

**Corporate Risk Register 2022-2023
Analysis of Risks**

Gravesham Borough Council's Corporate Risk Register is the result of an annual strategic risk management exercise that is conducted to identify, analyse and prioritise those risks that may affect the ability of the Council to achieve its corporate objectives. Finance & Audit Committee have responsibility for monitoring the effective development and operation of risk management within the Council and reviewing the Corporate Risk Register prior to its submission to Cabinet for approval. This document should be read in conjunction with the report in which the outcomes from the annual risk identification exercise are presented. The following matrix is utilised when assessing whether a risk is a high, medium or low risk for the Council to help determine which risks should be included in the Corporate Risk Register and which risks should be managed at departmental level:

The Risk Matrix

LIKELIHOOD	Very High	5	5	10	15	20
	High	4	4	8	12	16
	Medium	3	3	6	9	12
	Low	2	2	4	6	8
	Very Low	1	1	2	3	4
	High Risk	1	2	3	4	
	Medium Risk	Negligible	Significant	Serious	Critical	
	Low Risk					
	IMPACT					

Likelihood		
Rating	Score	
Very High	5	On the evidence and knowledge of officers and members it is almost certain that this issue will occur sometime within the next year. The issue may have already occurred in previous years either at the Council or elsewhere.
High	4	On the evidence and knowledge of officers and members it is very likely that this issue or event will occur in the coming year.
Medium	3	On the evidence and knowledge of officers and members the issue is more likely to occur than not in the coming year.
Low	2	On the evidence and knowledge of officers and members it is unlikely that this event will occur in the coming year. Occurrences of this risk have occurred in the past but occurrences are very few and far between.
Very Low	1	On the evidence and knowledge that this event would occur in either the coming year or in future years.
Impact		
Rating	Score	
Critical	4	The financial impact on the authority would critically threaten the Council's financial stability. The delivery of service to the public could be affected either permanently or for a long duration and the Council could not achieve its key objectives. There would be a seriously damaging impact on the Council's reputation through poor media coverage.
Serious	3	The financial impact on the authority would be serious although would not threaten the stability of the Council's financial position. Services would experience disruption with the delivery of services being affected for a number of days. Whilst the Council's objectives would be met there would be significant delays in achieving them. The Council would endure poor media coverage for a period of time affecting the Council's reputation which would take some time to recover from.
Significant	2	There would be a financial impact on the authority however this would be manageable within the Council's existing financial resources. There may be disruption to services and possibly delays in achieving the Council's objectives. There may be poor media coverage which could affect the Council in the long term.
Negligible	1	There is little or no financial impact of the risk to the authority. There would be no disruption to the delivery of the Council's key objectives or frontline services. It is unlikely that this risk will impact on the Council's reputation.

The Corporate Risks that have been assessed for 2022-2023.

- 1 Ongoing financial viability of the Council
- 2 Changes in national priorities and legislation-
- 3 Organisational capacity/ resilience
- 4 Cyberattack resulting in data breach or corruption of data
- 5 Investment Risk
- 6 Universal Credit
- 7 IT infrastructure is not updated to meet the needs of the organisation
- 8 Adoption and delivery of sound Local Plan

The Risk	Ongoing financial viability of the Council	Risk No.	1
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Link to Corporate Objective					# Progress												
Assessment Date					January 2022												
Cabinet Portfolio					Leader of the Executive (but affects all portfolios)												
Risk Owner(s)					Director (Corporate Services); Assistant Director (Corporate Services)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	4	Score	20	Likelihood	4	Impact	3	Score	12	Likelihood	3	Impact	3	Score	9

Lead Officer (s)										Target Date							
Director (Corporate Services); Assistant Director (Corporate Services)										March 2023							

