

**Flintshire Local Development Plan 2015 – 2030**

**Adopted 24/01/23**

**Annual Monitoring Report (AMR) 1**

**01/04/23 – 31/03/24**

**Flintshire County Council**



**October 2024**

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## Executive Summary

The Flintshire Local Development Plan (LDP) was adopted on 23<sup>rd</sup> January 2023 and forms the development plan for Flintshire alongside Future Wales: National Plan 2040. The LDP forms the basis for planning decisions for the period 2015 to 2030.

As part of the statutory plan led system in Wales, the Local Planning Authority is required to prepare an Annual Monitoring Report (AMR). Welsh Government publication Development Plans Manual advises that 'Monitoring represents an essential feedback loop within the cyclical process of achieving sustainable development. Monitoring and review should be an ongoing function of the plan led system and is a vital aspect of evidence based policy making'.

This first AMR reflects the first full 12 month period since the Plan was adopted and covers the period 01/04/23 to 31/03/24.

The AMR is based on the Monitoring Framework within Chapter 10 of the adopted LDP. The AMR is organised as follows:

- Introduction
- Contextual Changes
- Core Indicators
- Local Indicators
- Results of Sustainability Appraisal
- Conclusions / recommendations
- Appendices

The Development Plans Manual requires that the Executive Summary identifies the key findings and conclusions in relation to the delivery of the strategy, setting out clear conclusions on whether a plan review is required.

The Development Plans Manual poses the following questions:

**• What new issues have occurred in the plan area, or changes to local/national policy?**

The AMR has demonstrated that there have been no significant contextual changes such as changes to legislation or national guidance within which the Plan operates. There have been no significant changes to the Plan area which affect the delivery of the Plan although the identification of Deeside and Wrexham as a potential Investment Zone represents an opportunity for existing and new businesses to benefit from a range of financial incentives.

**• How relevant, appropriate and up-to-date is the LDP strategy and its key policies and targets?**

The LDP has only recently been adopted and this is the first AMR since adoption. Given the lack of significant contextual changes, it is considered that the LDP Strategy is still relevant, appropriate and up to date and is consistent with guidance in Planning Policy Wales 12. The Plan strategy is consistent with Future Wales: National Plan 2040 and the identification of Wrexham and Deeside as a National

Growth Area, by seeking to deliver growth. The Plans spatial strategy as expressed through the settlement hierarchy is based on the principles of sustainable development and the suite of strategic and development management policies will work towards achieving sustainable development, placemaking, well-being and environmental protection.

**• What sites have been developed or delayed in relation to the plan's expectations at both places and in the phasing programme (as set out in the trajectory)**

The Plans allocations comprise a strategic mixed use site at Northern Gateway, an employment led strategic site at Warren Hall, 11 non-strategic housing sites and 6 non-strategic employment sites.

Northern Gateway – There are presently 4 developers on site comprising Clwyd Alyn (Castle Green), Bellway, Anwyl and Keepmoat whilst Persimmon have now signed up to and are marketing a large plot. The site is large and complex being split into two ownerships and has required substantial public investment in infrastructure to enable the site promoters to create development ready plots. Whilst there have been delays in bringing forward plots, and completions have run behind the Plans trajectory for two years, this is set to reverse going forward given the development activity presently on site. In terms of employment development, the site has delivered the Amazon distribution depot, a paper mill is under construction and planning permission (or Planning Committee resolution) exists on the other plots. Overall it is considered good progress is being made at Northern Gateway and there is no cause for concern.

Warren Hall – This is a strategic employment led mixed use site being promoted by Welsh Government. Further technical work has been commissioned by Welsh Government in respect of the aeronautical constraint associated with Hawarden Airport, with the intention of further informing the physical extent of development and the height of built development. Once this has been completed a Supplementary Planning Guidance note will be prepared and consulted on prior to submission of a planning application. Welsh Government remain committed to delivering the site and Ambition North Wales still intend to fund the necessary investment in infrastructure to deliver the site.

Non-strategic housing sites – Of the 11 allocated sites, 2 have been built, 2 are under construction, 4 have planning permission (or Planning Committee resolution) and 3 have detailed applications presently under consideration. Chapter 3 of the AMR provides reasons behind the lag in delivery on allocated sites, as well as a commentary on each site, but overall the Council is confident that sites will deliver within the Plan period.

Non-strategic employment sites – The Plan makes 6 employment allocations of varying sizes. Good progress in particular has been made at PE1.2 Hawarden Park with the completion of phase 1 of the Vista Business Park and Phase 2 is presently under construction.

**• What is the degree of variance from the anticipated annual and cumulative build rate? Is there a two year trend of under delivery (annual completions not number of AMRs submitted)?**

The monitoring evidence in Chapter 3 of the AMR shows that delivery of housing is ahead of the Plans annual build requirement of 463 units but has lagged behind the trajectory and the Anticipated Annual Build Rate (AABR) in the adopted Plan. However, the degree of variance is not considered to be significant given the progress being made in bringing allocated sites forward for development and the present development activity at Northern Gateway. This is not a scenario where the Plan will not deliver at all, but a scenario where the Plan will deliver in a different way to that intended in the adopted trajectory. Rather than a peak of completions in 2023/24 (703 units) and then tailing off, the revised trajectory shows a peak of completions in 2025/26 (587) and then completions remaining relatively high for a further 2 years before tailing off. The revised trajectory shows that the Plan will fall 61 units short of delivering the housing requirement of 6,950 units which is less than 1%. Although the way in which housing is to be delivered differs from that shown in the adopted trajectory, it is not considered that this is a significant concern, nor points to a Plan Review.

**• What has been the effectiveness of delivering policies and preventing inappropriate development?**

The monitoring evidence in Ch4 (local indicators) and Ch5 (sustainability appraisal) clearly demonstrates that the Plans policies are proving effective in preventing inappropriate and harmful development.

In conclusion it is considered that the Plan is still relevant, appropriate and effective in its role in determining planning applications and delivering development over the period 2015 to 2030. Despite there being a lag in housing delivery, this is not considered to be significant to the Plan given the positive outlook in terms of allocated sites coming forward. The Plan should continue to be monitored in order to gain the necessary evidence to inform a Plan Review. It is not considered that an immediate Plan Review would achieve anything in terms of bringing forward sites immediately, compared to the allocated sites being allowed to continue to progress.



## 1 Introduction

- 1.1 The Flintshire Local Development Plan (LDP) was adopted on 24<sup>th</sup> January 2023. The LDP now forms the land use framework, alongside Future Wales: National Plan, and is the basis for land use planning decisions.
- 1.2 As part of the statutory development plan process the Council is required to monitor the Plan and to prepare an Annual Monitoring Report (AMR). The AMR provides the basis for monitoring the effectiveness of the Plans objectives and policies, the Plans sustainability credentials and identifies any significant contextual changes that might influence its implementation.
- 1.3 This is the first full AMR to be prepared for the LDP, reflecting the first full 12 month period since its adoption. The AMR covers the period 01/04/23 to 31/03/24.

### The format of the AMR

- 1.4 The AMR is in line with the advice in Development Plans Manual Ed3 and comprises the following:
- 1.5 **Executive Summary** – This identifies the key findings and conclusions in relation to the delivery of the strategy, setting out clear conclusions on whether a plan review is required. It covers the following matters:
  - What new issues have occurred in the plan area, or changes to local/national policy?
  - How relevant, appropriate and up-to-date is the LDP strategy and its key policies and targets?
  - What sites have been developed or delayed in relation to the plan's expectations at both places and in the phasing programme (as set out in the trajectory)
  - What is the degree of variance from the anticipated annual and cumulative build rate? Is there a two year trend of under delivery (annual completions not number of AMRs submitted)?
  - What has been the effectiveness of delivering policies and preventing inappropriate development?
- 1.6 **Chapter 2 Significant Contextual Change** – this chapter presents a summary of wider significant contextual changes within which the LDP operates. This includes policy changes, key strategies and plans, economic social and environmental changes.
- 1.7 **Chapter 3 Analysis of Core / key indicators** – this chapter provides an analysis of the effectiveness of the LDP policy framework in achieving the Plan Strategy. It includes main objectives, and the specified growth levels including housing delivery, affordable housing and infrastructure.
- 1.8 **Chapter 4 Analysis of Local Indicators** – this chapter establishes whether or not policies are proving effective and how any issues will be addressed.



- 1.9 **Chapter 5 Sustainability Appraisal Monitoring** – This chapter analyses the impact the LDP is having on the social, economic and environmental well-being of the County. It reports on the Plans Integrated Impact Assessment which incorporates the sustainability appraisal and strategic environmental assessment.
- 1.10 **Chapter 6 Conclusions and Recommendations** – this provides an overview of the findings of the AMR and makes recommendations about issues that require further consideration.

### The Plans Monitoring Framework

- 1.11 The Monitoring Framework comprises two key elements which are the monitoring of:
  - The LDP strategy, policies and proposals; and
  - The Sustainability Appraisal (SA) which includes the Strategic Environmental Assessment (SEA).
- 1.12 The LDP monitoring framework is set out in Chapter 10 of the written statement and identifies 66 monitoring indicators. Each indicator is referenced back to the relevant Strategic Objective as well as the relevant strategic policy and / or development management policy. Monitoring of the indicators will therefore also consider the Plans policies and objectives. The monitoring framework was developed in line with the guidance in Welsh Governments Development Plans Manual Ed3.
- 1.13 For each monitoring indicator the framework identifies a target and a trigger point together with an explanation and justification. In each case it will be necessary to monitor the extent to which the policy has either met or deviated from the trigger point. If it is a deviation it will be necessary to determine the level of deviation, the reasons for it and what action needs to be taken.
- 1.14 The Welsh Government Development Plan Manual Ed3 identifies the monitoring actions that can be taken in instances where the LDP is deviating from the target and trigger. The detailed tables of monitoring indicators are set out in Chapter 3 and 4 and for each monitoring indicator there is a ‘policy performance’ statement alongside the use of the colour coding from the table below.

Monitoring Action	Explanation of Action
Continue Monitoring	Development plan policies are being implemented effectively
Training Required	Development plan policies are not being implemented as intended and officer or Member training is required.
Supplementary Planning Guidance (SPG) Required	Development plan policies are not being implemented as intended and further guidance is required, potentially preparing additional SPG.

Further Investigation / Research Required	Development plan policies are not being implemented as intended and further research and/or investigation is required.
Policy Review Required	Development plan policies are not being implemented and are failing to deliver; a review of the specific policy may be required.
Plan Review	Development plan policies are not being implemented and the plan’s strategy is not being delivered, triggering a formal review in advance of the statutory 4-year review.

### Integrated Impact Assessment Objectives and Indicators

1.15 The preparation of the Local Development Plan was accompanied by an Integrated Impact Assessment (00). This comprised:

- the more commonly known Sustainability Appraisal (SA)
- the Strategic Environmental Assessment (SEA)
- Welsh Language Impact Assessment
- Health Impact Assessment and (HIA)
- Equalities Impact Assessment (EqIA)

1.16 The LDP was also accompanied by a Habitat Regulations Assessment (HRA) which assesses impacts on European protected sites. However, it should be noted that there is no requirement in the HRA for formal monitoring following adoption of the LDP. The most recent versions of the IIA and HRA were those that accompanied the adopted LDP:

<https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Final-Sustainability-Appraisal-Report.pdf>

<https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Final-Habitats-Regulations-Assessment.pdf>

1.17 The IIA has assessed the likely significant effects of the Plan and found it to be acceptable. However, the IIA recognises in section 5 the need to monitor significant environmental effects. The SEA Regulations require that potential significant effects which may occur as a result of the implementation of the strategy be monitored. In simple terms the IIA recognises that there is a risk to the sustainability effects of the LDP, including the effects of specific aspects or the cumulative effects of LDP in combination, being different to those anticipated due to unforeseen circumstances. The IIA sets out in Table 5.1 the 17 IIA objectives, the effect to be monitored and some 27 monitoring indicators, and potential sources of data. The table forms the basis of the IIA monitoring and is set out in chapter 5 of this document. The IIA monitoring will include data for each indicator and a commentary as to whether sustainability

objectives are being met. It also uses a simple colour coding as suggested in the Development Plans Manual as follows:

Symbol	Predicted effect
++	Very positive effects compared to the current situation The Plan is having a very positive impact on the monitoring objective
+	Positive effect compared to the current situation The Plan is having a positive impact on the monitoring objective
0	Neutral effect compared to the current situation The Plan is not having an impact, or is having a mixed impact on the monitoring objective
-	Negative effect compared to the current situation The Plan is having a negative impact on the monitoring objective
--	Very negative effect compared to the current situation The Plan is having a very negative impact on the monitoring objective
I	Effect depends on how the policy and allocation are implemented
?	Uncertain effect

## 2. Significant Contextual Changes

### Introduction

2.1 This chapter provides an overview of the relevant significant changes affecting the context in which the LDP operated in the 12 months 2023 – 2024. It includes relevant legislation, national, regional and local policies and strategies and social, economic and environmental factors.

### Legislation

2.2 Historic Environment Wales Act – this received Royal Assent on 14/06/23 but will not come into force until supporting secondary legislation has been made and administrative documents have been revised and updated. It is expected the Act will come into force in the latter part of 2024.

### National Policy and Guidance

2.3 Revised TAN15 Development, Flooding and Coastal Erosion – further delay to its adoption by Welsh Government, following consultation on further amendments to the draft TAN in early 2023. The Council has updated its Strategic Flood Consequences in the light of the updated Development Advice Maps and there are not considered to be any overriding issues relating to the delivery of the LDP growth through its allocations.

2.4 Biodiversity Net Benefit – Dear Chief Planning Officer Letter 18/10/23 ‘Addressing the Nature Emergency through the Planning System’ confirmed the update to Chapter 6 of PPW (relating to biodiversity net benefit, green infrastructure, sites of special scientific interest and trees woodlands and hedgerows). This was followed in February 2024 by the publication of an updated PPW12 which included the updated Chapter 6. A number of LDP policies referenced enhancement and net benefit and therefore the LDP is in line with the principles in PPW12.

2.5 PPW12 – Notwithstanding the update to Ch 6 referenced above, there were a number of other changes in the latest version of PPW, none of which are significant, as follows:

- Section 4.1 – Transport: Updates in line with Llwybr Newydd – The Wales Transport Strategy 2021 and to the text on Ultra Low Emission Vehicles to reflect changes to Building Regulations.
- Section 4.2 – Housing: Capturing the changes published in the Dear CPO letter (28 September 2022) on second homes and short-term holiday lets. Additional text to recognise that community-led housing can contribute to the provision of affordable homes, where it meets the Welsh Government’s definition of affordable housing.

- Section 4.3 – Retail and Commercial Development: Update on retail assessments / sequential test for uses in town centres to complement and reflect Future Wales and additional text emphasising the possible use of Local Development Orders for retail uses.
  - Section 4.4 – Community Facilities: Additional text regarding community assets in response to the Local Government and Housing Committee’s October 2022 report on ‘Community Assets’ and new text on ‘changing places toilets’ to reflect changes to Building Regulations.
  - Section 5.2 – Electronic Communications: Relocation of existing policy from Technical Advice Note 19: Telecommunications and an update regarding fixed line broadband to complement and reflect Future Wales.
- 2.6 Written Statement: Town Centres Position Statement – In May 2023 Welsh Government issued a statement addressing the key challenges facing town centres and a series of actions aimed at addressing those actions. The LDP has a set of retail policies which are based on the Welsh Government town centres first principle and seek to take a flexible approach to protecting and enhancing town centres in parallel with the work of the Regeneration Team.
- 2.7 Written Statement: Noise and Soundscape Plan for Wales – In December 2023 Welsh Government published a statement recognising the importance of sound and the effects it can have on people’s health and well-being. A Noise and Soundscape Plan covers the period from 2023 to 2028 and will work alongside the forthcoming revised TAN11 Air Quality, Noise and Soundscape. Policy EN18 recognises the importance of noise when considering new developments.
- 2.8 Written Statement: Securing Greater Nature, Environmental and Community Benefits through SuDS – in July 2023 Welsh Government published the review into SuDS and the way forward.

## Regional Context

- 2.9 NRW consultation re National Park – Welsh Government commissioned NRW, as the Designating Authority in Wales, to evaluate the case for a new National Park based on the existing Clwydian Range and Dee Valley AONB. An engagement period ran from Monday 9<sup>th</sup> October to Monday 27<sup>th</sup> November 2023 and consultation on draft boundaries is expected later in 2024.
- 2.10 Local Development Plans - North Wales LPAs are at various stages in the preparation of LDP’s. Wrexham CBC adopted their LDP on 20/12/23. The Denbighshire Replacement LDP reached Preferred Strategy (pre-Deposit) stage but covid and changes to national policy and guidance have slowed progress. Conwy undertook Preferred Strategy (pre-Deposit) consultation and are presently working on a Deposit Plan. The Anglesey Replacement LDP has reached Review Report stage whilst the Gwynedd Replacement LDP has reached Review Report and Delivery Agreement stage. The Powys

Replacement LDP has proceeded through Review Report, Delivery Agreement and Candidate Sites stages.

- 2.11 Strategic Development Plan – The North Wales Local Planning Authorities including Eryri National Park Authority, are jointly required to prepare and adopt a Strategic Development Plan. A Corporate Joint Committee has been established and this has responsibility for delivering economic well-being, a regional transport plan and a strategic development plan. Initial work is underway in compiling the present policy position in each LDP in North Wales, on order to set a baseline for the development of a SDP.

## Local Context

### Economy

- 2.12 The economy of North East Wales, alongside the UK generally, has seen a difficult period with the fall out from Covid and the effects of the Sept 2022 mini budget which has resulted in a significant economic downturn. Pressures include the general cost of living crisis, further controls on public spending and high interest rates that have hit mortgage holders and potential buyers particularly hard.
- 2.13 The Stats Wales Annual Labour Market Summary shows for the period to 31/03/24 that Flintshire is performing relatively well in relation to the UK and Wales:

	UK	Wales	Flintshire
Employment Rate	75.4%	73.5%	78.7%
Economic Inactivity Rate	21.5%	23.8%	18.7%
Economic Inactivity Rate (exc students)	17.7%	20.3%	17.1%

- 2.14 The Stats Wales Employment in the Public and Private Sector for the period up to 31/03/24 shows that Flintshire has a lower proportion in the public sector than compared with the UK and Wales:

	UK	Wales	Flintshire
Persons employed in public sector	7,792,100	464,600	18,000
Persons employed in private sector	24,918,300	994,100	57,800
% in public sector	31.3%	46.7%	31.1%

- 2.15 In terms of average (median) gross weekly earnings for the year to 2023 Stats Wales shows £633.70 for Wales and £649.70 for Flintshire.
- 2.16 Deeside Enterprise Zone - Flintshire continues to benefit from the Deeside Enterprise Zone which brings with it a range support measures to existing and new businesses. The Advance Manufacturing Centre is one of the key

projects to be delivered by the EZ and this continues to benefit local businesses.

- 2.17 Investment zone status – In November 2023 Welsh Government backed plans to create an £80million Investment Zone in North East Wales. The project is a joint initiative between Flintshire and Wrexham Councils and a wide range of business, educational and leisure partners. It is one of 12 Investment Zones across the UK and the UK Government will decide on the support to be provided in the Autumn budget.
- 2.18 Ambition North Wales – Ambition North Wales is working to identify and deliver opportunities to develop the North Wales economy. A key part of this is the North Wales Growth Deal which deliver a number of projects amounting to £1bn investment. One of the key projects is the Warren Hall strategic site which Ambition North Wales are seeking to bring forward with Welsh Government, by funding infrastructure and ground preparations to create development ready plots.

## Housing

- 2.19 Stats Wales produces statistics which show housing starts and housing completions which clearly show the effects of the Covid period and also the more recent cost of living and mortgage conditions. Whilst these statistics provide a useful context, they are based on local authority building control and NHBC returns and differ from the figures within the main body of the AMR which are based on housing land monitoring.

	Housing Starts			Housing Completions		
	Wales	N. Wales	Flintshire	Wales	N. Wales	Flintshire
2015-16	6708	1345	554	6900	1261	511
2016-17	6871	1644	619	6833	1300	472
2017-18	6037	920	416	6663	1311	428
2018-19	5974	1165	423	5777	1284	458
2019-20	6224	1263	516	6037	1121	399
2021-21	4314	1066	250	4616	1233	442
2021-22	5659	1211	327	5273	1356	285
2022-23	4556	990	252	5785	1166	270
2023-24	5161	1130	270	4756	1016	250

- 2.20 Savills published an article in Jan 2024 [here](#) which confirmed that sharp increases in mortgage rates have constrained affordability and demand resulting in house price falls across Wales. The article noted that Flintshire was the only location in North Wales to show an annual price growth. Savills is forecasting a positive outlook from the second half of 2024 onwards with 21.4% value growth in Wales over the next 5 years to 2028 which represents the strongest potential house price growth in the UK. It noted that new homes completions fell by 7% in the year to Sept 2023 and remain 6% below the 2017-2019 average. Starts and planning consents however, have fallen

considerably with starts down by 18% in the year to June and consents down by 31% in the year to September. The article noted continuing viability difficulties relating to construction cost increases.

2.21 House prices – Land Registry data shows that housing is relatively more affordable in Wales and Flintshire but shows that house prices are rising slightly in Flintshire compared with continuing decreases in Wales and the UK.

	UK	Wales	Flintshire
Average house price for 'all property types' for year to Dec 2023	£284,681	£213,816	£218,308
Percentage Change for 'all property types' for year to Dec 2023	-1.4%	-2.5%	+0.2%

### Population / Households

2.22 Stats Wales published mid year population estimates for Flintshire of 155,334 for 2022 and 155,812 for 2023 compared to 155,000 at the 2021 Census. The latest household projections for Flintshire in 2023 show the following:

- Principal Variation 67,342
- Lower variant 66,915
- Higher Variant 67,615
- Zero migration variant 67,314
- 10 year average migration variant 67,492

### Retail

2.23 The Welsh Retail Consortium (WRC) indicates that the vacancy rate has increased from 16.5% to 17% in the second quarter of 2023 making it the second highest rate in the UK

### Infrastructure Projects - Energy

2.24 The past 12 months has seen the Council working on a number of major energy related infrastructure projects as detailed below:

2.25 Hynet – The Council participated throughout the PINS consideration of this major infrastructure project which represents a Development of National Significance. On 20/03/24 the Secretary of State for Energy Security and Net Zero announced that development consent was to be granted [here](#) with detailed report [here](#). The Council will be involved in further work in connection discharging requirements.

2.26 Padeswood Carbon Capture and Storage – This Development of National Significance will seek to capture approximately 7,200,000 tonnes of CO2 per



year from the cement kiln at Padeswood and feed into the proposed HyNet pipeline. The proposal is presently being considered by PEDW.

- 2.27 Point of Ayr , Talacre – Flintshire planning committee resolved on 10<sup>th</sup> January 2023 to approve a detailed application for the re-purposing of the current Point of Ayr Gas Terminal to be used to transport CO2 to be stored in depleted under sea gas fields.
- 2.28 Bretton Hall Farm Solar Farm – This Development of National Significance involved a proposed solar farm straddling the Flintshire / Chester West and City border. It was approved by the Minister for Climate Change on 19/12/23. The proposed solar farm involved approximately 50ha of land of which half would be in Wales and will generate 30Mw of electricity of which 16Mw would come from Wales.
- 2.29 Shotton Paper Mill – This Development of National Significance involves a combined heat and power plant to provide power to the redevelopment and extension of the Shotton Paper Mill (which was granted planning permission by FCC on 26/10/22). The case is presently being considered by PEDW.
- 2.30 Former Connah’s Quay Power Station – proposed low carbon energy development to be considered by The Planning Inspectorate – presently at Scoping Opinion consultation stage.

## Phosphates

- 2.30 Part of the County sits within the catchment for the Bala Lake and R. Dee Special Area of Conservation (SAC). As part of informing the Examination and supporting the enabling the adoption of the LDP, Wrexham and Flintshire Councils produced a joint Dee Phosphorous Reduction Strategy. During the 12 months following adoption of the Plan considerable work was undertaken between the Council, its consultants, NRW and Dwr Cymru Welsh Water to progress possible mitigation measures in respect of phosphates and also in respect of progressing permit reviews for 3 waste water treatment works. The lack of known mitigation measures in relation to potential discharges held back the delivery of 4 housing allocations totalling 550 units.
- 2.31 In the Autumn of 2023, following work between NRW and DCWW, revised permits were issued by NRW. Mold (CM00031001) was issued on 09/08/23, Buckley (CM00081001) was issued on 10/08/23 and Hope (CM0075801) was issued on 28/09/23. DCWW have established that the performance of the three wwtw is within the phosphate discharge limits and this gives rise to capacity or ‘headroom’ for the growth within the LDP to be delivered without harm to the SAC. Subsequent windfall sites will need to be considered on a case by case or ‘business as usual’ basis in terms of whether sufficient headroom still exists.
- 2.32 Alongside this work, the Council has also attended early meetings of the Dee Catchment Nutrient Management Board. Wrexham Council have led on the

set up and administration of the Board. The Board is supported by a Technical Advisory Group with consideration being given to the setting up of a wider stakeholder group. The permit reviews have relieved the immediate pressure on the Board in terms of facilitating LDP growth, but the Board will still need to work towards a multi disciplinary approach to not only dealing with phosphates longer term, but also the need to improve river quality more generally.

