

Housing, Planning and Regeneration Risk Register

Q3 2021/22

REF	DIVISION	RISK TITLE & DESCRIPTION (a line break - press shift & return - must be entered after the risk title)	RISK CAUSE & EFFECT	RISK CATEGORY	GROSS RISK RATING (See next tab for guidance)			EXISTING CONTROLS IN PLACE TO MITIGATE THE RISK	CURRENT RISK RATING (See next tab for guidance)			FURTHER ACTION REQUIRED	RISK OWNER
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1	All	Failure to deliver Housing Financial Strategy	<p>Cause(s):</p> <ul style="list-style-type: none"> - Demand led statutory services which can be difficult to predict - High number of households meeting criteria for temporary accommodation - Lack of suitable housing - Impact of COVID-19 on tenancies including changes to government directives, increased placements and their cost, reduced rental income for properties and progressing building works - Increased costs at 2 Traveller Sites due to unexpected police operation. Lack of income as a result of un-tenanted pitches. <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to achieve a balanced budget 	Financial	5	5	25	<ul style="list-style-type: none"> - Match financial planning to Council priorities - Plans to deliver £11m of identified savings in Housing through work of Housing Transformation Board - Budget monitoring and forecasting - Regular reporting to CLT and Members via the Committee reporting process - Internal audit framework - Regular review of strategies to prevent homelessness and identify/develop temporary accommodation housing - Determination at planning stage to ensure collection of obligations due (S106) - Conditions attached to S106 funding received to ensure it is spent on preventing homelessness - Constantly reviewing service operations for potential efficiencies - All relevant statutory strategies implemented 	4	5	20	<ul style="list-style-type: none"> - Ensure the continued delivery of the housing schemes as set out in the Transformation Board Housing Plan - Close monitoring required for homeless approaches. This will allow earlier identification of any changes in homelessness demand which could have an impact of adding further financial pressures 	Director, Housing (Sara Bowrey)
2	Housing Needs	Failure to deliver effective Housing Needs services The Council is unable to deliver an effective Housing Needs service to fulfil its statutory obligations	<p>Cause(s):</p> <ul style="list-style-type: none"> - very demand led - lack of experienced staff - homelessness is increasing in number and complexity of cases needing maximisation of early intervention - Lack of awareness of where households need to approach services - Lack of suitable housing options. <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in need of Housing Services - Reputational damage - Legal challenge - Financial Impact 	Legal	4	4	16	<ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - Implementing the Homelessness Strategy - the multi-agency Homelessness Forum has been established and implemented and other priorities of the Strategy are being taken forward - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Housing Transformation Board programme being implemented - Implementation of new Housing schemes to ensure the supply reduces the reliance on nightly paid accommodation - Provide a competitive private sector offer - All relevant statutory strategies implemented - Ensuring grant funding is pursued and properly utilised. 	2	4	8	<ul style="list-style-type: none"> - Return to work being reviewed following COVID-19 in order to provide in-person services - Changes in legislation following COVID-19 which has amended the guidance which has increased the scope for provision of services. - Additional support being sought from HR to fill vacant posts 	Assistant Director, Housing (Lynnette Charnielec)
3	Housing Needs	Temporary Accommodation Inability to effectively manage the volume of people presenting themselves as homeless and the additional pressures placed on the homelessness budgets	<p>Causes:</p> <ul style="list-style-type: none"> - Changes in government funding - Rising number of placements (approx. 