

## Flintshire Deposit Local Development Plan

### Submission of Plan for Examination in Public

### Council's Responses to Inspector's Preliminary Questions – 27<sup>th</sup> November 2020

*All elements of the LDP must be based on robust, credible and proportionate evidence. It will be helpful if the answers to the following questions include signposts to the relevant parts of the evidence base and any other assessments relied upon.*

**Question:**

1. Has the Local Development Plan (LDP) been prepared in accordance with the requirements of:
  - a) The approved Delivery Agreement, including the Community Involvement Scheme?
  - b) The Well-being of Future Generations Act (Wales) (2015)? and The Equality Act (2010)?

**Council's response: a)** An original Delivery Agreement (DA) was approved by Welsh Government on 14<sup>th</sup> Feb 2014, subsequently 3 further revised versions were approved. In the first 3 versions of the DA the Community Involvement Scheme (CIS) remained the same, however the 4<sup>th</sup> Revised [DA](#) set out a 4 month delay in the timetable and that LDP documents would only be available on the Councils website rather than physically in libraries and Council offices due to the Covid 19 Regulations. The 4th Revised DA was approved on 27 July 2020. A [Consultation Report](#) has been produced which sets out all the consultation carried out as part of the Local Development Plan from the early stage of the Key Messages to the Strategic Options, Preferred Strategy and the Deposit Plan.

**b)** The Well Being of Future Generations Act places a duty on all public bodies in Wales to “carry out sustainable development ” and as part of the LDP a Sustainability Appraisal / Strategic Environmental Assessment in the form of an Integrated Impact Assessment (IIA) has been undertaken at key stages in the Plans preparation to ensure that the plan is sustainable. As explained in Q2 the [IIA](#) went through a re-scoping exercise to ensure that it had regard to the Well-being goals. Also all strategic policies in the plan have been considered against the seven Well Being Goals and these have been identified in the plan under the policy context table for each policy, as explained in para 3.18 and the accompanying table in the written statement.

In terms of The Equality Act, consultation was carried out throughout the plan making process with a group set up by Flintshire County Council, the Equalities Impact Assessment (EIA) Quality Assurance Group, all the relevant meetings are set out in page 17 and Appendix 13 of the [Consultation Report](#). In addition to this as part of the LDP Preferred Strategy, Flintshire County Council carried out its own Integrated Impact Assessment of the LDP ([Flintshire Integrated Impact Assessment – Welsh Language, Health and Equalities](#)). Also as part of the Deposit LDP the [IIA](#) explains in

para 1.6 how it considered the issue of Equality. See answer to Q2 regarding SEA /SA.

**Supporting evidence:**

Preferred Strategy [Integrated Impact Assessment \(Welsh Language, Health and Equalities\)](#) Oct 2017

Consultation Report October 2020 [LDP-KPD-CR1](#)

Consultation Report Appendices 21a to 24 [LDP-KPD-CR1a](#)

Consultation Report Appendices 25a to 29d [LDP-KPD-CR1b](#)

Consultation Report Appendices 30 to 33 [LDP-KPD-CR1c](#)

4<sup>th</sup> Delivery Agreement July 2020 [LDP-KPD-DA1](#)

Deposit IIA Sept 2020 [LDP-KPD-IIA4](#)

**Question:**

2. *Has the LDP been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? and have all of the 'likely significant environmental effects' of the Plan and all 'reasonable alternatives' been identified, described and evaluated?*

**Council's response:**

A Sustainability Appraisal / Strategic Environmental Assessment has been undertaken at key stages in the Plans preparation under the umbrella title of 'Integrated Impact Assessment' (IIA). The IIA has been undertaken by specialist consultants Arcadis who also undertook similar work on the UDP and who have a good working knowledge of the County and its planning context.

A [scoping report](#) for the IIA was first undertaken in Mar 2015 and subsequent IIA's were undertaken at Strategic Options, Preferred Strategy and then Deposit consultation stages. The Non-Technical Summary within the Deposit IIA [Deposit IIA Sept 2019](#) explains that the IIA provides an assessment of the social, economic and environmental effects of proposals in the LDP and comprises a number of impact assessments including Strategic Environmental Assessment, Sustainability Appraisal, Health Impact Assessment and Equalities Impact Assessment. In August 2017 a re-scoping exercise was undertaken to revisit the IIA framework in the light of the Well-being of Future Generations (Wales) Act 2015. This ensured that health, equalities, cohesive communities and protection of the Welsh language were incorporated into the assessment process.

The Non-Technical Summary sets out the key sustainability issues and opportunities for the County and then identifies the 18 Objectives and the Sub-Objectives which comprise the assessment 'framework'. The IIA has therefore undertaken a robust and comprehensive approach to ensure that any 'likely significant environmental effects' are identified. The IIA has identified no such effects.

The Non-Technical Summary explains how the Council has '*...undertaken a thorough and legally compliant approach to reasonable alternatives. They have identified a*

*broad range of alternatives to proposals in the LDP and have robustly justified their selection of options in light of these. In particular, the Council have closely considered the alternatives available to them for the quantity of growth that the LDP should seek to provide for, the overall spatial distribution for accommodating this growth and the specific sites for development'. Reasonable alternatives in respect of growth strategy, spatial strategy and allocations have been identified, described and evaluated.*

**Supporting evidence:**

IIA Scoping Report March 2015 [LDP-KPD-IIA](#)  
SA / IIA Strategic Options Oct 2016 [LDP-KPD-IIA2](#)  
IIA Preferred Strategy Oct 2017 [LDP-KPD-IIA3](#)  
IIA Preferred Strategy Non-Technical Summary Oct 2017 [LDP-KPD-IIA3.1](#)  
IIA Deposit Sept 2019 [LDP-KPD-IIA4](#)  
IIA Deposit Sept 2019 Appendix A-D [LDP-KPD-IIA4.1](#)  
IIA Deposit Sept 2019 Appendix E [LDP-KPD-IIA4.2](#)

**Question:**

*3. Has the LDP been subject to a robust Habitats Regulations Assessment? and where 'likely significant environmental effects' have been identified has an adequate appropriate assessment been undertaken?*

**Council's response:**

The Preferred Strategy consultation stage of the LDP was accompanied by a Habitats Regulations Screening Report ([LDP-KPD-HRA1](#)). The Deposit LDP was accompanied by a Habitats Regulations Screening Report ([LDP-KPD-HRA2](#)) and an accompanying map ([LDP-KPD-HRA2.1](#)). The HRA has been undertaken by specialist consultants Arcadis who also undertook similar work on the UDP and who have a good working knowledge of the County and its planning context. The HRA concludes in para 8.1.1 '*This HRA Screening of the Flintshire Local Development Plan has considered the potential implications of the Plan for the European sites in the vicinity of the borough*' and in para 8.1.2 '*The Screening exercise concluded that none of the policies or associated allocation sites were considered to have a likely significant effect on any of the European sites alone, or in combination*'. On this basis there is no need for Appropriate Assessment to be undertaken.

Objections were raised at Deposit consultation stage by NRW to the HRA (comment id1048 recorded under policy STR13) on the basis of concerns that policies PE2, PE13 and PE14 were screened out too early in the HRA process. Discussions have taken place between the LPA, NRW and Arcadis to agree amendments to the wordings of the respective policies and their explanations which satisfy NRW. This will be set out in a Statement of Common Ground, alongside an addendum to the HRA which will be submitted to the Examination in due course.

**Supporting Evidence:**

Preferred Strategy Habitats Regulations Screening Report ([LDP-KPD-HRA1](#))  
Deposit LDP Habitats Regulations Screening Report ([LDP-KPD-HRA2](#))

Deposit LDP Habitats Regulations Screening Report Map ([LDP-KPD-HRA2.1](#))  
Statement of Common Ground – NRW and HRA Addendum (to be submitted to Examination in due course)

**Question:**

4. *Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? if there have, what are the implications of these changes for the Plan? do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? and what is the intended timescale for this work?*

**Council's Response:**

**TAN1 / PPW10**

On 26<sup>th</sup> March 2020 the Minister for Housing and Local Government Julie James issued a [letter](#) to Heads of Planning at Local Planning Authorities advising of the permanent revocation of TAN1 and associated changes to PPW10 alongside Development Plans Manual 3. The letter advised that the housing trajectory within adopted LDP's will form the basis for monitoring the delivery of development plan housing requirements. As a result of this change the Council is updating Background Paper 10 Housing Land Supply [LDP-EBD-BP10](#) with a revised housing trajectory and this will be submitted in due course to the Examination.