### 3 Core / key Indicators

#### Introduction

- 3.1 A number of the core indicators in this section of the AMR relate to housing delivery. Site survey work as part of the annual housing land monitoring exercise was conducted from April 2024. Two schedules relating to large sites (10 or more units) were prepared – one showing a position statement and commentary on each large site (Appendix A) and the other showing a forecast of completions on each site (Appendix B). The schedules were circulated to the Stakeholder Group for feedback but the response rate was poor (Appendix C), with only one substantive response which was from a housebuilder who is not presently active in the County and with no involvement in LDP allocated sites. The Council did not consider that there were any grounds for convening a Stakeholder Group meeting. It should be noted that the circulation of the 2023 schedules had only taken place a few months earlier and this may account for the poor response on the 2024 schedules. A number of housebuilders had been contacted separately and ahead of the consultations. Housebuilders who are involved in either committed or allocated sites have therefore had the opportunity to provide feedback on the Council’s figures and it is therefore assumed that they are comfortable with them. It should be noted that since circulating the schedules to the Stakeholder Group an omission has been identified whereby 8 completed units were missed on site PFD001. This has now been amended in the schedules within this report.
- 3.3 The following actions, taken from the Development Plans Manual, have been used throughout this chapter.

	Continue monitoring (if development plan policies are being implemented effectively)
	Training required for Officers / Members (if development plan policies are not being implemented as intended and further training is required)
	Further supplementary planning guidance required (if development plan policies are not being implemented as intended and further guidance is required)
	Further investigation / research required
	Policy Review required (if development plan policies are not being implemented and are failing to deliver)
	Plan review required (if development plan policies are not being implemented and the plan’s strategy is not being delivered, this could trigger a formal review in advance of the statutory 4-year review).

**Indicators required by Legislation**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI2 Number of net additional market and affordable houses</b>								
SO11	STR1 STR11 [HN1] [HN3]	STR1 STR11 [HN1] [HN3]	Total annual build rate of 463 per annum / affordable housing target of 151 units per annum	Delivery below Plan's annual build rate / target for at least two consecutive years	PPW11 LDP Reg 37 To determine whether housing completions are in line with Plan.	FCC / Developers / Infrastructure Providers	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**

Total completions for the period since the period 2019/20 (which forms the basis for the adopted Plan) are set out in the table below.

Year	Completions	Annual Build Requirement	Performance / Cumulative performance
2015-2020	2609	463x5=2315	+ 294
20/21	582	463	+ 119 (+413)
21/22	400	463	- 63 (+350)
22/23	425	463	- 38 (+312)
23/24	322	463	- 141 (+171)

Over the four years there has been a slowing down of total completions compared with the annual build rate of 463 units. However in cumulative terms the Plan is 171 units above the Plans cumulative annual build rate. Compared to the average per annum requirement of 463 units per annum the Plan has delivered an average of 482 units per annum, running slightly ahead of what the Plan seeks to provide. Delivery levels in the early Plan years were buoyed by the 'speculative' housing developments which came forward on the back of the then TAN1 five-year housing land supply measure. As delivery of those sites have tailed off, there have been delays in the allocated sites coming forward.

The Northern Gateway site has involved the creation of 'development ready' plots and significant infrastructure provision but the Countryside Homes development was developed out over a 3 year period 2020/21 – 2022/23 and created confidence in the

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<p>site as a residential location. All residential phases at Northern Gateway have planning permission. At the base date of this AMR, Keepmoat, Clwyd Alyn, Anwyl and Bellway Homes were all constructing dwellings with completions recorded and further units under construction, with significant completions in particular by Bellway and Anwyl. Since the base date, Persimmon have commenced construction in terms of initial site works on a 200 unit site (part of Bellway plot) and have started marketing their 'Queensgate' development on their website. It is therefore considered that completions will continue and possibly at an accelerated rate with 5 developers active. Northern Gateway strategic site is the subject of a separate monitoring indicator MI16.</p> <p>The Plan makes 11 non – strategic housing sites and these are the subject of a separate monitoring indicator MI5. Of the eleven sites, two are complete (HN1.2 and HN1.5), one is under construction and nearing completion (HN1.11), one has full planning permission and works commencing (HN1.3), four have recent Planning Committee resolution (HN1.1, HN1.6, HN1.9 and HN1.10) and three have detailed planning applications presently under consideration (HN1.4, HN1.7, HN1.8). There is therefore a pipeline of allocated sites ready start delivering completions. Further commentary is provided in MI5.</p> <p>Note – affordable housing completions are monitored in MI9.</p>								

**Key Indicators applicable to all Plans**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI1 Annual level of housing completions</b>								
SO11	STR1 STR11 [HN1]	STR1 STR11	AABR as specified in adopted housing trajectory	Below AABR for at least two consecutive years.	PPW11 LDP Manual Ed.3 (Table 29)	FCC / Developers / Infrastructure Providers	Annual Housing Land Monitoring Exercise	Keep monitoring
Policy Performance:								

The Examination of the LDP focussed on the housing position at April 2020 and this forms the basis for the housing balance sheet and trajectory. The adopted trajectory schedule (Appendix D) and graph (Appendix E) shows a clear peak in completions for the year 2023-2024 with completions gradually trailing off in the remaining Plan period.

Year	AABR (Adopted Plan)	Actual completions	Surplus / Deficit
2021	470	582	+112
2022	485	400	-85
2023	512	425	-87
2024	580	322	-258
Overall Cumulative	2047	1729	-318 (-15.5%)

The updated trajectory schedule (Appendix F) and graph (Appendix G) shows a peak of completions in the year 2025/26. There has clearly been a delay in delivering completions and this is largely related to the allocated strategic site and non-strategic housing allocations being attributed to a number of factors:

- The existing landbank of ‘speculative’ sites on the back of the then TAN1 has slowed down in recent years in terms of delivery
- Landowners / developers on some allocations holding off from submitting planning applications until the Inspectors Report was received and the Plan was adopted.
- The process of identifying preferred developer on some allocations taking longer than anticipated
- The scale of infrastructure provision at Northern Gateway and the creation of development ready plots
- The economic downturn, following the effects of Covid, in terms of cost and availability of materials and labour, interest rates, mortgage rates and general cost of living.
- The delays on four allocations (HN1.1, HN1.6, HN1.9 and HN1.10) amounting to 550 units as a result of the phosphates issue.

In respect of the phosphate issue, although initial work was undertaken in respect of identifying mitigation measures in the form of wetlands adjacent to three affected waste water treatment works, this was overtaken by the issuing in Autumn 2023 of revised permits for the three affected wwtw’s, following collaboration with Dwr Cymru Welsh Water. On the basis that the three affected wwtw’s were operating well within the limit set in the revised permits, as a result of the performance of the phosphate stripping technology at the plants, this created ‘headroom’ whereby the growth arising from the four allocations could be accommodated without detriment to the Bala Lake and River Dee SAC as a result of discharges.

The peak in predicted completions has therefore moved back by some three years for the reasons set out above and is more pronounced whereby allocated sites are coming on stream at more or less the same time. The revised trajectory schedule (Appendix F) shows that at present there is forecast to be a modest shortfall at the end of the Plan period in meeting the Plan’s housing requirement figure of 6950 units by 61 units which represents 0.9%. However, this is not considered to be a significant variance from the Plan strategy, objectives and aims.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI3 Spatial Distribution of Housing</b>								
SO12	STR2	STR2	Spatial Distribution to settlement tiers as set out in explanation to STR2	Variation of +/- 10% from the expected distribution for at least two consecutive years	PPW11 The Plan Strategy sets out an apportionment of growth to each tier in the settlement hierarchy in terms of completions, commitments and allocations.....	FCC / Developers / Infrastructure Providers	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**  
 Policy STR2 Location of Development is supported by a break down of the level of growth across the 5 tiers of settlements within the new Settlement Hierarchy. The break down was 47% Tier 1 Main Service Centres, 35% Tier 2 Local Service Centres, 15% Tier 3 Sustainable Settlements, 2% Tier 4 Defined Villages and 1% Tier 5 Undefined Villages. The table below shows completions for the period 2015-2020 and then for each subsequent year.

Year	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Total
Policy Aim	47%	35%	15%	2%	1%	
Completions 2015-2020	1489 57%	579 22%	433 17%	67 2%	41 2%	2609
Completions 2021	268 46%	221 38%	87 15%	4 1%	2 0%	582
Cumulative 2015-2021	1757 55%	800 25%	520 16%	71 2%	43 2%	3191

Completions 2022	135	34%	170	43%	86	21%	7	2%	2	0%	400
Cumulative 2015-2022	1892	53%	970	27%	606	17%	78	2%	45	1%	3591
2023	199	47%	65	15%	150	35%	6	2%	5	1%	425
Cumulative 2015-2023	2091	52%	1035	26%	756	19%	84	2%	50	1%	4016
2024	131	41%	106	33%	63	20%	16	5%	6	2%	322
Cumulative 2015-2024	2222	51%	1141	26%	819	19%	100	2%	56	1%	4338

In the context of the trigger of +/- 10% the above data can be summarised below:

Settlement Hierarchy	Target	Trigger =/- 10%	Within Variance?	
			2024	cumulative
Tier 1	47%	42.3% - 51.7%	41% yes	51% yes
Tier 2	35%	31.5% - 38.5%	33% yes	26% no
Tier 3	15%	13.5% - 16.5%	20% no	19% no
Tier 4	2%	1.8% - 2.2%	5% no	2% yes
Tier 5	1%	0.9% - 1.1%	1% yes	2% no

The policy aim in effect reflects what the spatial distribution of completions would look like at the end of the Plan period as by then, all sources of supply as identified in the tables accompanying policy STR2 should have delivered. The above table shows the policy aim as set out in policy STR2 and shows the distribution of completions during the period 2015 to 2020 as a total. For each subsequent year the completions are presented as an 'in year' figure and as a cumulative figure since 2015 and shows number of units and percentage. It is not unexpected to see variations in the spatial delivery of completions from year to year, particularly as the non-strategic allocations have yet to deliver completions. On-going monitoring of the yearly cumulative distribution should identify whether distribution is moving closer to the intended policy aim, as the Plan period progresses. However, at present there is nothing to indicate that the spatial distribution is markedly out of alignment with the policy aim.



LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI4 Total cumulative housing completions monitored against the anticipated cumulative completion rate</b>								
SO11	STR1	STR1 HN1 HN3	Cumulative housing completions as specified in the adopted housing trajectory	Cumulative housing completions below cumulative completion rate specified in adopted trajectory for at least two consecutive years	To ensure that the housing is being delivered  PPW11  LDP Manual Ed.3 (Table 29)	FCC / Developers / Infrastructure Providers	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**

The table below sets out a comparison of the cumulative AABR figures from the adopted Plan against the cumulative actual completions rate. In the first year following the 2020 base date in the adopted Plan, actual completions were ahead of the AABR figure by 112 units. The inclusion of the 2022 figures results in a cumulative shortfall of 27 units or -2.8%. The inclusion of the 2023 figures results in a cumulative shortfall of 67 units or -4.6%. The inclusion of 2024 figures results in a cumulative shortfall of 326 units or -15.9%.

Year	In year actual completions	Cumulative actual completions	AABR in year completions	Cumulative AABR completions	Cumulative Surplus / Deficit
2021	582	582	470	n/a	+112 (+23.8%)
2022	400	982	485	955	-27 (-2.8%)
2023	425	1407	512	1467	-60 (-4.6%)
2024	322	1729	580	2047	-318 (-15.5%)

It is evident that there is a trend of a shortfall over the period since the base date of the housing figures in the adopted LDP ie. 2020. However, this is the first formal AMR to be published and it should be stressed that the cumulative shortfall for 2022 and 2023 were negligible. It is noted that 2024 has seen a more significant cumulative shortfall but commentary has been provided elsewhere in this report relating to a number of factors including:

- The delay on four allocated sites as a result of the phosphates issue which has now been resolved

- The delay in bringing forward two large allocations to planning application stage
- The significant infrastructure and site preparation works at Northern Gateway
- The economic downturn and increase in interest rates and costs of materials and labour.

However, there are a number of positive messages in terms of the pipeline of allocated sites which are likely to start delivering completions over the remaining Plan period. A number of factors include:

- Edwards Homes on site at Highmere Drive, Connahs Quay
- Several developers on site at Northern Gateway
- Progress in delivering a number of larger committed sites
- The majority of allocated sites having a planning permission or Committee resolution to grant subject to s106
- The remaining three allocated sites having a planning application presently under consideration.

There has clearly been a lag in terms of some 2-3 years in terms of the anticipated ‘peak’ in completions compared with the present forecast site completions. The delivery of housing will therefore be more concentrated in the remaining 6 years of the Plan period compared with what was anticipated in the adopted trajectory.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI5 Housing Allocations – number of dwellings delivered</b>								
SO11 SO12	STR11	HN1	Annual completions figure as per the adopted housing Trajectory	Annual completions falling below levels in adopted trajectory for at least two consecutive years	The Plans detailed housing allocations are an important part of the Plans housing provision	FCC / Developers / Infrastructure providers?	Annual Housing Land Monitoring Exercise	Keep monitoring

Policy Performance:

The Plan identifies one strategic housing allocation and 11 non-strategic housing allocations. A more detailed breakdown of allocated sites is contained in MI15 and MI16 with a commentary on each site. The table below shows a summary of performance on all allocated sites.

Year	AABR Anticipated Completions Allocated Sites	Actual Completions Allocated Sites	Surplus / Deficit
2020/21	206	222	+16
2021/22	195	205	+10
2022/23	278	36	-242
2023/24	445	95	-350

In comparing the anticipated completions for allocations in the adopted trajectory against actual completions it is evident that there is a marked contrast between the years 2020/21 and 2021/22 when completions were slightly ahead and the years 2022/23 and 2023/24 when completions were behind that projected. Commentary has been provided in other MI's in the AMR as to the reasons why this has occurred and also set out how the Plans allocations are moving forward to start delivering.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI6 Northern Gateway – number of dwellings delivered</b>								
SO11 SO12	STR3	STR3 HN1	Annual completions figure as per the adopted housing Trajectory	Annual completions falling below levels in adopted trajectory for at least two consecutive years	The Northern Gateway Strategic Sites form a significant part of Plans housing provision and the Plans strategy to deliver strategic mixed use sites	FCC / Developers / Infrastructure providers?	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**  
 Northern Gateway is a large strategic mixed use site with employment, housing, community and retail facilities with a green infrastructure network. The site is split into two with the northern Airfields site and the southern Corus site, with each delivering housing and employment development. The table below shows a summary of actual completions against anticipated completions for the site as a whole and each phase or plot:

Site / Delivery	Units	21	22	23	24	25	26	27	28	29	30	30+	Notes
Adopted Trajectory	1325	100	120	150	150	100	100	120	120	120	105	140	
		Actual completions				Forecast completions							
Northern Gateway (Whole site)													
GAR002A Countryside	283	112	135	36	-	-	-	-	-	-	-	-	Site complete Countryside Homes
GAR002B Anwyl	112				38	40	40	40	40	28	-	-	Site under construction Anwyl
GAR002C Bellway	185				40	40	40	40	40	40	31	-	Site under construction Bellway
GAR002D Anwyl	71					See GAR002B						-	
GAR002E Anwyl	89					See GAR002B and C						-	
GAR002F Keepmoat	129				17	40	40	32	-	-	-	-	Site under construction Keepmoat
GAR002G Clwyd Alyn	100					30	30	40	-	-	-	-	Site under construction (Castle Green)
GAR002H Bellway / Persimmon	400					40	70	70	70	70	70	104	Persimmon started site works.
GAR002I Bellway	54					See GAR002H							
Total	1423*	112	135	36	95	150	220	222	150	129	70	104	
<b>Surplus / Deficit</b>		<b>+12</b>	<b>+15</b>	<b>-114</b>	<b>-55</b>	<b>+50</b>	<b>+120</b>	<b>+102</b>	<b>+30</b>	<b>+9</b>	<b>-35</b>		
*Note that the total number of units is now 1423 units													

It is evident that there is a contrast between the two years 2020/21 and 2021/22 when completions were ahead of the trajectory and the years 2022/23 and 2023/24 when completions were behind that projected. This is reflected by the Countryside Homes plot coming on stream and delivering early and delays in the other phases coming forward. However, each plot or phase now has planning permission with developers either on-site now or due to commence in the near future. There are a total of 5 developers presently on-site including Persimmon who commenced site works on part of GAR002H after the AMR base date, and these include Anwyl, Bellway, Keepmoat and Clwyd Alyn Housing Association (being constructed by Castle Green). With supply coming on stream in numbers it is not considered that there is cause for concern in the site being able to be largely completed within the Plan period.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI7 Small Sites Allowance – number of dwellings delivered</b>								
SO11 SO12	STR11	STR11	60 dwellings per annum for each year of the remaining Plan period	Small sites completions either above or below 60 dwellings per annum for at least two consecutive years	Ensure contribution of small sites allowance to plans overall housing provision, is being achieved.	FCC Developers	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**

Since the position at 2019/20 (which formed the basis of the adopted Plan, small site completions have remained consistently above the allowance of 60 units per annum specified in the Plan. Small site completions for 20/21 were 92 units, for 21/22 were 69 units, and for 22/23 were 111 units. A downturn in small site completions for 2023/24 of 44 units is noted, but when looking at the whole Plan period, in the table below, this is the only year when small site completions have fallen below the allowance. The average annual delivery of small sites is 85 units per annum, well above the Plans allowance.

	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Small Site Annual Allowance per annum	60	60	60	60	60	60	60	60	60
Actual Small Site Completions per annum	87	102	104	73	87	92	69	111	44
Surplus / Deficit per annum	+27	+42	+44	+13	+27	+32	+9	+51	-16
Cumulative Surplus / Deficit		+69	+113	+126	+153	+185	+194	+245	+229

It is clear from the cumulative surplus in the table above that the anticipated allowance for small sites significantly exceeded the forecast rate. The Monitoring Indicator has therefore been met.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI8 Windfall Allowance - number of dwellings delivered</b>								
SO11 SO12	STR11	STR11	Annual and cumulative windfall completions as specified in the adopted housing trajectory	Annual and cumulative windfall completions falling below levels in adopted trajectory for at least two consecutive years	Ensure contribution of windfall sites allowance to plans overall housing provision, is being achieved.	FCC Developers	Annual Housing Land Monitoring Exercise	Keep monitoring

**Policy Performance:**

The Plan sets out an allowance for windfall completions of 60 units per annum. The delivery of windfall sites was significant during the earlier years of the Plan period as detailed in the table below. This demonstrates delivery well in excess of the 60 units per annum sought. This was discussed at the LDP Examination and set out in Examination document [FCC014](#).

	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Large site annual allowance per annum	60	60	60	60	60	60	60	60	60
Actual large site completions per annum	0	16	211	134	128	0	11	18	90
Surplus / deficit per annum	-60	-44	+151	+74	+68	-60	-49	-46	+30
Cumulative surplus / deficit per annum	-60	-104	+47	+121	+189	+129	+80	+34	+64

This monitoring indicator seeks to identify completions on all windfall sites granted planning permission since 31/03/20 and any subsequent completions. It picks up windfall sites that were not included in the list of committed sites in Appendix 1 of the adopted LDP. Some information was included in the informal Housing Land Monitoring Statements for 2020-21, 2021-22 and 2022-23. This has been re-assessed and presented below.

Site ref	Site name	units	Comp 2021	Comp 2022	Comp 2023	Comp 2024
<b>New windfalls picked up in 2021 Study</b>						
BUC230	Princess Avenue, Buckley	12	0	0	0	12
BUC231	80-86 Mold Rd, Buckley	12	0	0	0	10
BUC223	The Hayfield, Buckley	14	0	0	0	0
HAW036	Poor Claire Monastery, Hawarden	15	0	11	4	-
MOL122	Park House, Broncoed, Mold	20	0	0	0	12
MOS013	Ffordd Pandarus, Mostyn	20	0	0	0	20
PYF047	South of Rhos Rd, Penyffordd	40	0	0	0	0
AST082	Grosvenor Social Club, Jubilee St, Shotton	10	0	0	10	-
<b>New windfalls picked up in 2022 Study</b>						
HOL105	Former Infirmary Site, Lluesty Hospital, Holywell	29	-	0	4	25
LEE033	Factory 2 Site, Pontybodkin Hill, Leeswood	26	-	0	0	0
MOL126	St Davids Building, Daniel Owen Square, Mold	14	-	0	0	0
<b>New windfalls picked up in 2023 Study</b>						
CON134	315 High Street, Connah's Quay	11	-	-	0	11
BUC236	Buckley Police Station, Mold Rd, Buckley	10	-	-	0	0
<b>New windfalls picked up in 2024 Study</b>						
HCAC088	Spectrum Garden Centre, Cefn y Bedd	30	-	-	-	0
MOS006	Ffordd Pennant West, Mostyn	64	-	-	-	0
<b>Total</b>		<b>327</b>	<b>0</b>	<b>11</b>	<b>18</b>	<b>90</b>

This further analysis shows that windfall sites have continued to come forward although completions have dropped off until a sharp upturn for 2023/24. The average annual level of windfall completions to date is 67 units which is slightly above the Plans allowance. Putting aside some fluctuations in delivery, the overall delivery of large windfall sites is considered to be in line with the Plans intended allowance and the monitoring indicator.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI9 Level of affordable housing completions against Plans overarching affordable housing target</b>								
SO11	STR11	HN3	Target of affordable houses in Affordable Housing Background Paper.	Deviation of delivery by number from Affordable Housing Background Paper for at least two consecutive years	Ensure that the Plan is delivering sufficient amount of affordable housing.	FCC Planning FCC Housing Strategy	Annual Housing Land Monitoring Exercise & Housing Strategy monitoring	Keep monitoring

**Policy Performance:**

The Plan has set a target for the delivery of 2265 affordable dwellings over the 15 year Plan period. This equates to an annual figure of 151 units. However, in reality it is unlikely that affordable housing would be delivered at a flat rate as housing generally will not be delivered at a flat rate, as demonstrated in the trajectory.

	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
	2,265 affordable dwellings over the plan period								
Overarching Target of Affordable Housing (2265)	151	151	151	151	151	151	151	151	151
Actual Affordable Housing completions	43	84	249	163	96	228	76	113	52
Performance	-108	-67	+98	+12	-55	+77	-75	-38	-99
Cumulative performance	-108	-175	-77	-65	-120	-43	-118	-156	-255
Remaining Affordable Housing to be delivered	2,222	2,138	1,889	1,726	1,630	1,402	1,326	1,213	1,161

The average annual delivery rate of affordable housing during the plan period so far is 123 dwellings which is slightly below the 151 figure required to achieve the affordable housing target of 2,265 set out in policy STR1. However, this includes the years prior to the adoption of the LDP (2015-2022) when the affordable housing policy HN3 was not active together with the impact of the global Covid pandemic on the house building industry.



The beginning of the plan period delivered a significant number of affordable homes, many of these units were accounted for as part of the committed sites, as a result of speculative sites coming forward under the previous TAN1 regime. There has been a total of 1,104 affordable units completed by 31/03/2024 which represents a shortfall of 255 affordable units. Overall, as at April 2024 there remains 1161 affordable units to be delivered. However, the bulk of the phases / plots at Northern Gateway have generally not yet delivered completions or where sites are in the early phases of construction and the provision of affordable units tend to be lower. Furthermore, many of the non-strategic housing allocations have yet to deliver completions and these sites will deliver substantial numbers of affordable units. In combination with windfall sites and affordable housing exception schemes it is anticipated that affordable housing over the whole Plan period will be close to the 2265 target.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI10 Tenure of affordable housing completions</b>								
SO11	STR11	HN3	Tenure split (social rented and intermediate) in line with the need identified in LHMA and the Affordable Housing background paper	Deviation of delivery by tenure from Affordable Housing Background Paper for at least two consecutive years	Ensure that the Plan is delivering appropriate tenure of affordable housing.	FCC Planning FCC Housing Strategy	Planning Register Aff Housing returns	Keep monitoring
Policy Performance:								

It is important to point out that Flintshire Planning Department carry out a Housing Land Monitoring (HLM) survey every April to track how housing sites are being developed. The HLM survey notes whether planning permissions for houses or apartments have been built, are under construction or have not started. Affordable houses have only been counted separately for the years 2023 and 2024. The HLM survey counts the number of affordable housing units secured as part of planning permissions either through a condition or a Section 106 legal agreement. These figures cover residential units for social rent, intermediate rent, intermediate low-cost houses and tenure neutral (in cases where due to market demand, developers have yet to decide exactly the form of the affordability).

