

Appendix 1 – Strategic risks 36 and 38

Risk Code	Risk Description	Responsible Officer	Risk Category	Initial Rating	Revised Rating
SR36	Not taking effective action to help our city transition to carbon neutrality by 2030	Executive Director - Economy, Environment & Culture Donna Chisholm	Transport & Sustainability Committee	20	16
				L4 x I5	L4 x I4
Causes					
BHCC has declared a climate and biodiversity emergency and has a target for the whole city to reach carbon neutrality by 2030. Not taking effective action towards this target would mean that the council does not play its part in reducing the risk of global warming above 1.5oC and consequent climate change.					
Potential Consequence(s)					
<ul style="list-style-type: none"> • Errors, inefficiencies and missed opportunities in implementation and delivery of Carbon Neutral Programme. • Reputational damage to council of not progressing towards its committed target. • Failure to implement regulatory and legislative changes related to climate action, and exposure to legal challenge • Difficulty recruiting and retaining suitably experienced and qualified staff • Brighton & Hove seen as not a good place to invest or work in. • Reduced ability to be successful in applications for external funding. • Lack of engagement and resources from major external partners to deliver critical aspects, milestones and projects. • Higher costs to the council arising from not delivering climate adaptation measures in a timely way. 					
Existing Controls					
<p>First Line of Defence - Management Actions</p> <ol style="list-style-type: none"> 1. Brighton & Hove City Council Plan 2023-27, including a focus on delivering and accessible, clean and sustainable city, particularly promoting the responsible use of resources to tackle the climate and biodiversity emergency and foster a strong and vibrant city. 2. The Carbon Neutral 2030 Programme launched in 2021 overseen by the Carbon Neutral Programme Board and Corporate Modernisation Delivery Board, and an associated climate communications and engagement plan with regularly updated online resources. 3. Highway Services contract includes KPIs focused on carbon neutrality. 4. Social Value and Environmental Sustainability procurement framework includes sustainability outcomes for all council suppliers to meet. 5. Brighton and Hove Air Quality Action Plan 2022-2027 and the city's six declared Air Quality Management Areas 6. The programme of works to improve the energy efficiency of council buildings, council housing, and other assets, and to install renewable energy generation including solar panels and heat pumps. 					

7. Brighton and Hove Circular Economy Routemap and Action Plan to help the city minimises waste and pollution, keeps products and materials in use for as long as possible and supports the regeneration and protection of natural resources.
8. Brighton and Hove City Council's Fleet Strategy 2020-2030 including the commitment to transition the council's fleet to low emission vehicles.
9. Spatial planning policies which support sustainable low-carbon development
10. Ongoing support to Schools' climate campaign, "Our City, Our World".
11. Climate Literacy training in place – online for new staff and intensive sessions for senior managers.

Second Line of Defence – Corporate Oversight

1. Brighton and Hove City Council's Transport and Sustainability Committee is responsible for the Council's functions relating to highways management, traffic management and transport, parking and sustainability
2. Brighton and Hove City Council's City Environment, South Downs and the Sea Committee is responsible for the Council's functions relating to waste, parks and open spaces, environmental health, coast protection and trading standards.
3. Sustainability Checklist supports the assessment of climate impacts in reports to council committees
4. Brighton and Hove City Council and the Transport Partnership work together to deliver sustainable transport policies through the delivery of the Local Transport Plan (LTP).

Third Line of Defence – Independent Assurance

1. Internal Audit of Carbon Neutral 2030 programme completed in 2022-23

Risk Action	Responsible Officer
Deliver Fleet Strategy	Rachel Chasseaud

Comments:

- The council now has a fleet of 66 electric vehicles.
- All relevant vehicles comply with the Operator's Licence.
- City Parks have taken delivery of an electric Beavertail van for transporting ride-on mowers.
- Two Team Leaders are now using electric vans.
- The Playground Team is now using an electric van.
- There is a delay for the delivery of the first communal bin electric vehicle. This is due to engineering issues that were unforeseen. The fleet will now be delivered between February and March 2024.
- A Toploader for glass collections is due for delivery soon.
- Two further Refuse Collection Vehicles are on order and will be delivered in June/July 2024.
- The Fleet Service continues to work with other services for the procurement of new electric vehicles.
- An update on the Fleet Strategy was included in the City Environment Improvement Programme report presented to City Environment, South Downs & The Sea Committee on 19 September 2023.