Trigger	Consequences	Mitigation / Control
<p>Financial Challenges due to changes in government legislation and posed by the COVID-19 Pandemic, leading to increased financial pressure on the budget. Single year finance settlement for 2022/23 leaving uncertainty as to how local government will be funded in future years Central Government Finance reforms have been put on hold (fair funding review, business rates retention and future of new homes bonus)</p>	<ul style="list-style-type: none"> Difficult decisions around funding of services and quality of services compromised Inability to plan effectively for future years. Traditional income generating activity has reduced (such as car parking income and investment income) as a result of the COVID -19 Pandemic. Council not being able to meet its statutory obligations due to lack of funding Uncertainty of funding for the authority and for future projects Changes in legislation have a negative financial impact on the Council. Impact on minimum reserve limits. 	<ul style="list-style-type: none"> Effective Budget Monitoring Medium Term Financial Strategy in place Ongoing monitoring of the Medium Term Financial Plan Monitoring of changes in legislation by officers. Model effects of any changes in legislation and application of these to the MTFP Responding to Government Consultations

Key corporate documents and processes in place	<ul style="list-style-type: none"> Medium Term Financial Strategy Medium Term Financial Plan Budget monitoring process
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The Risk					Changes in national priorities and legislative change					Risk No.		2					
Link to Corporate Objective					#People, #Place & #Progress												
Assessment Date					January 2022												
Cabinet Portfolio					All portfolios												
Risk Owner(s)					Chief Executive and Management Team												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	4	Score	20	Likelihood	5	Impact	3	Score	15	Likelihood	4	Impact	3	Score	12

Lead Officer (s)					Target Date				
Chief Executive/ Management Team/Wider Management Team					March 2023				

Trigger	Consequences	Mitigation / Control
<p>Changes in national priorities including National Significant Infrastructure Projects (NSIP). Current proposals that affect the Borough are:</p> <ul style="list-style-type: none"> • Lower Thames Crossing (Gravesham) • Thurrock Flexible Generation Plant (Tilbury) • London Resort (Dartford, Gravesham) 	<p>Council may not have the necessary resources to deliver on key projects. Projects may adversely affect local residents</p>	<p>Circulation of monthly briefings to key officers Working alongside other stakeholders and partner organisations to keep informed of developments such as:-</p> <p>Local Government Association District Councils Network Kent Finance Officers Group Kent Resilience Forum</p> <p>Information sharing and gathering across all Council services</p>
<p>Change (s) in legislation / statutory duties imposed by Central Government such as</p> <ul style="list-style-type: none"> • Local Government Reform • Levelling Up Agenda 	<p>Introduction of new statutory duties could</p> <ul style="list-style-type: none"> • Change the strategic direction of the Council • Result in new statutory duties not being enacted leading to legal challenge • Entail additional workloads for officers • Move to an agile way, directing resources as required • Increase scrutiny by members and the public • change the way existing services are delivered • increase financial pressures (discussed as part of risk 1) 	<p>Circulation of monthly briefings to key officers on proposed / new legislation Effective business continuity planning Regular updates to members on developments and potential changes in legislation Preparation of workforce strategy Co-ordination and sharing of information with other local authorities through various networks and forums.</p>

Key corporate documents and processes in place	<ul style="list-style-type: none"> • Corporate Plan 2019-2023 • Medium Term Financial Strategy • Medium Term Financial Plan
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**Corporate Risk Register 2022-2023
Analysis of Risks**

The Risk					Organisational capacity/resilience					Risk No.	3						
Link to Corporate Objective					#People												
Assessment Date					January 2022												
Cabinet Portfolio					Deputy Leader (but affects all portfolios)												
Risk Owner(s)					Chief Executive and Management Team												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	4	Score	20	Likelihood	4	Impact	3	Score	12	Likelihood	3	Impact	3	Score	9