Separate to the HLM survey the Councils Housing Strategy team also track the number of affordable houses which are being delivered. The Housing Strategy Team can only include houses which have been built using the Social Housing Grant (SHG) or other grant funding in their figures. These figures are sent to Welsh Government who then publish them in the Flintshire Stats Wales figures. SHG can only be used for social housing delivery. Housing Strategy do not report on the intermediate low-cost home ownership delivered via private developers. Housing Strategy will for instance, pick up the delivery through the refurbishment of existing houses which the HLM survey work would not pick up.

There are also other differences in the way the HLM survey and Housing Strategy figures are counted. Each survey counts whether a house is complete in a different way, in the HLM survey if a house is built but not occupied it is considered complete but for housing strategy the house must be occupied to count as being delivered. So sometimes the same house may be included in one year's figures for the HLM survey and not for the Housing Strategy figures.

Therefore, the Flintshire Housing Strategy / Flintshire Stats Wales figures will not align with the Flintshire HLM survey figures as they are being counted in different ways and are not a like for like comparison.

The LDP sets out a target tenure split of 30% social rented, 30% intermediate rented and 40% low cost home ownership. The data in the above tables can be summarised as follows:

	Social Rented	Intermediate Rented	Low Cost Ownership	Tenure Neutral
Plan target	30%	30%	40%	n/a
Completions 2023	57%	5%	38%	-
Completions 2024	92%	4%	4%	-

It is evident that delivery during the first two years of monitoring is differing from the tenure split built into the LDP. This is not unsurprising as completions in 2023 /24 have come from a mix of allocations or commitments or commitments / windfalls which gained planning permission before the new tenure split requirements came into force. It is also evident that several of the allocated sites have yet to commence delivery on site. Small social rented schemes have also continued to come forward. Once completions start being recorded on these sites it is anticipated that the % split will realign closer to what the Plan seeks. The present position when compared with the Plan target is not considered to be a cause for concern.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI13 Delivery of affordable housing thresholds and percentage targets for each sub-market area</b>								
SO11	STR1 STR11	HN3	Delivery as per HN3 and Affordable Housing Background Paper	Deviation above or below the target for at least two consecutive years	Ensure that the Plan is delivering affordable housing.	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring

**Policy Performance:**

The LDP seeks different affordable housing requirements based on six housing sub market areas identified in the Local Housing Market Assessment. The % requirements vary from 15% to 40% on all housing developments of 10 units or more, which contrasts with the flat rate of 30% in the UDP on sites of 25 units or more. The table below shows planning permissions granted, or Council resolution to grant subject to s106 agreement, for the period since adoption of the Plan.

The table shows that the targets are being met and the policy is being successfully implemented. The only exception is the Northern Gateway site where each phase / plot has been assessed on its individual merits having regard to infrastructure investment through viability assessments. The approach of allowing a lower % affordable housing provision based on viability considerations is in line with the policy approach in HN3.

<b>Flint &amp; Coast Housing Market Area</b>					
Site Name	Date of Permission	No. Market Dwellings	No. Affordable Units	% Affordable Housing	% Affordable Required
Land adj Ffordd Pennant, Maes Pennant Mostyn	13/02/24	57	9	15%	15%
Conversion of Former Institute Gronant	08/07/24	14	2	15%	15%

<b>Central Housing Market Area</b>					
<b>Site Name</b>	<b>Date of Permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
					40%
<b>Connah's Quay, Queensferry &amp; Broughton Housing Market Area</b>					
<b>Site Name</b>	<b>Date of permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
Highmere Drive, Connah's Quay	21/06/23	141	49	35%	35%
<b>Garden City Housing Market Area</b>					
<b>Site Name</b>	<b>Date of permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
62898 GAR002B Anwyl	22/02/22	102	10	9%	20%
62898 GAR002C Bellway	22/02/22	166	19	10%	20%
62898 GAR002D Anwyl	22/02/22	63	8	11%	20%
63591 GAR002H (Phase 4) Bellway / Persimmon	10/03/2023	400	0	0%	20%
RES/000658/22 GAR002i (Phase 3) Bellway	25/08/2023	49	5	9%	20%
<b>Mold &amp; Buckley Housing Market Area</b>					
<b>Site Name</b>	<b>Date of Permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
Well Street, Buckley	13/03/24	140	56	40%	40%

North of Gwernaffield Road (Denbigh Road), Mold	13/03/24	235	94	40%	40%
New Brighton	08/07/24	90	36	40%	40%
<b>South Border Housing Market Area</b>					
Site Name	Date of Permission	No. Market Dwellings	No. Affordable Units	% Affordable Housing	% Affordable Required
Wrexham Road Abermorddu	13/03/24	70	21	30%	30%

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI14 Viability – trends in house prices, land values, build costs</b>								
SO11 SO1 SO4	STR1 STR11	HN3 HN1	Scheme viability and delivery of planning obligations in line with Viability Study	A 5% deviation (positive or negative) between house prices, land values & build costs compared to Viability Study for at least two consecutive years	To ensure that housing development remains viable in delivering planning obligations in the context of changing financial parameters	FCC Planning District Valuer		Keep monitoring / Further investigation
<p>Policy Performance:</p> <p>The HM Land Registry headline statistics for June 2024 show that the average price of a property in Wales was £216,000 with an increase of 1.8%. In Flintshire the average price in June 2023 was £211,189 and in June 2024 £213,287 an increase of 1.0%. The Council is aware from anecdotal evidence that build costs have increased both during the Covid period and since due to the economic downturn. The Council has been unable to find data in relation to land costs. However, it is evident from MI13 that affordable housing requirements are being met in recent developments.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI15 Rate of development on key local housing allocations (completions, take up and infrastructure schemes)</b>								
SO11	STR1 STR11	HN1	Delivery as per housing trajectory	Deviation (positive or negative) compared to housing trajectory for at least two consecutive years	To ensure local housing allocations in HN1 are delivering at the rate specified in the housing trajectory	FCC Planning	Planning Register	Keep monitoring

**Policy Performance:**

The table below shows the forecast completions from the adopted trajectory for each of the non-strategic housing allocations measured against the revised forecast completions. Delays have been experienced of between 1 and 3 years with most sites being delayed by two years. Four of the allocations were delayed by phosphates and the need for delay was known during the Examination of the Plan. Other sites have taken longer than expected to reach planning application stage due to contractual complications between landowners and developers and this is entirely beyond the control of the Council.

Site	Units	21	22	23	24	25	26	27	28	29	30	30+	Slippage
<b>HN1.1 Well Street, Buckley</b>													
Forecast completions (adopted trajectory)	140	-	-	-	46	47	47	-	-	-	-	-	2 years
Revised forecast completions		-	-	-	-	-	40	50	50	-	-	-	
<b>HN1.2 Broad Oak Holding, Connah's Quay</b>													
Actual Completions	32	27	5	-	-	-	-	-	-	-	-	-	n/a
<b>HN1.3 Highmere Drive, Connah's Quay</b>													
Forecast completions (adopted trajectory)	150	-	-	-	30	30	30	30	30	-	-	-	1 year
Revised forecast completions	(now 141)	-	-	-	-	30	60	51	-	-	-	-	
<b>HN1.4 Northop Road, Flint</b>													
Forecast completions (adopted trajectory)	170	-	-	-	20	40	40	40	30	-	-	-	2 years
Revised forecast completions		-	-	-	-	-	50	40	40	40	-	-	
<b>HN1.5 Maes Gwern Mold</b>													
Actual completions	160	59	26	-	-	-	-	-	-	-	-	-	n/a

(completions took place in previous years)														
<b>HN1.6 Denbig Rd / Gwernaffield Rd, Mold</b>														
Forecast completions (adopted trajectory)	238	-	-	38	40	40	40	40	40	-	-	-	-	3
Revised forecast completions	(now 235)	-	-	-	-	-	35	40	40	40	40	40	40	years
<b>HN1.7 Holywell Rd, Green Lane</b>														
Forecast completions (adopted trajectory)	298	-	-	-	28	45	45	45	45	45	45	-	-	2
Revised forecast completions		-	-	-	-	-	45	45	45	45	45	73	73	years
<b>HN1.8 Ash Lane, Hawarden</b>														
Forecast completions (adopted trajectory)	288	-	-	-	18	45	45	45	45	45	45	-	-	2
Revised forecast completions		-	-	-			45	45	45	45	45	63	63	years
<b>HN1.9 Wrexham Rd, HCAC</b>														
Forecast completions (adopted trajectory)	80	-	-	-	20	30	30	-	-	-	-	-	-	2
Revised forecast completions	(now 70)	-	-	-	-	-	10	30	30	-	-	-	-	years
<b>HN1.10 Cae Isa, New Brighton</b>														
Forecast completions (adopted trajectory)	92	-	-	15	30	30	17	-	-	-	-	-	-	3
Revised forecast completions	(now 90)	-	-	-	-	-	20	35	35	-	-	-	-	years
<b>HN1.11 Chester Road, Penymynydd</b>														
Forecast completions (adopted trajectory)	181	39	40	40	35	-	-	-	-	-	-	-	-	1 year
Actual Completions (completions took place in previous years)		24	39	69	22	-	-	-	-	-	-	-	-	
Revised forecast completions		-	-	-	-	5	-	-	-	-	-	-	-	

The table below sets out the present position in respect of each of the non-strategic housing allocations. Two of the allocations have been completed and two are under construction, with one of these at Penyffordd nearing completion. Four allocations have a Council resolution to grant planning permission and the remaining three have a current planning application under construction. This represents a positive picture in terms of a portfolio of sites ready to start delivering.

HN1.1	<b>Well Street, Buckley</b>	5.3ha	140	Current outline application 062458 by Clwyd Alyn for up to 140 dwellings. Progress in determining this application delayed due to phosphate constraint. However, the issuing in Autumn 2023 by NRW of an updated permit for Hope waste water treatment works and the confirmation of headroom to accommodate new development without harm to the SAC, has	Keep Monitoring
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				removed this constraint. Planning Committee resolved to approve this application on 13/03/24.  Current full application 826/23 by Castle Green Homes for 155 dwellings under consideration.	
HN1.2	<b>Broad Oak Holding, Connah's Quay</b>	1.3ha	32	Completed by Edwards Homes	n/a
HN1.3	<b>Highmere Drive, Connah's Quay</b>	5.0ha	150	Full application 34/22 for 141 dwellings by Edwards Homes granted planning permission 22/11/23. Sales office on site and being marketed on Edwards Homes website and subsequently site works underway.	Keep Monitoring
HN1.4	<b>Northop Road, Flint</b>	9.1ha	170	Site is split into two with a small parcel of land adjoining Northop Road and a large parcel of land extending down to Halkyn Road. Small site – current full application by Edwards Homes 435/24 for 22 dwellings Large site – Current full planning application by Watkin Jones 414/22 for 200 dwellings The site now has the potential to deliver an additional 52 units.	Keep Monitoring
HN1.5	<b>Maes Gwern, Mold</b>	5.7ha	160	Completed by Wates	n/a
HN1.6	<b>Land between Denbigh Road and Gwernaffield Road, Mold</b>	10.6ha	238	Current detailed planning application by Anwyl 061994 for 235 units. Progress in determining this application delayed due to phosphate constraint. However, the issuing in Autumn 2023 by NRW of an updated permit for Mold waste water treatment works and the confirmation of headroom to accommodate new development without harm to the SAC, has removed this constraint. Planning Committee resolved to approve this application on 13/03/24.  Welsh Government issued a direction regarding a possible call-in of planning application dated 15/02/21. Anwyl have been eager to commence works on site but have been frustrated by the Welsh Government call-in remaining in place, despite the site being confirmed as an allocation in the Inspectors Report and also in the adopted Plan. On 11/09/24 Welsh Government confirmed the application would not be called-in.	Keep monitoring



HN1.7	<b>Holywell Road / Green Lane, Ewloe</b>	9.9ha	298	Subsequent current detailed application (429/24) submitted 04/06/24 by Castle Green Homes on whole site for 315 dwellings	Keep monitoring
HN1.8	<b>Ash Lane, Hawarden</b>	10.9ha	288	Current detailed planning application for 300 dwellings (195/24) submitted 18/03/24.	Keep Monitoring
HN1.9	<b>Wrexham Road, HCAC</b>	3.5ha	80	Current detailed application 769/22 for 70 dwellings by Castle Green Homes. Progress in determining this application delayed due to phosphate constraint. However, the issuing in Autumn 2023 by NRW of an updated permit for Hope waste water treatment works and the confirmation of headroom to accommodate new development without harm to the SAC, has removed this constraint. Planning Committee resolved to approve this application on 13/03/24.	Keep monitoring
HN1.10	<b>Cae Isa, New Brighton</b>	3.5ha	80	Current detailed planning application 063507 for 90 dwellings by Stewart Milne Homes. Progress in determining this application delayed due to phosphate constraint. However, the issuing in Autumn 2023 by NRW of an updated permit for Mold waste water treatment works and the confirmation of headroom to accommodate new development without harm to the SAC, has removed this constraint. Planning Committee resolved to approve this application on 10/04/24. Site now in the control of Lovells.	Keep monitoring
HN1.11	<b>Chester Road, Penyffordd</b>	7.7ha	181	Site under construction by Redrow and nearing completion	Keep monitoring

### Gypsy and Traveller Sites

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
<b>MI16 Gypsy and Traveller sites / pitches built on allocated sites</b>								

SO11 SO12	STR12	HN8	Identified need to be fully met by 2030	No planning permission on allocated site	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service / FCC Housing Strategy	Planning Register	Keep monitoring
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**Policy Performance Monitoring**  
 Policy STR12 sets the overall objectives in respect of gypsy and traveller sites which is to meet the assessed need through allocations and to assess windfall proposals as they arise. This is achieved by policy HN8 which identifies 3 residential site allocations and 1 transit site allocation. Both policies are working well and have been the subject of internal Member training sessions.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
<b>MI17.1: Magazine Lane, Ewloe</b>								
SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 9 pitches to be provided by 01.04.25.	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.25.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring

**Policy Performance:**  
 Full planning permission was granted under ref 061722 on 08/12/22 for the reconfiguration of the existing site to accommodate an additional 9 pitches. Target 1 has been met but further monitoring is required to establish implementation of the pitches on the ground to ensure Target 2 is met.

<b>MI17.2: Gwern Lane, Cae Estyn, Hope</b>								
SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 4 pitches to be provided by 01.04.25	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.25.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring
<p><b>Policy Performance Monitoring</b>                      Full planning permission was granted under ref 061271 on 15/12/21 for the extension of the existing site to accommodate an additional 4 pitches. Target 1 has been met but further monitoring is required to establish implementation of the pitches on the ground to ensure Target 2 is met. Appears that the site has been extended but pitches not yet developed.</p>								

<b>MI 17.3: Riverside, Queensferry</b>								
SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 10 pitches to be provided by 01.04.26	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.26.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring / further investigation
<p><b>Policy Performance Monitoring</b>                      The Council’s Housing Strategy Unit has commissioned planning consultants to prepare and submit a planning application for the extension of the existing Council owned and run Riverside residential park to accommodate an additional 10 pitches. The proposal would also involve the reconfiguration of the existing site.</p> <p>The project is inextricably linked to the Welsh Government proposals to improve the existing bridge over the R. Dee for a new river crossing for west bound traffic and the partial re-use and improvement of the existing bridge for eastbound traffic). Delays to the A494(T) project have had knock-on effects for the progression of an application for the gypsy and traveller site. However, there are no fundamental concerns over the project proceeding.</p>								

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MI 17.4: Castle Park, Flint								
SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 6 pitches to be provided by 01.04.26	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.26.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring
<p><b>Policy Performance Monitoring</b>                      The allocation is to develop a former Council run Civic Amenity Site for a small transit site comprising 6 pitches. The Council's Housing Strategy Unit is seeking to progress a planning application for the development of the site.</p>								

MI18 Gypsy and Traveller sites / pitches built on 'windfall' sites								
SO11 SO12	STR12	HN9	No target	Any permission for gypsy and traveller site which is not allocated	To monitor whether allocated sites are sufficient to cater for need over the Plan period and to inform future GTAA	FCC Planning FCC Housing Strategy	Planning Register	Keep monitoring
<p><b>Policy Performance Monitoring</b>                      Policy HN9 is a criteria based policy against which windfall proposals for gypsy and traveller sites can be assessed. An updated GTAA (2022) <a href="#">here</a> was approved by Welsh Government on 30/05/24 <a href="#">here</a>. The approved updated GTAA shows a 5 year need for 23 pitches and a Plan period need for 27 pitches. The GTAA was accompanied by an Addendum <a href="#">here</a> which sought to identify an up to date position in terms of planning permissions for gypsy and traveller residential pitches. The Addendum identified that the 5 year need reduced to 2 pitches and that the Plan period need reduced to 6 pitches. In the intervening time since the drafting of the Addendum further pitches have been approved which further reduces the need for pitches. This is a</p>								

positive position for the Council to be in and reflects the determination of planning applications based on their individual merits against policy HN9 and the guidance in Circular 005/2018.

### Employment Development

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
<b>MI11 Employment Land Take up on Allocations</b>								
SO8 SO9	STR1 STR8	PE1	Take up on employment land allocations	No take up on employment land allocations for at least two consecutive years	Ensure that development is being achieved on the Plans employment allocations	FCC Planning	Planning Register	Keep monitoring

#### Policy Performance

The Plan makes 2 no. strategic employment site allocations and 6 no. non-strategic employment site allocations as summarised in policy PE1. The position in respect of each site is set out below:

Site Ref	Site Name	Area	Progress
STR3A	Northern Gateway	72.4ha	<p>This strategic site is split into two with the northern (Praxis) part of the site and the southern (Pochin) part of the site and comprises 72.4ha of employment land.</p> <p>The northern part of the site comprises three plots of land for employment development as follows:</p> <ul style="list-style-type: none"> <li>• Plot A – Amazon warehouse (9,200sqm) approved 08/01/20 under 060222 and built</li> <li>• Plot B – storage and distribution unit (48685 sqm) approved 09/03/23 under RES/000385/22</li> <li>• Plot C – paper processing plant 124,344 sqm (063721) approved 30/03/22 and under construction.</li> </ul> <p>The southern part of the site comprises Phase 1 and 2 employment land. Planning Committee resolved to grant full planning permission 506/23 subject to s106 for B1,</p>

			<p>B2, B8 development. The scheme involves 1,001,000 sqm internal floorspace comprising 4 units of various sizes. S106 nearing completion.</p> <p>It is evident that good progress is being made in securing planning permissions and development taking place on the ground at Northern Gateway.</p>
STR3B	Warren Hall	19.1ha	<p>Further technical work is presently being undertaken by specialist aeronautical consultants into the flight path constraint in respect of Hawarden Airbus. This work will further inform both the physical extent of built development (19.1ha developable area specified in LDP) and the height of development (restriction of 12m in height in LDP). In parallel with this, work is being undertaken on a development brief for the site, to be taken forward as SPG.</p> <p>Growth Deal funding from Ambition North Wales is still in place to deliver infrastructure and services for the site. Work is also progressing in respect of the potential Investment Zone status for Flintshire and Wrexham and the potential financial benefits that could accrue to businesses.</p>
PE1.1	Chester Aerospace, Broughton	5.72ha	<p>This allocation comprises 5.72ha of land. On the northern part a high tech assembly business with allied R&amp;D (059221 approved 21/03/19) has been built by Trelleborg Marine Systems Ltd. This leaves a residual site of approx 4ha available for development.</p>
PE1.2	Manor Lane / Hawarden Park Extension	18.2ha	<p>This 18.2ha allocation can be broken down into 3 distinct parts and comprises what is now known as Vista Business Park:</p> <ul style="list-style-type: none"> <li>• Western Part – Phase 1 erection of 4 units for B1, B2 and B8 (5,542 sq m) approved 23/12/21 (058082) – built. Phase 2 erection of 3 units for B1, B2 and B8 (5,583 sqm) approved 19/07/23 (345/23) – under construction</li> <li>• Middle Part – no movement</li> <li>• Eastern Part – no movement</li> </ul>
PE1.3	Drury New Road	1.4ha	<p>The allocated site (1.4ha) and adjoining existing unit is available for development / occupation. Planning application for housing by Whitley Estates (061507) refused 13/07/22 on the basis of seeking to resist the loss of allocated employment sites and existing employment land and was dismissed on appeal on 10/06/24 following an informal hearing.</p>
PE1.4	Mold Business Park	3.9ha	<p>This allocation comprises two distinct and separate parcels of land.</p> <ul style="list-style-type: none"> <li>• The eastern portion of this allocation has been built out by Smurfitt Kappa in the form of an extension to the existing unit. Planning permission was granted on 02/10/19 (under 062445) for a 14,349 sq m extension.</li> </ul>

			<ul style="list-style-type: none"> <li>The western portion has planning permission granted (772/22 – 27/04/23) on part of the land (0.53ha) for a ‘New Works Opportunity Day Care Services Facility’. Details approved on 03/07/24 (67/24) ) and on 05/03/24 (169/24) but not started on site</li> <li>A residual parcel of land approx. 3ha remains available on the western portion of the site.</li> </ul>
PE1.5	Chester Road East, Queensferry	3.15ha	Planning permission was granted on 24/06/20 (under 061117) for a Lock Stock Self Storage Facility which has been built. The remainder of the allocated site has been used as a flood surface water storage lagoon in connection with that development. Therefore there is no further land available for development within the allocation.
PE1.6	River Lane, Saltney	1.1ha	no movement on this small allocation

Overall, good progress has been made in securing planning permissions on some sites and in other cases development taking place on site.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
<b>MI12 Job Growth</b>								
SO8 SO9	STR1 STR7	STR1	8-10,000 jobs	No trigger	To monitor whether job growth over the Plan period meets the aspirational target	FCC Regeneration	ONS	Keep monitoring
<p>Policy Performance:</p> <p>The Council does not maintain job growth figures as a matter of routine but can identify job creation as part of a number of key sites / developments as follows:</p> <ul style="list-style-type: none"> <li>Vista Business Park – Phase 1 – two of the three units have created a total of 90 jobs</li> <li>Vista Business Park – Phase 2 – anticipated 100 jobs</li> <li>Northern Gateway Plot A – Amazon 50 permanent jobs and 300 drivers</li> <li>Northern Gateway Plot B – estimated 500 jobs</li> <li>Northern Gateway Plot C – papermill 463 jobs</li> </ul>								

- Northern Gateway Phase 1 and 2 – estimated 1086 jobs

Although not an allocated site the redevelopment and expansion of Shotton Papermill at Deeside Industrial Park will create an additional 470 jobs. Throughout the County there will also be jobs created as part of expansions and smaller scale new development, particularly in existing Principal Employment Areas such as Deeside Industrial Park.



## 4. Local Indicators

### Introduction

4.1 The following actions, taken from the Development Plans Manual have been used throughout this chapter in looking at local monitoring indicators.

	Continue monitoring (if development plan policies are being implemented effectively)
	Training required for Officers / Members (if development plan policies are not being implemented as intended and further training is required)
	Further supplementary planning guidance required (if development plan policies are not being implemented as intended and further guidance is required)
	Further investigation / research required
	Policy Review required (if development plan policies are not being implemented and are failing to deliver)
	Plan review required (if development plan policies are not being implemented and the plan's strategy is not being delivered, this could trigger a formal review in advance of the statutory 4- year review).

