policy.	23-Sep-2025	Allan Cameron	31-Dec-2025

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.

Current Risk	lmpa	oct
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Trend	Constant

Target Risk	Impact	
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Target Date	31-Dec- 2025

Original Risk	Impact	
Risk Score	Likelihood Impact	
16	Likely	Major
Red	Creation Date	15-Jun-2022

Local plans continue to be developed and are scrutinised and commented on by officers when required. Although the new Conservation Ranger is now in post, there is still insufficient staff resource to manage the volume of work associated with commenting on Local Plans.	23-Sep-2025
The risk remains at a score of Amber 8 (Likely / Serious), and we accept we are unable to reduce it further at the current time. The target date shown is the date of the next risk review.	

Risk Level	Service
Department	Environment

Risk Approach	Accept
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
004d	colleagues in the Planning and Development Division.	Investigate options for obtaining support and advice from colleagues in the Environment Department's Planning and Development Division.	23-Sep-2025	Allan Cameron	31-Dec-2025

Risk Code ENV-NE-COC 005	Risk Title	Negative impacts of pests and diseases
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Description

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.

Current Risk	Impact	
Risk Score	Likelihood Impact	
8	Likely	Serious
Amber	Trend	Constant

Target Risk	Impact	
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Target Date	31-Dec- 2025

Original Risk	Impact	
Risk Score	Likelihood	Impact
12	Possible	Major
Amber	Creation Date	15-Jun-2022

Latest	Note

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.

23-Sep-2025

The Departmental Tree Safety Policy will be reviewed again by the end of December 2025.

Risk Level	Service
Department	Environment

Risk Approach	Accept
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	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 and Safety Group and relevant corporate boards.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 005b Inspections	Annual tree inspections undertaken by qualified personnel.	This is ongoing action. Inspections continue on a scheduled basis or as the need arises.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 005c Partnerships	Active involvement with leading partners such as Forestry Commission and Natural England	This is an ongoing action.	23-Sep-2025	Allan Cameron	31-Dec-2025
005d	Measures in place for staff, volunteers and contractors including public messages	This is an ongoing action.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 005e Tree Safety Policy	Review The Departmental Tree Safety Policy tri-annually.	The Departmental Tree Safety Policy will be reviewed again by the end of December 2025.	23-Sep-2025	Allan Cameron	31-Dec-2025

Risk Code ENV-NE-COC 008	Risk Title	Pollution
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Description

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.

Current Risk	Impact		
Risk Score	Likelihood	Impact	
8	Likely	Serious	
Amber	Trend	Constant	

Target Risk	Impact		
Risk Score	Likelihood	Impact	
4	Unlikely	Serious	
Green	Target Date	31-Dec- 2026	

Original Risk		o la
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Creation Date	22-Jun-2022

	The Head Ranger attends meetings of the local multi-agency Flood Action Group where this is a standing agenda item.	
Latest Note	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.	23-Sep-2025
	We continue to report any issues to the Environment Agency and Thames Water.	

	The target date has been extended to 31 December 2026 with the hope that Thames Water will put an action plan	
Į	in place by that date.	

Risk Level	Service
Department	Environment

Risk Approach	Reduce
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
	Attend meetings of the local Flood Action Group.	The Head Ranger represents the CoL at meetings of the local Flood Action Group which are held periodically (every 2-3 months).	23-Sep-2025	Allan Cameron	31-Dec-2025
	Monitor progress of Thames Water action plan.	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 have not yet done so. Officers have met with Thames Water but have been 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.	23-Sep-2025	Allan Cameron	31-Dec-2026

Appendix 3

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.	

Risk Code ENV-NE-COC 009	Risk Title	Decline in condition of assets
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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.

Current Risk	Likelihood Impact			
Risk Score				
8	Unlikely	Major		
Amber	Trend	Decreasing		

Target Risk	Impact		
Risk Score	Likelihood	Impact	
4	Rare	Major	
Green	Target Date	31-Dec- 2025	

Original Risk	Impact			
Risk Score	Likelihood	Impact		
16	Likely	Major		
Red	Creation Date	22-Jun-2022		

	atest Note	Chief Officers in occupation are typically accountable for asset condition within their functional area. They are responsible for commissioning required work, and ensuring an appropriate funding route is identified. This action is often delivered upon the professional advice of the City Surveyor's Department (CSD). Once a work package is commissioned, it is the responsibility of CSD to deliver those works as agreed and funded within the given cost/timeline/specifications. The Chief Officer in occupation is to be closely supported by the City Surveyor's Department and the Environment Department Head of Estates as subject matter experts.	23-Sep-2025
		Some long-standing key issues have recently been resolved (i.e. replacing byelaw boards; and repairing cattle grids) resulting in the risk score being reduced from Red 16 (Likely/Major) to Amber 8 (Unlikely/Major). However, concerns about the general situation are raised at monthly client liaison meetings with CSD with the aim of	

reducing the risk further over time.

