

Brighton & Hove City Council

Appendix 1

Strategic Risk Report for Audit & Standards Committee Focus:
SR35; SR36; SR23 and SR21 Risk Report

Print Date: 29-Sep-2020

Initial Rating

LIKELIHOOD	IMPACT				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Almost Certain (5)	0	0	0	1	0
Likely (4)	0	0	0	1	0
Possible (3)	0	0	0	2	0
Unlikely (2)	0	0	0	0	0
Almost Impossible (1)	0	0	0	0	0

Revised Rating

LIKELIHOOD	IMPACT				
	Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Catastrophic (5)
Almost Certain (5)	0	0	0	0	0
Likely (4)	0	0	1	0	0
Possible (3)	0	0	3	0	0
Unlikely (2)	0	0	0	0	0
Almost Impossible (1)	0	0	0	0	0



1 - 3
Low
Monitor periodically

4 - 7
Moderate
Monitor if the risk levels increase

8 - 14
Significant
Review and ensure effective controls

15 - 25
High
Immediate action required & need to escalate to the management level above

Risk Details

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR35	Unable to manage serious risks and opportunities resulting from the impact of Brexit on the local and regional society and economy.	Executive Lead Officer Strategy, Governance and Law Brexit Coordinator	BHCC Strategic Risk	15/07/20	Threat	Treat	 L5 x I4	 L4 x I3		Revised: Uncertain

Causes

The Transition Period comes to an end on 31st December 2020 however uncertainty remains about the outcome of the current UK-EU negotiations. Whatever the outcome, from 1st January 2021 free movement of people, goods and services will end and that will impact on the city and in turn the COVID recovery both locally and regionally.

Potential impacts include:

1. Economic impact of ending of free movement of people, goods and services between UK-EU affecting businesses, citizen wealth and council income
2. Existing rights and regulations applying to EU citizens residing in the UK
3. The ability of partners in the health & social care sector to engage and retain staff
4. Local projects unable to secure future EU funding after Brexit
5. Travel and hospitality businesses' ability to recruit or employ foreign nationals
6. Pool of workers reducing (B&H has a larger pool of European residents)
7. Travel in and out of Greater Brighton due to changed border controls

Potential Consequence(s)

1. Fragmented communities leading to civil unrest
2. Increased demand for advice services for EU residents, citizens and businesses
3. Increased costs of goods and services for citizens and businesses
4. Reduction in workforce, skills and capacity affecting health and social care in the city
5. Disruption to supply chains – food, fuel, medical supplies and other key components of city infrastructure
6. Less able to manage local environmental impacts e.g. waste disposal
7. Less certainty around export/import regulations
8. Impact on food safety regulations and standards inc. Export Health Certificates

Existing Controls

1. City Brexit readiness review to be conducted through Recovery Working Groups where appropriate with oversight maintained by ELT and DMTs. The officer Brexit Resilience & Planning Group (BRPG) will reconvene once outcome of negotiations is known or new national planning assumptions are shared by MHCLG to ensure all risks and mitigations are being developed.
2. COVID-19 Recovery & Renewal Programme will include Brexit related risks and issues.
3. Key areas of potential impact highlighted in Readiness Monitoring Report by officers and partners. An updated report considering COVID-19 impacts to go to October 2020 Policy & Resources (P&R) Committee. Last update on readiness (Jan 2020) provided on council website (<https://new.brighton-hove.gov.uk/sites/default/files/2020-01/BHCC%20Brexit%20Readiness%20Report%20Jan%202020.pdf>)
4. Brexit Member Working Group providing Member oversight of the potential impacts of Brexit on Brighton & Hove and co-ordinating relations with city stakeholders and communities where potential impact has been identified by the Brexit Resilience & Planning Group or Recovery Working Groups.
5. City Management Board (CMB) considering Brexit related risks in September 2020 and including as part of wider city resilience planning.
6. Established contact on potential Brexit impacts with our waste contractor Veolia inc. on post-Brexit and future waste disposal arrangements including reselling of recycled materials
7. Communications are open within council and with city partners to escalate, disseminate and develop solutions to emerging issues through Brexit Implementation Lead and Recovery Working Groups.
8. Brexit Communications Officer coordinating and delivering Brexit related messaging and signposting to city stakeholders.
9. BHCC HR monitoring developments on employment rules and laws related to EU nationals and forthcoming introduction of the new Points Based Immigration System.
10. FCL and HASC monitoring potential impacts on service delivery including EU nationals in workforce and EU nationals as services users through DMTs and involving partners where necessary.

Second Line of Defence – Corporate Oversight

1. ELT holding role as strategic lead for Brexit response through monthly overview of DMT and Recovery Working Group actions.
2. Brexit Working Group (BWG) providing democratic oversight of Brexit preparations and reporting quarterly to P&R Committee.
3. P&R Recovery Sub-committee considering Brexit risks and issues in the context of resilience and recovery as a result of Covid-19 pandemic.
4. BHCC is part of the Sussex Resilience Forum (SRF). The SRF is working with colleagues both regionally and nationally to review contingency plans and

ensure the county is prepared for concurrent issues related to Brexit, Covid-19 and other significant Winter challenges across the county.