**Covid-19 / Building Better Places**

The key change in circumstances since the Deposit Plan consultation was the global Covid-19 pandemic and the impacts on the County as a result of successive national and local lockdowns. This has manifested itself in terms of economic and social changes in the way people live their lives with greater working from home, reduced travelling, staying local and social distancing.

Clearly, the Covid -19 Global Pandemic has occurred since the Deposit plan was consulted on, and whilst this has had short term effects on growth, development, and the economy, there is as yet no definitive assessment of the medium to longer term effects on the economy of Flintshire that would warrant a review of the Strategy of the LDP, remembering also there is still almost 10 years of the plan period remaining. It is simply too early to tell and there is no reliable evidence from economic projections or forecasts on which to base such a reassessment. What is clear anecdotally is that housing development and sales remain at high levels with some developers reporting a buoyant market in terms of sales of new properties, and a similar trend appears evident in the existing housing market, reflected in stable or rising house prices and transactions.

What is also clear is that in agreeing in July to a revised Delivery Agreement timetable to maintain progress to EiP, the Welsh Government have not raised any concerns or need to 'pause and reflect' in relation to the strategy of the Plan and any perceived Covid-19 impact. Given where the Council is in the process, the overriding priority must be to have an adopted development plan in place in Flintshire to guide and

protect communities from further speculative development. The LDP strategy is fit for purpose and it is relevant that Welsh Government, in agreeing to an amended delivery agreement so quickly, stated that the Council has “taken a pragmatic view to trying to keep the plan moving forward” they could easily have required the Council, as other authorities who are pre-deposit have been told, to review their evidence base in light of Covid ‘effect’, but they haven’t said this to Flintshire.

In terms of factual evidence, 2018 based population projections have recently been published nationally during lockdown and these show an uplift in projected population growth for Wales overall which filters down to most local authorities. Whilst household projections have not yet been produced, the Council’s advising statistician at Conwy Council has run some household projection scenarios based on the national uplift, and whilst Flintshire’s household growth projection is yet to be confirmed, it will still be below the LDP housing requirement.

Finally economic recovery post Covid could go two ways – accelerated recovery led by housing development and market confidence which may use up the sites the Plan has at a quicker rate. In this scenario the Council would be required to review the plan and in terms of LDP Regulations, it is necessary to review 4 years after adoption in any event.

The other scenario is slow recovery of the economy and developer confidence to build, in which case the sites are sustainable but may take longer to come forward and as such supply would be maintained and would not necessarily trigger a plan review. On this basis the strategy is sufficiently balanced and flexible to happily sit between these two scenarios and is therefore fit for purpose.

In July 2020 Welsh Government published additional planning policy in response to the Covid-19 pandemic setting out priorities for planning system for recovery. The document [Building Better Places: The Planning System Delivering Resilient and Brighter Futures](#) provides guidance in respect of development management and Local Development Plans. The document sets out a number of key themes:

- Climate change and Decarbonisation –
- Considering Health and Well-being throughout the Planning Process
- Staying Local: creating neighbourhoods
- Active Travel: exercise and rediscovered transport methods
- Revitalising our town centres
- Digital places – the lockdown lifeline
- Changing working practices – our future need for employment land
- Reawakening Wales’ tourism and cultural sectors.
- Green Infrastructure, health and well-being and ecological resilience

### **National Development Framework**

Following extensive consultation on the draft NDF the Minister for Housing and Local Government issued an [announcement](#) on 21/09/20 that the draft NDF has been laid before Senedd for a 60 day consultation period. It is accompanied by a consultation

report setting out the issues raised during the consultation and a schedule of changes the Minister intends to make. The outcome of this consultation in the form of a final published NDF will need to be assessed in the context of the LDP. However it is important to note that in the Annex to their formal representations on the Deposit LDP Welsh Government state '*The Welsh Government is broadly supportive of the strategy, level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with the emerging NDF.*

### **Development Plans Manual (Edition 3) March 2020**

Although [Edition 3](#) was published after the Deposit LDP consultation, the Council was able prepare the Plan in the context of the advice in the draft consultation version on the document. In their formal representations on the Deposit LDP Welsh Government comment '*It is pleasing to note the Deposit Plan has been prepared having regard to the guidance in DPM3.*

### **Supporting evidence:**

[Letter](#) to local planning authorities announcing changes to PPW and associated guidance March 2020

[Building Better Places: The Planning System Delivering Resilient and Brighter Futures](#)

Welsh Government [announcement](#) on NDF Sept 2020

[Development Plans Manual Edition 3](#) Mar 2020



Flintshire LDP -  
DEPOSIT PLAN - WG

Welsh Government formal comments on Deposit LDP

### **Question:**

5. *Is the LDP strategy consistent/compatible/in conformity with:*
- National policy and the Wales Spatial Plan (National Development Framework when published)?*
  - The Well-being Goals?*
  - The Welsh National Marine Plan?*
  - The relevant Area Statement?*
  - The relevant strategic development plan (when adopted)?*
  - Regional plans/strategies and the programmes of utility providers?*
  - The plans/strategies of neighbouring local planning authorities? and the relevant Well-being Plan or National Park Management Plan?*

### **Council's response:**

a) National Policy / Wales Spatial Plan / NDF / Development Plans Manual 3 National Planning Policy:

Given that the Preferred Strategy had been prepared in the light of PPW9, the preparation of the Deposit LDP necessitated a review against PPW10 which was published in December 2018. The Deposit LDP is considered to be in conformity with PPW10 and the supporting TAN's. In their formal representations on the Deposit Plan Welsh Government commented '*The Welsh Government is broadly supportive of the strategy, level of homes and jobs proposed, considers **it aligns with national policy***

*and is in general conformity with the emerging NDF*. The Plan has also been prepared in line with the (then) draft DPM3 as explained in the response on Q3. Wales Spatial Plan:

The LDP has been prepared in the context of the guidance in the [Wales Spatial Plan 2008 Update](#). The Wales Spatial Plan recognises the very important contribution NE Wales make to the economy of Wales and the links with North West England and identifies the Wrexham-Deeside-Chester hub, the coastal belt and the rural hinterlands. Key elements in recognising the vision in the Wales Spatial Plan for the area are:

- Strengthening key hubs as a focus for investment in future employment, housing, retail, leisure and services.
- Developing sustainable accessibility between hubs, coastal and border towns and rural parts of the area.
- Improving the quality and diversity of the economy
- Developing in a focussed and strategic manner the skills and education of the current and potential workforce.
- Promoting sustainable development.

For Flintshire, the Wales Spatial Plan identifies that the opportunity ‘is about harnessing its special characteristics to benefit not only North East Wales but the wider geography, east and west. It will be a place where the strengths of prosperous areas are enhanced and the benefits of economic growth are maximised through linking areas of opportunity with areas in need of regeneration. Working towards this vision, the Mersey Dee Alliance will play a key role in delivering the spatial strategy...’. The LDP has sought to embrace a growth based approach to job creation and economic development supported by an appropriate amount of housing which is distributed having regard to the sustainable settlement hierarchy in policy STR2 but also having regard to key settlements in and around the growth hub. The LDP is considered to be in general conformity with the Wales Spatial Plan.

Draft National Development Framework:

The draft National Development Framework ([dNDF](#)) was published for consultation by Welsh Government 7<sup>th</sup> August 2019 shortly before the Deposit LDP consultation started on 29<sup>th</sup> September 2019. By the time the dNDF was published, the content of the Deposit LDP had been agreed and it was not possible for the Deposit LDP to formally comment on it in the written statement.

