

APPENDIX 5

Risk Analysis and Options Appraisal of the Implications of Phosphates on the RLDP

The recent announcement of water quality (Phosphate) issues in Riverine SACs, including the River Wye and River Usk, has potential implications for the progression of the RLDP as the Council's Preferred Strategy directs future growth to key sustainable settlements within these affected catchment areas over the Plan period (2018-2033). Consideration therefore needs to be given as to how we progress with the preparation of the RLDP. The following three realistic options have been assessed:

1. Progress preparation of the RLDP with Preferred Strategy which involves proportionate distribution of growth across the County's most sustainable settlements, including those in the Wye and Usk catchment areas which are affected by phosphate.
2. Halt/pause RLDP preparation until there is certainty that the phosphate issue can be resolved i.e. solutions identified/agreed with NRW and DCWW.
3. Withdraw the RLDP and commence a new RLDP with a revised Plan period.

The risk analysis and options appraisal are set out below.

Risk Analysis

RED: High impact **AMBER:** Medium impact **GREEN:** No or minimal impact

Options	Impacts		
	Impact on Plan preparation - Resources, Work Programme, Expenditure	Impact on Addressing RLDP Issues/Challenges/ Objectives	Impact on Deliverability of the RLDP (including growth levels, market and affordable housing delivery, economic prosperity /recovery)
OPTION 1 Progress preparation of the RLDP with Preferred Strategy	<ul style="list-style-type: none"> • Potential for abortive work/cost/resources up to Deposit if solution(s) not identified and agreed. • This is not an issue if solution(s) is identified and agreed by Deposit. Proactive liaison and discussions with key organisations to date suggest viable and timely solutions can be identified and agreed by Deposit plan stage. 	<ul style="list-style-type: none"> • If solution(s) identified by Deposit stage, RLDP can be progressed and RLDP key issues/challenges/objectives can be addressed in a timely manner. Proactive liaison and discussions with key organisations to date suggest viable and timely solutions can be identified and agreed by Deposit plan stage. • If solution(s) not identified by Deposit stage this will impact on the ability to the RLDP address issues/ challenges/objectives, many of which have been exacerbated by the Covid-19 pandemic. 	<ul style="list-style-type: none"> • If solution(s) identified by Deposit stage, the RLDP can be progressed and delivered within Plan period. Proactive liaison and discussions with key organisations to date suggest viable and timely solutions can be identified and agreed by Deposit plan stage. • If solution(s) not identified by Deposit stage delivery of the RLDP will not be achievable within Plan period.
OPTION 2 Halt RLDP preparation until certainty that the phosphate issue can be resolved	<ul style="list-style-type: none"> • Avoid abortive work • But could be additional costs/ resources if need to revisit the evidence base/ early stages of the RLDP process - depending on how long process is paused. 	<ul style="list-style-type: none"> • Uncertain as to how long we would need to pause RLDP process. Unable to address issues/challenges during this time, many of which have been exacerbated in light of the Covid-19 pandemic, including delivering affordable homes, supporting economic recovery and growth, and revitalising the High Street. 	<ul style="list-style-type: none"> • Uncertain as to how long we would need to pause the RLDP process. Resultant shorter timescale to deliver the objectives of the RLDP within the Plan period.
OPTION 3 Withdraw the RLDP and commence a new RLDP with a revised Plan period	<ul style="list-style-type: none"> • Avoid abortive work up to Deposit stage. • But there would be additional costs/ resources associated with re-starting the Plan process. 	<ul style="list-style-type: none"> • Significant delay in ability to address issues/challenges in short-medium term, many of which have been exacerbated in light of the Covid-19 pandemic, including delivering affordable homes, supporting economic recovery and growth, and revitalising the High Street. 	<ul style="list-style-type: none"> • RLDP could be progressed and delivered within revised Plan period. • But this also depends on solution(s) being identified and agreed.