15 per month) - Lack of local, affordable sustainable options - Increased homelessness and lack of access to accommodation <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to fulfil statutory obligations - Impact on life chances and outcomes for individuals and families in temporary accommodation - Increased risk of legal challenge due to provision of unsuitable accommodation (including shared accommodation) - Pressure on other services - Increase in the number of out of borough placements 	Legal	5	4	20	<ul style="list-style-type: none"> - Focus on preventing homelessness and diversion to alternative housing options through:- - Landlord and Tenancy advice support and sustainment - Assistance (including financial aid) to access the private rented sector - Access to employment and training - Debt, money, budgeting and welfare benefits advice, including assistance to resolve rent and mortgage arrears - Sanctuary scheme for the protection of victims of domestic violence - The Homelessness Forum has been established and is taking forward the priorities of the Homelessness Strategy. - Working with local charities and faith groups to increase opportunities for joint / outreach work. - Effective contract monitoring arrangements to ensure acceptable quality of service provision and value for money - Housing Transformation Board programme being implemented - Implementation of new housing schemes to ensure the supply reduces the reliance on nightly paid accommodation - Provide a competitive private sector offer - All relevant statutory strategies implemented 	4	4	16	<ul style="list-style-type: none"> - Acquired homes through the Beehive scheme - The scheme with Meadowship Homes for 260 properties is currently underway and performing on target - Converting tenancies in the More Homes Bromley scheme from temporary to permanent - 3 modular homes sites with work underway (Bushell Way, Brindley Way and Anerley Car Park Site) and other sites being reviewed 	Assistant Director, Housing (Lynnette Charnielec)

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4	Housing Needs (Housing Strategy)	Capital Grant Failure to deliver the Council's affordable housing strategy in support of statutory obligations Lack of infrastructure in place where growth is occurring (Section 106 monies)	Cause(s): - Lack of availability of external capital grant (Housing Associations) to deliver key housing schemes - Lack of available suitable sites within the borough on which to develop new affordable housing schemes over the short to medium term together with delays in completing developments - Potential fluctuations in house prices and supply chains - Schemes not granted planning permission to develop identified sites Effect(s): - Failure to fulfil statutory obligations - An inadequate supply of housing will lead to an inability to meet housing needs of a range of client groups in support of statutory housing and homelessness duties.	Social	4	4	16		- Participation in negotiations on the affordable housing provision on section 106 applications, ensuring that the affordable housing obligation reflects local adopted planning policy and local statutory and high priority housing need - Work underway to streamline the S106 process to ensure that the Council maximises the use of available funding to meet housing needs - Determination at planning stage to ensure collection of obligations due - Conditions attached to funding received to ensure it is spent on preventing homelessness - Development group with Housing Associations established to improve relationships with planners and developers to increase supply of affordable housing	3	4	12	-Re-instate Bromley Federation of Housing Association meetings suspended due to COVID - Discussions held with individual registered providers. - Planning seeking to maximise affordable housing delivery through planning consents and s106 funding	Assistant Director, Housing (Lynnette Chamielec)	
5	Housing, Planning and Regeneration	Recruitment and Retention Failure to recruit and retain key skilled staff with suitable experience/qualifications	Cause(s): - Failure to compete with other organisations to recruit the highest quality candidates to build an agile workforce - Small pool of experienced workers Effect(s): - Failure to identify and meet service user needs - Provision of service to ineligible clients - Provision of service prior to/without appropriate authorisation - Lack of skill sets result in an inability to deliver effective housing services and planning services as well as progressing housing and regeneration schemes. - Impact on life chances and outcomes of families and young people.	Personnel	5	4	20		- Recruitment drive to convert locums to permanent staff - Council's recruitment web site includes a video virtual tour of the Council in housing - Support in effectively managing staff performance - Bespoke training for first line managers - Training and quality assurance of best practice - Role on Recruitment and Retention Board - Review the recruitment/retention of housing staff including packages for retaining staff - Developing apprenticeship and trainee roles in Planning Services - Grading and role responsibilities for key posts benchmarked - Promotion of employment prospects and career progression in Bromley enhanced - Working with specialist recruiters.	3	4	12	- Further work required around salary benchmarking and key roles consideration - Consideration to be given around succession planning across the department - Recruitment and retention package developed	Director, Housing (Sara Bowrey) Supported by Director, Human Resources (Charles Obazuaye)	