Measures of success:

- Increased number of council-owned electric vehicles charged on council land
- All vehicles comply with vehicle operator licence

Deliver key capital funded transport projects in the Local Transport Plan (LTP) Capital Programme.

Mark Prior

Comments:

- The council is waiting on updates from Central Government on proposals for future Local Transport Plans and are dependent on this to inform an interim an LTP report
- Valley Gardens Phase 3 – detailed design fully complete and construction issue drawings prepared. Officers had commenced the procurement process to appoint the main contractor to commence on site in January 2024. Procurement phase was paused in June to allow Members to review the designs. Review complete and procurement in progress.
- A23 Active Travel Scheme is on track. Detailed design completed with final supporting Traffic Regulation Orders (TROs) and has been agreed by committee.
- A259 Active Travel Scheme is on track. Redesign progressing with high-level concept drawings showing a bidirectional cycle route along the whole of the A259 between the Brighton & Hove local authority boarder and options to progress with detailed sections between the western border.
- Western Road progressing well with plans to commence on Dyke Road junction and the Clocktower junction in the next couple of months. Updated estimated completion currently May 2024.

Measures of success

- LTP capital programme on track
- Valley Gardens Phase 3 construction started by January 2024
- A23 Phase 1 construction of the active travel scheme started by March 2024
- A259 active travel scheme redesign completed by October 2023
- Phase 1 Western Road scheme complete by June 2024

Deliver the 2030 Carbon Neutral City Programme

Rachel Williams

Comments:

- The 2022-23 corporate KPI on annual greenhouse gas emissions for the city was reported on 19 October 2023. There was a small uptick in emissions in 2021 (the most recent year for which data is available) as the Covid lockdowns ended and economic activity and transport bounced back. This took the emissions slightly above the council's KPI target.
- An Annual Report 2022-23 on the Carbon Neutral 2030 Programme was reported to Transport and Sustainability Committee on 3 October 2023. This reports on a wide range of actions and projects by services and teams across the council.
- Strategic Risk SR36 has been revised and split into two parts – one on actions to cut carbon emissions and the second on making the city more resilient to climate change.
- A final report of the Climate Risk and Vulnerability Assessment has now been received from the consultants and a number of internal stakeholder workshops

have been held. Work is progressing on developing an action plan. The CRVA is likely to be reported to committee in February 2024.

- The contract for the Decarbonisation pathways study was let to consultants Buro Happold in August 2023 and work is well under way on evidence gathering for Phase 1, the Baseline Assessment of energy systems in the city. An internal stakeholder workshop has been held and external stakeholders are being engaged. This study is currently progressing on track.

Measures of success:

- Greenhouse gas emissions (Corporate KPI)
- CN2030 action plan deliverables on track
- Climate risk and vulnerability assessment complete by December 2023

Deliver the City Environmental Improvement Programme	Rachel Chasseaud
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Comments:

- As of 30 June 2023, 28.1% of waste was sent for reuse, recycling and composting in the preceding 12 months. This is the latest data available as there is a three-month lag. This is below the target of 35.60%. A Waste Minimisation Officer has been appointed and is developing a communications plan to reduce the volume of waste produced across Brighton & Hove, increase recycling and reduce contamination. A Food Waste Project Manager is developing an options appraisal on the introduction of a food waste collection service.
- As of 30 June 2023, 0.74% of municipal waste was landfilled in the preceding 12 months. This is the latest data available as there is a three-month lag. This is well below the target of 2.40% and green.
- As of 30 June 2023, 558.91kg of residual waste per household was collected in the preceding 12 months. This is the latest data available as there is a three-month lag. This is below the target of 513.00kg.
- As of 30 September 2023, there were 596 reported missed refuse and recycling kerbside collections per 100,000 expected collections, in the preceding 12 months. This is below target the target of 513 and amber. Management is addressing restrictive work practices at Cityclean as part of the Refuse & Recycling Service Improvement Plan. Over time this will lead to fewer missed collections and where there are missed collections these will be collected within a shorter time frame.
- A Waste Minimisation Officer is in post and a work plan is under development.
- Work continues to implement the trade waste module of Collective to digitise the service. This is currently on schedule to be delivered by March 2024.
- The sites for Phase 2 of the Public Toilet Refurbishment Programme have been agreed with procurement to start shortly. This is currently on track to be developed by March 2024.
- An update on the City Environment Improvement Programme was presented to City Environment, South Downs & The Sea Committee on 19 September 2023.