5. BHCC Director of Public Health is the co-Chair of the Local Health Resilience Partnership and attends meetings and NHS preparedness exercises.

Third Line of Defence – Independent Assurance

1. BHCC completes a range of HM Government surveys and returns. At this stage there is no view communicated by HM Government on BHCC actions but post-Brexit assessment from Home Office of BHCC actions may occur.

Reason for Uncertain rating in Effectiveness of Controls : there is still uncertainty around the outcome of the negotiations and the risk actions are in development.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
All council services to ensure that Business Continuity Plans (BCPs) consider potential impacts on contracts and supply chain issues related to a Brexit 'no deal' scenario.	Environmental Health Manager	70	31/03/21	06/02/19	31/03/21
<p>Comments: As at September 2020 all BC Plans are currently being reviewed by services and the deadline for this review is the 25th September. All services have been advised that the review of their plans should include the impacts of BREXIT, COVID 19 pandemic and incorporating winter preparedness. These plans are all receiving quality checks by the emergency planning and resilience team. Status of the business continuity plans is being reported to the Executive Leadership Team (ELT) in early October. The Housing, Neighbourhood & Communities (HNC) directorate's Emergency Planning and Resilience (EPR) team are part of Brexit Resilience & Planning Group (BRPG). ELT instruction to ensure all their BC arrangements are considered in line with SitRep report. Senior officers risk and resilience training part 1 has been delivered. BCPs reviewed in the context of Brexit.</p>					
All directorates to ensure providers messaged to request reviewing of Business Continuity Plans in relation to a 'no deal' Brexit scenario.	Executive Lead Officer Strategy, Governance and Law	60	30/09/20	25/09/19	30/09/20
<p>Comments: Audit trail of messaging to providers requested by Policy, Partnerships & Scrutiny (PPS) team for corporate coordination to provide evidence and offer guidance to assist those with any issues. Further assistance required from Procurement to ensure effective coverage across all council services.</p>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Awareness raising of EU Settlement Scheme (EUSS) and available support across the city for residents, businesses and partners.	Head of Communications	75	30/06/21	06/02/19	30/06/21
<p>Comments: As at August 2020 there were 20,280 applications with potential for more in the future up to 30/6/21. We originally estimated the city's EU population as 19k which was a best guess. The council will work further to ensure as many people as possible are reached and apply.</p>					
BHCC to maintain ongoing liaison with Shoreham Port through SRF planning arrangements.	Environmental Health Manager	80	01/01/21	06/02/19	01/01/21
<p>Comments: EEC & NCH responsibility being covered by 2 officers, the AD City Transport and the Regulatory Services Manager. Shoreham Port risk</p>					
Brexit Resilience & Planning Group (BRPG) to make recommendations for ELT agreement for the prioritisation of Govt funding related to Brexit impact mitigation activities including specific communications needs and staffing resources.	Head of Policy, Partnerships & Scrutiny	75	30/06/21	25/01/19	30/06/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Brexit Co-Ordinator drafted a Brexit spending plan for the council with funds to be used by 31st March 2021. This was reported to the Member Working Group and will be reported to P&R Committee in October 2020. Brexit Coordinator appointed Sept 2019 (part of PPS team) Brexit Communications Officer appointed Nov 2019 (part of Communications team) 4 x EU Settlement Scheme (EUSS) scanning devices purchased. In use at Brighton Town Hall as part of free ID checking service for the EUSS scheme for residents. Emergency Planning College/Cabinet Office risk & resilience training for senior officers - 2 sessions delivered - a follow up session took place in Jan 2020. Transition year until Dec 2020 staffing retained and further planning underway.</p>					
Cross-party Member Working Group maintaining oversight of the potential impacts of Brexit on Brighton & Hove .	Executive Lead Officer Strategy, Governance and Law	65	31/03/21	30/09/19	31/03/21
<p>Comments: Member Working Group meetings are scheduled every 3 weeks and are influenced by national planning assumptions. Previously taking place fortnightly and will be reviewed after 2019 General Election. Group provides direction to the BRPG through agreement of actions and financial sign-off.</p>					
Health & Social Care services provide contact point for providers if they have Brexit issues related to following the CQC guidance provided to providers.	Head of Adult Social Care Commissioning	60	31/03/21	25/09/19	31/03/21
<p>Comments: Health and Social Care (HASC) services were focused March - August 2020 on responding to the Covid-19 pandemic, in September HASC agreed they will send out further reminders re Brexit to all providers. In respect of Brexit Emails were sent to all providers outlining areas of potential impact for them to consider in their Business Continuity Plans and signposting to additional Gov.uk guidance and support. The health care services continue to monitor progress and uptake and signpost further as necessary.</p>					
Readiness Monitoring Report updated on regular basis through 2020.	Brexit Coordinator	70	31/03/21	01/02/19	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Updated report considering COVID-19 impacts to go to October 2020 P&R. Last update on readiness (Jan 2020) provided on council website (https://new.brighton-hove.gov.uk/sites/default/files/2020-01/BHCC%20Brexit%20Readiness%20Report%20Jan%202020.pdf). The impact of Covid-19 did have an effect on the delivery of Brexit work but the Brexit Coordinator continues to collate and share emerging issues and risks and previous meetings of Members Working Group & BRPG have been rescheduled and reflect national planning assumptions.</p>					