**Green Wedges**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI19 Loss of green wedges</b>								
SO16	STR13	EN2	No loss of green wedges unless considered to be in line with national policy	Any permission granted contrary to policy and national policy	To ensure no development which would lead to loss of green barrier or harm to its openness	FCC Planning	Planning Register	Keep monitoring
<p><b>Policy Performance</b></p> <p>The Council is not aware of any cases of development being permitted within a green wedge which is unjustified in terms of policy EN11 and the guidance in PPW12. The policy has been and will continue to be robustly and consistently applied. The table below provides a commentary on the range of planning permissions granted within each of the green wedges.</p> <p>A Development of National Significance comprising a large solar farm straddling the Flintshire / Cheshire border at Broughton / Bretton was approved by the Minister for Climate Change on 19/12/23. The Inspector and Minister both considered that the development was inappropriate development in a green wedge but concluded that harm to openness was outweighed, as part of the very exceptional circumstances test, by the schemes benefits in terms of contribution to renewable and low carbon energy generation targets in Wales.</p>								
Ref	Green Wedge Name	Planning Permissions since adoption						
EN1.1	Gronant – Talacre - Gwespyr	A range of planning permissions approved mainly comprising extensions to dwellings, replacement dwellings, agriculture related development, all in accordance with policy EN11. The most notable planning permission was 246/23 relating to the re-purposing of Point of Ayr gas terminal for carbon transport and this was considered to accord with policy and PPW12.						
EN1.2	Gorsedd - Carmel	Small scale planning permissions relating to house extensions and fencing, in accordance with EN11.						
EN1.3	Flint - Bagillt	Small scale development comprising a house extension in accordance with policy EN11						

EN1.4	Flint – Connahs Quay	Small scale planning permissions relating to housing extensions and alterations and a dog exercising area, in accordance with EN11.
EN1.5	Flint – Flint Mountain	None
EN1.6	Flint Mountain - Northop	None
EN1.7	Gwernaffield - Pantymwyn	None
EN1.8	Holywell - Greenfield	None – appeal dismissed for residential development on edge of Holywell.
EN1.9	Mold - Gwernymynydd	None – refusal of extension of residential curtilage.
EN1.10	Mold – Mynydd Isa – Sychdyn – New Brighton	Small scale planning permissions involving change of use, house alterations and agricultural related development in accordance with policy EN11. The most notable permission 741/23 was for a temporary 1000 seat big top tent for the theatre.
EN1.11	Connah’s Quay – Northop Hall – Ewloe - Shotton	Small scale planning permissions relating to agriculture, camping pods, house extension and a Lawful Development Certificate regarding an extension in accordance with policy EN11.
EN1.12	Shotton – Mancot – Hawarden - Ewloe	One small scale permission for house extensions in accordance with policy EN11.
EN1.13	Hawarden – Mancot – Hawarden Airport – Saltney (S of R. Dee)	None
EN1.14	Broughton – Hawarden Airport – Saltney – Cheshire border	Small scale permissions relating to agricultural development and security fencing to a playing field in accordance with policy EN11. See main commentary regarding solar farm
EN1.15	Sealand – Cheshire Border (N of R Dee)	Small scale permissions relating to house extensions and alterations, car parking, overhead power lines, horse related development and the removal of an occupancy condition in accordance with policy EN11.
EN1.16	Buckley – Little Mountain – Dobshill – Drury – Hawarden - Ewloe	Small Scale permissions relating to house extensions and alterations, improved vehicular access in accordance with policy EN11. An application for a residential gypsy caravan site was refused.

**Retail and Town / District Centres**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI20 Loss of retail units in Primary Shopping Areas</b>								
SO1 SO2 SO7 SO10	STR9	PE8	No loss of retail units which are contrary to policy	Granting of permission contrary to policy	To ensure that Primary Shopping Areas retain a mix of retail and other uses which contribute to the centres vitality and viability	FCC Planning/ FCC Regeneration	Planning Register Health Checks	Keep monitoring
<p><b>Policy Performance</b>                      The Plan identifies 5 Primary Shopping Areas which are all located within defined town centres. Policy PE8 adopts a criteria based approach to the assessment of proposals for the change of use of use or loss of A1 retail units in Primary Shopping Areas. The position following the first 12 months after adoption of the Plan is set out for each Primary Shopping Area below:</p> <p>Flint - no loss of A1 retail units contrary to policy</p> <p>Holywell - no loss of A1 retail units contrary to policy</p> <p>Mold - no loss of A1 retail units (since adoption of Plan). Change of Use A1 to A3 Unit 4 St Davids Building, Earl Road (602/23) approved 22/08/23 following compliance with policy. Current application 302/24 under consideration for change of use of unit 4 Daniel Owen Precinct from A1 to A1 / A2 and A3.</p> <p>Buckley - no loss of A1 retail units contrary to policy</p> <p>Shotton - no loss of A1 retail units contrary to policy</p>								

It is therefore evident that the policy is working effectively in seeking to retain existing retail units in Primary Shopping Areas in accordance with policy PE8.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI21 New major retail development within defined centres</b>								
SO1 SO2 SO7 SO10	STR9	PE7	All major retail development to be within defined centres	Granting of permission outside of defined centres	To ensure that major retail development takes place within defined centres	FCC Planning	Planning Register	Keep monitoring

**Policy Performance**

The Plan identifies in policy PE7 some 5 Town Centres and 3 District Centres (both with defined boundaries) and some 21 Local Centres which do not have a defined boundary.

In the post covid period, there is still a challenging environment within which the retail industry operates. The LDP deliberately did not allocate sites for either convenience or comparison retail development. Instead, it adopted a flexible approach whereby retail development proposals could come forward either as a result of market forces or regeneration activities. In the period since the adoption of the Plan, no major retail development has been granted planning permission.

Whilst not major retail development (in the context of TAN4), planning permission was granted on 08/10/22 (under 064445) for the erection of 12 units (retail, food and drink) on 3.45ha of land on Plot 2A at Northern Gateway. The site forms the district shopping centre designated in policy STR3A which is an integral part of the Northern Gateway Strategic Site. Garden City is also identified as a Local Centre within policy PE7. The scheme amounted to 2117 sq m gross internal floorspace. A subsequent planning application 1017/23 for a 66 bed care home on part of the site (0.7ha) was approved 13/03/24 and provision still exists for the establishment of a local centre. A planning application has subsequently been submitted for a supermarket.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI22 New major retail development outside of defined centres</b>								
SO10	STR9	PE11	No major retail permissions contrary to national policy	Granting of permission contrary to national policy	To ensure that major retail development takes place within defined centres	FCC	Planning Register	Keep monitoring
<p>Policy Performance</p> <p>No major retail development has been approved outside of defined centres identified in the retail hierarchy. The Plan’s retail policies are based on the ‘town centres first’ principles in PPW12 and have been robustly implemented.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI23 Take up on retail commitments</b>								
SO1 SO2 SO7 SO10	STR9	STR9	Implementation of existing retail planning permissions	Expiry of planning permissions	The non-take up of existing retail commitments may allow scope for other retail development	FCC	Planning Register	Keep monitoring

**Policy Performance:**

The Retail Study (2019) which underpinned the LDP identified the following retail commitments:

- Saltney Retail Park – 3,520 sq m net sales (comparison) - It was established at the Examination that this planning permission (adjacent to the Go Outdoors retail unit) for 5no. retail units had expired, and this is reflected in the comparison goods floorspace need figure of 4028 sq m net identified in para 3.24 of the supporting text to policy STR9. The site is in use as a storage compound by Lock Stock.
- Flintshire Retail Park – 1,254 sq m (convenience) - Planning permission was granted on 06/10/17 (under 0572630 for the erection of new retail units and these have been built.
- Denbigh Road, Mold – 483sm (comparison) - This was a planning permission for a small retail unit alongside the main Lidl store located on the Denbigh Road frontage of the Lidl store site in Mold. Given that the Lidl store was subsequently extended it is considered unlikely that the second unit could be accommodated within the site.

The Plan does not identify retail allocations as a result of the relatively small identified need for comparison retail floorspace and lack of need for convenience floorspace and also reflects the large number of town and district centres in the County. To allocate a site in one centre would unduly constrain retail development coming forward in another centre. A number of Council led initiatives are underway including the preparation of Place Making Plans in a number of town centres. Suitable retail development can come forward in response to these initiatives or market forces.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI24 Vacant retail units</b>								
SO1 SO2 SO7 SO10	STR9	PE9	Vacancy levels improving or no worse than levels in 2019 Retail Study	Vacancy levels increase	To ensure that the vitality and viability of town and district centres is not	FCC Planning/ FCC Regeneration	Town and District Centre Surveys	Keep monitoring

					prejudiced by vacant units			
<p><b>Policy Performance</b></p> <p>The 2019 Retail Study, which underpinned the LDP retail strategy and policies included GOAD data and maps for most of the defined town centres and district centres. For these centres 2023 GOAD data and maps have been obtained through the consultants who undertook the Retail Study. For the town centre of Buckley and the district centres of Queensferry and Saltney there is no GOAD data or maps, so bespoke survey work has been undertaken.</p> <p>Given the cost of obtaining GOAD data and the resources required to do bespoke town and district centre survey work, it is not considered reasonable or necessary for this data to be collected and reviewed on an annual basis. A more realistic monitoring regime would be every 2-3 years. This would also enable the present Council programme of preparing Place Plans and other initiatives to be progressed and monitored.</p> <p>The table below shows a comparison of vacancy rates in town and district centres between 2019 and 2023 and in the case of Buckley, Queensferry and Saltney, between 2023 and 2024. The comparison is to that of the average vacancy levels in the U.K which was at 12.37% in 2019, and 15.5% in 2023. This suggests there has been a gradual increase in vacancy rates throughout the whole of the U.K since 2019, this could have occurred due to the impacts of covid. The data from the latest retail survey demonstrates that the vacancy rate within Flintshire is steady, Flint saw a decrease in vacant units and Mold had no change. The other town and district centres saw some increase in vacancy levels, but most stayed below the U.K average percentage.</p>								
<b>Town Centre</b>	<b>Vacancy levels according to Retail Study 2019</b>	<b>% of total units</b>	<b>U.K %</b>	<b>Vacancy levels 2023 / June 2024</b>	<b>% of total units</b>	<b>U.K %</b>		
Buckley	n/a	n/a	12.37	6 units	6.7	15.5		
Flint	13 units	12.15	12.37	11 units	12.4	15.5		
Holywell	13 units	13.68	12.37	18 units	17.8	15.5		
Mold	23 units	10.85	12.37	23 units	10.5	15.5		
Shotton	14 units	14.14	12.37	17 units	17.2	15.5		



**Buckley**  
 No GOAD data is available for Buckley for 2019. In 2024 there is a total of 89 retail/service units within the Town Centre boundary of Buckley and a total of 6 vacant units which is a vacancy rate of 6.7%. This is lower than the average vacancy rates in the U.K

**Flint**  
 The retail survey of Flint in 2019 showed a total of 107 units, 13 of which were vacant. The survey for 2023 showed there to be a total of 89 units, 11 of which are vacant. There has been a decrease of 2 vacant units which is a vacancy rate of 12.4%, which is lower than the U.K average.

**Holywell**  
 The retail survey for Holywell in 2019 found there to be a total of 95 units with 13 vacant units, the 2023 survey shows a total of 101 units and 18 vacant units. This suggests there has been an increase in retail units but there has also been an increase in vacant units, the increase in retail units is 6 and there has been an increase of 5 vacant units. This gives a vacancy rate of 17.8% which is slightly higher than the U.K average.

**Mold**  
 The retail survey for Mold in 2019 found there to be a total of 212 retail units, 23 of which were vacant. The 2023 retail survey shows a total of 219 units, 23 of which are vacant. This means that there has been an increase of 7 retail units and no change in vacant units, this is a vacancy rate of 10.5%, which is lower than the U.K average.

**Shotton**  
 The retail survey for Shotton in 2019 showed there were a total of 99 units and 14 vacant units. The survey for 2023 showed there was no change in the number of overall retail units but there has been an increase of 3 vacant units, this gives a vacancy rate of 17.2%, which is slightly higher than the U.K average.

District Centre	Vacancy levels according to Retail Study 2019	% of total units	U.K %	Vacancy levels 2023 / June 2024	% of total units	U.K %
Connah's Quay	6 units	17.65	12.37	9 units	25.7	15.5
Queensferry *	n/a	n/a	12.37	8 units	12.3	15.5
Saltney	n/a	n/a	12.37	1 unit	5.9	15.5

\*Data being collected

<p><b>Connah's Quay</b> The retail survey of Connah's Quay in 2019 showed there to be a total of 34 units and 6 were vacant. The latest retail survey results show a total of 35 units and 9 of which are vacant, this gives a percentage of 25.7%, which is higher than the U.K average.</p> <p><b>Queensferry</b> There is a total of 65 units within the District Centre boundary of which 8 are vacant. The vacancy rate of 12.3 is below the UK average.</p> <p><b>Saltney</b> There is a total of 17 units within the District Centre boundary of Saltney. There is 1 vacant unit which is a vacancy rate of 5.9% which is lower than the average vacancy rate in the U.K</p>						
<b>Broughton Shopping Centre</b>	<b>Vacancy level rates according to Retail Study 2019</b>	<b>% of total units</b>	<b>U.K %</b>	<b>Vacancy level rates June 2024 according to Retail Study 2023</b>	<b>% of total units</b>	<b>U.K %</b>
	4	9.30	12.37	3	6.4	15.5
<p><b>Broughton</b> Although Broughton is not a defined centre within the LDP Retail Hierarchy, it is useful to monitor vacancy rates. Broughton Shopping Park is a key retail destination within the County and therefore important to monitor its health. The data shows that vacancy levels have decreased since the retail survey in 2019, the 4 vacant units gives a percentage of 6.4%, which is lower than the U.K average.</p>						

**Community Facilities**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI25 Loss of community facilities</b>								
Assembly and Leisure	STR6	PC12	No loss of community facilities unless in accordance with policy	Granting of permission not in accordance with policy	To ensure the retention of local community facilities where possible	FCC Planning	Planning Register	Keep monitoring
Policy Performance								

Policy PC12 adopts a criteria-based approach to the loss of community facilities. There have been 6 planning approvals for change of use from a D1 Non Residential Institutions or D2 Assembly and leisure uses to other uses, such as residential, industrial or holiday accommodation.

COU/000574/23 8 Well Street Holywell - change of use from counselling centre to a dwelling.

FUL/000628/22 Gwynfa Chapel, Rhewl Fawr Road, Penyffordd, Holywell - vacant chapel to a dwelling.

COU/000689/23 Unit 2A Interling Trade Park, Ffordd Y Pentre, Deeside - D2 to B1 and B8.

FUL/000216/22 Hibberts Corner, Bistre Avenue, Buckley - D2 Assembly and leisure to residential 4, 2 bed flats.

FUL/000231/22 Bethel Chapel Gronant - Change of use of former chapel to residential.

FUL/000332/22 Old Nant Y Ffrith Chapel, Nant Road, Pentre Halkyn - Vacant Chapel to holiday accommodation.

Each of these permissions were assessed as being policy compliant.

**Minerals Development**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI26 The extent of primary land won aggregates permitted as a % of the total capacity required</b>								
SO9 SO13 SO19	STR16		No target	No trigger	Ensuring that the Plan delivers necessary aggregates	FCC Operators	Planning Register/ North Wales Regional Aggregate Working Party Report Regional Technical	Keep monitoring

							Statement 2 <sup>nd</sup> review and accompanying appendix for North Wales	
<p><b>Policy Performance:</b>                  Policy STR16 of relevance to the monitoring indicator requires a contribution to the regional supply of mineral through the allocation of 3.543 million tonnes of sand and gravel and at least 35.928 million tonnes of crushed rock. This will be achieved through the extension to existing quarries, as set out in Policy EN25, new sites and in collaboration with Denbighshire County Council and Wrexham County Borough Council.</p> <p>The extension to and consolidation of applications at Hendre Quarry increased reserves of 19.866Mt. This is above the estimation of the plan which expected circa 11Mt of limestone. Therefore, at the time of writing circa 55% of the total capacity for crushed rock required for the plan period has been provided.</p> <p>No new permissions (which would provide additional mineral to the landbank) have been granted for sand and gravel quarries.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI27 Amount of sand and gravel/hard rock reserves</b>								
SO9 SO13 SO19	STR16	STR16	Maintain a landbank of 10 years for hardrock and 7 years for sand and gravel	Lanbank falls below 7/10 years	Ensuring that sufficient mineral reserves can be maintained	FCC / WCBC Operators	Planning Register/ North Wales	Keep monitoring

								Regional Aggregate Working Party Report Regional Technical Statement 2nd review and accompanying appendix for North Wales	
<p><b>Policy Performance:</b>                  The monitoring indicator relates to the reserves of sand and gravel and hard rock. A target to maintain a landbank of 10 years for hard rock and 7 years for sand and gravel is set with a trigger being when the landbank falls below 7/10 years.</p> <p>The most recent annual report for the North Wales Regional Aggregates Working Party for 2021 (Published May 2024) identifies a 14 year landbank for sand and gravel in North Wales (an apportionment agreement with Wrexham and Denbighshire is agreed). Across North Wales, a landbank of 32 years is present for limestone, a 104 year landbank for granite and 6 year landbank of slate (slate reserves also include slate used for non-aggregate end uses).</p> <p>Flintshire has a 30-year landbank for Limestone.</p> <p>Based on these figures, the targets are being met for the policy.</p>									

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI28 Extraction of minerals from allocated sites</b>								
SO9 SO13 SO19	STR16	EN25	No target	No trigger	Ensuring that the allocated sites are brought forward	FCC WCBC Operators	Planning Register	Keep monitoring
<p>Policy Performance:</p> <p>The monitoring indicator relates to the extraction from allocated sites, namely the extensions to: Hendre Quarry, Pant y Pall Dwr Quarry, Ddol Uchaf Quarry and Fron Haul Quarry.</p> <p>Planning permission ref: 062110 granted in December 2021 allows for the extension to Hendre providing circa 19.866Mt of Limestone.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI29 Area of land lost to non-mineral development within Minerals Safeguarding Areas</b>								
SO9 SO13 SO19	STR16	EN23	No loss of mineral unless in accordance with the policy	Any land lost to inappropriate development not in accordance with the policy	To monitor the effectiveness of the policy in safeguarding minerals reserves.	FCC Planning	Planning Register	Keep monitoring
<p>Policy Performance:</p>								

The monitoring indicator relates to the area of land lost to non-mineral development within Mineral Safeguarding Areas. A target of no loss of mineral unless in accordance with the policy is set with a trigger being when any land is lost to inappropriate development not in accordance with policy.

The planning register indicates that some 150 planning applications have been received within the Mineral Safeguarding designation on the proposals map. These applications are generally for minor or small scale development comprising domestic extension, alterations and garages, vehicular access and parking, horse related development, tourism and rural enterprise related development, none of which are considered to raise issues in terms of mineral safeguarding and policy EN23.

It is recommended that to ensure that policy EN23 is effective that requirements for the submission of Mineral Safeguarding Assessments / Prior Extraction Assessments are set out within any forthcoming Local Validation List of Requirements.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI30 Number of planning permissions granted for sensitive development in buffer zones</b>								
SO9 SO13 SO19	STR16	EN24	No planning permissions for sensitive development within a buffer zone unless in accordance with national policy	One or more planning permission for sensitive development not in accordance with national policy	To monitor effectiveness of the policy	FCC Planning	Planning Register	Keep monitoring

**Policy Performance:**

The monitoring indicator relates to the number of planning permissions granted for sensitive development in buffer zones. A target of no planning permissions for sensitive development within a buffer zone, unless in accordance with national policy, has been set with the trigger being when one or more permissions are granted for development not in accordance with national policy. An analysis of planning applications shows that no planning permissions have been granted for sensitive development within the Minerals Buffer Zones on the proposals maps.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI31 Number of planning permissions for the management of secondary and recycled aggregates</b>								
SO9 SO13 SO19	STR16	EN27	No target	No trigger	To provide evidence on the requirement for such facilities	FCC Planning	Planning Register	Keep monitoring
Policy Performance: No new permissions for the management of secondary or recycled aggregates have been received.								

**Waste Development**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI32 Development within landfill buffer zone</b>								
S05	STR15	EN20	No planning permission for sensitive / inappropriate development within landfill buffer zone	Planning consent for sensitive development	To ensure that the operation of the consented landfill site at Alltami is not compromised	FCC Planning	Planning Register	Keep monitoring
Policy Performance: The monitoring indicator relates to planning permissions granted within the buffer zone. A target of no planning permissions for sensitive development / inappropriate development within the buffer zone has been set with the trigger being when one or more permissions for sensitive development is granted.								



The Plan identifies a single Landfill Buffer Zone at Parry’s Quarry, Alltami. The following applications within the buffer zone have been submitted / determined (as of 07/06/2024):

- FUL/000070/24 – Erection of an Agricultural Shed (Approved 22nd May 2024)
- FUL/000924/23 - Creation of a Drive Thru Facility and associated works (Approved 4 December 2023)
- 059489 – Full application for a new vehicular access from Mold Rd (A494T) to the Gateway services on the A55. (Committee decision to approve subject to a s106 agreement, 19th June 2024)
- FUL/000317/24 – Retrospective planning application for an agricultural building (Approved 5th June 2024)
- FUL/001025/23 – Restoration of farm (residential accommodation) - Decision pending.

In review of the above applications, none would permit a sensitive / inappropriate development within the landfill buffer zone.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI33 Take up of sites identified for waste management</b>								
SO5	STR15	EN21	No target	No trigger	To monitor whether the identified sites are delivering waste management development	FCC Planning	Planning Register	Keep monitoring

**Policy Performance:**

Policy EN21 allocates 19 sites which are considered to be acceptable in principle for waste management facilities, but which are not allocations. During the 12 months since adoption there have been no planning applications for waste management facilities but most of these sites have existing waste management facilities and some have Council run household recycling centres. By identifying such locations, the policy serves not only to direct new waste related development towards these locations, but also serves to safeguard existing businesses.

Since the adoption of the plan no applications for new waste management uses have been received by the Local Planning Authority.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI34 Take up other sites not identified for waste management</b>								
SO5	STR15	EN22	No target	No trigger	To monitor whether waste management proposals are arising outside of the identified sites.	FCC Planning	Planning Register	Keep monitoring
<p>Policy Performance:</p> <p>The monitoring indicator relates to the take up of sites for waste management not identified within policy EN21. No new waste management sites have come forward.</p>								

**Green Infrastructure**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI35 Green Infrastructure</b>								
SO17	STR13	EN2	No target	No trigger	To ensure new development protects, enhances or creates green infrastructure	FCC Planning	Planning Register Green Infr' Assess't Update	Now a statutory requirement

**Policy Performance**  
 Plan policies seek to ensure biodiversity, green infrastructure and trees, woodland and hedgerow enhancement. However, the Minister for Climate Change wrote to all Heads of Planning on 11 October 2023 advising that revisions to PPW in respect of net benefit for biodiversity, green infrastructure and the protection afforded to trees and woodland would be implemented with immediate effect. The letter was accompanied by an annexe which set out the detailed changes to PPW11 which were to be incorporated into PPW12. The need for net benefit or, as defined in policies ‘enhancement’ is now a statutory requirement and is reflected in PPW12. This is now a requirement for all new development proposals, proportionate to the development proposed, and overrides the policy monitoring. The Council are preparing an advice note on Biodiversity Net Benefit / green infrastructure / trees, woodland and hedgerows, which will be published as soon as possible. In effect this monitoring indicator has been overtaken by events.

**Walking and Cycling Infrastructure**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI36 Amount of walking and cycling infrastructure implemented as part of planning permissions</b>								
SO4 SO7 SO17	STR5	PC6	Increase in number of schemes implemented	No delivery of schemes over two successive years	To monitor whether planning permissions are delivering the improvements sought by policies	FCC Planning Service and Local Highway Authority	Planning Register Active Travel Review	Keep monitoring

**Policy Performance:**  
 Policy PC6 seeks to ensure that people have access to services and facilities and wherever possible new development should provide for walking and cycling routes and facilities. Clearly, this will depend on the location, type and scale of development and be proportional in its response. At the same time the Council is promoting its Active Travel initiative, based on its Active Travel Network Map. This does not cover every settlement or area in the County but covers the key settlements and employment areas. There is a clear opportunity for walking and cycling routes and facilities, secured through new development, to link in to the Active

Travel Routes, whether existing or proposed. During the 12 months since the LDP was adopted a number of the Plans housing allocations have secured planning permission (or a Council resolution to adopt) and each scheme seeks to promote sustainable transport as follows:

STR3A Northern Gateway - The site is a strategic mixed use development comprising housing, employment and local facilities set within a structured green infrastructure network. The site sits between the settlement of Garden City and Deeside Industrial Park. A cycleway and footway runs along the R. Dee along the southern edge of the site and the Sustrans Millenium Cycleway runs along the eastern and northern edge of the site. These form the strategic framework of routes which will link into routes within the site. This network of routes will enable accessibility to employment, local facilities and services and leisure opportunities along the River Dee.

HN1.1 Well Street, Buckley – Committee resolution to approve outline scheme subject to s106. The approved scheme links in with existing public right of way adjacent to the site and is in close proximity to existing / proposed Active Travel routes between Mold, Mynydd Isa and Buckley.