Lead Officer (s)	Target Date
Laura Lowrey	June/July 2022

Trigger	Consequences	Mitigation / Control
External opportunities of agile and home working in light of the COVID pandemic is making it difficult to recruit staff, especially those in specialist roles.	Increase in turnover resulting with a reduction in staff, Specialist roles remain vacant for prolonged periods of time, placing additional pressures on staff in service areas which may already have stretched resources. Increased agency costs Services areas with reduced staff will suffer a greater impact	A Hybrid Working Policy was introduced from 1 November 2021 giving office based staff the opportunity to work from home, depending on the needs of the service. Initiatives that have been introduced to ensure the Council remains competitive in order to retain existing staff and attract potential employees include: <ul style="list-style-type: none"> Increased availability of training for (including qualification training). Revisiting and improving advert templates and reviewing where vacancies are advertised. HR and Managers working closely to ensure career progression is available within services. The introduction of a Management Development Programme
Overstretched resources resulting with reduced staff motivation, low morale and increased sickness and stress levels.	Council will be required to provide additional help and support to overcome problems.	HR continue to monitor the levels of stress and sickness absence within the Council and support line managers. When appropriate staff will be referred to Occupational Health and the Employee Assistance Programme. Other initiatives in order to support staff wellbeing that have been introduced and will continue, include: <ul style="list-style-type: none"> Undertaking periodic Wellbeing surveys amongst the workforce. Reviewing the format of the joint staff forum to ensure the whole workforce is represented at the meetings and includes a wellbeing item on the agenda. Undertaking weekly Webinars that are run by the Council's Employee Assistance Programme. Reviewing and promoting the role of the Councils Mental Health Champions. Continuing Investors in People reviews next one due in April 2022.
Staff (especially office based) experiencing difficulties in adapting to remote working	Increase in organisational stress negatively impacting productivity and mental health and wellbeing.	All line managers undertook training in November 2021 on Leadership Behaviours for Managing and Motivating Hybrid Teams. The Hybrid Working Policy provides office based staff the opportunity to adopt a better work life balance.

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Key corporate documents and processes in place

- Corporate Business Plan 2019-2023
- Workforce Development Plan

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The Risk	Cyberattack resulting in data breach or corruption of data											Risk No.	4				
Link to Corporate Objective	Progress Deliver a more resilient, creative, cost effective Council Digital innovation Successfully manage key business risks																
Assessment Date	January 2022																
Cabinet Portfolio	Leader																
Risk Owner(s)	Director (Corporate Services)																
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	4	Impact	4	Score	16	Likelihood	3	Impact	4	Score	12	Likelihood	2	Impact	4	Score	8

Lead Officer (s)	Target Date
Assistant Director (Transformation & IT)	November 2022

Trigger	Consequences	Mitigation / Control
Member of staff falls victim to phishing attack	The login credentials used by a member of staff is stolen enabling an unauthorised user to access and modify data and systems used by that person. In the case of a user with access to privileged systems this may also enable administrative access and the ability to move laterally between systems. The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.	<ul style="list-style-type: none"> • Cyber awareness training for staff • Use of strong passwords • Use of multifactor authentication • Separation of administrative accounts from general user accounts • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Member of staff falls victim to “drive by download”	A member of staff visits a website which has been poisoned with malware which automatically runs when the web page is viewed. The malware is able to access resources on the computer with the same level of access as the logged in user, or with elevated privileges if combined with additional vulnerabilities (such as unpatched software), The ultimate consequence could be a cyber-attack resulting in a loss of access to Council systems and data.	<ul style="list-style-type: none"> • Use of web filtering software to control access to known high risk websites • Use of antivirus software • Use of non-administrative accounts when browsing the web • Timely patching of software vulnerabilities • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Misconfiguration of IT Infrastructure results in a breach	An item of IT infrastructure is accidentally configured in such a way that it allows exploitation by an external actor to carry out a cyber-attack resulting in a loss of access to Council systems and data	<ul style="list-style-type: none"> • Policies, processes, and procedures for configuration of IT infrastructure • Staff training • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Brute force attack against IT infrastructure results in breach	An attacker constantly attempts to gain access to Council systems via external infrastructure (web sites, email systems, vpn) in a systematic way with the hope of finding a vulnerability which will provide access to Council systems and data. Once access has been gained, the ultimate consequence could be a cyberattack resulting in a loss of access to	<ul style="list-style-type: none"> • Regular review of IT defences (such as firewall rules and network configurations) to ensure they are operating effectively • Regular scanning of IT infrastructure to identify what an attacker is able to see