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR36	Not taking all actions required to address climate and ecological change, and making our city carbon neutral by 2030.	Executive Director Economy, Environment & Culture Business Development Manager - Transport International & Sustainability Programme Manager	BHCC Strategic Risk	15/07/20	Threat	Treat	Red L5 x I4	Red L4 x I4		Revised: Uncertain

Causes

Link to Corporate Plan 2020-23. Outcome 5 'A sustainable City', action 5.1 'Become a carbon neutral city by 2030'

The climate is warming and studies recommend that actions must be taken to keep global warming to under 1.5 degrees to avoid negative catastrophic impacts on biodiversity and the ecology of the planet.

Potential Consequence(s)

If this is not addressed local impacts are:

Sea-level rise impacting Brighton & Hove as a coastal city

Coastal protections challenged by sea level rise affecting city roads, homes and the coastline

Increasing local flooding due to extreme weather events and prolonged periods of heavy rainfall, inefficiencies in our urban infrastructure and built environment

Water shortage

Crop failure and food insecurity

Depletion or threat to local species and their natural habitats

Ocean acidification

Disproportionate impact upon groups suffering inequality

Impact on public health due to increased temperatures

Existing Controls

First Line of Defence - Management Actions

1. Brighton & Hove is part of the UNESCO biosphere designated area with biodiversity plan overseen by the biosphere delivery board who meet 3 times p.a. As at January 2020 the delivery board is chaired by Martin Harris CEO of Brighton & Hove buses, the deputy chair is Sean Ashworth of Inshore Fisheries Conservation Authority (IFCA).
2. BHCC, the Brighton & Hove Economic Partnership and the Chamber of Commerce have agreed an economic strategy which includes creating a sustainable city and moving towards a circular economy as a core objective
3. BHCC owns 12,000 acres of downland and agricultural farmland surrounding the city and works in partnership with Southern Water and the South Downs National Park Authority on initiatives to protect the chalk aquifer and city water supply
4. BHCC and the Transport Partnership work together to deliver sustainable transport policies through the delivery of the Local Transport Plan (LTP)
6. Flood and Coastal Erosion risk management - Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority.

Second Line of Defence - Corporate Oversight

1. BHCC's Environment, Transport & Sustainability (ETS) Committee is responsible for the council's functions in relation to coastal protection and flood defence; sustainability; parks; open spaces; sustainable transport; highways management and environmental health
2. Biosphere delivery board oversees delivery of biosphere management strategy
3. BHCC's Policy & Resources (PR) Committee approved the 2030 Carbon Neutral programme in Dec 19 and a Member working group to develop a high level carbon neutral plan by June 2020
4. The Council's Corporate Plan includes a section of priority actions around the theme of 'A Sustainable City' and the target to transition to carbon neutral by 2030.
5. Air quality Programme Board
6. Greater Brighton Economic Board's Infrastructure Panel has oversight of Energy and water plans
7. Communications officer in post to support carbon neutral programme.
7. A Climate Assembly (Citizens Assembly) is being established as part of a deliberative engagement process to identify and prioritise actions which will support the delivery of the 2030 Carbon Neutral Programme, starting with a focus upon Transport.

Third Line of Defence - Independent Assurance

Environment Agency (EA) in respect of flooding and monthly reports made to EA on how the city council spends the monies received from EA includes schemes such as coastal protection; Property Level Protection; sustainable urban drainage SPG (policy); Strategic Flood Risk Assessment.