HN1.3 Highmere Drive, Connahs Quay – The approved scheme incorporates a walkway / cycleway through existing green space and path linking Pembry Rise and Courbet Drive. This can link in with other Active Travel routes in Connah's Quay.

HN1.6 Denbigh Road / Gwernaffield Rd, Mold - Committee resolution to approve subject to s106. The scheme incorporates a waling / cycle route along Factory Pool Road and links in with Active travel scheme MO13.

HN1.9 Wrexham Road, Abermorddu – Committee resolution to approve subject to s106. The scheme includes a walking link to the adjacent play area and school, through green space.

HN1.10 Cae Isa, New Brighton - Committee resolution to approve subject to s106. The scheme includes improved crossing facilities to facilitate a safer walking route through to Mynydd Isa and the new school.

**Road Schemes**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI37 Implementation of road schemes</b>								
SO4 SO7	STR5	PC10	No target	No trigger	To monitor whether the road schemes (as safeguarded in the Plan) are being delivered.	Welsh Gov Highways FCC Highways	Planning Register Local Transport Plan review Welsh Gov transport programme	Keep monitoring / Further investigation
<p>Policy Performance: Policy PC10 safeguards land on the proposals Map for five road schemes as set out below</p> <p>The publication of the Welsh Government Roads Review has brought about a revised approach towards road improvement schemes or new roads in Wales. The emphasis is now on schemes not undermining the modal share targets as a result of increasing car dependency, nor hindering the achievement of Welsh Government carbon reduction targets. This has directly resulted in Welsh Government not progressing the Red Route and the Council reconsidering a number of its road schemes and whether to progress them. These more local schemes were safeguarded in the LDP solely due to them being designated in Local Transport Plans or being existing commitments, rather than them being a key component of the Plan Strategy and development allocations. The schemes are considered unlikely to proceed as envisaged in policy PC10 but this is not considered harmful to the delivery of the LDP growth strategy as they are not directly associated with any particular allocation. The Council is still considering its position on each scheme and further updates will be provided in future AMRs.</p>								
<p>i) A494(T) / A55(T) / A548 Northop to Shotwick Interchange improvement This scheme, commonly known as the Red Route is no longer to be progressed by Welsh Government and the rationale is summarised in this statement “The scheme should not proceed. The case for change is not well aligned with Welsh Government’s aim to reduce car mileage. The scheme would increase private car capacity and result in mode shift from public transport to car travel, and this would undermine the target to increase sustainable transport modal share”. The scheme was not a key part of the Plans growth / spatial strategy and the schemes non progression will not harm the Plans implementation.</p>								

<p>ii) <b>Plough Lane Link Road</b>                  This scheme is closely linked with the Red Route as set out in i) above. Given the Welsh Government decision to not progress the Red Route, this local road improvement is unlikely to be progressed by the Council. However, scope exists for the route to be developed as a walking / cycling active travel type route. The fact that the road scheme is no longer being progressed is not considered to have implications for the Plan Strategy nor the delivery of housing and employment development.</p>
<p>iii) <b>A548 Greenfield to Ffynnongroyw</b>                  Given the rationale for road schemes in Wales, as set out in the Roads Review, this scheme is unlikely to be progressed by the Council. This does not have implications for the Plan Strategy or for the delivery of housing and employment development.</p>
<p>iv) <b>A5104 Penyffordd Station to Padeswood Junction</b>                  Given the rationale for road scheme in Wales, as set out in the Roads Review, this scheme is unlikely to be progressed by the Council. This does not have implications for the Plan Strategy or for the delivery of housing and employment development.</p>
<p>v) <b>A494(T) Improvement Ewloe to River Dee – this scheme comprises improved crossing of the A494(T) over the R. Dee and is being progressed by Welsh Government.</b></p>

**Employment Land and Development**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI38 Employment land lost to other uses</b>								
SO8 SO9	STR7 STR8	PE6	No loss unless in accordance with policy	Permission granted for loss of employment land not in accordance with policy	To retain key areas of the County available as potential or existing employment land.	FCC	Planning Register	Keep monitoring

**Policy Performance:**

Policy PE6 seeks to safeguard existing employment land and buildings within allocated sites and the Principal Employment Areas as well as elsewhere in the County.

The purpose behind employment allocations is to provide land specifically earmarked for employment development comprising uses include B1 business use, B2 general industry and B8 storage and distribution. The two strategic employment allocations and six non-strategic sites have been assessed in terms of the loss of employment land to other uses over the last 12 months and it is perhaps unsurprising that no such planning permissions have been granted.

The purpose behind Principal Employment Areas is to identify existing industrial estates or areas where the predominant use is employment uses within B1, B2 and B8. On the one hand policy PE2 seeks to safeguard existing employment uses from inappropriate uses or development whilst on the other hand establishes the broad principle of further employment development being acceptable within them. Policy PE6 adopts a criteria based approach with which to assess any proposals which result in the loss of employment land and buildings. All 30 Principal Employment Areas have been assessed and no examples found of planning permissions resulting in the loss of employment land or buildings, contrary to policy PE6. Each proposal is considered on its individual merits and examples exist where uses such as gym and fitness centres, convenience stores, café and takeaways, childrens play centres, childrens day nurseries have been granted planning permission where this would be in line with policy requirements and not harm the underlying function, character and appearance of a PEA.

It is accepted that there will be free standing employment land and buildings elsewhere in the County but the Council presently has no data or ability to monitor any loss. It is not considered that this would be significant in terms of scale or impacts. Such planning applications would involve an internal consultation with the Policy Team thereby enabling a policy comment to be made as to whether the proposed use and the loss of employment land / building was considered to be policy compliant.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI39 Employment Development outside allocations / PEA's</b>								
SO8 SO9	STR7 STR8	PE3	No target	No trigger point	To monitor employment development against the aim of ensuring that the Plans primary focus for new employment development is allocations / PEA's.	FCC	Planning Register	Keep monitoring
<p>The policy framework in the Plan seeks to direct new employment development to employment allocations (PE1) and to Principal Employment Allocations (PE2). Policy PE3 then allows new development in other locations as follows:</p> <ul style="list-style-type: none"> <li>• On land within a defined settlement boundary</li> <li>• Through the conversion of existing buildings in open countryside</li> <li>• Through the development of land on the edge of settlement boundaries of Tier 2, 3 and 4 settlement (an 'exceptions' style policy approach)</li> </ul> <p>The Policy Team does not actively monitor planning applications for employment development outside of employment allocations or Principal Employment Areas. Such planning applications tend to be fairly small scale and typically do not raise policy concerns. Where a larger development or a more novel development was proposed then the Policy Team would be the subject of an internal consultation to ensure that policy comments could be provided on the planning application. A notable example was a detailed planning application (254/22) for the retention of a brewery building near Dee Bank Industrial Estate, Bagillt which subsequent to the base date of this AMR has been granted planning permission.</p>								



**Open Space**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI40 Open space, sport and recreation lost to new development</b>								
SO1 SO4 SO7 SO17 SO18	STR13	EN1	No loss unless in accordance with policy	Permission granted contrary to policy	To ensure that existing open space, sport and recreation facilities are protected.	FCC AURA	Planning Register Open Space Survey	Keep monitoring
<p>Policy Performance:                      An analysis of planning applications has been unable to identify planning permissions that have been granted leading to the loss of open space, sport and recreation areas. Evidence on the net loss of open space, sport and recreation is unavailable at this time, further investigation / review required for future AMR's.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI41 Open space provided as part of new housing development</b>								
SO1 SO4 SO7 SO17 SO18	STR13	EN1	Provision of open space in accordance with policy / SPG	Permission granted without sufficient provision of open space.	To ensure that new residential development is delivering appropriate open space	Planning Service Aura	Planning Register Open Space Survey	Keep monitoring
<p>Policy Performance:                      Policy EN1 seeks to ensure provision of open space as part of new residential development at a rate of 2.4ha per 1000 population. Further detail is set out in existing SPG which is presently being reviewed and updated. The preference is for on-site provision, but consideration may be given in exceptional circumstances for off-site provision or for commuted sums for instance in</p>								

relation to small scale development. Perusal of the planning register and analysis of planning applications on allocated sites indicates open space being provided in line with policy.

### Biodiversity Designations

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI42 Loss of SAC / SPA / Ramsar</b>								
SO16 SO17	STR13	EN6	None, unless appropriate mitigation in line with national policy	Any permission granted without appropriate mitigation or contrary to advice of NRW	To ensure the protection of international nature conservation designations	Planning Service	Planning Register	Keep monitoring
Policy Performance: The Planning Register and discussions with Council Ecologist has identified no loss of SAC / SPA / Ramsar.								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI43 Loss of SSSI</b>								
SO16 SO17	STR13	EN6	None, unless appropriate mitigation in line with national policy	Any permission granted without appropriate mitigation or contrary to advice of NRW	To ensure the protection of national nature conservation designations	Planning Service	Planning Register	Keep monitoring

Policy Performance:  
The Planning Register and discussions with Council Ecologist has identified no loss of SSSI.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI44 Loss of wildlife site / RIG</b>								
SO16 SO17	STR13	EN6	None, unless appropriate mitigation in line with national policy	Any permission granted without appropriate mitigation or contrary to advice of the County Ecologist	To ensure the protection of national nature conservation designations	Planning Service	Planning Register	Keep monitoring

Policy Performance:  
The Planning Register and discussions with Council Ecologist has identified no loss of Wildlife Site / RIG.

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI45 Loss of protected trees and ancient / semi ancient woodlands</b>								
SO16 SO17	STR13	EN7	No net loss of protected trees and woodland	Any permission granted without appropriate mitigation or contrary to the	To ensure the protection of trees and woodland	Planning Service	Planning Register	Keep monitoring Further investigation

				Arboricultural Officer				
<p><b>Policy Performance:</b>                  In line with PPW 12 the Council seeks to safeguard protected trees and ancient woodlands. Ancient woodland enjoys the strongest protection in planning policy terms, TPOs can be woodlands, groups, areas or single trees and they are regarded as a protected trees and woodlands. Plan policies seek to ensure biodiversity, green infrastructure and trees, woodland and hedgerow protection and enhancement. Evidence on the net loss of protected trees or woodland is unavailable at this time, further investigation / review required for future AMR's.</p>								

**Clwydian Range and Dee Valley AONB**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI46 Permissions granted in AONB contrary to Officers recommendation</b>								
SO16 SO17 SO18	STR13	EN5	None, unless appropriate mitigation measures have been agreed	Any permission granted contrary to AONB JAC advice / Officer recommendation	To ensure protection of the AONB	FCC Planning	Planning Register	Continue monitoring
<p><b>Policy Performance:</b>                  There have been 55 planning applications received for sites which sit inside the AONB, of which 7 were refused. There were a range of applications received including extensions to dwellings, conversion of building to business use and TPO applications. There have been no permissions granted within AONB contrary to Officers recommendations. The AONB planning officer and NRW are consulted with on such applications to ensure that any developments do not have an adverse impact on the special character and qualities of the AONB.</p>								

**Renewable and Low Carbon Energy Development**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI47 The number and capacity (MW) of renewable, low or zero carbon energy developments approved / implemented</b>								
SO15	STR14	EN13	REA?	No permissions granted or implemented within a 5 year period	To identify whether the Plans policies are contributing to renewable energy generation	FCC Planning	Planning Register	Continue monitoring
<p><b>Policy Performance:</b></p> <p>Solar farm Bretton – The Minister for Climate Change approved on 19/12/23 a solar farm at Bretton Hall Farm, to the east of Bretton / Broughton. The solar farm straddles the boundary between Flintshire and Cheshire West and Chester Council. The portion of the solar farm across the boundary was approved by CWAC. The solar farm would cover an area of 50ha of which around 25ha is in Flintshire, including the grid connection. Overall, the proposal would generate 30Mw of which 16Mw would come from Flintshire.</p> <p>Hynet – Although not an energy generation development, a development order has been granted by the Secretary of State for the proposed Hynet pipeline which runs through Flintshire. FCC resolved at Committee on 10/01/24 to approve a scheme to enable the Point of Ayr Gas Terminal to be re-purposed for use in connection with the Hynet pipeline. Carbon will be transported by pipeline to Point of Ayr and then stored under the sea in voids now empty following the extraction of gas.</p> <p>An application (599/23) for a 7.5Mw Green Hydrogen Electrolyser at Kimberley Clark, Aber Industrial Estate, Flint was approved on 20/06/24.</p>								

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI48 Installed capacity of wind / solar PV within the 'Local Search Areas'</b>								
SO15	STR14	EN13	REA		To identify whether the Plans policy approach to identifying 'Local Search Areas' is delivering additional capacity.	FCC Planning	Planning Register / Operators	Continue monitoring / Further investigation

**Policy Performance:**

Within MI48 it should be noted that 'wind' has been included in error. The Indicative Local Search Areas referenced in policy EN13 relate only to solar and not to wind. These are not firm allocations but are areas of search where solar energy development is acceptable in principle subject to complying with the criteria in policy EN13. As indicated in the table below there have been no planning applications or developer proposals in respect of the areas of search.

Ref	Name	Size ha	Potential Capacity MW	Planning Applications
EN13.1	Buckley west	39	5	None N– Planning permission has been granted for a replacement school which partly encroaches into the solar area of search. However, the school involves a number of renewable and low carbon energy generation technologies and is carbon neutral.
EN13.2	Buckley south	117	10	None
EN13.3	Buckley s/e Lane End	28	5	None
EN13.4	Coed Talon & Pontybodkin	65	10	None
EN13.5	Connah's Quay	83	5	None
EN13.6	Holywell	35	5	None
EN13.7	Leeswood	27	5	None – but previous planning permission for solar array (054041) 01/08/16
EN13.8	Llanfynydd n/w	52	5	None

EN13.9	Mynydd Isa	120	5	None
EN13.10	New Brighton	217	5	None
EN13.11	Penyffordd / Penymynydd	89	10	None

The Council has also been preparing a Local Area Energy Plan in conjunction with Arup consultants. This will assist in working towards Welsh Government’s ‘Net Zero Wales’ by 2050. The LAEP should bring about actions and initiatives in relation to the following areas:

- Scaling zero carbon buildings
- Decarbonizing transport
- Maturing hydrogen in industry
- Supporting green business
- Upgrading the grid
- Increasing local renewable generation.

**Development in Flood Risk Areas**

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI49 Development in DAM flood risk zone C</b>								
SO15	STR14	EN14	None unless in accordance with local and national policy	Any permission granted which does not accord with local / national policy	To ensure that new development is not permitted in locations where it would not meet the tests in TAN15	FCC Planning NRW	Planning Register	Keep monitoring
Policy Performance:								

Policy EN14 has been robustly and consistently applied alongside TAN15 and having regard to the consultation responses of NRW. The Council is not aware of any decisions in flood risk areas contrary to national and local policy / guidance.

Solar farm Bretton – The Minister for Climate Change approved on 19/12/23 a solar farm at Bretton Hall Farm. The solar farm straddles the boundary between Flintshire and Cheshire West and Chester Council. The portion of the solar farm across the boundary was approved by CWAC. The solar farm would cover an area of 50ha of which around 25ha is in Flintshire, including the grid connection. Overall, the proposal would generate 30Mw of which 16Mw would come from Flintshire and this is within the Flood risk area Zone C1 in Flintshire. The Inspector and Minister noted that NRW agreed with the findings of a FCA that the consequences of a flooding event are acceptable and would not worsen conditions elsewhere. However, it was noted that the scheme did not satisfy some of the justification tests in TAN 15 and, therefore, conflicts with guidance in TAN 15 but that TAN 15 exempts certain types of development from the first part of the justification tests. An outdoor classroom which represented highly vulnerable development was not permitted.

### Contextual Indicators – Welsh Language

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI50 Welsh speaking % in county</b>								
SO6	STR4	STR4	Increase in number of Welsh speakers	Any decrease over two successive years?	To monitor levels of Welsh speaking over the Plan period	FCC Planning Service	Office National Statistics	Keep monitoring

**Policy Performance:**

Census data – The Census data for Wales shows in 2001 582,400 Welsh speakers, in 2011 562,000 Welsh speakers and in 2021 538,300 Welsh speakers, which represents a gradual downward trend. However, the Annual Population Survey for Wales for 2024 shows an estimated 862,700 Welsh speakers. Despite some downward blips in the number of Welsh speakers, the long term trend is an increasing number of Welsh speakers. Census data for Wales in 2021 is broken down by local authority area and Flintshire shows a decrease of -1.6% for all age groups compared to the Welsh average decrease of -1.2%.

The Annual Population Survey data is also broken down by local authority area. This shows, that with the exception of 2020 and 2024, there has been a slow growth in the estimated number of Welsh speakers in Flintshire: over the last few years:



Year	Ability to Speak Welsh		Frequency of Speaking Welsh - daily	
	Flintshire	Wales	Flintshire	Wales
2019	22.3%	29.0%	9.4%	16.7%
2020	20.7%	28.4%	7.0%	16.1%
2021	24.1%	29.2%	9.6%	15.8%
2022	23.5%	29.9%	6.9%	14.9%
2023	23.9%	29.7%	8.5%	15.9%
2024	19.5%	29.7%	7.4%	14.4%

Although there are blips in terms of the data, there is no indication of a continuing decline in the ability to speak Welsh in Flintshire.

### Contextual Indicators – Employment / Unemployment

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI51 Unemployment / employment</b>								
SO8	STR1	STR1	Decreased unemployment	Increase in unemployment for two successive years	To monitor the strength of the local economy and performance of LDP policies	FCC Planning Service	Labour Market Statistics	Keep monitoring

Policy Performance:  
The Welsh Government Annual Labour Market Summary shows the following:

year	Employment Rate		Economic Inactivity Rate	
	Flintshire	Wales	Flintshire	Wales
Year to 31/03/19	77.0%	73.1%	20.3%	23.3%
Year to 31/03/20	79.9%	73.6%	17.8%	23.5%
Year to 31/03/21	77.8%	72.2%	19.7%	24.7%
Year to 31/03/22	81.1%	73.6%	17.9%	23.5%
Year to 31/03/23	76.4%	73.0%	21.4%	24.5%
Year to 31/03/24	78.7%	73.5%	18.7%	23.8%

The data shows that Flintshire consistently has a higher level of employment than Wales and a lower level of economic activity than Wales. Slight variations do not represent a cause for concern.

### Contextual Indicators – Supplementary Planning Guidance

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action
<b>MI52 Provision of new/ updated guidance on Services, Facilities &amp; Infrastructure</b>								
SO1 SO12 SO15	STR4 STR6	PC5 PC12 EN1 EN2	Production of new SPGN (to include a review of existing Developer Contributions to Education SPGN No. 23)	No SPGN produced within 1 year of LDP adoption date	To ensure new/ updated guidance is provided on the provision of services, facilities & infrastructure, and the requirements for developer contributions	FCC Planning FCC Highways FCC Education		Keep monitoring
Performance - Draft prepared to be reported to Planning Strategy Group.								
<b>MI53 Provision of updated guidance on Extensions and Alterations to Dwellings</b>								

SO16 SO18	STR4	PC2 PC3 HN5 HN6	To review & update existing SPGN No. 1 within 2 years of LDP adoption date	SPGN No. 1 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to the extension and alteration of dwellings	FCC Planning		Keep monitoring
Performance - SPG reported to Planning Strategy Group (PSG) 15/09/23 and subject of 6 week consultation commencing 01/12/23 and ending 26/01/24. Reported back to PSG on 14/03/24 and endorsed to be reported to Cabinet for formal adoption.								
<b>MI54 Provision of updated guidance on Space around Dwellings</b>								
SO16 SO18	STR4	HN2 PC3	To review & update existing SPGN No. 2 within 2 years of LDP adoption date	SPGN No. 2 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation space around dwellings	FCC Planning		Keep monitoring
Performance - SPG reported to and endorsed by Planning Strategy Group on 25/01/24 to be the subject of a 6 week consultation.								
<b>MI55 Provision of updated guidance on Trees and Development</b>								
SO17 SO18	STR13	EN7	To review & update existing SPGN No. 4 within 2 years of LDP adoption date	SPGN No. 4 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to trees and development	FCC Planning		Keep monitoring
Performance - Progression of this SPG has been delayed following revisions to Chapter 6 of PPW12. However, the revisions to PPW12 support and strengthen the approach set out in policy EN7 rather than conflicting with or weakening its effectiveness.								
<b>MI56 Provision of updated guidance on the Conversion of Rural Buildings</b>								
SO16 SO18	STR4	PC2 PC3 HN4-B	To review & update existing SPGN No. 5 within 2 years of LDP adoption date	SPGN No. 5 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to the conversion of rural buildings	FCC Planning		Keep monitoring

Performance - SPG reported to Planning Strategy Group 22/06/23 and subject of 6 week consultation commencing 01/12/23 and ending 26/01/24. Reported back to PSG 14/03 and endorsed to be reported to Cabinet for formal adoption.								
<b>MI57 Provision of updated guidance on Nature Conservation and Development</b>								
SO17 SO19	STR13	EN2 EN6	To review & update existing SPGN No. 4 within 2 years of LDP adoption date	SPGN No. 4 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to Nature Conservation and Development	FCC Planning		Keep monitoring
Performance Monitoring - Progression of this SPG has been delayed following revisions to Chapter 6 of PPW12. However, the revisions to PPW12 support and strengthen the approach set out in policy EN7 rather than conflicting with or weakening its effectiveness. As an Interim measure the Council is preparing an Advice Note which will be available on the Council's website.								
<b>MI58 Provision of updated guidance on Affordable Housing</b>								
SO11 SO12	STR2 STR11	HN1 HN2 HN3	To review & update existing SPGN No. 9 within 1 year of LDP adoption	SPGN No. 9 not updated within 1 year of LDP adoption	To ensure up to date guidance is provided in relation to Affordable Housing	FCC Planning FCC Housing Strategy		Keep monitoring
Performance - The SPG was endorsed by Planning Strategy Group on 14/03/24 to go out to consultation.								
<b>MI59 Provision of updated guidance on New Housing in the Open Countryside</b>								
SO11 SO12 SO13	STR2	HN1 HN3 HN4 HN4-C	To review & update the relevant sections of existing SPGN No. 10 within 2 years of LDP adoption date	Relevant sections of SPGN No. 10 not reviewed & updated within 2 years of LDP adoption date	To ensure up to date guidance is provided on New Housing in the Open Countryside in relation to infill Development in Groups of Housing	FCC Planning		Keep monitoring
Performance - SPG reported to Planning Strategy Group 22/06/23 and subject of 6 week consultation commencing 01/12/23 and ending 26/01/24. Reported back to PSG 14/03/24 and endorsed to be reported to Cabinet for formal adoption.								