6	Housing Needs	Welfare Reform Impact of Welfare Reform legislation (including Universal Credit).	Cause(s): - Ongoing concerns about delays with Universal Credit and the impact of the benefit cap on families Effect(s): - Increased Rent Arrears - Lack of affordable/sustainable local options - Subsequent evictions and landlords reluctant to rent properties to claimants. - Higher proportion of clients impacted by benefit cap.	Social	4	4	16		- Notification, advice and support provided through:- - Housing Association transfers - Negotiations with landlords - Budgeting/debt advice - Moves to cheaper areas - Prevention grants/welfare fund/Credit union loans and savings - Access to child care and employment - New IT system and rent arrears procedure in place to improve arrears collection and support tenants with financial advice. - Protocol established with housing associations including single point of contact to identify those with financial issues in order to prevent homelessness.	3	3	9	- Experienced 50% decrease in the DHP (from c.£800k to c.£400k) - New Household Support Grant has been implemented from December 2021 - Money Advice team have undertaken enhanced work to help support individual financial circumstances and prevent homelessness. - Worked with Clarion on early intervention work to support those impacted by COVID-19 by way of job loss, furlough etc.	Assistant Director, Housing (Lynnette Chamielec)	
7	Housing, Planning and Regeneration	Business Interruption / Emergency Planning Failure to provide Council services or statutory requirements of mass illness/fatalities scenario following a business interruption or emergency planning event	Cause(s): - Business Interruption could be caused by Loss of Facility (fire, flood etc.), Staff (illness, strike) or IT (cyber attack). - Mass fatalities or illness has a range of causes and this risk to the council could be caused by council staff being impacted resulting in failure to manage statutory requirements of mass illness/fatalities scenario (e.g. registering of deaths within timescales) Effect(s): - Business interruption - failure to deliver services, loss of customer / resident satisfaction. - Emergency planning - failure to deliver statutory duties.	Personnel	2	5	10		Business Interruption - Civil protection and emergency planning policies in place at corporate level overseen by the Corporate Risk Management Group - Business Continuity Plans in place at service level. Reviewed and updated. - Contracts contain business continuity provision - Communication to all staff prior to all impending industrial action, informing of any possible service disruption as well as explaining implications of strike action for individual staff members Emergency Planning - Robust plans in place, including Outbreak Plan, Flu Plan and Pandemic Flu Plan - Alert system via the South East London Health Protection Unit (SEL HPU) - Annual Flu vaccination programme in place	1	5	5	- Business Continuity Plans reviewed annually.	Director, Housing (Sara Bowrey)	

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8	Strategy, Performance and Corporate Transformation	Data Collections Failure to undertake statutory statistical data collections; including key housing and planning information, thereby adversely affecting government grant allocations and performance assessments	Cause(s): - Business Interruption Effect(s): - Failure to commission effectively - Adverse impact on the timing and quality of decision making	Data and Information	3	3	9		- Schedule of statutory returns has been incorporated into the Performance and Information team's work programme - Specialist members of the team for each area - Other staff trained to provide 'back up' for specialist members of the team - Good project planning in place to co-ordinate all data collections including contributions from other services	1	3	3		- Complete contract extension for the Orchard Housing system to ensure operational continuity - Reports under continued improvement programme.	Director, (Sara Bowrey) Supported by Assistant Director, Strategy, Performance & Corporate Transformation (Naheed Chaudhry)
9	Strategic Property	Financial Performance Failure to reach expected income through rental income and property disposal	Cause(s): - Failure to lease all properties - Failure to eliminate rent arrears - Downturn in property market - Impact of COVID-19 on retail and property markets - Non-payment of rent on properties Effect(s): - Reduced rental income - Reduced capital income - Impact on overall Council budget	Financial	3	5	15		- A programme of rent reviews, lease renewals, new lettings, lease renegotiations, cost recharges and cost refunds is being carried out by the property team. - Rental deferrals monitored and repayment plans arranged from property portfolio.	2	5	10		-Following termination of C&W contract, new staff and contract support have been migrated to the Council.	Assistant Director, Strategic Property (Michael Watkins)
