

Annexe 5 - TMBC Local Plan Risk Register (updated October 2025)

No	Risk Title	Consequences	Date identified	Likelihood Score	Impact score	Overall inherent risk score	Risk Assessment form completed?	Desired risk score	Mitigating actions to achieve desired risk score	Risk escalation date	Risk Owner	Date closed	Action required/ by	Review Date
1	Change in political administration or direction from administration	Delay or revisiting key aspects of the local plan, failure to meet 'transitional arrangements' as proposed by Government, failure to achieve an adopted plan under the current planning system and potential for Government intervention in plan-making.	01/09/2024	4	4	16	N	Medium	Progress a Local Plan Engagement Strategy setting out how both internal and external engagement will be progressed. Working with members to gain understanding and awareness of the local plan, the process and the direction of the spatial strategy and local plan policies. Regular member briefings. External legal and technical advice obtained and for the outputs to be communicated to members.	n/a	Kelly Sharp		21/10/2025	01/12/2025
2	Project management-timetable for local plan document, evidence and supporting documentation slips	Delay to the local plan consultation and failure to meet deadlines including submission of a plan under the current planning system.	01/09/2024	3	4	12	N	Medium	Regular project management meetings between PPM and PPOs; regular updates of timetable	n/a	Kelly Sharp		21/10/2025	01/12/2025
3	Staffing- further changes in staff numbers or loss of hours; unexpected absences	Delay to timetable, health and wellbeing implications for team.	01/09/2024	4	4	16	N	Medium	Regular team meetings, 1:1s, effective file management and installation of a 'buddy' system, risk management escalation; utilising contractor staff. Smart recruitment policy and investigation of specialist support. Work with recruitment agencies to fill permanent positions including the currently vacant PPO post.	n/a	Kelly Sharp		21/10/2025	01/12/2025
4	DTC issues	Failure to demonstrate DTC at examination or other issues raised prior to consultations; duty to cooperate issues with neighbouring boroughs including unmet development needs and cumulative infrastructure issues. This may be more critical with Government reorganisation.	01/09/2024	3	4	12	N	Medium	Developing a robust PM system, new DTC grid and legal compliance toolkit and cross boundary issues understood at an early stage. Meeting with DTC partners early.	n/a	Kelly Sharp		10/11//2025	31/12/2025

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5	Consultation database, GDPR and privacy notice issues	Failure of management of the database	01/09/2024	3	4	12	N	Medium	Liaising with legal, keeping them informed of current process, setting dates/timeframes for consultation database review/refresh	n/a	Kelly Sharp		10/11/2025	31/12/2025
6	Lack of design/conservation support	Lack of dedicated internal staff offering this support could lead to matters being missed in local plan, design code or decision-making compromised.	01/09/2024	4	3	12	N	Medium	We are currently working with the Conservation and Design team at Sevenoaks to provide a resource to consider priority local plan work and to also provide support in progressing Conservation Area Appraisals. Grant awarded from the Planning Skills and Delivery Fund to progress review of three conservation areas.	n/a	Kelly Sharp		31/10/2025	31/10/2025
7	HRA, AQ Evidence-Evidence	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of NPPF consultation.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Providing enough time in the work programme to test the local plan and its policies.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025
8	SA	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of national policy consultation.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Providing enough time in the work programme to test the local plan and its policies.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025

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9	Evidence base studies - general	Delay to the local plan production and consultation process; lack of consultant support or ability of consultants to progress the workstream, failure to deliver the study to time. Securing the right consultants to undertake the work with work being delivered in a timely manner to inform plan-making.	01/09/2024	4	4	16	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Engaging with consultants early to ensure they are available and have the necessary resources to deliver work to the identified timescales.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025
10	SFRA, L1 and L2- - Evidence	Delay to the local plan production and consultation process; Not PPG compliant as data is not available; issues with new Environment Agency mapping. With impacts on other workstreams.	01/09/2024	4	4	16	N	Medium	Procuring consultants and speedy contract resolution, Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025
11	Spatial Strategy and spatial strategy testing	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of any new national policy. Engagement with members requiring work to be re-visited and the resulting impact upon local plan production or progressing the plan per se to meet the Government's submission deadline. Receiving evidence base outputs in time to consider this and progress the spatial strategy.	01/09/2024	4	4	16	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met. Dissemination, engagement and approval by members. Providing priorities to the legal team to ensure contracts can progress. Ensure that other workstreams are completed to allow a focus on evidence outputs and progressing the LAA and spatial strategy.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025

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12	Green Belt - Evidence	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of NPPF guidance or emerging national policy. Including development of evidence base options with differing implications for the outputs of the work in relation to spatial strategy decisions and local plan options.	01/09/2024	4	4	16	Y	Medium	Project management approach, regular evidence base check ins, ensuring consultants are in place and internal and external deadlines are met. Ensuring that consultants are in place to undertake work when required and have sufficient resources to meet timescales.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025
13	Transport Modelling	Delay to the critical path of evidence production and resulting impact upon local plan production and consultation process. Including any delays to the procurement process or changes in scope of the work, resulting from direction or outcomes of NPPF consultation.	01/09/2024	3	4	12	N	Medium	Project management approach, regular evidence base check ins, ensuring consultants and internal deadlines are met	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025
14	Amended or escalating costs of evidence base	Changes to the scope, timing or number of iterations of the evidence base requirements incurring additional costs; or amended requirements of national policy in order to meet the Governments proposed submission date of no later than December 2026.	01/09/2024	4	4	12	N	Medium	Regular financial management procedures, ensuring contracts are in place, strict project management controls	n/a	Kelly Sharp		31/12/2025	31/12/2025

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15	Transition arrangements for plan making maintained and formally confirmed to be submission no later than December 2026	Meeting the transitional arrangements will be dependent on meeting key stages in plan-making. A revised NPPF has resulted in fundamental changes to the way we are to progress plan-making, obtaining evidence and to update policies to account for the new NPPF. The new NPPF has resulted in cost implications to account for the work required and also the extended time period to deliver a local plan.	01/09/2024	5	4	12	N	Medium	Continue to liaise with members to keep them informed of the impacts of a new NPPF and other relevant consultations; ensure flexibility within new evidence base commissions and budgets to enable quick action. Submission of response to the government's consultation setting out the implications for TMBC on the proposed national policy changes and other planning reforms.	n/a	Kelly Sharp		31/12/2025	31/12/2025
16	Meeting housing needs following a new standard methodology and meeting employment needs.	Changes to work undertaken so far in plan-making, a need to undertake a further call for sites at Regulation 18 stage to identify suitable sites for development to meet needs and further work as necessary to ensure a 'no stone left unturned' approach. The knock on impact of this in evidence gathering and spatial strategy / site allocation testing and work to progress towards a Regulation 18 consultation, including engaging with Members and other relevant stakeholders	01/09/2024	4	4	16	N	Medium	Progress the Land Availability Assessment and work with consultants to understand implications and liaise with members to keep them informed. Progress duty to cooperate meetings with surrounding LPAs and other relevant stakeholders / partners.	n/a	Kelly Sharp		31/12/2025	31/12/2025

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17	Overall increase in costs required to progress a local plan and additional / sufficient budget not being agreed	Inability to deliver a robust / sound local plan. The knock-on effect could result in not progressing a local plan, issues at examination and / or achieving an adopted local plan for the borough following examination.	03/11/2024	4	4	16	N	Medium	Detailed work has taken place to estimate likely local plan costs up to adoption and to allow the Council to consider and plan for increased costs to deliver a local plan.	To be identified subject to revised timetable	Kelly Sharp		31/12/2025	31/12/2025