Reason for Uncertainty in Effectiveness of Controls - The EEC Directorate Plan has actions specified but there will also be new actions added as the Climate Change agenda issues are determined.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Create a new Climate change fund	Assistant Director - City Development & Regeneration	50	31/03/21	24/06/19	31/03/21
<p>Comments: First call for SCRIF funding has gone out, bids due in on 18/10/19. Members Oversight Group met on 27/11/19 to review the bids, first project approval made in January 2020.</p>					
Develop a local cycling and walking infrastructure plan (LCWIP)	Assistant Director City Transport	40	31/03/21	21/05/19	31/03/21
<p>Comments: The LCWIP project is underway, with technical support being provided since late March 2020 by consultants Mott MacDonald following a competitive tender exercise. Mott MacDonald have worked on numerous LCWIPs in other cities / areas, and also provide technical support to Department for Transport (DfT) on the LCWIP programme nationally. Therefore we are well placed to learn lessons from these other areas / programmes when developing our LCWIP.</p>					
<p>The second stage of stakeholder engagement is currently taking place on the LCWIP, to review the draft walking and cycling network. This draft network has been developed following input from stakeholders in the first stage as well as data and mapping analysis of current and future journeys. Further stakeholder engagement will follow, to review the updated network and then full public and stakeholder consultation will take place on the draft LCWIP document.</p>					
<p>An Interim LCWIP was developed in response to the Covid-19 emergency and approved at the June ETS committee. This is being carried forward via the Covid-19 Urgent Response Transport Action Plan, which will next be reviewed by members at the September ETS committee.</p>					
Develop a new sustainable transport strategy (LTP5) for the city	Assistant Director City Transport	30	31/10/21	21/05/19	31/10/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Internal stakeholder engagement workshops are taking place in Autumn 2020, so that a vision for Transport in the city can be agreed by Councillors in the New Year ready for consultation. Public consultation on the vision document is planned for early Spring 2021, after which completion of a draft LTP5 will be due before the summer for further consultation. The content will be informed by inputs from councillors, the Climate Assembly and consultation part 1. The final LTP5 documents are due for completion by Autumn 2021.</p>					
Develop a route map towards a Circular Economy	Assistant Director - City Development & Regeneration	25	31/03/21	21/05/19	31/03/21
<p>Comments: Initial events on Built Environment & Construction and Visitor Economy held in June/July 2019. Accelerator Sessions focusing on the Built Environment and Construction to support staff engagement have been held since September 2019 and will continue until February 2020. These are supporting identification of actions, policy and case studies for supporting implementation of circular principles across council services and operations. Environmental consultancy SOENECS have been commissioned to write the CE framework. Work on progressing with the Visitor Economy will commence shortly.</p>					
Develop a whole Downland Estate plan	Assistant Director - Property & Design	33	31/03/21	21/05/19	31/03/21
<p>Comments: CDEP consultation paused as a result of COVID19, this has given the team the opportunity to plan the consultation/ engagement stage thoroughly, seek project support and explore Planning for Real techniques. Savills, council teams - project manager, property, Planning & Real are working out the engagement plan and timetable and exploring a variety of Covid secure engagement tools.</p>					
Establish a 2030 Carbon Neutral City Programme to report to P&R Committee (involves work between the ED EEC; the Executive Lead Officer, SGL; and Head of Policy, Partnerships & Scrutiny)	Executive Director Economy, Environment & Culture	60	31/03/21	21/05/19	31/03/21

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: • 2030 Carbon Neutral Programme Initiation Document approved at P&R committee in December 2019</p> <ul style="list-style-type: none"> • Cross-party 2030 Carbon Neutral Programme Board established with terms of reference agreed by P&R Committee, December 2019. • Review of current initiatives that currently tackle climate change developed, November 2019 • Governance structure for officer steering group and project team established, October 2019 • Collation of outline the baseline data and measuring tool, October 2019 • Lead BHCC officer identified and working on Communications plus Digital communications support in place , November 2019 • Ipsos Mori appointed for support to establish and deliver as deliberative engagement (Climate Assembly) process February 2020 <p>- Independent Advisory Board to oversee the Climate Process established – July 2020</p> <p>- Recruitment of residents to the Climate Assembly – August 2020</p> <p>Next Steps</p> <p>- Virtual Climate Assembly to take place – Oct-Nov 2020</p> <p>- Outcomes from the Climate Assembly to be reported to P&R Committee - end Jan 2021</p> <p>- Draft 2030 Carbon Neutral Programme to be presented to P&R Committee - end March 2021</p>					
Establish a 2030 Carbon Neutral Programme and governance framework	Head of Policy, Partnerships & Scrutiny	20	31/05/21	10/10/19	31/05/21
<p>Comments: This is a ten year programme ending 31 March 2030. The draft Programme Initiation Document was considered by Member steering group on 09 Oct 19. Member Working Group established and Climate Assembly agreed. The Climate Assembly was postponed due to Covid-19 but is due to take place on line in November 2020. The Net Zero Carbon Strategy is currently being developed, and is due for launch Spring 2021.</p>					
Improve rates of recycling and re-use and develop business case for food waste collection	Assistant Director - City Environmental Management	50	31/10/20	21/05/19	31/10/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Between April 2019 and December 2019, 29.5% of waste was sent for reuse, recycling and composting. The percentage for the 2019/20 financial year is expected towards the end of June 2020.</p>					
<p>Actions:</p>					
<ul style="list-style-type: none"> • Delivering the Managing Waste Responsibly Project (previously known as Increasing Recycling) to increase recycling rates • Completed the rollout of on-the-go recycling litter bins along the seafront • Introducing a third garden waste round • Sent a recycling leaflet out with council tax bills explaining what can and cannot be recycled • Received funds of £33,960 from the Sustainability & Carbon Reduction Investment Fund to expand the Community Composting scheme • Completing a cost-benefit analysis for the introduction of a food waste service • Rolled out new design communal recycling bins to the Lewes Road Triangle, with different lids for different type of waste and improved signage • Designing the new communal bin system 					
Review Biosphere Management plan	Assistant Director - City Development & Regeneration	25	31/03/21	21/05/19	31/03/21
<p>Comments: New Biosphere Programme Manager has started to review the existing management plan. The Biosphere Board held a workshop on principles and alignment with UN sustainable development goals at the last meeting.</p>					
Review procurement of fleet to deliver lower emissions & improve air quality	Assistant Director - City Environmental Management	40	31/12/20	21/05/19	31/12/20