The Spatial Strategy map on p25 of the dNDF clearly identifies Flintshire (alongside Wrexham) as a ‘National Growth Area’. On p49 the dNDF sets out ‘Policy 17 – Wrexham and Deeside’ which states:

*‘The Welsh Government supports Wrexham and Deeside as the primary focus for regional growth and investment. Wrexham and Deeside’s role within the North region and the wider cross-border areas of Cheshire West and Chester and Liverpool City Region should be maintained and enhanced.*

*Strategic and Local Development Plans across the region should recognise Wrexham and Deeside as the focus for strategic housing and economic growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure; and consider how they can support and benefit from Wrexham and Deeside's regional role. The Welsh Government will work with cross border authorities to promote Wrexham and Deeside's strategic role and ensure key investment decisions support Wrexham and Deeside and the wider region'.*

The Strategic Context for the LDP in para 3.25 of the [Deposit LDP](#) identifies the economic significance of the County and region and this is further recognised in the Key Issues and Drivers table in para 3.30 and the section 'In Flintshire, we need to plan for:' in para 3.35. The Preferred Strategy for the Plan is summarised in the table following para 3.65 in terms of jobs growth, housing growth, spatial strategy, managing growth, infrastructure and deliverability. The Plans approach is considered to be broadly in line with the dNDF. In their formal representations on the Deposit Plan Welsh Government commented '*The Welsh Government is broadly supportive of the strategy, level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with the emerging NDF*'. Unless the final version of the NDF has changed significantly, it is considered that the Deposit LDP is in conformity.

b) Well-being Goals

The table following para 3.18 of the Deposit LDP sets out the structure for each strategic policy whereby the policy wording and explanatory text is followed by a table setting out the planning policy 'context' which includes PPW10 references and Well-being Goals. This has ensured that the strategic framework of policies in the Deposit LDP has been prepared having regard to meeting the Well-being Goals.

c) Welsh National Marine Plan

The [National Marine Plan](#) (NMP) explains in para 512 that it extends up to the level of mean high water spring tides whereas land use planning boundaries generally extend to mean low water spring tides. The NMP therefore overlaps physically with terrestrial plans, helping to facilitate integration between land and sea planning and management. The Deposit LDP does not propose any new development which would harm the marine environment. Furthermore, the Plans framework of policies, particularly in respect of the natural environment, provides the basis with which to ensure that development proposals which do arise are assessed in a manner which would prevent harm to the marine environment. More specifically, policy EN3 'Undeveloped Coast and the Dee Estuary Strategy' seeks to strictly control new development in the undeveloped coast which lies to the north of the A548 Coast Road. No objections have been raised by either Welsh Government or Natural Resources Wales in terms of incompatibility of the Deposit LDP with the NMP.

d) The relevant Area Statement

The NRW [website](#) explains that '*Each Area Statement outlines the key challenges facing that particular locality, what we can all do to meet those challenges, and how we can better manage our natural resources for the benefit of future generations.*



*They will be updated regularly and improved year-on-year as we engage with more people, gather new evidence, put forward ideas and work across boundaries to create opportunities. Watch this space, in other words'. NRW state that 'North East Wales encompasses the three separate counties of Denbighshire, Flintshire and Wrexham. It features large urban communities, industry, several of the country's major transport arteries and some stunning scenery' but goes on to explain that this only reflects a fraction of the natural and historic resources of the area.*

The North East Wales Area Statement identifies 5 key themes which are commented on below:

- Climate emergency: resilience and adaptation – climate change has been a key consideration in the preparation of the Plan and this reflects its prominence within [PPW10](#). The strategy of the Plan seeks to facilitate an appropriate level of development which reflects the Wales Spatial Plan and draft NDF, whilst distributing that development in a sustainable manner. Although the Plans policies need to be read and applied as a whole, key policies which work towards this theme are STR14 Climate Change and Environmental Protection and PC4 Sustainability and Resilience of New Development.
- Develop and improve urban / rural green infrastructure – Increased emphasis was given to green infrastructure by Welsh Government in [PPW10](#). The Council issued [Background Paper 2 Green Infrastructure](#) which pulls together various strands of green infrastructure work within the Council. Key policies which provide the basis for protecting, enhancing and creating green infrastructure are policy STR13 Natural and Built Environment, Green Networks and Infrastructure and policy EN2 Green Infrastructure. In particular opportunities exist within allocated sites for green infrastructure to be a key principle in the layout and design of new development.
- Increasing woodland cover for social, environmental and economic benefits – the plan does not have a specific policy for increasing woodland cover but any such proposals are capable of being assessed against the Plans framework of environmental policies.
- Promoting the resilience of ecosystems in maintaining and enhancing biodiversity – strategic policy STR13 Natural and Built Environment, Green Networks and Infrastructure and detailed policies EN6 Sites of Biodiversity Importance and EN7 Development Affecting Trees, Woodland and Hedgerows all seek to protect the natural environment and for new development to enhance biodiversity.
- Protecting water and soil through farming and sustainable land management – the Plans framework of policies seeks to carefully manage new development in open countryside with policy PC1 The Relationship of Development to Settlement Boundaries setting out specific forms of development permitted outside settlement boundaries. The Plan does not contain a policy in respect of protecting best and most versatile agricultural land as this is fully covered in PPW10. However, the Council undertook a robust approach to assessing candidate and alternative sites in terms of the PPW10 objective of minimising

the loss of Best and Most Versatile agricultural land. In their representations on the Deposit LDP Welsh Government have offered 'Support in Principle' in respect of Best and Most Versatile Land. Policy PE4 seeks to facilitate farm diversification development proposals. The Plans environmental policies will provide a land use planning context for the NRW objectives in terms of farming and sustainable land management.

There are no objections from NRW to the Deposit LDP on the basis that it is inconsistent with the Area Statements.

e) Strategic Development Plan

No Strategic Development Plan presently exists for North Wales.

f) Regional plans/strategies and the programmes of utility providers

The Deposit LDP has been prepared in the context of a number of regional plans and strategies as explained in para 3.25 of the written statement. These include economic strategies including the Mersey Dee Alliance and the North Wales Economic Ambition Board in terms of the Growth Vision and Deal for North Wales. The Plan has been prepared in the light of the Minerals Regional Technical Statement for North Wales and the Council is presently seeking to adopt a collaborative approach with Wrexham CBC and Denbighshire CC in meeting the increased need for minerals identified in [RTS2](#).

The preparation of the Plan has involved close engagement and consultation with key service providers who were invited to sit on the [Key Stakeholder Forum](#). In the run up to publishing the Deposit LDP the Council prepared an [Infrastructure Plan](#) (Background Paper 3) which again involved engagement with service providers.

g) The plans/strategies of neighbouring local planning authorities and the relevant Well-being Plan or National Park Management Plan

The preparation of the LDP has involved close working with the nearest neighbours Wrexham CBC, given the relative closeness of respective Plan timescales. Joint working has been undertaken with Wrexham in the form of a joint [Employment Land Review](#) and the first [Local Market Housing Assessment](#). More recently, a joint approach has been undertaken whereby Flintshire, Wrexham and Denbighshire employed the District Valuation Service to ensure a consistent approach to undertaking a [Viability Study](#). Regular North Wales Policy Officer liaison meetings take place with Welsh Government Development Plan team and representatives of Policy Teams. These meetings ensure close liaison between authorities in respect of their development plans and establishing good practice. During earlier stages of the preparation of the Chester Cheshire West and Chester Local Plan (Part One), regular liaison meetings were held between Officers of each Authority. No objections were made to the Deposit Plan by Wrexham CBC and a modest number of representations have been received from Chester West and Chester City.

As explained in para 3.25 of the Deposit Plan, a key consideration in terms of the local context for the Plan is the [Flintshire Well-being Plan](#). The priorities are grouped into a number of themes:

- Community Safety – crime and disorder objectives are met through policy PC2 General Requirements for Development and PC3 Design
- Economy and Skills – the economic objectives are met through the LDP’s allocation of two strategic mixed use sites (STR3), a portfolio of employment allocations (PE1), the identification of Principal Employment Areas (PE2) and a suite of economic and tourism policies. This policy framework sits alongside the Deeside Enterprise Zone and North Wales [Growth Deal](#).
- Environment – The LDP’s suite of strategic and detailed policies will seek to protect and enhance the environment of the County.
- Healthy and Independent Living – The LDP seeks to bring about the basis for healthy environments and living by locating development in sustainable locations (STR1 and HN1), through design related policies (PC2 and PC3), through encouraging active travel (PC6) and green infrastructure (EN2).
- Resilient Communities – the LDP seeks to locate development in sustainable locations and settlements which can accommodate new development whilst maintaining cohesive communities. The two mixed use strategic sites both have the potential to create cohesive communities in their own right.