10	Strategic Property	Health and Safety Regulations Failure to comply with statutory regulations with regard to the built environment in Council occupied and leased properties	Cause(s): - Inadequate risk assessments - Lack of capacity to discharge the Council's H&S responsibilities with regard to the built environment - Ineffective monitoring of risks Effect(s): - Potential prosecution of Council and/or civil claims for compensation - Insurance claims - Potential accidents/fatalities - Corporate manslaughter	Physical/ Legal/ Financial	3	5	15		- Corporate Safety Adviser employed - Safety Policies reviewed and updated - Health and Safety works provided through Amey - Contractors held to account for managing Council premises to required legal standards	2	5	10		-Council in the process of agreeing an exit plan with Amey which will include statutory compliance data which will need to be mapped into the council's new database.	Assistant Director, Strategic Property (Michael Watkins)
11	Strategic Property	Contractor Performance Failure to deliver facilities management service	Cause(s): - Inadequate qualified staffing resources - Lack of capacity to deliver outcomes Effect(s): - Failure to deliver statutory obligations - Poor performance impacts on work of Council officers	Contractual and Partnership - Operational	3	5	15		- Regular monitoring of performance and key performance indicators - Contractors make regular reports to Members on delivery of contract - Contract reviewed and escalation for change available subject to Contract Change Notification - Business continuity plans in place and draft Exit Plan received	2	5	10		- New supply chain being formulated which include mitigation factors to ensure performance failure and service is de-risked.	Assistant Director, Strategic Property (Michael Watkins)
12	Culture and Regeneration	Outreach Service Failure to provide service in Cotmandene and Mottingham	Cause(s): - Buildings vulnerable to water and sewerage issues - Small staff base vulnerable to stress and sickness - Reduced service - recovering after COVID-19 closure Effect(s): - Failure to deliver full service - Closure of outreach centres - Impact on vulnerable adults	Social	4	4	16		- Staff experienced in successfully averting aggressive behaviour. - Regular weekly Team Meetings to discuss issues and address staff wellbeing as well as participation in training opportunities to help wellbeing - Facilities managed and repairs arranged with contractors (Amey and Clarion Housing)	4	4	16		- Daily, weekly and monthly Health & Safety checks to be continued - Lone working policy, CCTV and panic buttons, risk assessments in place and regularly reviewed - Allocating time for team meetings and staff training whilst maintaining delivery of service - Seek advice of Public Health colleagues on minimising the risk of infection for clients refusing the vaccine	Assistant Director, Culture and Regeneration (Lydia Lee)

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13	Culture and Regeneration	Vitality and Prosperity of Town Centres Failure of town centres to attract footfall and spend for retail and leisure opportunities	<p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to redevelop High Streets and diversify the offer - National trend for decline in the traditional retail sector in town centres and competition from out of town developments and online shopping - Risk that established Business Improvement Districts do not succeed at renewal or that planned Business Improvement Districts do not get established resulting in reduced revenue spend to support businesses in town centre locations. - Poor development in town centres - Lack of investment in town centre facilities and public realm. - Impact of COVID-19 on local economy - Supplier/contractor issues and increased contractor/supplier costs - Planning applications refused - Lack of stakeholder interest and support for improvements - General site constraints preventing progress/project delivery <p>Effect(s):</p> <ul style="list-style-type: none"> - Reduction in town centre business occupancy and increase in vacancies - Loss of income from business rates and market charges, and reduction in income from parking charges - Poor public perception and negative publicity. - Lack of private sector or inward investment. - Reduction in property value. - Reduction in footfall and spend per head resulting in loss of business. - Delays delivering public realm improvements - Public Realm Improvements projects have to be terminated 	Economic	4	4	16		<ul style="list-style-type: none"> - Support to Business Improvement Districts through renewal or ballot processes. - Work in partnership with Business Improvement Districts to drive town centre activity that support business success and include programming and events in town centres. - Secure funding for and deliver public realm improvements in town centres - Work with developers to bring forward suitable development that supports the vitality of town centres - Secure developer contributions for the benefit of town centres. - Investigate options for Renewal opportunities in all town centres. - Prioritise investment in town centre leisure facilities. - Implementation of the Business Support Task Force and support to plan for recovery - Terms of Reference to define relationship between the Business Improvement Districts have been created to better support the local economy. 	