<b>MI60 Provision of updated guidance on Parking Standards</b>								
SO4 SO7	STR4 STR5	PC2 PC4 PC5	To review & update existing SPGN No.11	SPGN No. 11 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to Parking Standards	FCC Planning FCC Highways		Keep monitoring
Performance - This SPG is being considered on the basis of a possible joint working arrangement with Wrexham CBC.								
<b>MI61 Provision of updated guidance on the Retention of Local Facilities</b>								
SO1 SO4	STR5 STR6	PC5 PC12	To review & update existing SPGN No.24 within 2 years of LDP adoption date	SPGN No. 24 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to the retention of Local Facilities	FCC Planning		Keep monitoring
Performance - The SPG was reported to and endorsed by Planning Strategy Group 10/11/23 to go out to public consultation.								
<b>MI62 Provision of updated guidance on SUDS and the Management of Surface Water in New Development</b>								
SO1 SO14	STR14	PC2 EN14 EN15	To review & update existing SPGN No.29 within 2 years of LDP adoption date	SPGN No. 29 not updated within 2 years of LDP adoption date	To ensure up to date guidance is provided on the Management of Surface Water in New Development	FCC Planning FCC Technical Services		Keep monitoring
Performance - The Council has existing guidance on its webpage in relation to Sustainable Drainage Systems <a href="#">here</a> . The progression of this SPG is not seen a pressing priority.								
<b>MI63 Provision of updated guidance on Outdoor Play Space in relation to New Developments</b>								
SO17 SO18	STR4 STR13	EN1 PC2	To review & update existing Draft SPGN No.13 'Outdoor Play Space and New Development within 1	SPGN No. 13 not updated within 1 year of LDP adoption date	To ensure up to date guidance is provided on the provision of play space in relation	FCC Planning FCC Leisure & Tourism		Keep monitoring

			year of LDP adoption date		to new developments.			
Performance - Draft SPG has been prepared ready to be reported to Planning Strategy Group.								
<b>MI64 Provision of updated guidance on Houses in Multiple Occupation</b>								
SO1 SO11 SO12	STR6 STR11	PC5 PC12 HN7	To review & update existing draft Advice Note In form of new SPGN within 1 year of LDP adoption date	Advice Note not updated & new SPGN not produced within 2 years of LDP adoption date	To ensure up to date guidance is provided in relation to Houses in Multiple Ownership	FCC Planning FCC Housing Strategy		Keep monitoring
Performance - Draft HMO SPG has been prepared to go to Planning Strategy Group.								
<b>MI65 Provision of guidance relating to the development of the Warren Hall Strategic Site</b>								
SO8 SO9 SO10	STR3B STR4	PE1 HN2	Production of new SPGN within 1 year of LDP adoption date	No SPGN produced within 1 year of LDP adoption date	To ensure new guidance is provided relating to the development of the Warren Hall Strategic site	FCC Planning Welsh Government		Further investigation required
Performance - Progress on the preparation of a SPG on Warren Hall has been delayed by further technical work being undertaken by Welsh Government via its specialist consultants in relation to the flightpath safeguarding. As this will determine the height of development on site and extent of both land cut on site and the extent of developable areas, the preparation of SPG has been delayed.								
<b>MI66 Provision of new guidance on Developer Contributions relating to Phosphates</b>								
SO1 SO14	STR14	EN15	Production of new SPGN in conjunction with the Dee Catchment Phosphorous Reduction Strategy	No new SPGN produced within 1 year of LDP adoption date	To ensure new guidance is provided to assist developers & others on the implications of the Dee Catchment Phosphorous	FCC Planning FCC Technical Services NRW		Keep monitoring

					Reduction Strategy.			
<p>Performance - In August / September 2023 Natural Resources Wales issued updated permits for the Mold, Buckley and Hope waste water treatment works which specified limits in respect of phosphate discharges into the R. Alyn and onwards to the Bala Lake and River Dee Special Area of Conservation. Dwr Cymru Welsh Water have confirmed that the present performance of the three wwtw is such that they are operating well within the limits set by the permits. Therefore there is headroom for new housing development on the four affected LDP housing allocations (HN1.1 Well Street, Buckley, Land between Denbig Road and Gwernaffield Road, Mold, HN1.9 Wrexham Road, HCAC and HN1.10 Cae Isa, New Brighton) to take place without harming the SAC. The preparation of the Phosphates SPG is therefore not essential to delivering growth in the LDP. Nevertheless, work in relation to phosphates will continue through the Dee Nutrient Management Board and the SPG may be revisited at some point in the future, possibly in relation to a Plan Review.</p>								





**5. Results of Sustainability Appraisal Indicators.**

- 5.1 The LDP was subject to Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) as an iterative process throughout the plan preparation process. The SA incorporated the SEA requirements in accordance with EU Directive 2001/42/EC. Para 4.32 of the Development Plans Manual states ‘The SEA Directive requires the monitoring framework to focus on the ‘significant environmental effects’ of implementing the plan’ and confirms that ‘The LDP Regulations require LPAs to produce Annual Monitoring Reports (AMRs) which allows for the SA monitoring framework to be integrated to the plan monitoring’. The Council produced an Integrated Impact Assessment (IIA) which incorporates the requirements of a combined Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA), as well as Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).
- 5.2 The purpose of the SA was to appraise the likely social, environmental and economic effects of the Plan, to ensure they were consistent with the principles of sustainable development. The SA of the LDP identified 17 objectives and 43 indicators which are intended to measure the social, economic and environmental impact of the Plan.
- 5.3 As this is the first Annual Monitoring Report, the focus of the analysis will be to set out how the policies in the LDP will likely affect the indicators, set out what evidence is available in order to assess any changes next year at the 2<sup>nd</sup> AMR. The data collected includes a mix of qualitative and quantitative data with a commentary under each SA objective to describe progress. Each SA Objective is assessed against the relevant monitoring indicators, with the findings set out in the sections below. The following coding has been used to give an overall summary of the findings for each indicator:

Symbol	Predicted effect
++	Very positive effects compared to the current situation - The Plan is having a very positive impact on the monitoring objective
+	Positive effect compared to current situation - Plan is having a positive impact on the monitoring objective.
0	Neutral effect compared to current situation - Plan is not having an impact, or is having a mixed impact on the monitoring objective
-	Negative effect compared to current situation - Plan is having a negative impact on the monitoring objective
--	Very negative effect compared to current situation - Plan is having a very negative impact on the monitoring objective
?	Uncertain effect

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p><b>1. To reduce crime, disorder and fear of crime</b></p>	<p>Positive effects on crime reduction. Uncertain effects on fear of crime.</p>	<p>1. Number and distribution of wards with Lower Super Output Areas (LSOA) in the bottom 10% most deprived for crime deprivation, targeting a reduction in those living in the bottom 10%; <i>North Wales Police (2020) have identified that areas where crime and disorder are prevalent have common characteristics of high levels of deprivation, child poverty and unemployment and low levels of household income. Using the Vulnerable Localities Index, which is calculated using six sociodemographic factors and attributes, and uses a method that combines crime data with other variables about neighbourhoods to generate a score, five localities have been identified within Flintshire that are considered the most vulnerable. These are: Holywell Central, Holywell West, Sealand 2, Shotton Higher 1 and Shotton Higher 2.</i></p>	<p>Stats Wales Nomis</p>	<p>Every three years</p>	<p>+</p>
		<p>2. Crime rates per 1,000 of the population for key offences, targeting a reduction; and <i>Annual crime rates in Flintshire is 81.8 crimes per 1000 population which is lower than the Wales average. The lowest is Higher Kinnerton with 15 crimes per 1000 population and the highest is Holywell</i></p>			

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<i>Central with 364 crimes per 1000 population.</i>			
		3. % rating of residents who perceived their quality of life has worsened due to crime, targeting a reduction.	Data for this indicator is not currently available on a Local Authority level. Continue to monitor the indicator in future AMRs.		
Explanation/Analysis	The LDP has no direct control over crime, disorder and fear of crime as this is a matter within the remit of North Wales Police. The LDP is a land use plan and can only seek to indirectly affect crime when new development takes place. Policy STR4 references important considerations such as placemaking, high standard of design, safe and accessible, safeguarding amenity and is backed up by more detailed policies. Policy PC 2: General Requirements for Development sets out in criterion c. that development will take account of personal and community safety and security in the design and layout. Policy PC3: Design also include criterion f. to create attractive, accessible, and safe and healthy places with natural surveillance visibility and sensitive lighting. The implementation of this policy framework should bring about new development which is designed in such a way that it can reduce crime and the fear of crime and therefore have a positive effect.				
<b>2. To improve levels of educational attainment for all age groups and all sectors of society</b>	Policy STR6	1. Percentage of population with no qualifications; <i>Between Jan 2023 to Dec 2023 8.8% of working age people (16 to 64 years old) had no Qualifications in Flintshire (Nomis) compared to Wales 8.6% and GB 6.5%.</i>	Office for National Statistics data on labour market	Annual	0
		2. Percentage of population with NVQ2 and above qualifications. <i>Between Jan 2023 to</i>			

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<p><i>Dec 2023 81% of working age people (16 to 64 years old) had RQF2 and Above Qualifications in Flintshire (Nomis) compared to Wales 84.9% and GB 86.5%</i></p>			
<p>Explanation/Analysis</p>	<p>Policy STR6: Services, Facilities and Infrastructure outlines how new development will contribute to the provision of a range of key infrastructure, where necessary to mitigate the impacts of that development, through Planning Obligations. Education is one of the services which can secure such funding in order to address any capacity issues arising at a school from the additional pupils from a development wishing to attend that school. Supplementary Planning Guidance Note 23 Developer Contributions to Education sets out in more detail the circumstances in which developments are required to make a financial contribution and also the calculation which determines how much developers will need to pay.</p> <p>At the LDP examination the Flintshire Local Education Authority produced a Position Statement dated March 2021. This set out historic pupil numbers from 2015, and a projected forecast of pupil places based on historic trends, to 2025. These projections indicate that over the five years from 2021, pupil numbers within primary school age range is likely to reduce by up to 971, and the projected trend at secondary level is predicted to reduce by up to 184 pupils.</p> <p>The statement goes onto say that <i>'forecasts are produced biannually and use previous school admissions to predict future numbers on roll. Pupil numbers likely to be generated from housing developments, which would be calculated using the SPGN23 formula, are not included. This is because of the many variables involved such as, for example, when will the units be built; what will be the final number of units constructed; how many of these units will be eligible for inclusion in the SPGN23 formula; and parental preference.'</i> It is also mentioned in the statement that <i>'pupil populations at schools, within areas and throughout the County as a whole can fluctuate over time, meaning that schools under pressure for places today may not be in a few years' time, whilst the reverse is also true'</i>. The statement concludes by saying <i>'although there is currently sufficient capacity at both primary and secondary levels across the County overall, these places may not necessarily be available where demand is highest'</i>. The planning system takes account of these fluctuations when calculating planning obligations and as policy STR6 requires, these are routinely sought when new development could potentially lead to an over capacity in the nearest suitable school. However, the LDP has no direct control over or influence on education nor the qualifications achieved by students and in this context the monitoring indicator of improving educational attainment cannot be achieved by the LDP. Rather, the LDP will have a neutral effect.</p>				

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p><b>3. To improve physical and mental health and well-being for all and reduce health inequalities</b></p>	<p>Good access to health Services Some health services potentially rendered overcapacity</p>	<p>1. Number of wards in the bottom 10% for health deprivation, seeking a reduction. <i>According to the Welsh Index of Multiple Deprivation (2019), three Lower Layer Super Output Areas in Flintshire feature in the 10% most deprived in Wales and these are Shotton Higher 2, Holywell Central, and Sealand 2. An Assessment of Wellbeing in Flintshire 2022 states on page 6 ‘The Welsh Index of Multiple Deprivation (WIMD) 2019 highlights that coastal communities in Flintshire experience high levels of deprivation (4% of Lower Super Output Areas (LSOA) in 10% most deprived; 14% in 20% most deprived in Wales), particularly when it comes to the employment, income, education, and community safety dimensions’.</i></p>	<p>Index of Multiple Deprivation Well-Being Assessment Area Profiles Development management, FCC</p>	<p>Every three years</p>	<p>+</p>
		<p>2. Percentage of people classified as being in good or very good health, targeting an increase; <i>An Assessment of Wellbeing in Flintshire 2022 states on page 6 ‘Exploring health-related data, including on health deprivation (15% of Flintshire LSOAs in top 20% most deprived; concentrated in coastal strip), comparative life expectancy figures (gap of 11.6 years for men and 13.7 years for women between most and least deprived areas) and substance misuse, again identifies</i></p>			

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<i>the same deprived coastal communities in Flintshire’.</i>			
		<p>3. Percentage of people participating in regular sport or exercise, targeting an increase; and  <i>The National Survey for Wales 2019/20 identifies the number of people participating in a sporting activity three times a week or more is a national indicator for the Well-being of Future Generations Act 2015. In Wales this had increased from 29% in 2016-17 to 32% in 2017-18, then remained at 32% during 2018-19. It remains at 32% again for 2019-20. In 2019-20, 59% of adults (ages 16+) reported that they had taken part in some sporting activity in the last four weeks (1,468,000 people). This rate remains unchanged when compared with the results from the previous years (2016-17, 2017- 18, and 2018-19). The Assessment of Well-being in Flintshire 2022 states on p25 “In Flintshire, the percentage of people (16+ years old) taking part in sporting activities on three or more occasions a week has increased from 28% in 2017/18 to 35% in 2019/20 and is above the Welsh average (32%) (Welsh Government, 2020).”</i></p>			
		<p>4. Number of GP surgeries in the County with surplus capacity, seeking to ensure there is enough capacity to satisfy local needs. <i>The Council does not maintain this</i></p>			

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<i>data as it falls within the remit of Betsi Cadwaladr University Health Board.</i>			
Explanation/Analysis	<p>The Council worked closely with Betsi Cadwaladr during the preparation of the LDP and made no objection to the Plan at Deposit stage. This work culminated in the publication of a Position Statement from the Betsi Cadwaladr University Health Board March 2021 to assist with the Examination of the Plan, in terms of the provision of health care in the County and the ability to accommodate the Plans level of growth.</p> <p>The Inspectors Report in para 8.21 noted that ‘the current legislative framework inhibits the ability for LPAs to secure financial contributions for increasing or improving health care facilities. In any case we have been informed that Flintshire has a number of relatively new Primary Health Care Centres, and the issue is one of a lack of sufficient staff including GPs, rather than a lack of premises or facilities’.</p> <p>The LPA consults Betsi Cadwaladr on all planning applications for large residential developments and Betsi Cadwaladr also inspect the weekly list of planning applications to identify applications on which they may wish to make representations.</p> <p>It should also be stressed that the Plan can seek to improve health and well-being by facilitating the right development in the right place to encourage walking and cycling and ensuring high quality design embracing biodiversity net benefit and green infrastructure.</p>				
<b>4. To provide access to good quality, affordable housing that meets the needs and requirements of the community</b>	LDP will satisfy the housing needs of the entire community	<ol style="list-style-type: none"> <li>1. Percentage of households prevented from becoming homeless. <i>The LDP does not directly influence this issue. Flintshire council has a Housing Support Programme Strategy which outlines Flintshire’s strategic approach to housing support and homelessness prevention.</i></li> <li>2. Housing supply in relation to housing need. <i>This information is contained in the main Annual Monitoring Report in terms of the total delivery of housing to meet the Plan need of 6,950.</i></li> </ol>	Development management, FCC	Annual	++

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		3. Number of affordable homes <i>This information is contained in the main Annual Monitoring Report in MI9, 10 and 13.</i>			
Explanation/Analysis	The LDP seeks to ensure that the varied housing needs of Flintshire’s diverse community are catered for over the Plan period through the allocation of a number of housing sites and also a framework of planning policies. This involves the provision of market housing and a variety of tenures of affordable housing.				
<b>5. To improve sustainable access to basic goods, services and amenities for all groups</b>	Some new residents will be likely to have relatively high reliance on personal car use	<ol style="list-style-type: none"> <li>1. Journey to work by mode i.e. % of those opting to walk, cycle, bus or train to work, targeting a consistent increase in sustainable transport modes;</li> <li>2. Average distances travelled to work; and</li> <li>3. Distance travelled to work, seeking to ensure residents are typically within a few kilometres of their place of work.</li> </ol> <p><i>The table below shows 2021 Census information for Flintshire in relation to travel to work by distance and type of transport. The data shows that there is a significant proportion of people who work from home and the majority of people travelling shorter distances to work with much fewer travelling shorter distances. Despite the predominance of shorter journeys, the main mode of transport to work is the private car or van, with only small proportions travelling on foot, by bicycle or by bus. In broad terms there would appear to be scope for a greater proportion of journeys to work to be made by more sustainable means of transport, other than the car.</i></p>	Office for National Statistics data on labour market	Every three years	++



IIA Objective		Effect to be monitored		Indicators				Source of data		Frequency		Predicted Effect	
<b>Travel to Work Distance</b>													
	Residents In work	<2km	2km – 5km	5km – 10km	10km– 20km	20km- 30km	30km- 40km	40km- 60km	60km+	Home working	Off shore		
2021 census	73823	6520	8775	11970	12964	4291	1639	1004	1310	16269	9081		
%		9%	12%	16%	18%	6%	2%	1%	2%	22%	12%		
<b>Travel to Work Method of Transport</b>													
	Residents In work	Work from home	Underground Metro train	Train	Bus minibus coach	Taxi	Motorcycle Scooter moped	Car / van	Passenger	Bicycle	On foot	Other method	
2021 census	73823	16269	27	258	1675	356	365	45411	3769	1126	3996	571	
%		22%	0.03%	0.3%	2.3%	0.5%	0.5%	61%	5%	1.5%	5%	1%	
Explanation/Analysis		Housing allocations in the Plan have been made in sustainable settlements close to services, facilities and employment opportunities, where the conditions exist for journeys to be made by more sustainable modes of transport. The majority of housing allocations are able to link in with either existing or proposed Active Travel routes. Planning permissions on key residential allocations or sites are conditioned to require a full Travel Plan and Transport Implementation Strategy.											
<b>6. To build strong and cohesive communities</b>		The LDP will ensure new residents are situated within existing communities. The LDP may situate new residents in proximity to air,		<ol style="list-style-type: none"> <li>Percentage of people who feel that their local area is a place where people from different backgrounds can get on well together; <i>Data for this indicator is not currently available on a Local Authority level. Continue to monitor the indicator in future AMRs.</i></li> <li>Support provide for those who feel lonely and isolated; <i>Data for this indicator is not currently available on a Local Authority</i></li> </ol>				Development management, FCC North Wales Combined Authority Annual Air Quality Progress Report		Every three years		++	

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
	noise and light pollutants, which should be avoided and monitored.	<p><i>level. Continue to monitor the indicator in future AMRs.</i></p> <p>3. % residents living in dangerously low air quality. <i>Based on the 2018, 2022 and 2023 North Wales Combined Air Quality Reports stating that there are no Air Quality Management Areas (AQMA) declared in North Wales, the figure is 0%.</i></p>			
Explanation/Analysis	<p>The Northern Gateway strategic site is a large mixed use development comprising housing, employment and community facilities set within a green space framework. It is located at the heart of the Deeside part of the North Wales Growth Area defined in Future Wales. It represents a positive opportunity for placemaking and creating a strong new cohesive community, but it is accepted that due to the scale of the site and construction timetable, this will take a number of years to establish. However, the remaining housing allocations are all logical and sustainable urban extensions to existing settlements where the conditions exist for new development to be integrated into the settlement and community life.</p> <p>All allocations have been the subject of extensive consultations with key internal and external consultees and have also been assessed by the Inspectors as part of the Examination.</p>				
<b>7. To promote a sustainable economy, business development and investment</b>	The LDP will enable sustainable economic growth	<p>1. Gross Value Added per head, seeking an increase; <i>Stats Wales shows GVA figures per head for 2022 of £23804 for Wales, £30981 for Flintshire and £32996 for the UK.</i></p> <p>2. Value Added Tax, seeking an increase;</p> <p>3. Economic activity rate, seeking an increase. <i>Office for National Statistics shows that around 17,500 people or 18.8% of the population aged 16 to 64 years in Flintshire were "economically inactive" in the year ending December 2023. This compares with around 18,800 people (20.1%) in the year ending December 2022. Economic inactivity</i></p>	Development management, FCC	Every three years	++

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<i>in Flintshire is lower than across Wales and Great Britain.</i>			
Explanation/Analysis	<p><i>Stats Wales show that although employment rates In Flintshire have decreased slightly over the past 3 years they have remained above the Welsh Average.</i>  <i>2022- FCC = 81.1%, Wales = 73.6%</i>  <i>2023- FCC = 75.45 Wales= 73%</i>  <i>2024 FCC =78.7% Wales = 73.5%</i>  <i>The Plans strategy is based on delivering a level of growth which reflects the designation of Deeside and Wrexham as a National Growth Area in Future Wales. The Plan has allocated two strategic employment sites and a range of smaller employment allocations which will help deliver economic growth. In particular Northern Gateway and Hawarden Industrial Estate have seen development and investment take place.</i></p>				
<b>8. To provide employment opportunities across the County and promote economic inclusion</b>	The LDP would help to facilitate growth in local employment opportunities	<ol style="list-style-type: none"> <li>1. Number of LSOAs in bottom 10% employment deprived;</li> <li>2. Percentage of 16-64-year olds unemployed; <i>Unemployment rates April 2023 to April 2024 Flintshire =2.9%, Wales= 3.5% and Great Britain = 3.9%</i></li> <li>3. Proportion of businesses in Flintshire hiring locally; <i>The Council no longer receives data relating to this. However, the Business Development Team invest time and resources into working with employers to achieve this aim.</i></li> <li>4. Employment in different sectors, seeking to ensure a varied mix; <i>see table below</i></li> <li>5. Number of LSOAs in bottom 10% for income deprivation <i>In 2005 of the 92 Lower Super Output Areas's in Flintshire, 2 LSOA's fell within the 10% most deprived (for overall deprivation) LSOA's in Wales.</i></li> </ol>	Index of Multiple Deprivation Office for National Statistics data on labour market	Every three years	++

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect																																																		
<p>Explanation/Analysis</p>	<p>The table below shows NOMIS data for employment by occupation between April 2023 and March 2024.</p>																																																						
	<table border="1"> <thead> <tr> <th></th> <th>Flintshire</th> <th>Flintshire</th> <th>Wales</th> <th>GB</th> </tr> </thead> <tbody> <tr> <td>Managers, Directors and Senior Officials</td> <td>6,100</td> <td>8.0%</td> <td>8.7%</td> <td>10.8%</td> </tr> <tr> <td>Professional Occupations</td> <td>17,000</td> <td>22.4%</td> <td>23.0%</td> <td>26.6%</td> </tr> <tr> <td>Associate Professional Occupations</td> <td>9,300</td> <td>12.3%</td> <td>15.4%</td> <td>15.3%</td> </tr> <tr> <td>Administrative and Secretarial Occupations</td> <td>10,500</td> <td>13.9%</td> <td>9.8%</td> <td>9.6%</td> </tr> <tr> <td>Skilled Trades Occupations</td> <td>8,000</td> <td>10.6%</td> <td>9.9%</td> <td>8.7%</td> </tr> <tr> <td>Caring, Leisure and Other Service Occupations</td> <td>5,500</td> <td>7.2%</td> <td>9.7%</td> <td>8.2%</td> </tr> <tr> <td>Sales and Customer Service Occupations</td> <td>5,500</td> <td>7.3%</td> <td>7.2%</td> <td>6.2%</td> </tr> <tr> <td>Process Plan and Machine Operatives</td> <td>8,900</td> <td>11.7%</td> <td>6.5%</td> <td>5.4%</td> </tr> <tr> <td>Elementary Occupations</td> <td>5,000</td> <td>6.5%</td> <td>9.4%</td> <td>9.0%</td> </tr> </tbody> </table>						Flintshire	Flintshire	Wales	GB	Managers, Directors and Senior Officials	6,100	8.0%	8.7%	10.8%	Professional Occupations	17,000	22.4%	23.0%	26.6%	Associate Professional Occupations	9,300	12.3%	15.4%	15.3%	Administrative and Secretarial Occupations	10,500	13.9%	9.8%	9.6%	Skilled Trades Occupations	8,000	10.6%	9.9%	8.7%	Caring, Leisure and Other Service Occupations	5,500	7.2%	9.7%	8.2%	Sales and Customer Service Occupations	5,500	7.3%	7.2%	6.2%	Process Plan and Machine Operatives	8,900	11.7%	6.5%	5.4%	Elementary Occupations	5,000	6.5%	9.4%	9.0%
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<p>Flintshire has traditionally been a focus for traditional industrial activity and this is reflected in the table above. More recently the County has seen a trend towards higher quality advanced manufacturing, links with the aerospace industry as well as storage and distribution. It is seen as a key location in Wales for advanced manufacturing as reflected in the recent establishment of an Advance Manufacturing Research Centre at Broughton. Whilst recognising the need for a diverse and resilient economy the focus should remain in terms of its advance manufacturing role.</p>																																																							
<p>The Plan seeks to provide opportunities for employment by allocating land for employment development, safeguarding existing industrial areas as Principal Employment Areas and through a framework of policies to ensure appropriate employment development elsewhere in the County. Planning Officers work closely with the Council’s Business Development Team to bring about as much benefits to the local population as possible. The delivery of the Plans allocations and policies will therefore have a positive benefit in respect of this indicator.</p>																																																							

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p><b>9. To protect and enhance biodiversity and geodiversity</b></p>	<p>The LDP could have adverse effects on biodiversity in some locations.</p>	<ol style="list-style-type: none"> <li>1. Number of development schemes which adopt biodiversity enhancement measures; <i>PPW 12 has confirmed the new national requirement for Biodiversity Net Benefit to be secured in all developments in a proportionate manner.</i></li> <li>2. Total tree canopy in the County, targeting a net increase; <i>In the NRW Report on Urban Tree Canopy Cover in Wales In 2013, Flintshire had below average Urban Tree Canopy Cover at 14.5% when the national average was 16.3%. This survey was updated in 2019 where the figure decreased to 14.3% (National Average 16.4%). PPW12 Chapter 6 provides updated guidance in respect of trees and tree canopy.</i></li> <li>3. Condition of SSSIs in the County. <i>The designation, monitoring and enforcement of SSSI' and their condition is a matter for NRW. The Councils Ecologist works closely with NRW and the Council will consult with NRW on all planning applications, particularly when they could affect a SSSI.</i></li> </ol>	<p>Development management, FCC. NRW SSSI survey results</p>	<p>Every three years</p>	<p>++</p>
<p>Explanation/Analysis</p>	<p>The Plans allocations have been the subject of consultation with key statutory consultees and other stakeholders as well as the close involvement of the Council's ecologist. Allocations were also the subject of close scrutiny as part of the Examination process and found to be sound. The Plans allocations will not therefore result in adverse harm to biodiversity.</p> <p>Policies STR13, EN6 and EN7 provide the basis with which to protect biodiversity but also to secure enhancement as part of new development. The policies have, in effect, been overtaken by the updated</p>				