Risk Level	Service	Risk Approach	Reduce
Department	Environment	Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
ENV-NE-COC 009a Monitoring	Monthly site infrastructure checks.	Continual monitoring of external infrastructure is undertaken.	23-Sep-2025	Allan Cameron	31-Dec-2025
	Monthly premises controller checks.	Monthly inspections of built assets are carried out and defects are reported to CSD. This is an ongoing action.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 009c Annual inspections of lodges	Annual inspections of lodges.	Due to insufficient resourced in CSD, local staff undertake these inspections and report defects to CSD. This is an ongoing action.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 009d Delivery of Works	City Surveyor's Department to deliver works as agreed and funded either by CWP funds and/or directly by the Environment Department.	The CSD's Operations Group deliver work packages as agreed with the Environment Department, within agreed allocated funds, timelines and specifications. This is delivered either via the Cyclical Works Programme (CWP), capital and/or local risk budget. Regular liaison meetings are held between Environment and CSD to manage the delivery	23-Sep-2025	Peter Collinson	31-Dec-2025

Appendix 3

	programme, and to ensure any risks / issues / conflicts / etc are escalated and understood by all parties.			
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Risk Code ENV-NE-COC 010	Risk	Title 7	Tree event or failure
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Description	trees are in leaf.
	Effect: Public safety - people (serious injury/death) and property; loss of trees; loss of habitat; insurance claims; reputational
	damage.

Current Risk	Impact				
Risk Score	Likelihood Impact				
8	Likely	Serious			
Amber	Trend	Constant			

Target Risk	Impact			
Risk Score	Likelihood Impact			
4	Unlikely	Serious		
Green	Target Date	31-Mar- 2026		

Original Risk	Impact	
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Creation Date	14-Oct-2025

Latest Note	This new risk has been added to the register due to the large numbers of older, more vulnerable trees throughout Coulsdon Commons which require regular inspection and works to prevent failure. The risk is exacerbated by a rise in tree disease and the impact of climate change. The risk is actively managed with regular inspections of trees as well as following the Severe Weather Protocol which is implemented in the event of large storms/high winds.	14-Oct-2025	
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Risk Level	Service
Department	Environment

Risk Approach	Reduce
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
	Carry out tree safety survey and works	Annual tree surveys have been reviewed and reprioritised and a scheme of works specified to address them. This is an ongoing action which will be kept under close and regular review	14-Oct-2025	Allan Cameron	31-Dec-2025
010b Continue	and keep it under regular review	A Severe Weather Protocol is in place which details planning and response to high wind events. We are unable to close the open spaces during such events, but staff provide onsite information and post messages on social media. Following storm events, staff undertake surveys of all residential boundaries and high-risk routes within 48 hours. This is an ongoing action which will be kept under regular review. The 'Due Date' shown is the date of the next review.		Allan Cameron	31-Dec-2025

Risk Code ENV-NE-COC 001	Risk Title	Budget pressures
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Cause: Potential reduction or removal of Environmental Stewardship Schemes resulting in gaps in operational budgets. Possible reduction in budget 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.

Current Risk	Impact	
Risk Score	Likelihood Impact	
6	Possible	Serious
Amber	Trend	Constant

Target Risk	Down Down	
Risk Score	Likelihood	Impact
6	Possible	Serious
Amber	Target Date	31-Dec- 2025

Original Risk	Impact	
Risk Score	Likelihood	Impact
8	Likely	Serious
Amber	Creation Date	15-Jun-2022

_atest Note	A Countryside Stewardship grant has been secured until 2026 but there is no certainty that the grant will move forward after 2026 and, therefore, this presents a budgeting risk for the charity linked to conservation and tree management. Climate Action Strategy funding is currently due to end in 2027. 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.	23-Sep-2025
	Car parking income has continued to reduce year on year resulting in diminishing returns on investments in car	

parks (52% of estimated levels).	
Income generation opportunities are very limited for The Commons.	
We will review the risk again when the 2026/27 budgets are confirmed. In the meantime, we accept the risk at the current level. The target date shown is the date of the next review.	

Risk Level	Service
Department	Environment

Risk Approach	Accept
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
	income situation.	Income targets are continually monitored and are reported monthly to the Chamberlain's Finance Business Partner.	23-Sep-2025	Allan Cameron	31-Dec-2025
		We will review the risk again when the 2026/27 budgets are confirmed. In the meantime, we accept the risk at the current level. The target date shown is the date of the next review.			

Risk Code	ENV-NE-COC 006	Risk Title	Adverse impacts of extreme weather and

Description

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.

Current Risk	Impact			
Risk Score	Likelihood Impact			
6	Possible	Serious		
Amber	Trend	Constant		

Target Risk	Impact		
Risk Score	Likelihood	Impact	
6	Possible	Serious	
Amber	Target Date	31-Dec- 2025	

Original Risk	Dough Impact			
Risk Score	Likelihood Impact			
12	Possible	Major		
Amber	Creation Date	15-Jun-2022		

climate change

	We are unable to reduce this risk but work on site continues to mitigate the impact of extreme weather events should they happen.	23-Sep-2025	;
	The target date shown is the date of the next review.		

Risk Level	Service
Department	Environment

Risk Approach	Accept
Risk Owner	Allan Cameron

Ref No:	Description	Latest Note	Note Date	Owned By	Due Date
	•	Detailed fire maps have been completed and shared with the fire services.	23-Sep-2025	Allan Cameron	31-Dec-2025
	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.	23-Sep-2025	Allan Cameron	31-Dec-2025
ENV-NE-COC 006c Climate change	· · · · · · · · · · · · · · · · · · ·	Officers engage in ongoing research and dialogue.	23-Sep-2025	Allan Cameron	31-Dec-2025