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: Approval has been obtained for spending of c.£1million on immediate fleet replacement needs. £300k of this has been allocated, and directors will be asked to authorise spending on the remainder as soon as the exact vehicles required have been identified. At Environment, Transport & Sustainability Committee on 26 November 2019, Members agreed a mixed and flexible approach to procurement, aiming for the maximum carbon reduction per pound. The new approach will ensure that the oldest, most costly and non-environmentally friendly vehicles are replaced as soon as possible and will enable a flexible approach to respond to advancing technologies. This approach is to be developed as part of a council-wide Fleet Strategy which will be taken to Members for final approval. A project is underway to hire and test electric vehicles to inform and de-risk our preferred option.</p>					
Roll out a network of electric vehicle charging points (EVCP) - Directorate Plan ref. 4.38	Assistant Director City Transport	60	31/03/21	21/05/19	31/03/21
<p>Comments: Informal consultation has been completed with residents living close to proposed fast and rapid charger locations. An update report on Electric Vehicle Charge Points will be presented to ETS Committee in September. Work is nearing completion on the installation of 200 lamp post chargers all linked to the Electric Blue app with live status of charge points.</p> <p>The replacement and upgrading of existing fast chargers should be complete by October. Installation of the 4 rapid taxi hubs with 24 charging bays is due to start in November 2020. A bid for additional Office for Low Emissions funding for 12 fast chargers (£82k) has been successful. Overall the number of electric vehicles registered in the city has increased to 625 and is growing at approximately 10% every 3 months.</p> <p>The project aims to increase electric vehicle uptake in the city through an improved charger network to help meet net carbon neutral ambitions by 2030 and air quality targets. All public chargers are powered by 100% renewable electricity. In August the lamp post chargers were used 650 times providing enough electricity to drive the equivalent of 12,000 miles saving approximately 3 tonnes of CO2.</p>					

Risk Details

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR23	Unable to develop and deliver an effective Regeneration and Investment Strategy for the Seafront and ensure effective maintenance of the seafront infrastructure	Executive Director Economy, Environment & Culture Business Development Manager - Transport	BHCC Strategic Risk	15/07/20	Threat	Treat	Amber L3 x I4	Amber L3 x I3		Revised: Adequate

Causes

Link to Corporate Plan 2020-23: Outcome 2 'A city working for all', actions 2.5 'Develop our visitor economy'.

The seafront is a city asset which is iconic and contributes to the city's reputation. The council is the lead custodian of the seafront but the benefits are shared by many. At least 5 million people use our seafront every year. It is a very significant attraction in our visitor economy; provides a series of important public spaces for residents; many businesses in the city rely on the draw of the seafront to sustain their organisation's value and to provide an attractive place for stakeholders and employees. It is being used beyond its original design life and, in many ways, is a victim of its own success and affected by the changing patterns and increased demands of usage. Resourcing required to deliver a solution is not readily available and impacts on timing of delivery of any projects. There several ambitious capital, regeneration and investment projects along seafront in various stages of planning development, including the Waterfront project, Shelter Hall, the King Alfred. The deterioration of Madeira Terraces in particular have reached a critical point, requiring fencing and safety measures until a longer term funding is developed which is expected to cost £24 million. The council is proactive in bidding for Heritage Lottery Funds (HLF) but as at 3 January 2019 two bids have been unsuccessful. The City Council is the coast protection authority and is required to deliver coastal strategy studies, coastal protection, and flood defences in partnership with DEFRA and the Environment Agency. Management of climate events, long shore drift and the impact of climate change requires management and re-profiling of the shingle beaches, groynes and sea walls.

Potential Consequence(s)

Without adequate investment the seafront will decline in popularity and impact on the visitor economy and the city and regional economy with potential to affect:

1. the heritages structures and infrastructure along the seafront which require significant investment and ongoing revenue in order to ensure suitability for modern use
2. preservation of the reputation of the city and enhancing its offer and protecting the visitor economy
3. the A259 highway and associated structures, such as the seafront arches and sewage infrastructure which could have an impact upon our transport systems and economy, and effect sewage and foul water management in the city centre
5. management of the impact of climate events and long shore drift upon the city's beaches which would lead to reduction in amenity space impact upon the visitor economy and profitability of small businesses
6. provision of adequate sea protection measures which could lead to coastal flooding impacting upon residents, businesses and visitors.

Existing Controls

First Line of Defence: Management Controls

- 1) Strategic Delivery Board has been established and is actively considering seafront redevelopment opportunities including the Black Rock and King Alfred sites. Project managers provide a monthly report of all projects to the Strategic Delivery Board.
- 2) Department for Transport (DfT) funding secured for the redevelopment of the West Street / A259 Junction and Shelter Hall. Initial infrastructure work commenced late 2015.
- 3) Annual special inspection report on the condition of Madeira Terraces undertaken by Structural Engineering consultants.
- 4) PR&G approval in December 2018 to enter into a conditional land acquisition agreement with Aberdeen Standard Investments for the Brighton Waterfront Project.
- 5) Late 2017 the Save Madeira Terrace crowd funding campaign raised £460K to restore the first three arches and the project is commencing.
- 6) PR&G in January 2019 considered a development agreement for the King Alfred site.
- 7) Physical (weekly and monthly) Inspections of 12km of Coastline and Sea Defences undertaken by Coast Protection Engineer.
8. Seafront Structures supporting the A259 are routinely maintained and restored utilising funding via the Council's LTP annual capital programme.