Measures of success:

- % household waste sent for reuse, recycling and composting (Corporate KPI)
- % of municipal waste landfilled (Corporate KPI)
- Residual household waste per household (Corporate KPI)

- Missed kerbside refuse or recycling collections per 100,000 collections reported (Corporate KPI)
- Waste minimisation plan developed by October 2023
- Trade waste module of Collective implemented by March 2024
- Phase 2 of Public Toilets refurbishment programme delivered by March 2024.

Improve the energy efficiency of council buildings and assets	Kelvin Newman
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- Comments:
- 2022/23 total energy emissions for all corporate activities were 16,078 tons CO2/e. This is a 12.85% reduction on 2021/22. Total emissions include energy related emissions from council operated properties, fleet/transport fuel and street lighting.
 - The annual greenhouse gas emissions report was published in October 2023.

- Measures of success:
- A decline in the annual total CO2 emissions for all corporate activities
 - Annual greenhouse gas emissions report produced by March 2024

Protect and improve biodiversity in the city	Rachel Williams
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- Comments:
- The Living Coast Biosphere periodic review is on track with stakeholder and public consultation undertaken in Summer/Autumn 2023.
 - 6 local wildlife sites to be reviewed is on track with survey works completed in Summer 2023.
 - The Government has delayed the introduction of mandatory Biodiversity Net Gain (BNG) to January 2024 and has only just published the Regulations and Guidance. Planning's Business Development Manager is currently reviewing reporting/monitoring systems that are still being developed for BNG. It is now aimed to have reporting/ monitoring systems in place by April 2024 when all applicable development will need to provide BNG.

- Measures of success:
- The Living Coast Biosphere periodic review completed for submission to the United Nations Educational, Scientific and Cultural Organisation (UNESCO) by March 2024
 - 6 local wildlife sites reviewed by March 2024
 - Mandatory Biodiversity Net Gain reporting and monitoring systems implemented for all applicable new development by November 2023

Reduce harmful emissions from transport in the city through the Air Quality Action Plan and Carbon Neutral Programme	Mark Prior
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- Comments:
- All areas where Nitrogen Dioxide (NO2) is monitored are below the target, particularly so in Lewes Road. It's important the note that the target for NO2 are longer term targets to be met in 2026, and these targets are likely to be met on a step change basis, with the introduction of significant changes in legislation or technology. The street canyon effect contributes to higher levels of nitrogen dioxide in this area. Lewes Road is currently the only corridor which does not have zero emission buses operating on route. It is also one of the city's main transport corridors, with congestion caused by illegal parking and

delivery vehicles. A red route is planned for the area to improve this. Bendi buses have also been recently decommissioned on these routes, which were relatively higher emission vehicles. An enhanced partnership between bus operators and the council is in place delivering the BSIP (Bus Service Improvement Plan), which is aimed at increasing use and accessibility of public transport and includes timetables to improve/upgrade buses across the city. Changes in travel behaviour can contribute to improved air quality and work that the council undertakes to promote and enable greater use of active travel and cleaner vehicle choice will support this. Investment in cycling and walking and electromotive charging infrastructures and promotional activity will help to influence changes in these behaviours.

- The council are waiting on updates from Central Government on proposals for future Local Transport Plans and are dependant on this to inform an interim an LTP report. The LTP will set out the carbon neutrality targets to be met in the future. The council continues to progress a significant number of projects, many in partnership with other organisations. These will deliver the priorities in the council's Air Quality Action Plan and Carbon Neutral Programme and include measures to increase active travel; encourage and support uptake of ultra-low and zero exhaust vehicles; monitoring and public awareness; reduce emissions from buildings, new developments, energy production and construction sites, including highway works. These measures are guided by the council's Local Transport Plan, Local Cycling & Walking Infrastructure Plan, Bus Service Improvement Plan and City Plan.
- A report to January's ETS Committee for the second phase of procurement of over 1,000 charge points was approved. In March the council received a provisional allocation of £2.86m of Local Electric Vehicle Infrastructure (LEVI) funding subject to completion of an application process. The application process is underway, and it's hoped to include this public capital investment in the second phase procurement opportunity. There is a risk that the bid is unsuccessful or that the procurement exercise is not successful.