4	3	12	<ul style="list-style-type: none"> - Work with businesses to investigate the viability of a Business Improvement District in West Wickham, now scheduled for Spring 2023. - Terms of Reference to define relationship between the Council and BIDs under regular review to ensure it remains relevant. - Work with developers including Areli to bring forward sensitive town centre development that also secures improved facilities for community services. - Finalise town centre public realm improvement schemes. - ARG top up grants focussed on town centre recovery. 	Assistant Director, Culture and Regeneration (Lydia Lee)	
14	Culture and Regeneration	Capital Schemes Failure to deliver housing schemes for temporary accommodation	<p>Cause(s):</p> <ul style="list-style-type: none"> - Failure to gain approval from Members for business cases - Failure to secure funding for schemes - Failure to deliver temporary accommodation schemes on time and in budget - Issues with land ownership and usage - Planning permission not granted or granted with conditions which impact adversely on costs - Issues with type of housing and construction - Lack of interest from market in developing sites - Impact of COVID-19 on construction industry and production of modular homes <p>Effect(s):</p> <ul style="list-style-type: none"> - Failure to provide number of temporary accommodation units identified - Failure to produced identified savings as part of Housing Transformation Board programme - Impact on vulnerable families and children 	Financial/ Social	5	5	25		<ul style="list-style-type: none"> - The York Rise development secured planning permission as of December 2021. The project team is closely working on main contract mobilisation with a project start on site date anticipated for February 2022. - The Burnt Ash Lane main site works are to be completed in January 2022. The project team is closely working on the substation installation works which are now underway and final connectivity which is planned for late January/ early February 2022, with expected handover to Housing colleagues in March 2022. - Expected completion at Bushell Way and Anerley (35 homes in total) expected in February 2022. - Feasibility analysis underway on Beckenham Public Halls. Leasehold disposal option being developed in line with recommendations made in Sept 2020 Executive report. - Additional resources in Regeneration and Renewals teams dedicated to assess and bring forward a range of housing sites across the borough. Approach to Housing report for additional pipeline of housing sites identified and funding agreed by Executive 18th September. Design, feasibility and pre-planning advice underway on modular schemes. - Crystal Palace Regeneration strategy subject to decision by GLA via the outline planning application. 	4	4	16	<ul style="list-style-type: none"> - Further conversations required to be developed with services to understand short and longer term requirements of particular sites. - Legal advice sought on ownership and usage issues and actions identified. - Coordination across disposals programme to ensure revenue and housing targets can be met jointly. - Leadership team working with GLA on Crystal Palace. - Further upskilling and knowledge sharing across teams to bring forward development effectively. 	Assistant Director, Culture and Regeneration (Lydia Lee)	
15	Culture and Regeneration	Library Service Failure to provide statutory library service	<p>Cause(s):</p> <ul style="list-style-type: none"> - Service provider ceases to trade due to financial difficulties - Service provider chooses to terminate contract - Council terminates contract because service provider fails to consistently meet KPIs - Service does not meet contracted levels because of industrial action - Impact of COVID-19 on usage and closure of libraries <p>Effect(s):</p> <ul style="list-style-type: none"> - Temporary cessation of library service in borough - Adverse public response - Possible impact on partners in shared use buildings - Social impact on vulnerable adults and families using library facilities and activities 	Legal Reputational Social	4	4	16		<ul