Second Line of Defence: Corporate Oversight

1. Quarterly monitoring of strategic management of the council's investment in the seafront through the Greater Brighton Economic Board and the Member led Strategic Delivery Board, underpinned by the Officer led Corporate Investment Board (capital) and Modernisation Board (revenue).
2. Member oversight by Regional Flood & Coastal Defence Committee, facilitated and Chaired by Environment Agency.
3. Coast Protection solutions and projects delivery by service lead officer.

Third Line of Defence: Independent Assurance

1. Projects funded by Government departments are overseen by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP governance arrangements (quarterly) / and by relevant government department (according to their timetable). No funding has been withdrawn to date.
2. DfT, C2C LEP and TfSE funded schemes will be scrutinised by their respective regional officers
3. Internal Audit - Internal audit review of Seafront Investment Strategy (Strategic Risk23) Reasonable Assurance - December 2018. Internal Audit work on the Waterfront Project in 2017/18. Some independent assurance on this risk is also provided by the Greater Brighton Economic Board (quarterly) and Coast to Capital LEP.
2016/17 audits were Valley Gardens and Shelter Hall (Limited Assurance)
4. Coast Defence includes oversight of B&H's Coastal Defence Strategy and agreement of Business Cases by Environment Agency and DEFRA.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Bring forward key development sites that form the City Regeneration Programme: - Waterfront project - King Alfred	Assistant Director - City Development & Regeneration	10	31/03/21	01/04/19	31/03/21
<p>Comments: - Waterfront: A standstill agreement has been signed on the CLAA. The parties are preparing a programme of workshops to set a brief for the project ahead of Heads of Terms.</p> <p>- King Alfred: The options for development are being re-examined. Firstly looking at the existing condition and investment plan for our other health and leisure facilities, as well as the city's wider Health and Activing Living strategy as part of the process of vdeveloping a new spec for a Leisure facility or facilities in the west of the City. This will then inform a site selection and development options process. A Member Working Group has been convened and has met for the first time.</p>					
Deliver a phased programme of works to manage and improve highways and structures related to the seafront	Assistant Director City Transport	75	31/03/21	01/08/16	31/03/21
<p>Comments: Phase 3 of the Shelter Hall scheme shall be complete at the end of October 2020. Inspections and maintenance works are on-going part of the annual maintenance programme for highway structures including the seafront arches. Phase 4 to 5 of the Kings Road Arches bid to DfT is still being reviewed and DfT is seeking further clarifications prior to validation. Their comments and feedback will be reviewed in the coming weeks. All comments following the LPRG review of the Marina to River Adur scheme business case have been responded to and confirmation of approval for the Grant in Aid funding is awaited.</p>					

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Flood and Coastal Erosion risk management - complete the feasibility and detailed design work prior to implement the Brighton Marina to River Adur coastal protection scheme undertaken in partnership with the Environment Agency (EA), BHCC, Adur District Council, Shoreham Port Authority. The scheme proposes new and improved groynes, seawall and beach profile management, to improve coastal protection for the seafront arches, promenade, A259, southern storm water sewer, city main foul & storm water</p>	Assistant Director City Transport	60	28/02/22	01/04/18	28/02/22
<p>Comments: The final response to the Environment Agency comments has been submitted and final approval of the Outline Business Case is due shortly. Approval from Council committee has been given for the award of the detailed design contract and initial project start up meeting is taking place on 24th September. A report will be taken to committee early 2021 (Q4) to provide an update on the additional funding element.</p>					
<p>Implement high priority actions from the structural engineering report</p>	Assistant Director - Property & Design	100	31/03/21	03/01/19	31/03/21
<p>Comments: Madeira Terrace - Works identified as priority in previous reports has been completed, this includes several fractured beams being propped. The 2020 report has been issued which identifies structural defects requiring work to reduce the risk of structural collapse. Monitoring of cracks and additional investigations are required to a number of structural elements to confirm additional works. Structural engineer to be consulted on the specification of works necessary.</p>					
<p>Listed Building Consent was obtained for the removal of the exiting cast iron rainwater goods in April 2020. Future planning approvals will be required for the refurbishment, and Major Projects have now appointed a design team who are in the early stages of conducting site inspections.</p>					
<p>Subject to partnership matchfunding carry out work within 5 years, linking to Council medium term financial strategy</p>	Assistant Director City Transport	20	01/01/25	01/05/19	01/01/25