Measures of success:

- NO2 levels in Brighton & Hove at Lewes Road, North Street and Wellington Road, Portslade (Corporate KPI)
- Contractors appointed to the Highways contract submit a Carbon Reduction Plan and annual update reports against these shows positive evidence of carbon reduction activity.
- Progress with the transport priorities within the carbon neutral programme:
 1. Increased number of electric vehicle charge points installed
 2. Interim Local Transport Plan report agreed by March 2024

Risk Code	Risk Description	Responsible Officer	Risk Category	Initial Rating	Revised Rating
SR38	Not taking effective action to improve our city's resilience to the impacts of climate change and biodiversity loss	Executive Director - Economy, Environment & Culture Donna Chisholm	Transport & Sustainability Committee	25	15
				L5 x I5	L5 x I3
Causes					
The climate is changing due to man-made greenhouse gas emissions. Climate change will bring costly and potentially catastrophic impacts to Brighton & Hove's infrastructure, communities, economy, natural environment and quality of life over the next decades. The timing and intensity of these risks is unpredictable but inevitable.					
Potential Consequence(s)					
<ul style="list-style-type: none"> • Coastal protection assets challenged by sea level rises, affecting seafront. • Risks to infrastructure networks – water, energy, transport, ICT – from flooding, erosion, heatwaves, high winds, and cascading failure. • Water shortage. • Risk to soils including seasonal aridity and waterlogging. • Risks to food safety and food security. • Risks to cultural heritage. • Risks to building fabric especially housing, including higher energy demand. • Risks to businesses and economy from extreme weather events, disruption to supply chains and distribution networks. • Depletion or threat to local species and their natural habitats. • Ocean acidification and sea temperature rises affecting marine ecosystems. • Disproportionate impact upon groups suffering inequality and vulnerable individuals. • Impact on health and wellbeing (mental and physical), and to health and social care delivery. • Inability to manage demand-led service pressures • Additional costs to council in responding to emergency events; increasing demand for services; disrupted services; damaged infrastructure. 					
Existing Controls					
First Line of Defence - Management Actions					
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5. Brighton and Hove Air Quality Action Plan 2022-2027 and the city's six declared Air Quality Management Areas
6. The programme of works to improve the energy efficiency of council buildings, council housing, and other assets, and to install renewable energy generation including solar panels and heat pumps.
7. Brighton and Hove Circular Economy Routemap and Action Plan to help the city minimises waste and pollution, keeps products and materials in use for as long as possible and supports the regeneration and protection of natural resources.
8. Brighton and Hove City Council's Fleet Strategy 2020-2030 including the commitment to transition the council's fleet to low emission vehicles.
9. Spatial planning policies which support sustainable low-carbon development
10. Ongoing support to Schools' climate campaign, "Our City, Our World".
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Third Line of Defence – Independent Assurance

1. Internal Audit of Carbon Neutral 2030 programme completed in 2022-23

Risk Action	Responsible Officer
Agree and implement works to protect and restore the city's coastal and seafront highway infrastructure.	Nick Bean

Comments:

- Marina to River Adur scheme is progressing well and commenced in July 2023. This has begun with the installation of shingle and boulder coastal protection in the Marina area.
- Construction of Flood and Coastal Erosion Risk Management (FCERM) Phase 4 is on track for completion by March 2024. Works have started at Hove Deep Sea Anglers Club, and the rock revetment at the lorry park. Ground Investigations have taken place to assist in the groyne designation at King Alfred.
- Seafront Arches Asset Management Plan is on track to be agreed by March 2024

Measures of success:

- Marina to River Adur scheme commenced by July 2023
- Construction of Flood and Coastal Erosion Risk Management (FCERM) Phase 4

complete by February 2024
 - Seafront Arches Asset Management Plan agreed by March 2024

Implement objectives of the City Downland Estate Plan (CDEP)

James Woodward

Comments:

- The Estates Team is 11 months into the initial 2-year City Downland Estate action plan. The team has appointed a City Downland Estate Programme Manager and consultant Ecologist. A cross-department Officer Working Group has been established. The CDE Programme Manager has established good working relationship with the BHCC Rangers team for collaborative working. Terms of Reference for the Downland Advisory Panel (DAP) – stakeholder forum – have been established. A communication strategy has been developed. A review of Rights of Way (i.e. public access) is underway to review access infrastructure (e.g. gates, signage). New public access signage and interpretation boards are in the process of being designed and are awaiting funding to be produced and installed.
- A protocol to carry out due diligence checks on land dedicated as open access has been created. The Public Rights of Way Improvement Plan has been established by the Council. The 2024 Farm School programme (school visits to farms) is being arranged by the Estates Team. The Estates Team has also opened the Stanmer Traditional Farm Buildings to the public now that the buildings have been repaired. The Sustainability Team has created a Biodiversity Working Group which will help the Estates Team create and establish habitat management plans. Farm biodiversity surveys have been completed for 2022 and 2023 by the consultant Ecologist.
- The Sustainability Team has joined the Nature Recovery Network and has begun work on the Local Nature Recovery Strategy. The farm plan frameworks for Patcham Court Farm and Ovingdean Grange Farm have been complete by the Estates Team in collaboration with the Officer Working Group and DAP. The fencing of South Downs Riding School has been complete and is now being marketed for a new tenant. Baseline surveys for ecology and carbon have been carried out for the City Downland Estate by commissioned Ecologist and Farm Carbon Toolkit. The 2-year action plan has been reviewed internally with the estates managing agents, Savills. Due to financial pressures and lack of resources, other actions have not been completed or are not in progress yet. Over the next 14 months, the Estates Team will aim to make progress towards completing all actions in the initial 2-year City Downland Estate action plan.
- The CDE Programme Manager has worked with colleagues in Cityparks to start drafting a Heritage Lottery Fund bid to help fund heritage and nature works at Stanmer Traditional Agriculture Buildings, Foredown Tower, community engagement activities, and new interpretation boards.
- Further capital works have been done on farms/sites which has included fencing along the south boundary of Happy Valley and 15 new metal H frame gates installed on various sites to improve public access.

Measures of success:

- Initial 2-year City Downland Estate Plan (CDEP) action plan deliverables on track

Protect and improve biodiversity in the city.

Rachel Williams

Comments:

- The Living Coast Biosphere periodic review is on track with stakeholder and public consultation undertaken in Summer/Autumn 2023.
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- The Government has delayed the introduction of mandatory Biodiversity Net Gain (BNG) to January 2024 and has only just published the Regulations and Guidance. Planning's Business Development Manager is currently reviewing reporting/monitoring systems that are still being developed for BNG. It is now aimed to have reporting/ monitoring systems in place by April 2024 when all applicable development will need to provide BNG.

Measures of success:

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Protect properties from surface water flooding

Nick Bean

Comments:

- Preston Park and Eldred Avenue feasibility studies on track to complete by March 2024
- Revised Local Flood Risk Management Strategy has not yet been to committee. This has mainly been down to resourcing, and the team was an officer down for three months due to sickness. However, this should be on track to complete at the next committee. This is the strategic work and will have minimal impact on the outputs and deliverables that protect the city from surface water flooding which are fully in motion.
- Wild Park Sustainable Drainages (SuDS) project construction works on track to complete by August 2024

Measures of success:

- Preston Park and Eldred Avenue feasibility studies complete by March 2024
- Revised Local Flood Risk Management Strategy adopted and published by September 2023
- Wild Park Sustainable Drainages (SuDS) project construction works complete by August 2024

Deliver an Adaptation action plan based on evidence in the Climate Risk and Vulnerability Assessment

Rachel Williams

Comments:

- Climate Risk and Vulnerability Assessment has been completed and an action plan drafted for agreement by the Transport & Sustainability Committee in February 2024