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p>guidance in Chapter 6 of PPW12 and the requirement for all new development to secure proportionate biodiversity net benefit. The policies and PPW12 will have a positive effect in respect of this indicator.</p>					
<p><b>10. To conserve and enhance the County's landscape and townscape character and quality</b></p>	<p>The LDP could have adverse effects on landscape in some locations.</p>	<p>1. Amount of development in the countryside; and <i>The Council does not specifically monitor new development in open countryside, other than through the planning register. All development proposals in the open countryside are assessed on their merits against Plan policies and PPW12. The 'amount' of development occurring is considered to be of less importance than the location, type and sustainability of each proposal and landscape impact and harm to character and appearance.</i></p> <p>2. Development within, adjacent to or viewable from the AONB. <i>This is addressed in MI46 in the main AMR.</i></p>	<p>Development management, FCC</p>	<p>Every three years</p>	<p>0</p>
<p>Explanation/Analysis</p>	<p>Policies STR2 and PC1 in the plan reflects PPW12 which seeks to strictly control new development in the open countryside. Policy EN4 seeks to protect landscape character generally and policy EN5 Area of Outstanding Natural Beauty strictly controls new development in and within the setting of the AONB. This is measured in MI 46 in the main AMR. The amount of development is not considered to be an overriding factor as the more important issue is the type, location, design and landscaping of a development. Consultation is carried on all development in the AONB with the NRW and the AONB Joint Committee. The policies in the plan only permit certain development which is fully justified and assess in terms of protecting the character and appearance of the AONB.</p> <p>Policies STR13, PC2 and PC3 seek to protect the built environment or townscape. However, the Plan can only seek to achieve this when new development is proposed through the implementation of placemaking and good design principles.</p>				

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p>The Plans allocations have been the subject of consultation with key statutory consultees and other stakeholders as well as the close involvement of the Council’s built conservation officer. Allocations were also the subject of close scrutiny as part of the Examination process and found to be sound. The Plans allocations will not therefore result in adverse harm to townscape or landscape. It is considered that overall the Plan will have a neutral effect in respect of this indicator.</p>					
<p><b>11. To protect and enhance the cultural heritage assets</b></p>	<p>The LDP could have adverse effects on the historic environment in some locations.</p>	<ol style="list-style-type: none"> <li>1. Proportion of new development that adopts avoidance or mitigation measures in relation to heritage assets. <i>This is not specifically monitored as each development is considered on its individual merits.</i></li> <li>2. Number of Listed Buildings, on the at-risk register, seeking a reduction. <i>There are 1035 Listed Buildings in Flintshire of which 115 are on the at Risk Register updated in November 2023. The Register is maintained by Cadw.</i></li> </ol>	<p>Development management, FCC</p>	<p>Every three years</p>	<p>0</p>
<p>Explanation/Analysis</p>	<p>Policy STR13 addresses the built historic environment generally whilst policy EN8 seeks to protect Listed Buildings and Scheduled Ancient Monuments and their settings, EN9 deals with conservation areas and EN10 Buildings of Local Interest. The Councils conservation section, Clwyd Powys Archaeological trust and Cadw are consulted on all relevant applications and any mitigation measures will be included as appropriate. The Plans allocations have been the subject of consultation with key statutory consultees and other stakeholders as well as the close involvement of the Council’s built conservation officer. Allocations were also the subject of close scrutiny as part of the Examination process and found to be sound. The Plans allocations will not therefore result in adverse harm to the built historic environment. Overall, the Plans policies are likely to have a neutral effect in respect of this indicator.</p>				

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<b>12. To protect and enhance the quality of water features and resources</b>	The LDP could pose a risk to the quality of water in natural waterbodies in some locations. The LDP would result in a net increase in water consumption.	<ol style="list-style-type: none"> <li>1. Amount of new development each year that requires a consent to be built in proximity to the Dee. <i>The Council does not maintain information in relation to consents or permits in relation to the water environment as this is within the remit of NRW.</i></li> <li>2. Water resource availability as per Water Resource Management Plans (every 5 years). <i>The main outcome of the Dwr Cymru/ Welsh Waters 's Revised Draft Water Resources Management Plan 2024, shows that there are no supply resilience issues for the Alwen Dee zone that Flintshire is part of.</i></li> </ol>	Development management, FCC	Annual	0
Explanation/Analysis	Policy EN5 Water Resources provides detailed guidance in respect of development which may affect water resources. In conjunction with NRW being consulted on such applications, the LDP should not result in any harm to the water environment. The Plans allocations have been the subject of consultation with key statutory consultees and other stakeholders. Allocations were also the subject of close scrutiny as part of the Examination process and found to be sound. The Plans allocations will not therefore result in adverse harm to the water environment. The Plan is likely to result in a neutral effect in respect of this indicator.				
<b>13. To reduce the risk of flooding</b>	The LDP would expose a limited number of residents and businesses to surface water and fluvial flood risk.	<ol style="list-style-type: none"> <li>1. Percentage of development with SuDS As of 7th January 2019, all construction work in Wales with drainage implications, of 100m<sup>2</sup> or more, is now required to have Sustainable Drainage Systems (SuDS) to manage on-site surface water (whether they require planning permission or not). <i>The Council does not have readily available information on the % of planning applications involving SuDS as they are two different consent regimes. The</i></li> </ol>	Development management, FCC	Annual	+



IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<p><i>important fact is that SuDS is a national requirement for certain types / sizes of development.</i></p> <p>2. Number of applications permitted contrary to NRW advice on flooding. <i>No specific data is held by the Council in respect of this measure. Not aware of any planning applications which have been approved contrary to NRW advice.</i></p>			
Explanation/Analysis	<p>Policy EN14: Flood Risk adopts a sustainable and precautionary approach to managing flood risk by avoiding development in areas at risk of flooding or ensuring that the risks and consequences of flooding can be satisfactorily managed and mitigated. Planning applications would have to meet the tests within TAN15 and have regard to the advice of NRW in their consultation response.</p> <p>The management of surface water for new development is a material consideration as emphasised in Wales following the implementation of Schedule 3 of the Flood and Water Management Act (FWMA) 2010 from January 7th 2019. The Act requires surface water drainage for new developments to be designed and built in accordance with the mandatory National Standards for sustainable drainage systems (SuDS) published by Welsh Government. All new developments with an area of construction works in excess of 100m<sup>2</sup> must comply with the National Standards. However, the requirement for SuDS is managed through the SuDS Approval Body (SAB) and is a different consenting regime from planning. Nevertheless, new development should result in new development having a lower surface water run off rate and should therefore have a positive effect in respect of this measure.</p>				
<p><b>14. To protect and improve air quality and limit greenhouse gas emissions</b></p>	<p>The LDP would be expected to result in a net increase in GHG emissions and air pollution</p>	<p>1. Total and proportion of CO<sub>2</sub> emissions from the transport sector. <i>The latest evidence available is from the 2019 transport sector emissions for the county, with the figures in 1000 tonnes of Carbon Dioxide (ktCO<sub>2</sub>) for Flintshire all transport is 377.6</i></p>	<p>Department for Business Energy and Industrial Strategy. UK Local Authority carbon dioxide</p>	<p>Annual</p>	<p>0 / +</p>

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
			emissions national statistics 2005 -2019		
Explanation/Analysis	As referenced in Measure 6 there are presently no Air Quality Management Areas in Flintshire. It should be stressed that housing allocations have been made in locations which represent logical and sustainable extensions to settlements where the conditions exist for using sustainable means of travel other than the car. The Northern Gateway strategic site represents a mixed use development at the heart of an urban area and the North Wales Growth Zone defined in Future Wales. In combination with low emission vehicles this should result in improvement to or at least no worsening of air quality. An article in The Leader in 2021 reported that over the period 2009-2019 total CO2 emissions in Flintshire had dropped by 12.7%. In terms of this measure the Plan should result in either a neutral or positive effect.				
15. To increase energy efficiency, require the use of renewable energy and sustainable building design	The LDP would be expected to result in a net increase in energy consumption	<ol style="list-style-type: none"> <li>1. Average annual fuel bill for residents; <i>UK Government Statistical data on annual domestic energy bills (table 2.6.2) shows the average expenditure each week on fuel per consuming household in the UK year 2021/22 was £58.90 or £3,062.80 per year (includes electricity, gas, solid fuel, heating oil and other fuels and motor fuel). However, a measure related to the cost of energy is not necessarily an accurate reflection of the amount of energy consumed.</i></li> <li>2. Number of renewable energy projects permitted in the County; <i>See AMR MI47 and 48</i></li> </ol>	Development management, FCC	Annual	0
Explanation/Analysis	The Plan seeks to bring about energy efficient development but is limited in terms of what it can directly achieve as such matters are within the remit of Building Regulations. The Plan has identified areas of search for solar development and a further large scale solar farm has recently been granted planning permission at Broughton				

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
<p><b>16. To ensure sustainable use of natural resources</b></p>	<p>The LDP would be expected to result in a net loss of agriculturally and ecologically valuable soils</p>	<ol style="list-style-type: none"> <li>1. % of development that takes place on best and most versatile (ALC) land; see <i>commentary below</i>.</li> <li>2. Percentage of land remediated, as a proportion of total contaminated land in the County; and <i>The LPA does not have readily available data in respect of this measure</i>.</li> <li>3. % of new developments that incorporate waste management facilities <i>The LPA does not have readily available data in respect of this measure</i>.</li> </ol>	<p>Development management, FCC</p>	<p>Annual</p>	<p>0 / -</p>
<p>Explanation/Analysis</p>	<p>The plan policies already strictly control new development in the open countryside. Any application where the predicted agricultural land classification map indicates the possibility of BMV land then a site survey would be required and consultation undertaken with Welsh Government. Even where BMV is proven to be affected it is still necessary to undertake a planning balance between the loss of BMV and other material planning considerations e.g the Solar Farm at Bretton, which was approved by Welsh Government.</p> <p>The Council prepared a Background Paper on agricultural land for the Examination and this explained how the preparation of the Plan had sought to minimise the loss of BMV. The paper highlighted that only one of the Plans employment allocations would involve the loss of BMV and this was a site that was already allocated in the previous UDP. In terms of housing 6 of the 11 housing allocations involved the loss of BMV. The matter was assessed as part of the Examination process, in the light of Welsh Governments support in principle to the approach taken, and the Inspector considered the approach to be sound.</p>				
<p><b>17. To encourage the protection and promotion of the Welsh Language</b></p>	<p>The LDP could risk diluting rates of Welsh speaking in sensitive areas</p>	<ol style="list-style-type: none"> <li>1. % increase in the number of Welsh speakers in the County; <i>See MI50 in the AMR</i></li> <li>2. CIL or S106 Agreement contributions from large developments in areas where there is a high percentage of Welsh speakers in the Ward – for lessons or community activities in Welsh or Education.</li> </ol>	<p>Development management, FCC</p>	<p>Every three years</p>	<p>0</p>

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect
		<i>Background Paper 12 Welsh Language sets out the research and evidence from the SA ( or IIA) and concludes that no that no harm to the language was identified by any of the housing allocations in the LDP.</i>			
Explanation/Analysis	The only large housing development in the county is the Northern Gateway mixed use strategic site and the non-strategic housing allocations. The allocations were all assessed as part of the main IIA and also at examination and no impact on the Welsh language was identified. In determining planning applications on allocated sites this was not a common issue raised by objectors. During the plan period windfall housing developments and affordable housing exception sites may arise and these will be assessed on their individual merits against the guidance in TAN 20 Planning and the Welsh Language and PPW 12.				

### Conclusions

- 5.4 The Plan has been the subject of a Sustainability Appraisal and Strategic Environmental Assessment along with a number of other assessments which have been combined into a single Integrated Impact Assessment. This has been an iterative process with appraisal being conducted from the earliest stages of Plan preparation and through each key stage of preparation. The IIA culminated in a final report accompanying the adopted LDP. The Plan has been found to be in accordance with national legislation and guidance in terms of achieving sustainable development, working towards achieving well-being goals and not resulting in environmental harm.
- 5.5 Following adoption it is necessary to monitor the implementation of the Plan against the 17 IIA objectives. The above table shows a number of monitoring indicators or questions for each objective. In some cases it has been difficult to obtain up to date or directly relevant information but further work will be undertaken on these in readiness for future Annual Monitoring Reports. In other cases Plan policies have been overtaken by changes to national planning guidance such as the requirement for green space and biodiversity net benefit in PPW12. For the majority of objectives though it has been possible to provide data or evidence or an explanation as to how Plan policies are being implemented as part of the determination of planning applications. The Plan will either have a neutral or positive effect on the objectives. It must be stressed that the Plan cannot influence some issues or considerations in a general sense as it is restricted to its planning remit i.e. through new development.

- 5.6 There are a number of SA indicators where information is not published annually, for example those based on the census. The implications of the Covid pandemic has also meant that some information has not been available. The purpose of the monitoring framework is to review changes on an annual basis, as a consequence these are not necessarily going to be useful moving forward in terms of future monitoring. They have however been retained in order to provide a baseline, further work will be undertaken in time for the next AMR to determine whether alternative sources of information are available.



## 6. Conclusions and Recommendations

### Conclusions

- 6.1 This is the first AMR of the Flintshire LDP since its adoption on 23/01/23 and monitors the first 12 month period from 01/04/23 to 31/03/24. This AMR has been prepared in line with the advice in Welsh Government Development Plans Manual Ed 3.
- 6.2 A review has been undertaken in Chapter 2 to identify any changes in the context in which the Plan operates. There have been no changes in legislation or national planning guidance which have affected the implementation of the Plans Strategy. The key contextual change affecting the Plan is the economic downturn and the continuing cost of living crisis following closely on from the challenges presented by Covid. This has presented a difficult financial climate for housebuilders in particular. The Chapter has also identified positives such as the identification of Deeside and Wrexham as an Investment Zone by UK Government which should bring a range of benefits to investors and operators.
- 6.3 Chapter 3 sets out the key or core monitoring indicators for the Plan. The indicators show that actual housing completions are running slightly ahead of the flat rate housing requirement figure of 463 units per annum. However, when compared with the Anticipated Annual Build Rate in the adopted trajectory the Plan is running behind. There are a number of reasons set out in the Chapter to explain this and there are also positives in terms of progress at the Northern Gateway strategic site and the majority of the other allocated housing sites having planning permissions, or current planning applications, and able to move towards delivery. The updated trajectory shows that the Plans housing requirement figure of 6,950 units is set to be delivered with only a predicted shortfall of 61 units which is less than 1%. Rather than the more gradual delivery pattern in the adopted trajectory, the revised trajectory is showing a more concentrated delivery, with the peak in delivery running some 2-3 years behind that anticipated.
- 6.4 It should be stressed that the Plan was progressed to adoption with a close working relationship with site owners and prospective developers in order to demonstrate the necessary availability, viability and deliverability and found to be sound following Examination. This is still the case now with good progress having been made in bringing forward all of the allocated housing sites. It is also the case that annual monitoring of housing has continued to be undertaken in the period leading up to this first AMR involving consultation with the representatives of each allocated, committed and windfall sites (large). The Council will continue to work with developers to ensure that remaining consents are issued in a timely manner, but ultimately delivery is a matter for developers given that the Council has no direct control or input.
- 6.5 A similar scenario presents itself with affordable housing where delivery has been lower than anticipated due largely to the allocated housing sites not

delivering yet. However, these allocated sites will deliver substantial numbers of affordable homes and it is anticipated that the target of 2265 units can be met.

- 6.6 In terms of employment land good progress has been made at the Northern Gateway Strategic Site with planning permissions being granted, the Amazon depot being constructed and operational and a paper mill presently under construction. Good progress has also been made at Hawarden Park with Phase 1 of the Vista Business Park and Phase 2 being under construction. Further technical work is being undertaken by Welsh Governments specialist consultants in respect of the aeronautical flight path constraint at the Warren Hall Strategic Site. This work involves close liaison with Airbus and will further inform both the physical extent of the developable area and the height of built development. The delivery of the site is therefore likely to be delayed but still has Growth Deal funding allocated to it with which to deliver necessary infrastructure.
- 6.7 Chapter 4 sets out the local monitoring indicators and covers a range of Plan objectives and policies such as green wedges, town centres and retail development, community facilities, minerals and waste, green infrastructure, sustainable transport, employment development, natural and historic built environment, flood risk etc. These indicators are generally being met by the LDP policies.
- 6.8 Chapter 5 addresses the monitoring indicators which are incorporated into the Plans Sustainability Appraisal. In the case of the LDP the Sustainability Appraisal, Strategic Environmental Assessment has been incorporated with a range of other assessments to form an Integrated Impact Assessment. The Plans performance against these indicators shows that's its policies are working towards achieving sustainable development and well-being goals and are not resulting in significant environmental harm.
- 6.9 Overall, it can be concluded that the Plan strategy, policies and proposals remain relevant, appropriate and up to date and that good progress is being made in the Plans delivery. Despite the lag in housing delivery, there is not considered to be cause for concern, nor is there considered to be grounds for a Plan review.

### **Recommendation**

- 6.10 It is recommended that the Council continues to monitor the implementation of the Plan with particular attention paid to working with developers to ensure that allocated housing sites come forward in a timely manner.



## Appendix A - Large Sites at April 2024

Site and Ref	Tier	Site Capacity	Comps 2023-24	Total Comps	Units not started 01/04/24	Units u/c	Units Remaining 01/04/24	Comments
<b>Committed Sites</b>								
Wilcox Coach Works, Afonwen (AFN006)	5	19	0	0	0	19	19	Under Construction
Former British Legion, Bagillt (BAG038)	3	10	4	10	0	0	0	Site complete - Quatrefoil
Mount Pool, Buckley (BUC079)	1	18	5	15	1	2	3	Under Construction. Freed Homes (20 units but loss of 2 existing dwellings so recorded as 18 units)
F G Whitley Depot, Buckley (BUC080)	1	41	6	33	0	8	8	Under Construction
Adj. Mill Lodge, Buckley (BUC220)	1	19	0	0	10	9	19	13 houses & 6 apts. Full pp granted 29/01/2020. Blueoak Estates Ltd. Under construction.
Princess Ave, Buckley (BUC 230)	1	12	12	12	0	0	0	All affordable- Pennaf / Clwyd Alyn – complete. <b>WINDFALL</b>
80-86 Mold Rd., Buckley (BUC 228)	1	10	10	10	0	0	0	Lingard Homes. Complete. <b>WINDFALL</b>
The Hayfield, Cheshire Lane, Buckley (BUC 231)	1	14	0	0	0	14	14	Quatrefoil Homes. Under construction
Summerhill Farm, Caerwys (CAE007)	3	60	8	16	44	0	44	Ph2 comp. Landowner progressing site. Total number of units reduced slightly due to re-plans of phases.
South of the Larches, Ewloe (EWL043)	2	10	0	9	1	0	1	Single remaining unit
Croes Atti, Flint (FLI002)	1	615	28	600	0	15	15	Anwyl - last few remaining units under construction.
Flint working men's club (FLI048)	1	15	0	4	11	0	11	Part developed and site left with no activity currently. PP protected as part developed.
Nant Y Gro, East of Gronant Hill (GRO011)	3	41	0	0	41	0	41	Wates-SHARP scheme.
Rainbow Inn, Ruthin Rd. Gwernymynydd. (GYM013)	4	17	0	15	0	2	2	Under construction Wheeler Homes
Land adj. Siglen Uchaf, Gwernymynydd (GYM019)	4	10	0	0	10	0	10	RM approved 06/11/23. Site cleared and developers board erected – Stenhouse Developments.
Land at Friar's Gap, Hawarden (HAW013)	2	31	1	31	0	0	0	complete

Site and Ref	Tier	Site Capacity	Comps 2023-24	Total Comps	Units not started 01/04/24	Units u/c	Units Remaining 01/04/24	Comments
Lluesty Hospital, Holywell (HOL028)	1	89	0	28	55	6	61	Under construction – McCrory Holdings
Former Infirmary site, Lluesty Hospital (HOL105)	1	29	25	29	0	0	0	BAK Building Contracts Ltd. <b>WINDFALL</b> complete
East of Halkyn Rd., Holywell (HOL015)	1	44	0	0	44	0	44	Full pp granted 27/11/2018 & subsequent details approved - WWHA - Approval of s73 application 749/22 has extended period for commencement.
Ty Carreg, Stryt Isa, Hope (HCA071)	2	14	10	11	0	3	3	Quatrefoil Homes – under construction
Factory 2 site, Pontybodkin Hill, Leeswood (LEE033)	3	26	0	0	26	0	26	Full pp granted 22/9/21 – Foxbury Developments. <b>WINDFALL</b>
Bromfield Timber Yard, Mold (MOL020)	1	122	0	0	122	0	122	Technical start has kept pp alive. Unlikely to be developed within next 5 years
94 Wrexham Rd., Mold (MOL100)	1	11	0	9	2	0	2	2 remaining units in use as vintage shop but now closed and empty
Park House, Broncoed Business Park, Mold (MOL122)	1	20	12	12	0	8	8	20 apartments (FG Whitley) - on site. <b>WINDFALL</b>
St Davids building, Daniel Owen Square, Earl Rd, Mold (MOL126)	1	14	0	0	14	0	14	Full pp granted 17/1/22. COU-office to apartments. <b>WINDFALL</b>
Rose Lane/ Synnyside, Mynydd Isa (MYN028)	2	56	0	0	26	30	56	Full pp granted 22/7/21 - Clwyd Alyn – under construction
Ffordd Pennant West, Mostyn (MOS006)	3	64	0	0	64	0	64	Outline 496/22 approved 13/02/24. Drivestandard Ltd <b>NEW WINDFALL</b>
Ffordd Pandarus, Maes Pennant, Mostyn (MOS013)	3	20	20	20	0	0	0	SHARP scheme, Wates. <b>WINDFALL</b> complete
Off Rhewl Fawr Rd., Penyffordd (PFD001)	4	18	8	18	0	0	0	Grwp Cynefin scheme - complete
N.of Coed Mor, Rhewl Fawr Rd, Penyffordd PFD020	4	21	0	0	21	0	21	Resolution to grant outline at Planning Committee 30/08/23. Black Dove Developments. S106 nearing completion
South of Rhos Rd., Penyffordd (PYF047)	3	36	0	0	36	0	36	Outline pp on appeal 29/04/2020 –Reserved matters approved 14/12/23. Over 55s retirement scheme. Site preparation works.. <b>WINDFALL</b> .
Chester Rd, Penyffordd (PYF044)	3	186	22	181	0	5	5	Redrow – final units under construction

Site and Ref	Tier	Site Capacity	Comps 2023-24	Total Comps	Units not started 01/04/24	Units u/c	Units Remaining 01/04/24	Comments
The Stores House, Rhes Y Cae (RHE002)	5	10	1	4	0	6	6	Site under construction
Buckley Police Station, Mold Rd., Buckley (BUC236)	1	10	0	0	10	0	10	Outline approved 06/07/22 - demolition of police station & erection 10 apartments <b>WINDFALL</b>
Spectrum Home & Garden Centre, Cefn Y Bedd (HCAC088)	2	30	0	0	30	0	30	New build pp 21/11/22 for 14 units. Committee resolution 25/10/23 to approve full application for 30 units – Kingscrown Land & Commercial. S106 agreement progressing. <b>WINDFALL</b>
315 High St., Connah's Quay (CON134)	1	11	11	11	0	0	0	Conv. pub to 11 apartments - complete. <b>WINDFALL</b>
<b>Total Commitments</b>		<b>1773</b>	<b>183</b>	<b>1078</b>	<b>568</b>	<b>127</b>	<b>695</b>	
<b>Strategic Allocation Northern Gateway</b>								
GAR002A H1, H2 & H8 part (Airfields)	2	283	0	283	0	0	0	Countryside Homes / Simple Life – previously completed and occupied
GAR002B H6 part, H7 part, & H8 part (Airfields)	2	112	38	38	52	22	74	Anwyl – site under construction
GAR002C H3 part, H5 part, H6 part, H7 part, & H8 part (Airfields)	2	185	40	40	0	145	145	Bellway – site under construction
GAR002D H3 part & H5 part (Airfields)	2	71	0	0	65	6	71	Anwyl
GAR002E H4 (Airfields)	2	89	0	0	89	0	89	Anwyl / Bellway –reserved matters 71/23 approved 08/05/24 – Anwyl 43 units / Bellway 46 units
GAR002F Plot 2 (Corus) Phase 1	2	129	17	17	81	31	112	Keepmoat – under construction
GAR002G Plot 1 (Corus) Phase 2	2	100	0	0	88	12	100	Clwyd Alyn - Site under construction by Castle Green
GAR002H Plot 3 (Corus)	2	400	0	0	400	0	400	Bellway –reserved matters approval 063591 for 400 units on 10/03/23. Site to be shared with Persimmon. Since survey work, Persimmon commended site works.
GAR002I Plat 4 (Corus)	2	54	0	0	54	0	54	Bellway – reserved matters for 54 units 658/22 approved on 25/08/23.
<b>Total Strategic Alloc'n Northern Gateway</b>		<b>1423</b>	<b>95</b>	<b>378</b>	<b>829</b>	<b>216</b>	<b>1045</b>	