There is no National Park in or adjacent to Flintshire but the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty covers the western edge of the County. The Council sits on the AONB Joint Committee and is involved in the preparation of the AONB Management Plan. The Council also jointly adopted a Supplementary Planning Guidance Note ([SPG](#)) for the AONB with Wrexham CBC and Denbighshire CC. The Plan seeks to ensure that new development conserves or enhances the natural beauty of the AONB through policy EN5.

**Supporting evidence:**

See evidence referenced in response

**Question:**

6. *Has the Local Planning Authority (LPA) exhausted all opportunities for joint working and collaboration on both the preparation of the LDP and its evidence base?*

**Council’s response:**

As explained in Q5 the preparation of the LDP has involved close working with the nearest neighbours Wrexham CBC, given the relative closeness of respective Plan timescales. Joint working has been undertaken with Wrexham in the form of a joint [Employment Land Review](#) and the first [Local Market Housing Assessment](#). More recently, a joint approach has been undertaken whereby Flintshire, Wrexham and Denbighshire employed the District Valuation Service to ensure a consistent approach to undertaking a [Viability Study](#). The Council’s Minerals and Waste Team also provides technical advice to adjoining Local Planning Authorities on minerals planning matters, which ensures a coordinated approach.

**Supporting evidence:**

Employment Land Review WCBC and FCC October 2015 [LDP-EBD-EM1](#)

**Question:**

7. *What is the LDP's spatial strategy? how do the key components of the strategy interact? and does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?*

**Council's response:**

The identification of a preferred settlement hierarchy, as explained in Q8, provided the basis for considering a series of spatial options in terms of distributing development in the Plan. The provision for employment development in the Plan is based on existing employment allocations being reviewed and carried over from the adopted UDP, the two strategic sites which have planning permission and existing industrial estates, as reflected in the Principal Employment Areas. By contrast, the distribution of housing development requires a policy mechanism to guide development to the most sustainable locations, particularly given that there are 68 settlements identified in the LDP.

The [Strategic Options](#) document explains in section 10 the approach to developing spatial options. An initial 'large' list of spatial options was assessed and reduced to a 'small' list of 5 spatial options which were the subject of a more detailed assessment.

The 5 spatial options were:

- Option 1 – Proportional Distribution
- Option 2 – Focussed Urban Growth
- Option 3 – Growth Area
- Option 4 – Hubs and Corridors
- Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements

Each option was presented in a table format with a description, list of settlements affected, key pros and cons, a summary and accompanying illustrative map, but the Strategic Options document recommended no particular option. These options were the subject of consultation as part of the pre-deposit engagement and development of the Preferred Strategy.

The [Preferred Strategy](#) consultation document sets out in section 3 the assessment of spatial options. The summary assessment table following para 3.11.4 provides a brief overview of the assessment and conclusion for each option. The overall conclusion of the assessment in para 3.11.9 is that Option 5 is considered to be the most 'well rounded' spatial option in that it is based on a soundly evidenced settlement hierarchy and seeks to direct growth to the most sustainable settlements whilst not ignoring the needs of rural areas. Rather than being based on numerical or mechanical means to apportion growth it seeks to take a more informed approach to each settlement, utilising information in the [settlement audits](#), to identify which settlements are sustainably able to accommodate development. The broad scale of development would be based on the position of a settlement within the settlement hierarchy and

based on the particular characteristics of settlements as well as the availability of sustainable sites. Option 5 is therefore considered to represent the most suitable spatial option with which to formulate the Plans Spatial Strategy.

The Plans spatial strategy is set out in policy STR2 of the [Deposit LDP](#). Planned growth through allocations, is distributed to the top three tiers of the settlement hierarchy (Tier 1 Main Service Centres, Tier 2 Local Service Centres and Tier 3 Sustainable Settlements) as these are considered to be the most sustainable settlements. In Tier 4 Defined Villages and Tier 5 Undefined Settlements the focus is on delivering local needs affordable housing. The table following para 5.13 provides an overview of the apportionment of development across the 5 settlement hierarchy tiers having regard to allocation, commitments and windfalls and this is considered to represent an appropriate and sustainable distribution of development across the County.

In their representations on the Deposit LDP (rep 1135) Welsh Government comment '*In terms of spatial distribution, 47% of housing growth is directed to main service centres (Tier 1) 36% to local service centres (Tier 2) and 17% to Tiers 3-5 (sustainable settlements, defined villages & undefined villages). The majority of new allocations outside of the strategic allocations are located in Tier 1 and Tier 2 settlements. WG does not object to the principle of this approach*'. The Welsh Government representation also states '*The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs and has no fundamental concerns in this respect*'. The Plan's spatial strategy is therefore considered to represent a sustainable approach to the distribution of development across the County.

**Supporting evidence:**

Settlement Audits [LDP-KSD-KM2](#)

Strategic Options Main Consultation Document Oct 2016 [LDP-KSD-SO1](#)

Preferred Strategy Main Consultation document Nov 2017 [LDP-KSD-PS1](#)

Deposit LDP Written Statement Sept 2019 [LDP-KSD-DEP1](#)

**Question:**

8. *How was the LDP's settlement hierarchy defined?*

**Council's response:**

During the early stages of Plan preparation the Council undertook a robust review of the settlement hierarchy within the adopted UDP. This was informed by a comprehensive survey and assessment of 72 settlements called [settlement audits](#). Each settlement was assessed in terms of the following broad factors as part of the establishing the sustainability of each settlement:

- Settlement Size (population and number of dwellings);
- Character and Built Form;
- Role and Function;
- Services and Facilities;
- Accessibility;
- Employment;

- Broadband Provision;
- Changes to Service Provision Since 2000

The initial set of settlement audits were issued to elected Members and also Town and Community Councils in 2015 to invite comment on the content of each document, as explained in section 8 of the [Consultation Report](#). The results and findings of the settlement audits informed the development of settlement groupings.

The approach to reviewing and defining a settlement hierarchy for the LDP was set out in the [Key Messages Document](#) issued for consultation in March 2016. This document also set out to engage with stakeholders on the vision for the Plan, the issues facing the Plan and the identification of objectives for the Plan. Whilst not a requirement of the formal LDP process, it was considered that this additional consultation was necessary and beneficial in seeking consensus on key aspects of the Plan ahead of the publication of the Strategic Options consultation.

More detailed information on the settlement audits is contained in Appendix 1 of the Key Messages Document and the approach to defining settlement hierarchy or categorisation options is contained in Appendix 2 of the Key Messages Document. Some six draft settlement hierarchy options were presented in the document and consulted upon. Each option was accompanied by a commentary but the Key Messages document did not contain a recommendation for a preferred option.

The outcome of the consultation on the settlement hierarchy options in the Key Messages Document is explained on p7/8 of the [Strategic Options](#) consultation document. There was considered to be general consensus that the UDP approach was rather basic and somewhat outdated and that there was a need for a more refined and informed approach to categorising settlements. Although there was some support for the concept of urban areas, a five tier hierarchy was considered more appropriate in terms of representing settlements which exist now and are easily recognised, rather than seeking to create 'new' groupings of settlement into urban areas, which would not be recognisable to, or supported by the public. The settlement audit findings in respect of the relationships and linkages between settlements resulted in the 5 tier settlement hierarchy being further refined to take account of these settlement relationships (Option 2a). In these circumstances, some settlements appeared higher up the hierarchy than they would otherwise logically appear to do on account of the proximity to higher order settlements which had greater services and facilities.

The Plan's settlement hierarchy is therefore Option 2a i.e. a 5 tier settlement hierarchy adjusted to take account of proximity and functional relationships to higher level settlements. This option is considered to take a much more refined approach than that contained within the UDP and is based on sustainability considerations. The settlement hierarchy provides a flexible and logical basis for the formulation of a number of spatial options. The settlement hierarchy is presented in policy STR2 The Location of Development in the [Deposit LDP](#).