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	Council systems and data.	<ul style="list-style-type: none"> • Central recording of security incident logs which can identify when attacks happen • In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Unpatched software vulnerability results in breach	All software has the potential to have bugs and programming errors. Unpatched software means there are vulnerabilities in a program or code that the Council is aware of and will not or cannot fix. Bugs in software can be exploited to carry out tasks for which the software was not originally designed to perform, such as carrying out a cyber-attack.	<ul style="list-style-type: none"> • Only use software which is supported by the supplier • Apply patches to software in a timely manner when notified by the supplier of a vulnerability • In 2022 further systems and procedures will be explored for the automation of loading software patches to speed up the process and reduce the amount of time software is vulnerable • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Denial of service attack prevents IT systems from being used	The Council's internet connections is flooded with a high volume of meaningless data which prevent legitimate data from getting through. Access to Council services for staff and members of the public is prevented and the systems appear to be down.	<ul style="list-style-type: none"> • The Councils internet connection provided by KPSN features a high level of Distributed Denial of Service protection from JISC (the internet service provider) • In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture
Ransomware attack steals and then deletes Council data	A malicious actor who has gained a foothold within the Council IT infrastructure is able steal large volumes of data before destroying access to that data for the Council. Staff are not able to access their systems or data and provide their services.	<ul style="list-style-type: none"> • Regular backup of data to systems that have ransomware protection and immutable storage • In 2022 a Security Operations Centre managed service will be explored in order to provide 24/7 proactive monitoring of our IT environment and highlighting any risks for further action on immediate identification • In 2022 a dedicated IT Security Officer post will be established which will coordinate all IT security activity across the Council and improve our security posture

Key corporate documents and processes in place	<ul style="list-style-type: none"> • Business Continuity Plans • IT Security Policies
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The Risk					Investment Risk					Risk No.	5						
Link to Corporate Objective					#Progress												
Assessment Date					January 2022												
Cabinet Portfolio					Leader												
Risk Owner(s)					Director (Corporate Services)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	3	Score	15	Likelihood	5	Impact	2	Score	10	Likelihood	3	Impact	3	Score	9

Lead Officer (s)	Target Date
Director (Corporate Services), Assistant Director (Corporate Services)	March 2023

Trigger	Consequences	Mitigation / Control
Investments do not perform as expected	Investment income is reduced, negatively impacting on budget and the reputation of the Council which could impact on the delivery of services due to the loss of income.	External professional advice is sought on new investment activity such as from the Councils treasury management advisors and subjected to due diligence checks Regular meetings with fund managers to ascertain how investments are performing. Maintaining and reporting on the Council's Treasury Management Strategy and Capital Strategy, which set out the criteria for investments Regular updates to members and management team on investment performance. Monitoring and review of treasury activity
Commercial property does not maintain the expected rental yield	Reduction in income for the Council which could adversely affect the delivery of services due to lack of financial resources.	Close working between finance and property services to enable early identification of risks or opportunities to the Council's investment portfolio. Maintaining the commercial income protection reserve. Currently this reserve is set at 25% of annual commercial income. Maintaining and reviewing the Property Acquisition Strategy and ensuring all commercial investments align with this strategy. Development of a Commercial Income Dashboard.
Government intervention on investment activity for example potential changes to the Prudential Code and access to Public Works Loan Board (PWLB)	Council could be limited in its investment options going forward Requirement to disinvest in some areas that are performing well to ensure compliance with the relevant codes and legislation.	Review of commercial property portfolio to ensure it is compliant with the Prudential Code and PWLB criteria. Research other investment opportunities / income streams.