Site and Ref	Tier	Site Capacity	Comps 2023-24	Total Comps	Units not started 01/04/24	Units u/c	Units Remaining 01/04/24	Comments
<b>Allocated sites</b>								
HN1.1 Well Street Buckley	1	140	0	0	140	0	140	Clwyd Alyn – Committee resolution to approve outline for 140 units 13/04/24. Also full application 826/23 for 155 dwellings under consideration.
HN1.2 Broad Oak Holding, Mold Rd, Connah's Quay	1							Completed in previous studies – Edwards Homes
HN1.3 Highmere Drive, Connah's Quay	1	141	0	0	141	0	141	Edwards Homes – Detailed permission granted 22/11/23. Site works underway.
HN1.4 Northop Rd, Flint	1	170	0	0	170	0	170	2 developers. Detailed application Watkin Jones 414/22 under consideration on large part of site for 200 units. Detailed application 435/24 for 22 dwellings submitted on 04/06/24 Edwards Homes.
HN1.5 Maes Gwern, Mold	1							Recorded separately as committed site – site completed 2023
HN1.6 Denbigh Rd / Gwernaffield Rd, Mold	1	235	0	0	235	0	235	Anwyl –Committee resolution 13/03/24 to grant detailed permission -235 dwellings
HN1.7 Holywell Rd / Green Lane, Ewloe	2	298	0	0	298	0	298	PAC March 2024 on whole site for 315 units. Now single developer Castle Green.
HN1.8 Ash Lane, Hawarden	2	288	0	0	288	0	288	Detailed application 195/24 for 300 units under consideration. Castle Green
HN1.9 Wrexham Rd, Abermorddu	2	70	0	0	70	0	70	Committee resolution 13/03/24 to grant detailed permission for 70 dwellings. Castle Green
HN1.10 Cae Isa, New Brighton	3	90	0	0	90	0	90	Committee resolution 13/03/24 to grant detailed permission for 90 dwellings. Stewart Milne now replaced by new developer Lovells.
HN1.11 Chester Rd, Penymynydd	3							Recorded separately in committed sites
<b>Total allocated Sites</b>		<b>1432</b>	<b>0</b>	<b>0</b>	<b>1432</b>	<b>0</b>	<b>1432</b>	
<b>Total Commitments, Strategic Allocation and all Allocated sites</b>		<b>4628</b>	<b>278</b>	<b>1456</b>	<b>2829</b>	<b>343</b>	<b>3172</b>	

**Appendix B - Large Site Projections 2023-2024**

Site and Ref	Tier	Units not started 01/04/24	Units u/c	Total Units remaining 01/04/23	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030+ (beyond Plan period)
Wilcox Coach Works, Afonwen (AFN006)	5	0	19	19	9	10	-	-	-	-	-
Former British Legion, Bagillt (BAG038)	3	0	0	0	-	-	-	-	-	-	-
Mount Pool, Buckley (BUC079)	1	1	2	3	3	-	-	-	-	-	-
F G Whitley Depot, Buckley (BUC080)	1	0	8	8	8	-	-	-	-	-	-
Adj. Mill Lodge, Buckley (BUC220 )	1	10	9	19	6	6	7	-	-	-	-
Princess Ave., Buckley (BUC 230) WINDFALL	1	0	0	0	-	-	-	-	-	-	-
80-86 Mold Rd., Buckley (BUC 228) WINDFALL	1	0	0	0	-	-	-	-	-	-	-
The Hayfield, Cheshire Lane, Buckley (BUC 231)	1	0	14	14	7	7	-	-	-	-	-
Summerhill Farm, Caerwys (CAE007)	3	44	0	44	4	8	8	8	8	8	-
South of the Larches, Ewloe (EWL043)	2	1	0	1	1	-	-	-	-	-	-
Croes Atti, Flint (FLI002)	1	0	15	15	15	-	-	-	-	-	-
Flint working men's club (FLI048)	1	11	0	11	0	3	4	4	-	-	-
Nant Y Gro, East of Gronant Hill (GRO011)	3	41	0	41	0	20	21	-	-	-	-
Rainbow Inn, Ruthin Rd. Gwernymynydd (GYM013)	4	0	2	2	2	-	-	-	-	-	-
Land adj. Siglen Uchaf, Gwernymynydd (GYM019)	4	10	0	10	0	5	5	-	-	-	-
Land at Friar's Gap, Hawarden (HAW013)	2	0	0	0	-	-	-	-	-	-	-
Lluesty Hospital, Holywell (HOL028)	1	55	6	61	15	15	15	16	-	-	-

Site and Ref	Tier	Units not started 01/04/24	Units u/c	Total Units remaining 01/04/23	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030+ (beyond Plan period)
Former Infirmary site, Lluesty Hospital (HOL105) WINDFALL	1	0	0	0	-	-	-	-	-	-	-
East of Halkyn Rd., Holywell (HOL015)	1	44	0	44	0	14	15	15	-	-	-
Ty Carreg, Stryt Isa, Hope (HCA071)	2	0	3	3	3	-	-	-	-	-	-
Factory 2 site, Pontybodkin Hill, Leeswood (LEE033) WINDFALL	3	26	0	26	0	8	9	9	-	-	-
Bromfield Timber Yard, Mold (MOL020)	1	122	0	122	0	0	0	0	0	30	92
94 Wrexham Rd., Mold (MOL100)	1	2	0	2	2	-	-	-	-	-	-
Park House, Broncoed Business Park, Mold (MOL 122) WINDFALL	1	0	8	8	8	-	-	-	-	-	-
St Davids bldg, Daniel Owen Sqr, Earl Rd., Mold (MOL126) WINDFALL	1	14	0	14	0	14	-	-	-	-	-
Rose Lane/ Synnyside, Mynydd Isa (MYN028)	2	26	30	56	26	30	-	-	-	-	-
Ffordd Pandarus, Maes Pennant, Mostyn (MOS013) WINDFALL	3	0	0	0	-	-	-	-	-	-	-
Ffordd Pennant West, Mostyn (MOS006)	3	64	0	64	0	20	20	24	-	-	-
Off Rhewl Fawr Rd., Penyffordd (PFD001)	4	0	0	0	-	-	-	-	--	-	-
N of Coed Mor, Rhewl Fawr Road, Penyffordd (PFD020)	4	21	0	21	7	7	7	-	-	-	-
South of Rhos Rd., Penyffordd (PYF047) WINDFALL	3	36	0	36	0	18	18	-	-	-	-
Chester Rd, Penyffordd (PYF039)	3	0	5	5	5	-	-	-	-	-	-
The Stores House, Rhos Y Cae (RHE002)	5	0	6	6	2	2	2	-	-	-	-

Site and Ref	Tier	Units not started 01/04/24	Units u/c	Total Units remaining 01/04/23	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030+ (beyond Plan period)
Buckley Police Station, Mold Rd., Buckley (BUC236) WINDFALL	1	10	0	10	0	5	5	-	-	-	-
Spectrum Home & Garden Centre, Cefn Y Bedd (HCAC088) WINDFALL	2	30	0	30	0	10	10	10	-	-	-
315 High St., Connah's Quay (CON134) WINDFALL	1	0	0	0	-	-	-	-	-	-	-
<b>Sub Total Commitments</b>		<b>568</b>	<b>127</b>	<b>695</b>	<b>123</b>	<b>202</b>	<b>146</b>	<b>86</b>	<b>8</b>	<b>38</b>	<b>92</b>
GAR002A H1, H2 & H8 part (Airfields) Countryside	2	0	0	0	-	-	-	-	-	-	-
GAR002B H6 part, H7 part, & H8 part (Airfields) Anwyl	2	52	22	74	40	40	40	40	28	-	-
GAR002C H3 part, H5 part , H6 part, H7 part, & H8 part (Airfields) Bellway	2	0	145	145	40	40	40	40	31	-	-
GAR002D H3 part & H5 part (Airfields) Anwyl	2	65	6	71	See GAR 002B	See GAR 002B	See GAR 002B	See GAR 002B	See GAR 002B	See GAR 002B	-
GAR002E H4 part Bellway / part Anwyl	2	46 43	0	46 43	See GAR 002C See GAR 002B	See GAR 002C See GAR 002B	See GAR 002C See GAR 002B	See GAR 002C See GAR 002B	See GAR 002C See GAR 002B	See GAR 002C See GAR 002B	-
GAR002F Plot 2 (Corus) Phase 1 Keepmoat	2	81	31	112	40	40	32	-	-	-	-
GAR002G Plot 1 (Corus) Phase 2	2	88	12	100	50	50	-	-	-	-	-

Site and Ref	Tier	Units not started 01/04/24	Units u/c	Total Units remaining 01/04/23	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030+ (beyond Plan period)
GAR002H Plot 3 (Corus) Bellway / Persimmon	2	400	0	400	40	70	70	70	70	70	64
GAR002I Plat 4 (Corus) Bellway		54	0	54							
<b>Sub – Total Strategic Allocations</b>		<b>829</b>	<b>216</b>	<b>1045</b>	<b>210</b>	<b>240</b>	<b>182</b>	<b>150</b>	<b>129</b>	<b>70</b>	<b>64</b>
HN1.1 Well Street Buckley	1	140	0	140	0	40	50	50	-	-	-
HN1.2 Broad Oak Holding, Mold Rd, Connah's Quay	1	-	-	-	-	-	-	-	-	-	-
HN1.3 Highmere Drive, Connah's Quay	1	141	0	141	30	60	51	-	-	-	-
HN1.4 Northop Rd, Flint	1	170	0	170	0	50	40	40	40	-	-
HN1.5 Maes Gwern, Mold	1	-	-	-	-	-	-	-	-	-	-
HN1.6 Denbigh Rd / Gwernaffield Rd, Mold	1	235	0	235	0	35	40	40	40	40	40
HN1.7 Holywell Rd / Green Lane, Ewloe	2	298	0	298	0	45	45	45	45	45	73
HN1.8 Ash Lane, Hawarden	2	288	0	288	0	45	45	45	45	45	63
HN1.9 Wrexham Rd, Abermorddu	2	70	0	70	0	10	30	30	-	-	-
HN1.10 Cae Isa, New Brighton	3	90	0	90	0	20	35	35	-	-	-
HN1.11 Chester Rd, Penymynydd	3	-	-	-	-	-	-	-	-	-	-
<b>Sub – Total Allocated Sites</b>		<b>1432</b>	<b>0</b>	<b>1432</b>	<b>30</b>	<b>305</b>	<b>336</b>	<b>285</b>	<b>170</b>	<b>130</b>	<b>176</b>
<b>Sub Total All Allocations</b>		<b>2261</b>	<b>216</b>	<b>2477</b>	<b>240</b>	<b>545</b>	<b>518</b>	<b>435</b>	<b>299</b>	<b>200</b>	<b>240</b>
<b>Total commitments and all Allocations</b>		<b>2829</b>	<b>343</b>	<b>3172</b>	<b>363</b>	<b>747</b>	<b>664</b>	<b>521</b>	<b>307</b>	<b>238</b>	<b>332</b>



## Appendix C - Consultation with Stakeholder Group

E-mail consultation sent to Stakeholder Group on 03/07/24 with responses requested by 19/07/24. The response rate was poor but this may be as a result of this 2024 consultation closely following a request earlier in 2024 relating to the 2023 consultation. In the light of the lack of response and only one detailed response received from a developer who is not active in the County, it is considered that there are no grounds for a Stakeholder meeting.

<b>COMPANY</b>	<b>Response</b>	<b>Comment</b>
<b>Hilbre Homes</b>	None	n/a
<b>Edwards Homes</b>	<p>Estimates for plot completions at Connah's Quay as follows:-</p> <p>By March 2025 – 30 plot completions</p> <p>By March 2026 – additional 60 plot completion</p> <p>By March 2027 – remaining plots completed (i.e. 51).</p> <p>In addition to our site in Connah's Quay we also have a development in planning at Northop Road, Flint. Subject to the grant of planning permission we would estimate that the 22 plots at this development would be completed by March 2026.</p>	Schedules updated as per response
<b>Anwyl Homes</b>	None e-mailed separately ahead of consultation on schedules	n/a
<b>Castle Green</b>	None e-mailed separately ahead of consultation on schedules	n/a
<b>Bellway</b>	None	n/a
<b>Stewart Milne</b>	None Subsequent correspondence with new developer Lovells who confirmed that proposed completion rates were acceptable but that it is likely completions rates will be accelerated.	Keep figures as per the draft schedule and review next year.
<b>Bloor Homes</b>	None	n/a
<b>HBF</b>	None	n/a
<b>Redrow</b>	None	n/a
<b>Persimmons</b>	None	n/a
<b>FG Whitley &amp; sons</b>	None	n/a
<b>Taylor Wimpey</b>	None	n/a
<b>Muller properties</b>	None	n/a
<b>Gower Homes</b>	None	n/a

<p><b>Elan Homes</b></p>	<p>What is the delivery elsewhere in the borough, if these are large sites only listed?</p> <ul style="list-style-type: none"> <li>• is there a collated list of smaller sites delivered?</li> <li>• is there a list of Windfall sites delivered?</li> </ul>	<p>Small sites are not circulated to the Stakeholder Group and will be included in the AMR. Large windfall sites (10 or more units) are included in the schedules and clearly identified.</p>
	<p>On the basis of large sites delivery only -                  A second year of under delivery, with a short fall of 193 units to the target of 463/year (2023 shortfall of 149 units) this shortfall amounts to 5.36 permitted developments each delivering 36 units per year – is there a pipeline of Windfall sites expected to assist this shortfall?</p> <p>Projections of delivery show a further shortfall expected in 2025 of some 223 units, but then with the allocated sites of the LDP then producing units, a surplus of 82 units in 2026. but falling away once again in 2027, into a continued shortfall</p> <p>As above, further windfall sites are needed to support the LDP to deliver the projected 463/annum target - over the nine years we have an average 120 units shortfall per year, which is a further 3.33 sites per year delivering 36 units per annum – a heavy burden to place on the speculative (Windfall) applications received</p>	<p>It is also necessary to have regard to the housing delivery in the earlier years of the Plan period which was ahead of schedule. A lag has occurred in the delivery of four allocated sites due to phosphates and two sites taking longer to progress to planning application than anticipated. The figures provided by Elan do not include small sites. The full picture will be presented within the AMR.</p>
	<p>Although some (11no.) Windfall sites are already listed on this Monitoring sheet – risk of double counting, when seeking Windfall assistance</p>	<p>When the AMR is producing it will be evident that the large windfall site allowance does not apply to the next two years, thereby avoiding double counting.</p>
	<p>Build/Sales rates - the wider area has seemingly slowed down in 2023/4 for open market sales, with those affordable D&amp;B opportunities supporting the open market sales</p> <p>Airfields – general perception is that sales are slowing here on the open market                  it is understood that Keepmoat seeking revised sales strategy and revised pricing structure</p>	<p>Keepmoat have been consulted and have not advised that the anticipated figures are unachievable.</p> <p>Anwyl achieved 38 completions and Bellway 40 completions during the study period and the projected rate of completions is not considered unrealistic and there has been no feedback from the developers concerned</p>

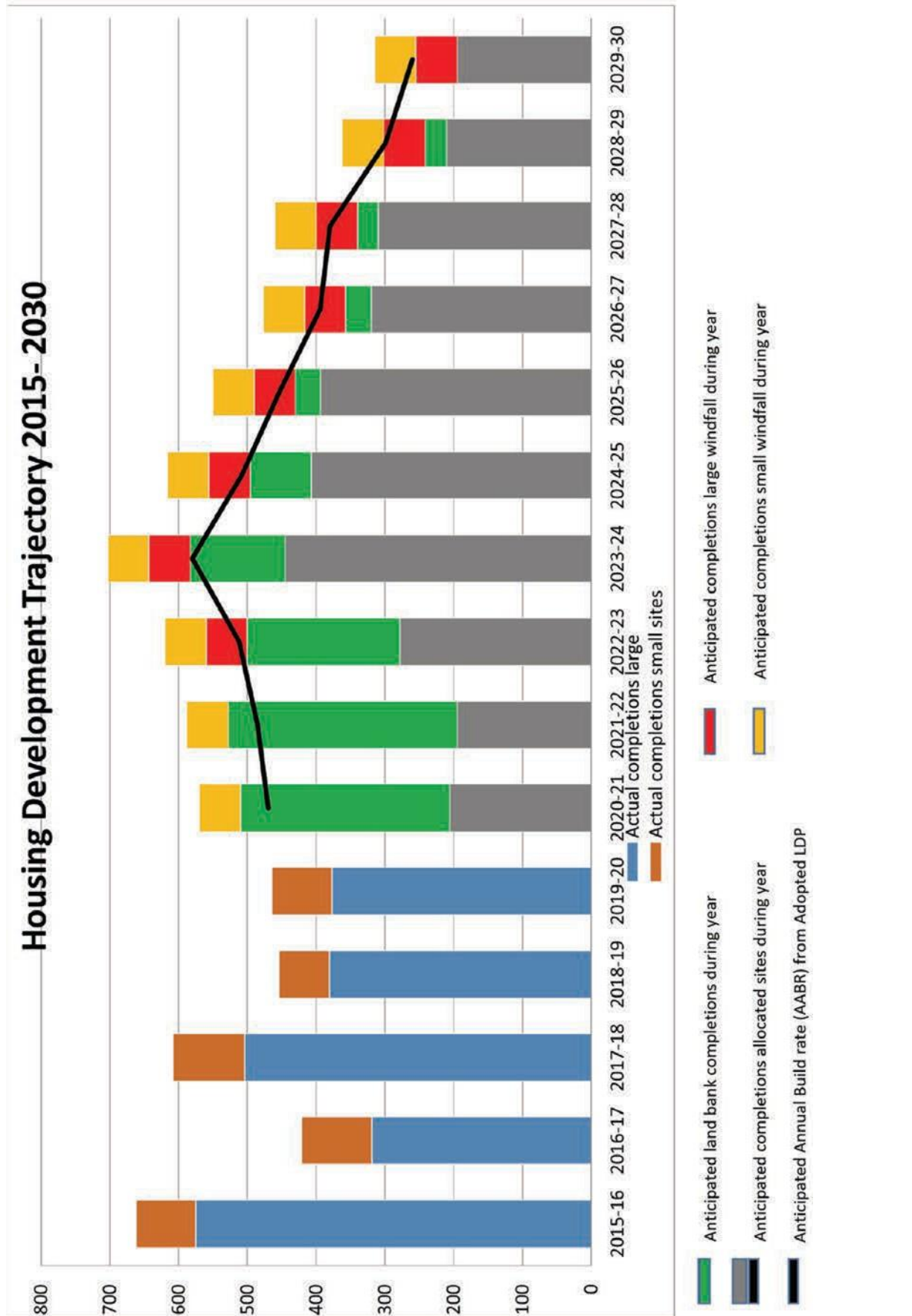
	<p>40 units off each site seems steep as an annual rate of delivery</p> <p>Strategic allocations – build/sales rates should be tapered to 36 units per year, not 40 plus, unless D&amp;B projects</p> <p>2 sales per month on the open market plus the affordables (Sec106) seems fair, if not wholly supported by local agents</p> <p>National average timings from planning submission to a start on site is some three years, which creates an unwanted lag, when the LDP delivery is requiring Windfall sites to support a shortfall.</p>	<p>to disagree with the projected completions.</p> <p>It is necessary to consider delivery over the whole Plan period in terms of meeting the Plan requirement of 6,950 dwellings. The representation puts forward a rather pessimistic view in terms of market conditions and build rates and asserts that the period between planning permission and a start on site is 3 years. Using this rationale a windfall site application coming forward now would take perhaps until March 2025 to receive planning permission and secure a s106 agreement and would not be on site until March 2028 with completions not being delivered until March 2029. The representation fails to explain how such new windfall sites, could serve to assist delivery except at the very end of the Plan period.</p>
	<p>Engagement with the main protagonists upon the allocation would be key to understand levels of D&amp;B sales projected and also sales targets – perhaps a meeting with the Stakeholder Group would be beneficial</p>	<p>Engagement with certain housebuilders has taken place and a wide range of stakeholders consulted upon in terms of the draft schedules. The only dissenting comment is from a housebuilder who is not active in the County and this is no basis upon which to convene a Stakeholder meeting.</p>
<b>Lingfield Homes</b>	None	n/a
<b>Quatrefoil</b>	None	n/a
<b>Pennaf/Clwyd Alyn</b>	None	n/a
<b>Grwp Cynefin</b>	Initial acknowledgement but no response	n/a
<b>Wales &amp; West HA</b>	None	n/a
<b>DCWW</b>	None	n/a



**Appendix D – Adopted Trajectory Schedule**

	LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A	<b>Year</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>	<b>2029</b>
		<b>-16</b>	<b>-17</b>	<b>-18</b>	<b>-19</b>	<b>-20</b>	<b>-21</b>	<b>-22</b>	<b>-23</b>	<b>-24</b>	<b>-25</b>	<b>-26</b>	<b>-27</b>	<b>-28</b>	<b>-29</b>	<b>-30</b>
B	<b>Remaining years</b>	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
C	<b>Total housing provision</b>	7950	7950	7950	7950	7950	7870	7870	7870	7870	7870	7870	7870	7870	7870	7870
D	<b>Total LDP housing requirement</b>	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950
E	Actual recorded completions on large sites during year	575	319	504	381	377										
F	Actual recorded completions on small sites during year	87	102	104	73	87										
G	Anticipated completions on allocated sites during year						206	195	278	445	407	394	320	310	210	195
H	Anticipated land bank completions during year						304	333	222	138	89	36	37	30	32	0
I	Anticipated completions large windfall during year						0*	0*	60	60	60	60	60	60	60	60
J	Anticipated completions small windfall during year						60	60	60	60	60	60	60	60	60	60
K	Total completions (E+F+G+H+I+J)	662	421	608	454	464	570	588	620	703	616	550	477	460	362	315

	LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
L	<b>Anticipated Annual Build Rate</b> -Total anticipated annual completions (G+H+I+J) adjusted with x% adjustment factor to future completions.						470	485	512	580	508	454	394	380	299	260
M	Total projected cumulative completions					2609	3079	3564	4076	4656	5164	5618	6012	6392	6691	6951**
N	Remaining housing completions (housing requirement minus projected completions by year)						3871	3386	2874	2294	1786	1332	938	558	279	-1**







### Appendix F - Revised Housing Trajectory 2024

	<b>LDP Year</b>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A	Year	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30
B	Remaining years	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
C	Total housing provision	7950	7950	7950	7950	7950	7870	7870	7870	7870	7870	7870	7870	7870	7870	7870
D	Total LDP housing requirement	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950
E	Actual recorded completions on large sites during year	575	319	504	381	377	490	331	314	278						
F	Actual recorded completions on small sites during year	87	102	104	73	87	92	69	111	44						
G	Anticipated completions on allocated sites during year										240	545	518	435	299	200
H	Anticipated land bank completions during year										131	202	146	86	8	38
I	Anticipated completions large windfall during year										0	0	60	60	60	60
J	Anticipated completions small windfall during year										60	60	60	60	60	60
K	Total completions (E+F+G+H+I+J)	662	421	608	454	464	582	400	425	322	431	807	784	641	427	358
L	Anticipated Annual Build Rate-Total anticipated annual completions (G+H+I+J) adjusted with x% adjustment factor to future completions.									4338	319	597	580	474	316	265
M	Total projected cumulative completions										4657	5254	5834	6308	6624	6889
N	Remaining housing completions (housing requirement minus projected completions by year)										2293	1696	1116	642	326	61



Appendix G