**Supporting evidence:**

Consultation Report Oct 2020 [LDP-KPD-CR1](#)

Key Messages Document Mar 2016 [LDP-KSD-KM1](#)

Strategic Options Main Consultation Document Oct 2016 [LDP-KSD-SO1](#)

Deposit LDP Written Statement Sep 2019 [LDP-KSD-DEP1](#)

**Question:**

9. *What is the rationale for the distribution of new development? and is the approach consistent with the National Sustainable Placemaking Outcomes?*

**Council's response:**

As explained in the response to Q7 the rationale for distributing development is based on the top three tiers of the settlement hierarchy in policy STR2 of the Deposit LDP. Referring to the policy explanation to STR2 (paras 5.11-5.16 of Deposit Written statement), the Plan does not seek to provide planned growth, in the form of allocations, in every settlement as this is not practicable or desirable, given the number of settlements in the top three tiers. Allocations have therefore been made in the most sustainable settlements in the County. The Plan's spatial strategy is also in conformity with the growth hub approach embodied in both the Wales Spatial Plan and the draft National Development Plan. In their formal representations on the Deposit Plan Welsh Government has 'Supported in Principle' the Plans economic growth strategy in terms of the scale and location of homes and jobs. More specifically, in terms of the Plans focus on two strategic sites and the spatial distribution of development according to the settlement hierarchy, Welsh Government commented '*The WG does not object to the principle of this approach*'.

The Plan's spatial strategy and the allocated sites are considered to represent a sustainable approach to facilitating the required level of development in the County. Careful consideration has been given to the allocations to ensure that they represent sustainable development and accord with the National Sustainable Placemaking Outcomes and the Placemaking Themes within PPW10.

The plan's focus in making housing allocations in particular has been to provide sites in the most sustainable locations based on the position of these settlements in the hierarchy commensurate with their role and function, defined by their level of services and facilities and degree of connectivity. The number and scale of allocations made is also significant and specific as the plan does not aim to scatter development throughout every settlement on some sort of proportionate basis, but it rather selects a relatively modest number of sites that are sufficiently significant in scale to better create the conditions for economies to be achieved which in turn will drive the viability, deliverability and integration of this new development into their respective communities.

This is deliberately about achieving visibly sustainable outcomes and mirrors the placemaking principle embedded in PPW10 where it states that "Sustainable Places

are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them". The plan then provides a suite of sustainable policies that together aim to facilitate the achievement of sustainable places and well-being by setting positive challenges for development to be the best it can be.

Whilst some local communities simply don't want any change or development in their areas, the more relevant test as to whether the Council has achieved a sustainable distribution with placemaking at its heart, is the combination of the lack of any fundamental objections from the key infrastructure providers to the allocations and the degree of developer interest in and due diligence work already done, to demonstrate the attractiveness and deliverability of the sites allocated in the Plan. This also extends to the significant progress now evident on the larger of the two allocated Strategic mixed use Development sites (Northern Gateway) where both housing and employment delivery is happening on the ground.

**Supporting evidence:**

**Question:**

*10. What was the methodology underlying the site selection process? Are the resultant allocated sites:*

- a) In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations? and*
- b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?*

**Council's Response:**

Site Selection

The Council undertook a Call for Candidate Sites exercise in 2014 which resulted in 734 candidate sites being submitted for consideration. Shortly afterwards the [Candidate Sites Register](#) was published on the Council website, along with consultation on a Draft Methodology and Assessment Process, as explained in section 5 of the [Consultation Report](#). Consultation responses on the Assessment Methodology can be viewed [here](#). The [Assessment Methodology](#) formed the basis for the subsequent assessment of Candidate Sites. A [Further Call](#) for Candidate Sites specifically to identify minerals and waste and Gypsy / Traveller sites was undertaken in 2017. In addition to the candidate sites submitted by landowners and developers, a number of UDP allocated sites were also included in the Candidate Site Register to ensure that they were re-appraised alongside other sites.

The Candidate Sites were filtered in terms of small and large sites using the definitions embedded within the housing land monitoring studies. Sites capable of accommodating less than 10 units were classed as 'small' sites and were not subject



to a full assessment but were considered as to whether settlement boundary changes were appropriate or not against the criteria set out in the Assessment Methodology for this scale of site. All 'large' sites were assessed in a consistent manner against the detailed criteria in Appendix C of the Assessment Methodology and recorded within an Access database. Consultations were undertaken with both external and internal consultees. Not all candidate sites sought development as some were submitted in order to achieve protection from development.

The assessment of Candidate Sites was ongoing as other aspects of the Plan progressed. In particular, the consultation on the Preferred Strategy was accompanied by a [Background Paper](#) which assessed each candidate site against the Preferred Strategy. This was not a detailed assessment of each site, but whether or not each site broadly accorded with the Preferred Strategy. It was presented in the form of a colour coded table and accompanying map with a short assessment commentary for each site.

The publication of the Preferred Strategy was also accompanied by the opportunity to submit Alternative Sites. This was also addressed within the [Background Paper](#) referred to in the preceding paragraph. This consultation produced some 97 Alternative Sites being submitted for consideration which were published as a [Register of Alternative Sites](#) shortly after the close of the consultation. Consultations with both external and internal stakeholders were undertaken and each site assessed against the same criteria as the Candidate Sites.

The combination of detailed site assessments and the broad conformity of sites against the Preferred Strategy resulted in a list of potential allocations being drawn up and these were the subject of further internal and external stakeholders' consultation. In October 2018 the Planning Strategy Group considered a detailed report setting out options for housing allocations and this was followed by a separate workshop to discuss in more detail.

The Deposit LDP was accompanied by [Background Paper 8 Assessment of Candidate Sites and Alternative Sites](#) which provided a summary assessment commentary on every candidate site and alternative site and a recommendation in terms of being allocated in the Deposit LDP or not. Furthermore, the [IIA](#) assessed (Appendix E) both the allocated sites and a number of reasonable alternative sites in order to establish the sustainability of allocated sites relative to other reasonable alternatives. These are the 'list of potential allocations' referred to above.

- a) The allocations are all in sustainable locations and are considered to represent logical extensions to existing settlements. The Warren Hall strategic site does not physically adjoin a settlement but is in close proximity to several settlements and comprises a mixed use development which will deliver sustainable development, building upon the existing outline planning permission for a business park. Sites have only been allocated in the Deposit LDP where there is a willing landowner and where sites are free from constraints or where constraints can be avoided or

mitigated. In order to demonstrate that allocations are appropriate and sustainable a number of allocated sites are supported by detailed background studies and assessments as part of due diligence work. The lack of representations on the Deposit Plan from statutory consultees and key stakeholders demonstrates that there is an absence of constraints which would prevent the sites from coming forward.

b) The allocated sites are all considered to be in attractive housing market areas, having regard to the findings of the [Local Housing Market Assessment Update](#). The allocated sites are able to accommodate key policy requirements in respect of open space and affordable housing. Two allocated sites currently have planning applications under consideration, one is the subject of an appeal against non-determination and three have planning permission, having arisen in the form of speculative sites promoted in the light of TAN1 and this assists in demonstrating deliverability. The following short position statement on each allocated site will demonstrate viability and deliverability:

- STR3A – The site is in two ownerships with each part of the site being delivered separately. The Northern part of the site is being delivered by Praxis. The recent key permissions set out below and other recent enquiries relating to the site demonstrate that the site is progressing well and is both viable and deliverable [the plot numbers are shown on an illustrative plan within the [Northern Gateway Praxis](#) Masterplan and Delivery Statement]:
  - Reserved matters approval (059513) on 25/09/19 for 283 units on plots H1, H2 and H8 (part) – Countryside Properties on site (under construction)
  - Reserved matters approval for enabling works (060311) on 24/02/20 on plots H6 and H7
  - Reserved matters enabling works approval (061918) on 28/05/20 on plots H3 and H5
  - Reserved matters (10,000sqm warehouse) approval (060222) on 08/01/20 on plot A

The Southern part of the site is in separate ownership and being delivered by Pochin. The recent key permissions and applications set out below again demonstrate that the site is progressing well and is both viable and deliverable [the phases are shown on an illustrative plan within the [Northern Gateway Pochin](#) Masterplan and Delivery Statement]:

- Reserved matters Phase 1a enabling and infrastructure works approval (058868) on 30.08.19
- Reserved matters application (060411) for 129 dwellings Phase 1 – Keepmoat Homes – under consideration
- Reserved matters application (061585) for 104 dwellings Phase 2 – Lane End Developments Construction Ltd – under consideration
- STR3B – The site is being promoted by Welsh Government Land Division and the North Wales Economic Ambition Board, in the context of the North Wales Growth Deal. It is the intention to make the residential element of the mixed

use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.