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: The council has submitted a funding bid of £20M to Department of Transport as part of the new designation for the A259 in the city as 'Major Route Network', this is being facilitated and prioritised by Transport for The South East (TfSE). In July 2019 we submitted our bid to TfSE for onward submission to DfT. The schemes would begin, if successful, within the financial year 2020/21 for approx. 5 years duration.</p>					
<p>The crowd funding campaign for the renewal and upgrading of the first three arches was successful, we now need to implement the project and spend the funding.</p>	<p>Assistant Director - City Development & Regeneration</p>	<p>25</p>	<p>31/03/21</p>	<p>22/12/17</p>	<p>31/03/21</p>
<p>Comments: Funding agreed to progress design work to get the project started. This will look at first 30 arches, but delivery will be of between three and thirty arches.</p>					
<p>08/07/20: Full design team now procured and appointed. starting design work. Additional budget secured in to the 20/21 financial year.</p>					
<p>Procurement of design team has started, complex process taking 6 to 9 months.</p>					
<p>Advisory Group has been formed and has met twice.</p>					

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Risk Details

Risk Code	Risk	Responsible Officer	Risk Category	Last Reviewed	Issue Type	Risk Treatment	Initial Rating	Revised Rating	Future Rating	Eff. of Control
SR21	Unable to manage housing pressures and deliver new housing supply	Interim Executive Director, Housing, Neighbourhoods & Communities Head of Planning Assistant Director Housing	BHCC Strategic Risk, Environmental / Sustainability	15/07/20	Threat	Treat	 L4 x I4	 L3 x I3		Revised: Adequate

Causes

Link to Corporate Plan 2020-23. Outcome 1 'A city to call home'.

Brighton & Hove is a growing city with high house prices, low incomes, an ageing population and a significant proportion of households with a support need. Scope for development within the city is affected by significant geographical constraints and competing land pressures. The increasing demand for housing continues to outstrip new supply and as a consequence accommodation is becoming less affordable. Housing shortages are particularly acute for low income households affecting our ability to retain essential workers in the city. Demand for affordable rented homes is growing with a significant number of households in temporary accommodation. The private rented sector continues to expand at the expense of rates of owner occupation which are in long term decline.

Potential Consequence(s)

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1. Changes in Government legislation require council intervention to prevent homelessness at an earlier stage.
2. The city is constrained in its capacity to accommodate economic growth, housing supply obligations and sustainable development objectives.
3. The city council is unable to meet its strategic housing and planning policy objectives to: meet City Plan and Housing Strategy requirements in terms housing numbers; improve overall housing supply and housing mix; deliver affordable lower cost homes, in particular homes for rent.
4. The city council is unable to meet statutory homelessness obligations. In particular, corporate critical budget implications arising from Temporary Accommodation pressures owing to lack of suitable alternative accommodation and overall need to reduce the use of Temporary Accommodation.
5. The shortage of homes to meet the accommodation requirements of elderly and vulnerable people which can have an adverse impact on social care provision and cost pressures on both social care and Health.
6. Impact on our ability to recruit and retain lower income working and younger households and employment in the city, in particular in social care, health and other lower wage sectors.

Existing Controls

First Line of Defence: Management Controls

1. Housing Work Plan 2019-2023 agreed at Housing Committee on 18 September 2019 with reports on progress to be taken to every other committee. Progress is also subject to regular review against delivery within business plans e.g. HNC Directorate Plan and Service Plans;
2. The City Plan also sets out housing targets across all tenures; policies on securing affordable housing through the planning system, residential development standards;
3. Housing Revenue Account (HRA) Asset Management Strategy is aligned to Housing Strategy in support of improving housing supply & housing quality which is in alignment with the Housing Committee Work Plan;

Key controls include:

1. Housing Allocation Policy framework ensuring best use of existing council and registered provider resources through nomination of affordable housing to priority households.
2. Deliver 800 additional council homes - 2019-23. Includes:
 - a) New build council homes under our New Homes for Neighbourhoods programme;
 - b) Homes purchased under our Home Purchase Policy;
 - c) Improving supply through best use of existing HRA assets including conversions and extensions and the hidden homes programme;
 - d) Work in partnership with Community Land Trust to support community housing initiatives.
3. Deliver 700 other affordable homes - 2019-23. Includes:
 - i) Enabling delivery of new affordable homes in partnership with Registered Provider partners and Homes England;
 - ii) Development of additional Housing Delivery Options. The Living Wage Joint Venture 'Homes for Brighton & Hove' with Hyde to deliver 1,000 new lower cost homes for rental and sale. Future possibilities for housing market intervention / direct delivery through a council wholly owned housing company.
4. Increase the supply of council owned Temporary Accommodation (TA) in addition to procurement of TA and long term private sector housing lettings with private landlords for those to whom we owe a housing duty;
5. Bringing long term empty private sector homes back into use through our Empty Property Service;
6. Tenancy sustainment initiatives particularly for more vulnerable people in order to prevent homelessness;
7. Ongoing work of Greater Brighton Housing & Growth initiatives to share good practice and accelerate delivery of new homes;

8. On-going work of the Greater Brighton Strategic Property Board; bringing national, regional and local partners together to make the best use of the combined public estate – including the release of surplus land and sites for economic growth (new jobs, employment floorspace and home);
9. Early intervention through the homelessness trailblazer programme and funding to support households into the private rented sector.