style="list-style-type: none"> - Monitoring of service provider to identify potential financial difficulties - KPIs monitored regularly, twice yearly reports to Members and monthly/annual review meetings with service provider. Extra monitoring measures put in place during COVID-19 - Exit plan in place to manage any closure of contracted service and bring service in-house which is regularly reviewed and updated. - Library without Walls created as a response to COVID-19 and has been retained as the 15th Bromley Library - Increased usage of social media to deliver activities for children and adults when in-branch activities are not possible - Promotion of e-books, newspapers and magazines - Libraries' re-opening to regular opening hours complete following end of governmental restrictions 	4	3	12	<ul style="list-style-type: none"> - Maintain and adjust contract and KPI monitoring exercises as COVID restrictions ease - Monitor and support reintroduction of all 'business as usual' services from pre-COVID including in-branch activities - Continue regular informal contact with contractor in addition to formal meetings and provide support to resolve issues as necessary 	Assistant Director, Culture and Regeneration (Lydia Lee)	
16	Planning	Planning Service Failure to deliver statutory requirements related to planning	<p>Cause(s):</p> <ul style="list-style-type: none"> - Failure of Planning IT service - Lack of suitably qualified staff to provide expertise within the service <p>Effect(s):</p> <ul style="list-style-type: none"> - Council enters 'designation' status resulting in major planning decisions being removed from Council decision-making process leading to income loss to Council and lack of local control - Failure to prevent unauthorised development - Failure to respond to planning applications within statutory timescales - Planning decisions overturned on appeal - Failure to enforce Tree Protection Orders, protect listed buildings and conservation areas - Adverse public response 	Legal Financial Reputational	3	4	12		<ul style="list-style-type: none"> - Planning software upgraded annually and maintained by software developer. - Staffing levels and skill set appropriate for current levels of demand - Planning Advisory Service (PAS) review of service in June 2019 resulted in an improvement plan which is being delivered and reported to Members. - Appeals reviewed and learning implemented. - Planning Advisory Service (PAS) returning to review improvement plan and committees in July 2021 	2	3	6		Assistant Director, Planning (Tim Horsman)	

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17	Planning	Community Infrastructure Levy Failure to adopt local CIL and use for local infrastructure	Cause(s): - Failure to have local CIL schedule agreed and adopted - Failure to implement and collect the local CIL - Failure to use local CIL appropriately - Income impacted by COVID-19 Effect(s): - Lack of funding for infrastructure to support new developments - Lack of funding to provide Infrastructure Delivery Team	Legal Financial	2	3	6	- Local CIL has been adopted and commenced in June 2021 - Experienced Infrastructure Delivery Scheme Manager in post to ensure successful adoption of agreed local CIL - Impact of COVID-19 being monitored to ensure CIL does not discourage development	2	3	6	- Controls implemented and now in place	Assistant Director, Planning (Tim Horsman)
18	Planning	Section 106 Agreements Failure to complete S106 agreements for affordable housing	Cause(s): - Lack of appropriately qualified staff to ensure S106 agreements are implemented as appropriate - Lack of S106 Monitoring Officer in post Effect(s): - Impact on level of supporting infrastructure in borough - S106 monies not being spent on appropriate infrastructure and housing schemes	Financial Social	3	3	9	- Officer group in place to monitor and maximise s106 spend - Infrastructure Delivery Team Leader in post acting as s106 monitoring officer and overseeing s106 agreements including financial receipts and payments	2	3	6	- Controls have been implemented and enhanced	Assistant Director, Planning (Tim Horsman)
19	Planning	London Plan Failure to deliver level of housing in Bromley contained in Mayor of London's plan	Cause(s): - Mayor of London's Plan requires greater levels of housing to be built in Bromley than in Local Plan - Planning permission for sufficient level of development not granted - Landbanking by developers resulting in targets of new houses not being met in a timely fashion Effect(s): - Bromley penalised at planning appeal stage	Reputational Financial	5	3	15	- Local Plan policies being reviewed to identify suitable sites - Planning and Regeneration teams are seeking to promote appropriate housing development in the Borough	3	3	9	- Review of Local Plan commencing in line with London Plan 2021	Assistant Director, Planning (Tim Horsman)