- HN1.1 Well Street, Buckley – New owners Clwyd Alyn undertook PAC in August 2020 and current planning application for screening in respect of EIA.
- HN1.2 Broad Oak Holding, Connah's Quay – Site has planning permission (058583 – 33 dwellings Edwards Homes)
- HN1.3 Highmere Drive – Willing landowners and background studies undertaken, discussions with developers
- HN1.4 Northop Road, Flint – Planning applications on each part of the site under consideration (057565 Edwards Homes – 20 dwellings and 058314 Anwyl Land – 145 dwellings)
- HN1.5 Maes Gwern, Mold – site has planning permission (056742) and being developed by Wates as part of Council's SHARP scheme – under construction
- HN1.6 Land between Denbigh Road and Gernaffield Rd, Mold – Detailed planning application (061994) submitted by Anwyl November 2020 for 238 dwellings
- HN1.7 Holywell Rd / Green Lane, Ewloe – two landowners working jointly, wide range of background studies commissioned and preferred developer in place
- HN1.8 Ash Lane, Hawarden – one landowner, wide range of background studies commissioned and tentative preferred developer identified.
- HN1.9 Wrexham Rd, Abermorddu – Willing landowner as demonstrated by previous planning application and wide range of background studies
- HN1.10 Cae Isa, New Brighton – appeal by Stewart Milne Homes against non-determination in respect of detailed planning application for 92 dwellings (060220)
- HN1.11 Chester Rd, Penymynydd – site has planning permission (055590 – Redrow Homes) and is under construction

**Supporting evidence:**

Consultation Report [LDP-KPD-CR1](#)

Candidate Site Register [LDP-KPD-CS1](#)

Candidate Sites Assessment Methodology [LDP-KPD-CS1.2](#)

Summary representations/responses on Assessment Methodology [LDP-KPD-CS1.3](#)

Further Call for Candidate Sites – minerals/waste/G&T [LDP-KPD-CS2](#)

Preferred Strategy Background Paper – Consideration of Candidate Sites Against the Preferred Strategy / Invitation for Alternative Sites [LDP-KSD-PS4](#)

Alternative Sites Register [LDP-KPD-AS1](#)

Integrated Impact Assessment Appendix E Assessment of Site Allocations [LDP-KPD-IIA4.2](#)

Northern Gateway Pochin [LDP-EBD-STR3A.1](#)

Northern Gateway Praxis [LDP-EBD-STR3A.2](#)

**Question:**

*11. How were the settlement boundaries defined?*

**Council's response:** The Flintshire Unitary Development Plan (UDP, 2000-2015) defines the present settlement boundaries in the County. In preparing the LDP it was therefore necessary to review the UDP settlement boundaries to establish whether they were fit for purpose and if they needed to be amended to provide for planned growth. The settlement boundaries seek to balance the need for growth to meet housing requirements and the conservation of the countryside by allowing for appropriate urban extensions and windfall opportunities both within and on the edge of settlements. The [Candidate Sites Assessment Methodology](#) set out in para 3.11 to 3.14 a commentary on settlement boundaries in the context of considering candidate sites, particularly small sites. The significance of settlement boundaries in terms of new development is explained in policy PC1 The Relationship of Development to Settlement Boundaries.

The review of the existing UDP settlement boundaries has been approached in a number of ways as set out below:

- Consideration of candidate sites – the assessment of candidate sites has informed the choice of allocated sites to be included within settlement boundaries and amendments to settlement boundaries to provide for future windfall opportunities;
- Planning permissions – the inclusion of those sites where planning permission has been granted despite sites being outside the UDP settlement boundaries. This will include those sites where 'speculative' development has been approved in the light of TAN1 and the 'considerable' weight to be attached to housing land supply. It will also include sites where planning permission has been granted where the detail of the approved scheme requires a minor amendment to the settlement boundary;
- Minor amendments / corrections – this is where, for example, as a result of considering pre-application consultation requests in respect of proposed developments, an amendment to the settlement boundary is warranted. It also arises from general survey work as part of reviewing settlement boundaries.

**Supporting evidence:**

Candidate Site Assessment Methodology May 2015 [LDP-KPD-CS1.2](#)  
Background Paper LDP08 Candidate Alternative Sites [LDP-EBD-BP8](#)

**Question:**

*12. Will the LDP be supported by supplementary planning guidance? if so, what subjects will be addressed? what are the timescales for the adoption of the guidance? and how will it assist in the delivery of the Plan?*

**Council's response:** The LDP will be supported by Supplementary Planning Guidance Notes and the list of SPG's as well as their status is explained in Appendix 2 of the written statement and below. It is intended that the majority of SPG's will be updated once the LDP has been adopted. A review is necessary to make sure all the information is up to date at the time of adoption and to take into consideration any Matters Arising Changes following examination. It is Flintshire County Council's

intention to prepare and keep up to date a series of Supplementary Planning Guidance (SPG) Notes which will provide detailed guidance on a range of development issues and topics. The purposes of these Notes are:

- To assist the public and their agents in preparing planning proposals and to guide them in discussions with officers prior to the submission of planning applications,
- To guide officers in handling, and officers and councillors in deciding, planning applications, and
- To assist Inspectors in the determination of appeals

The overall aim is to improve the quality of new development and facilitate a consistent and transparent approach to decision making :-

SPGN No.1 Extensions and Alterations to Dwellings - to be reviewed and updated

SPGN No 2 Space Around Dwellings - to be reviewed and updated

SPGN No 4 Trees and Development - to be reviewed and updated

SPGN No 5 Conversion of Rural Buildings - to be reviewed and updated

SPGN No 8 Nature Conservation and Development / and SPGN 8a Great Crested Newt Mitigation Requirements - to be reviewed and updated

SPGN No 10 Affordable Housing - to be reviewed and updated

Relevant part of SPGN No 10 relating to Infill Development in Groups of Housing - to be reviewed and updated

SPGN No 11 Parking Standards - to be reviewed and updated

SPGN No 23 Developer Contributions to Education - to be reviewed and updated

SPGN No 24 Retention of Local Facilities - to be reviewed and updated

SPGN No 29 SUDS and the Management of Surface Water in New Development - to be reviewed and updated

Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB) - recently prepared and adopted jointly by Flintshire, Denbighshire and Wrexham – no intention to review or update

An additional draft AONB SPG relating to Dark Skies has been produced and is due to be consulted upon in January 2021

SPGN No.13 Outdoor Playing Space and New Development - draft to be reviewed and updated

Houses in Multiple Occupation - Existing draft Advice Note to be reviewed and updated

**Supporting evidence:**

Written Statement Page 230 Appendix 2 [LDP-KSD-DEP1](#)

**Question:**

*13. What is the LDP's strategy for the provision of housing? is it appropriate to meet the needs of the area over the Plan period?*

**Council's response:** Flintshire's location and key role as an economic and employment hub for the wider sub regional area have played a key role in defining the growth strategy of the plan. This is explained in the introductory sections of the Plan's Written Statement (paragraphs 3.30-3.35). Whilst housing provision is a key function of the LDP and it has a key role in the Plan's strategy, this is set in the context of the focus being on developing a strategy that aims to promote economic development and the County's contribution to the wider regional economic growth ambition defined by the North Wales Growth Vision ([A Growth Deal for North Wales](#)), with the need to enable the delivery of jobs, homes and where necessary, infrastructure, required to accommodate growth sustainably.