Key corporate documents and processes in place	<ul style="list-style-type: none"> • Treasury Management Strategy • Capital Strategy • Property Acquisition Strategy
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The Risk					Universal Credit					Risk No.		6					
Link to Corporate Objective																	
Assessment Date					January 2022												
Cabinet Portfolio					Performance & Administration												
Risk Owner(s)					Director (Corporate Services) and Service Manager (Revenues & Benefits)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	3	Score	15	Likelihood	3	Impact	2	Score	6	Likelihood	3	Impact	3	Score	9

Lead Officer (s)					Target Date				
Head of Revenues & Benefits; Assistant Revenues & Benefits Manager					Ongoing				

Trigger	Consequences	Mitigation / Control
Delay and uncertainty on Managed Migration of cases to Universal Credit (a number of delays announced by Department for Work and Pensions (DWP) – latest announcement stating that full roll-out delayed to September 2024)	Difficult to predict the resourcing requirements of the Benefits service	Restructure of Revenues and Benefits Team undertaken January 2022 – to be reviewed in 18-24 months
Drop in Housing Benefit cases as they migrate over to Universal Credit (UC) showing reduction in Council Tax Reduction (CTR) scheme cases	<p>Those claimants who would be eligible for CTR not receiving a reduction on their Council tax account.</p> <p>Rise in level of corporate debt specifically</p> <ul style="list-style-type: none"> Council Tax arrears, costs incurred due to court action and enforcement agent charges Rent arrears as payments made directly to the tenant, rather than direct to the rent account <p>Increase in evictions/homelessness</p> <p>Claimants suffer financial hardship</p>	<p>Use of Low Income Family Tracker (LIFT) application so more data intelligence available to identify, and engage with claimants where</p> <ul style="list-style-type: none"> claims have 'dropped off' due to migration (or new claims) to UC claimants moving into financial crisis due to benefit changes / pandemic <p>Proposed change to 2022-23 CTR scheme to accept a claim for UC as a claim for CTR</p> <p>Liaison has continued despite the Covid-19 pandemic although remotely. Caseload & workload is closely monitored and reported monthly to management and Portfolio Holder. There has been significant benefit changes with good regular update bulletins. Job shadowing temporarily suspended due to the pandemic but will be resurrected as soon as practicable.</p>
Decrease in Housing Benefit caseload but increase Universal Credit workload for service	May affect turnaround times thereby directly affecting claimants including vulnerable claimants	<p>Recent restructure of service to build in anticipated resilience requirements.</p> <p>Proposed banded CTR scheme for 2022-2023 will reduce number of changes which would in the past have affected claim amount</p>

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Trigger	Consequences	Mitigation / Control
Significant changes to the benefit system	Delays in assessment of benefit claims Complex changes requiring both legislative and systems knowledge	Maintain briefing arrangements for members and staff and provide regular updates of any changes. Creation of a Service Change team within Revenues and Benefits to ensure staff training, policy changes, system testing/upgrades Continue signposting for claimants and potential claimants – working closely with Job Centre Plus Social Media messaging and website maintenance to ensure key messaging.

Key corporate documents and processes in place	<ul style="list-style-type: none"> • Service Plan • Exceptional Hardship Policy • Monthly reporting (to Senior Management and Portfolio Holder) of key performance indicators including caseload, speed of assessment, amount of Discretionary Hardship payment made, Council tax collection • Quarterly performance report to Performance and Administration cabinet committee
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**Corporate Risk Register 2022-2023
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The Risk	IT Infrastructure is not updated to meet the needs of the organisation											Risk No.	7				
Link to Corporate Objective	Progress Deliver a more resilient, creative, cost effective Council Digital innovation Successfully manage key business risks																
Assessment Date	January 2022																
Cabinet Portfolio	Leader																
Risk Owner(s)	Director (Corporate Services)																
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	5	Impact	4	Score	20	Likelihood	3	Impact	3	Score	9	Likelihood	2	Impact	1	Score	2

Lead Officer (s)	Target Date
Assistant Director (Transformation & IT)	August 2022