Options Appraisal

Option	Benefit	Risk	Comment
<p>Option 1: Progress preparation of the RLDP with the Preferred Strategy which proposes proportionate distribution of growth across the County's most sustainable settlements, including a number of settlements in the affected Wye and Usk catchments areas.</p>	<p>RLDP preparation process can be progressed in a timely manner on the basis that solutions to the phosphate issue are identified and agreed by Deposit Stage. This would reduce the risks associated with a policy gap and ensure the key demographic and affordability challenges facing the County, which have been exacerbated in light of the Covid-19 pandemic, are expediently addressed.</p>	<p>If solutions to the phosphate issue are not identified and agreed by Deposit stage this will delay Plan preparation with resultant implications, including a delay in addressing the key demographic and affordability challenges facing the County, which have been exacerbated in light of the Covid-19 pandemic.</p>	<p>Proactive liaison and discussions with key organisations to date suggest viable and suitable solutions can be identified and agreed by Deposit plan stage, meaning that the Plan can be progressed and delivered in a timely manner in accordance with the Delivery Agreement (Second Revision, October 2020). This is the preferred option.</p>
<p>Option 2: Halt/pause RLDP preparation until there is certainty that the phosphate issue can be resolved.</p>	<p>This option would avoid the potential for abortive work on future key stages of the RLDP. The RLDP would be progressed once solutions have been identified /agreed which would give certainty to the deliverability of the Plan's Strategy.</p>	<p>There would be a significant delay in RLDP preparation and adoption with resultant implications, including:</p> <ul style="list-style-type: none"> • Delay in addressing the key demographic and affordability challenges facing the County many of which have been exacerbated in light of the Covid-19 pandemic; • Policy gap - evidence/ policy framework in extant LDP becomes more out dated; • Associated lack of certainty for communities and investors. <p>It is likely that the Plan's evidence base would need to be revisited given the time lag in Plan preparation. There would also be implications in relation to costs and the ISA and HRA processes.</p> <p>LDPs have a fundamental role in supporting recovery post Covid-19, with Welsh Government's commitment to a Plan-led system reinforced by the Covid-19 pandemic (Future Wales 2040 and Building Better Places). Need for the RLDP to be</p>	<p>As above, it is considered that solution(s) to the phosphate issue can be identified and agreed by the Deposit Plan stage meaning that this no need to halt the RLDP process. The problems caused by this option outweigh the risk of Option 1.</p>

Option	Benefit	Risk	Comment
		<p>progressed in a timely manner. This option would significantly delay adoption and implementation of the RLDP.</p>	
<p>Option 3: Withdraw the RLDP and commence a new RLDP with a revised Plan period.</p>	<p>This would result in a longer Plan period to enable us to consider/ address the phosphate issue giving greater certainty of delivery.</p>	<p>There would be a significant delay in RLDP preparation and adoption with resultant implications, including:</p> <ul style="list-style-type: none"> • Delay in addressing the key demographic and affordability challenges facing the County many of which have been exacerbated in light of the Covid-19 pandemic; • Policy gap - evidence/ policy framework in extant LDP becomes more out dated; • Associated lack of certainty for communities and investors. <p>This would necessitate restarting the entire RLDP process, meaning that the issues, vision and objectives stage of the RLDP would need to be revisited and evidence base work updated with revised base date and plan period which would have resultant cost and resource implications.</p> <p>LDPs have a fundamental role in supporting sustained recovery post Covid-19, with Welsh Government’s commitment to a Plan-led system reinforced by the Covid-19 pandemic (Future Wales 2040 and Building Better Places). Need for the RLDP to be progressed in a timely manner. This option would significantly delay adoption and implementation of the RLDP.</p>	<p>As above, it is considered that solution(s) to the phosphate issue can be identified and agreed by the Deposit Plan stage meaning that this no need to withdraw the RLDP and commence a new Plan with a revised Plan period. The problems caused by this option outweigh the risk of Option 1.</p>