This intention is picked up in the Plan's objectives relating to 'Delivering Growth and Prosperity' (para 3.41 Written Statement, objectives 8, 9, 11, 12) where housing provision is important in supporting the economic ambition. The growth strategy of the plan is then explained in paras 3.43-3.63 of the Written Statement which specifically explains the approach to employment growth (pages 27-28) and housing growth (pages 29-32). The Preferred Strategy is then summarized from this (pages 33-35) where the role for the provision of housing is set in the context of the other components of the Preferred Strategy.

The approach taken by the Council has also been influenced by the consideration it has given to the available Welsh Government Household Projections where these have shown a consistently low and unambitious projected level of growth, which is at odds with setting a more positive LDP strategy which can then support the wider regional growth ambition. The level of housing provided in the Plan therefore exceeds the projected level of growth by some margin and whilst this is covered in the response to question 15, the approach to setting a suitable level of growth by considering growth options is helpful in explaining the approach followed by the Council. Section 9 and appendix 2 of the Strategic Options Main Consultation document provides supporting explanation of this ([Strategic Options Main Consultation document](#)).

The Plan's approach to growth is also in general conformity with the approach taken in the draft National Development Framework (NDF) with the focus regionally on Wrexham and Deeside (Flintshire) in leading on growth.

The Welsh Government in their formal comments on the Deposit LDP are supportive of the levels of housing and employment growth in the Plan and consider that the plan is in general conformity with the draft LDP (see embedded document below).

**Supporting evidence:**

A Growth Deal for North Wales [LDP-EBD-EM4](#)

Deposit Plan Sept 2019 – written statement [LDP-KSD-DEP1](#)

Strategic Options Main Consultation document [LDP-KSD-SO1](#)



Welsh Government formal comments on Deposit LDP -

**Question:**

*14. What is the LDP's housing requirement figure (HRF)? how has it been defined?*

**Council's response:** The LDP housing requirement figure (HRF) is **6,950 dwellings**, but where the Plan makes provision for 7,950 dwellings, incorporating a flexibility allowance of 14.4%.

The HRF has been derived from the assessment and consultation on projection derived growth options ([Strategic Options Main Consultation document](#)) where following consultation on these options, a preferred growth option was selected and incorporated into the Preferred Strategy. This assessment of the options and rationale for discounting options and selecting the preferred option is set out in the background paper ([Background Paper - Consideration of Strategic Options Consultation and Assessment of Options](#)).

The HRF is derived from growth option 6 which is an employment led projection where a range of employment job growth (8,000-10,000 jobs) was set as the parameter to then project how much housing growth would be required to support that level of job growth. Because the job growth is a range, the outcome of the resultant housing projection was also expressed as a range (6,550-7,350) and in order to set a HRF the mid-point of this range was chosen (6,950). A technical paper produced by the Council provides further explanation of the approach to deriving the preferred option projection ([Household Projections Technical Paper \(Preferred Strategy\)](#)).

The HRF is significantly above the prevailing trend in the national household projections which is consistently low for Flintshire (2011 , 2014 , and 2018 based projections) but is more positive and reflective of supporting a positive economically-led growth ambition both locally, and as a contribution to the North Wales Growth Vision ([A Growth Deal for North Wales](#)).

The figure also does not simply follow the projected low trends as the Council have been cognisant of the still extant Ministerial advice issued in 2014 directing Councils to not simply project forward trends that were affected by recessionary circumstances (The use of household projections for land use planning (CL-01-14) - see copy embedded below).

The HRF reflects a level of provision that is deliverable, sustainable, and meets local needs and supports the economically-led ambition to create jobs, which in turn will need to attract people to the area. Whilst the HRF is significantly above the national projections trends, delivery rates in the first 4 years of the plan period confirm that the plan can and is delivering at the rate it sets out to achieve and is therefore 'on track'.

Whilst there is no definitive evidence that expresses what impact Covid has had on the local or regional economy, the Council considers that it has produced a sufficiently positive and flexible strategy to facilitate recovery.

**Supporting evidence:**

Strategic Options Main Consultation document [LDP-KSD-SO1](#)

Background Paper - Consideration of Strategic Options Consultation and Assessment of Options [LDP-KSD-PS3](#)

Household Projections Technical Paper (Preferred Strategy) [LDP-EBD-HP4](#)

A Growth Deal for North Wales [LDP-EBD-EM4](#)



use-of-2011-house  
hold-projections.pdf

The use of household projections for land use planning (CL-01-14)

**Question:**

*15. In defining the HRF, was adequate regard paid to the latest household and population projections? and was consideration given to the main local influences on housing demand in the area? including household formation rates, migration levels, and household conversion ratios etc ?*

**Council's response:** The Council has had full regard to the relevant Welsh Government Projections produced and published during the preparation of the LDP. Having initially used the 2011 based projections available at the time growth options were being produced and considered, subsequent account has been taken of whether later projections produced as 2014 based figures, and then proposed 2017 based figures had any effect on the preferred growth option selected by the Council to derive the HRF. This comparison is made in a paper produced to support the Deposit LDP ([Growth Options for Flintshire LDP – Commentary on Welsh Governments Anticipated 2017 based Household Projections – Sept](#)). Further commentary of projections is provided in the Council's rebuttal paper to a 'technical note' produced as part of objections to the deposit plan produced by Lichfields on behalf of two house builders ([Rebuttal Statement to Lichfields Technical Statement](#)). The Council is awaiting confirmation of the Welsh Government 2018 based household projections and will provide a further update as to what if any effect those projections have on the Plan strategy and HRF, although the preliminary advice received suggests that they are well below the HRF continuing the low growth projection trend already apparent in Welsh Government projections.

All of the national projections demonstrate a consistently low household growth trend, influenced by negative economic trends influenced by recession. As per the Ministerial circular letter ([CL-01-14](#)) the Council have avoided relying on projections that are based on trends based on poor economic circumstances as none of the relevant national projections would support a sufficiently positive or ambitious growth strategy that supports the wider regional economic ambition, noting one of questions



within Test of Soundness 2 - Are the vision and the strategy positive and sufficiently aspirational?

Had the Council relied on national projections trends to set its HRF, given the level of completions and commitments in the Plan's housing balance sheet, and modest assumptions about windfall and small site development, then there would have been no identified need for new allocations which would neither have been a defensible position for the Council, or sufficiently supportive of a level of economic ambition locally and regionally.

The Council generated a number of projection based growth options which explains how key parameters such as migration and household formation rates were varied with different options. The background paper used to consult on the options explains the approach taken to each option ([Strategic Options Main Consultation document](#)). Following consultation on these options the Council explained how it took account of the feedback in selecting the preferred growth option again producing a background paper that supported consultation on the Preferred Strategy ([Background Paper - Consideration of Strategic Options Consultation and Assessment of Options](#)).

Having set the HRF at a level significantly above the consistently low projections trend, the Council's view is that it has struck the correct balance between supporting a level of growth ambition and setting a realistic and deliverable HRF. The Plan Strategy is also sufficiently flexible and positive to facilitate recovery from the as-yet unquantified effects of Covid-19.

**Supporting evidence:**

Growth Options for Flintshire LDP – Commentary on Welsh Governments Anticipated 2017 based Household Projections – Sept [LDP-EBD-HP5](#)  
Rebuttal Statement to Lichfields Technical Statement [LDP-EBD-HP13](#)  
Strategic Options Main Consultation document [LDP-KSD-SO1](#)  
Background Paper - Consideration of Strategic Options Consultation and Assessment of Options [LDP-KSD-PS3](#)

**Question:**

*16. Were alternative housing growth scenarios considered? if so, what scenarios were chosen, why were they discounted, and why was the preferred option selected?*

**Council's response:** In preparing the Preferred Strategy the Council prepared a number of strategic growth and spatial options which it consulted on publicly as part of the pre-deposit engagement on the preparation of the plan. These options are most succinctly summarized in the table within para 3.58 of the Deposit LDP Written Statement, but are explained in more detail in the consultation background paper produced to support the public engagement ([Strategic Options Main Consultation document](#)) and specifically section 9 and appendix 2 of that document explain how

these options were derived and the assumptions they were based on (table 1 in section 9 (page 11) provides a useful summary explanation of all options).

Essentially the Council used the Welsh Government 2011 based projection as a logical baseline against which to produce and 'test' a series of alternative growth options based on different assumptions. 4 of these were demographic projections based, where either the base population, migration and/or headship assumptions were varied, as explained in table 1 and appendix 2 of the document referenced above. A further option was employment led, deriving the level of housing needed to support a level of job growth.