Trigger	Consequences	Mitigation / Control
Staff are unable to use IT facilities to effectively deliver their services	<ul style="list-style-type: none"> The Council is unable to deliver the commitments made in the Corporate Plan Staff are unable to work effectively (or work at all) Services (including those to the public) are either delayed or not delivered at all Loss of revenue due to lack of quality monitoring data Low job satisfaction amongst staff resulting in retention issues 	<ul style="list-style-type: none"> Effective Digital & IT strategy (to be published August 2022) Effective Business Plan for Digital & IT Services Adequate investment identified for IT infrastructure Technical training for IT Staff Proactive contract monitoring is an area of improvement identified within the SOCITM review for implementation in 2022/23
The public are unable to access IT facilities effectively in order to do business with the Council	<ul style="list-style-type: none"> Low satisfaction with services delivered by the Council An increase in complaints Those most vulnerable and dependent upon our services are put at risk 	<ul style="list-style-type: none"> Effective Digital & IT strategy Effective Business Plan for Digital & IT Services Adequate investment identified for IT infrastructure Technical training for IT Staff Proactive contract monitoring is an area of improvement identified within the SOCITM review for implementation in 2022/23
Use of outdated IT infrastructure presents a cyber-risk if the software is unpatchable	<ul style="list-style-type: none"> A cyberattack can have far reaching consequences, including the theft and destruction of Council data which would prevent the Council being able to deliver its services for a protracted period 	<ul style="list-style-type: none"> Keep software and IT infrastructure up to date Do not use unsupported software and IT infrastructure Implement relevant security policies Implement relevant technical controls Maintain staff training and cyber awareness
Digital innovation not keeping up with current digital trends	<ul style="list-style-type: none"> Customers expect to be able to interact with the Council 24/7 and at a time that suits them. If we don't invest in the digital infrastructure and software, we risk falling behind customer demand. 	<ul style="list-style-type: none"> Investment in cloud infrastructure and continue to adopt a cloud first approach to software and hardware procurement

Key corporate documents and processes in place	Corporate Plan Business Plan (Digital and IT Services) Digital and IT Strategy IT Security Policies Business Continuity Plans
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The Risk					Adoption and delivery of a sound Local Plan					Risk No.		8					
Link to Corporate Objective					#Place												
Assessment Date					January 2022												
Cabinet Portfolio					Cllr Sullivan												
Risk Owner(s)					Director of Environment, Assistant Director (Planning)												
INHERENT RISK SCORE					RESIDUAL RISK SCORE					TARGET RISK SCORE							
Likelihood	4	Impact	4	Score	16	Likelihood	3	Impact	3	Score	9	Likelihood	3	Impact	3	Score	9

Lead Officer (s)					Target Date				
Service Manager (Planning) Assistant Director (Planning)					December 2023				

Trigger	Consequences	Mitigation / Control
Local Plan is not up-to-date and not underpinned by a robust evidence base	<ul style="list-style-type: none"> Local Planning Authorities (LPAs) are required to have an up to date local plan in place by the end of 2023 or face government sanction / intervention If Government intervention: <ul style="list-style-type: none"> Reputational damage to the Council The potential imposition of unwanted planning policies, causing an inability to deliver upon the Council's that are dependent on the Local Plan Council less able to protect the Borough from inappropriate or poor quality development 	<ul style="list-style-type: none"> Service has taken up the offer of a PAS Local Plan Gateway Review which is an independent assessment of the risks and opportunities faced. The Local Plan is supported by a detailed project timetable / project plan that is used to control and manage the process, so far as that is possible and that this is periodically presented to Management Team for management update/monitoring purposes.
Council is unable to identify a five-year land supply and fails the Government's Housing Delivery Test	<ul style="list-style-type: none"> Where Councils' cannot demonstrate a five year supply, national planning policy, rather than policies in a Local Plan have greater influence in decision making National policy states there should be a "presumption in favour of sustainable development" for housing. This means that if a site can be considered to deliver 'sustainable development' then planning permission could be granted, even if there is no support from the Council for housing in that location or the site sits outside the Local Plan. Councils have less 'control' over where new homes are built: <ul style="list-style-type: none"> May have to recommend approval of applications for sites they have not allocated Increase in rejected proposals approved at appeal. 	<ul style="list-style-type: none"> Production of Housing Delivery Action Plan and implementation of the interventions identified within it

Key corporate documents and processes in place	Housing Delivery Action Plan Local Development Scheme
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