Second Line of Defence: Corporate and Committee Oversight

1. The Housing Committee Work Plan 2019-2023 focuses on key shared priorities around providing Additional Affordable Homes including consultation with stakeholders, resource planning and a timescale for reports to come to Committee. Performance reports to be brought to alternate Housing Committees to monitor how officers are progressing with delivery against the Work Plan.
2. Corporate Investment Board.
3. Strategic Investment Board.
4. Cross Party Housing Supply Members Board (formerly Estates Regeneration Members Board, cross party).
5. Strategic Housing Partnership (cross sector).
6. Strategic Accommodation Board (reviewing accommodation needs of vulnerable households across Housing, CS & ASC). Progress is reported in HNC Directorate Plan.
7. The risk was reviewed at A&S Committee in January 2019.

Third Line of Defence: Independent Assurance

1. Internal Audit - current activity. Ensure all Audit requirements have been actioned. Most recently 2018/19 Audit actions concern Temporary Accommodation – Partial Assurance. Actions, including reduce the budget overspend by increasing homeless prevention work and moving current tenants into private sector rented accommodation, have been agreed with management and will be followed up by Internal Audit as part of the 2020/21 audit plan.
2. Internal Audit - previous activity. June - Oct 2018 Supported & Semi-Independent Accommodation – Reasonable Assurance. No specific Internal Audit work in 2017/18. In 2016/17 on Housing New Builds concluded Substantial Assurance.
3. Ministry of Housing, Communities & Local Government information returns. Submitted annually.
4. Homes England information returns where we have HE grant allocations. Homes England grant for homeless move on accommodation – regular updates to HE on scheme progress and draw down on grant.

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
Deliver Housing Work Plan	Assistant Director Housing	25	31/03/23	01/10/19	31/03/23

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: The Housing Committee Work Plan 2019-23 is incorporated in the Housing, Neighbourhoods & Communities Work Directorate Plan and appropriate business plans. Regular reports on progress are made to Housing Committee and Performance reporting six monthly to P&R Committee. Links to reports are available on the council's website</p>					
<p>Effective implementation of affordable housing policy in the City Plan</p>	<p>Head of Planning</p>	<p>50</p>	<p>31/03/21</p>	<p>01/04/15</p>	<p>31/03/21</p>
<p>Comments: Housing Delivery Action Plan in place which is being implemented and monitored. This is an action plan required by central government to address the under delivery of housing against planned targets. The action plan includes measures to ensure timely decisions by the Development Management Service and close working with colleagues in the Housing Strategy Team and Estates to support delivery of affordable housing (and housing in general). Report introducing a framework of viability assessors was agreed by TECC Committee in January 20 and will, due to changes in work priorities arising from Covid-19 response, will be implemented in the autumn 20. Proposed Submission City Plan Part Two agreed at Council in April 20 for final stage of consultation and submission for examination. Consultation started in Sept 20. It includes a significant number of sites allocated and includes a policy on Build to Rent Housing. This will go forward for submission to the Secretary of State in early 21 following consultation. Section 106 contributions (Sept 20) received towards delivery of affordable housing stands at £5.7m. Additional project underway to explore options to unblock delayed sites working with colleagues across Greater Brighton.</p>					
<p>Work through City Deal with regional partners & LEP to promote Economic development incl increased sub-regional working to meet housing need</p>	<p>Head of Planning</p>	<p>40</p>	<p>31/03/21</p>	<p>01/04/15</p>	<p>31/03/21</p>

Risk Action	Responsible Officer	Progress %	Due Date	Start Date	End Date
<p>Comments: New Project Manager for West Sussex and Greater Brighton Local Strategic Statement3 (LSS3) in post. Work started in earnest on statement of common ground setting out agreed approach between the partner authorities. Scoping of evidence to support LSS3 (non statutory Strategic Statement to plan housing, economic growth and infrastructure from 2030-2050) underway and preparation of a work programme. Strategic Planning Board to meeting in October.</p>					
<p>Previous updates Following work by the Greater Brighton Housing & Growth (GBH&G) Working Group to accelerate delivery of new housing supply a Local Strategic Statement 2016 was developed with the sub-regional planning group to consider the wide Greater Brighton area including Surrey.</p>					
Work with partners to address student housing needs	Head of Planning	95	31/03/21	01/04/15	31/03/21
<p>Comments: Citywide Article 4 Direction to control change of use to small HMOs came into effect in June 2020. The submission City Plan Part 2 with it's supporting policies, agreed at in April 20, though consultation was delayed, consultation underway in Sept 20 and likely submission in early 21. Collaborative working continues with close working between Private Sector Housing, Planning and other relevant Council Services at PRS meetings - however, these have been stopped as a consequence of covid 19. At meetings there is a focus on enforcement measures and appeals. A further measure agreed to encourage flexible planning permissions for C3/C4 uses to encourage landlords to revert under-occupied HMOs back to small HMOs (as there have been indicators of reduced occupation of HMOs).</p>					
<p>Planning applications service continues to consider new applications for purpose built student housing and support implementation of consented schemes with significant progress on a number of sites including Circus Street and Preston Barracks.</p>					