Having consulted on the growth options and to support and explain how the options were assessed including taking account of consultation feedback, a background paper was published alongside the Preferred Strategy, which explained how each option had been considered and dismissed, and why the preferred option had been selected ([Background Paper - Consideration of Strategic Options Consultation and Assessment of Options](#)).

There was clear stakeholder and consultee support for growth option 6 (employment-led) which included developers and the HBF. The selection of option 6 is further corroborated by the projected level of housing from growth option 4 which produced a very similar level of housing requirement to that from option 6, where the assumption for option 4 is driven by achieving high levels of in migration which would match with the ambition of the Plan strategy, and recognition of the need to bring people into Flintshire to facilitate the intended job growth.

**Supporting evidence:**

Deposit Plan Sept 2019 – written statement [LDP-KSD-DEP1](#)  
Strategic Options Main Consultation document [LDP-KSD-SO1](#)  
Background Paper - Consideration of Strategic Options Consultation and Assessment of Options [LDP-KSD-PS3](#)

**Question:**

*17. What is the LDP's housing land supply figure and how has it been defined?*

**Council's response:**

The Housing Land supply figure in the Deposit LDP uses a 01/04/18 base date and totals **7,950 units**.

The Housing land supply comprises a variety of sources including completions over the first 3 years of the plan (2015-2018), commitments (existing planning permissions for housing) that are genuinely capable of being delivered, new housing allocations in the Plan, and realistic allowances for windfalls (unidentified small and large sites coming forward during the Plan period).

The contribution of each source is summarised in the following table:

### LDP Housing Land Supply (as at 1.4.18)

Completions 2015-2018	1691	Includes large and small site completions.
Commitments	1771	Sites of 10+ units with pp at 1.4.18 (excluding allocated sites which have been granted pp)
Strategic Allocations	1294	Warren Hall (300 units) and Northern Gateway (994 units)- (1325 allocation discounted by 331 units which may be delivered beyond the Plan end date)
Other allocations	1874	See LDP policy HN1
Windfall allowance (10+ units)	600	Equates to an average of 50 pa for remaining 12 years of Plan
Small sites allowance (under 10 units)	720	60 pa for remaining 12 years of Plan
<b>Total Supply</b>	<b>7950</b>	

Further details relating to the above sources are contained in [Background Paper 10 Housing Land Supply](#).

The total Supply of 7,950 is 1000 units above the LDP Housing Requirement figure of 6,950 units. This 1,000 'oversupply' equates to a flexibility/non delivery allowance of 14.4% based on the Housing Requirement figure of 6,950.

The Council is intending to update the land supply information to a 1.4.20 base date in advance of the Examination and subject to the Inspectors' agreement will publish the updated information prior to commencement of the Examination.

#### **Supporting evidence:**

Background Paper 10 Housing land Supply (Sept. 2019) [LDP-EBD-BP10](#)  
Background Paper 10A (Update of Background Paper 10, updating the land supply information to a 1<sup>st</sup> April 2020 base date (to be submitted to Examination in due course))  
Flintshire Housing Land Monitoring Report 1.4.18 [LDP-EBD-HP11](#)  
Flintshire Housing Land Monitoring Report 1.4.19 [LDP-EBD-HP12](#)  
Flintshire Urban Capacity Study: Arcadis (June 2018) [LDP-EBD-HP8](#)  
[Planning Policy Wales Edition 10 \( December 2018\)](#)  
TAN 1:Joint Housing Land Availability Studies (January 2015) (Now revoked)

#### **Question:**

*18. Is the housing trajectory set out in the LDP realistic?*

#### **Council's response:**

The housing supply and delivery information contained in the Deposit Plan, was based on a 1st April 2018 base date and the supporting Background Paper 10 'Housing Supply and deliver' contains a housing trajectory setting out the anticipated timing of completions for all the components of the housing supply throughout the Plan period. Background Paper 10 incorporates phasing tables demonstrating how

the committed and allocated housing sites in the Plan will be delivered over the Plan period taking account of information on availability and delivery provided by landowners, agents and developers. It explains how estimates are incorporated for the delivery of large and small windfall sites based on past evidence and research. The Housing Trajectory (included as Appendix 4 in BP10) illustrates how the housing supply will be delivered and how a 5 year housing land supply will be achieved on adoption and maintained (based on a residual calculation) through the plan period.

The housing trajectory in Background Paper 10 was prepared in accordance with the guidance contained in the Development Plans Manual Edition 3: Consultation Draft (June 2019), having regard to the requirements in Planning Policy Wales (Edition 10, November 2018) and Technical Advice Note (TAN 1): Joint Housing Land Availability Studies (2015), for LPA's to identify and maintain a 5 year supply of available housing land.

However In a letter to LPA's and others dated 26th March 2020 the Minister for Housing & Local Government explained that the five year housing land supply policy in the Housing Delivery section of PPW was being removed and replaced by a policy statement making it explicit that the housing trajectory, as set out in the adopted LDP, will be the basis for monitoring the delivery of development plan housing requirements as part of LDP Annual Monitoring Reports (AMRs). In addition, as a consequence of this policy change, the letter explained that TAN 1 was being revoked in its entirety. Also in March 2020 the final version of the Development Plans Manual Edition 3 was published by the Welsh Government. In line with the revocation of TAN 1 and the removal of the 5 year land supply requirement the final version of Edition 3 of the Manual contains revised guidance relating to the preparation of the housing trajectory in the LDP. Under the new guidance, rather than demonstrating a five year supply throughout the Plan period, the trajectory must now show how the Plan's housing requirement will be met over the Plan period.

An 'Anticipated Annual Build Rate (AABR)' is now to be included in the trajectory, calculated based on a formula included in the Manual. The calculation takes into account past completions during the Plan period, the Plan's housing requirement, and also the plan's housing provision (which is the housing requirement plus the flexibility allowance built into the plan's housing supply).

In the light of this revised guidance the LPA is intending ( subject to the Inspectors' agreement), to provide updated housing supply information using a 1.4.20 base date and to prepare a revised housing trajectory and supporting tables to illustrate how the Plan's housing requirement will be met over the Plan period. It is intended that this information will be published in advance of the Examination to enable discussion at the Examination to be based on the updated information.

**Supporting evidence:**

Background Paper 10 Housing land Supply (Sept. 2019) [LDP-EBD-BP10](#) .

Background Paper 10A (Update of Background Paper 10, updating the land supply information to a 1<sup>st</sup> April 2020 base date (to be submitted to Examination in due course)

LDP Deposit written statement [LDP-KSD-DEP1](#)

Flintshire Housing Land Monitoring Report 1.4.18 [LDP-EBD-HP11](#)

Flintshire Housing Land Monitoring Report 1.4.19 [LDP-EBD-HP12](#)

Flintshire Urban Capacity Study: Arcadis (June 2018) [LDP-EBD-HP8](#)

[Development Plans Manual Edition 3: Consultation Draft \(June 2019\)](#)

[Development Plans Manual Edition 3: Final Version \(March 2020\)](#)

**Question:**

*19. What is the LDP's strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?*

**Council's response:**

The delivery of affordable housing is an integral part of the general provision of housing within the LDP. Affordable Housing has been identified throughout the LDP's strategy as a key issue and driver for change over the plan period. The approach to affordable housing delivery has been directly informed by the latest LHMA, which was produced by independent consultants Arc4, who have extensive experience in the production of LHMA's.

The LHMA was originally carried out by Arc4 in 2015 as a joint LHMA with Wrexham County Borough Council. In 2018 Arc4 carried out an update to the study using the latest available data for Flintshire. The latest LHMA shows that Flintshire has a need for 1,190 additional affordable homes (238 per annum over the lifetime of the LHMA 2018-2023) in order to meet the current and backlog of affordable housing need, with a recommended tenure split of 40% low cost homeownership, 30% intermediate rent and 30% social rented. In terms of affordable housing by size (number of beds), 45.6% of need is for smaller 1-2 bedroom general needs dwellings, 28.3% 3-bed general needs, 12% 4+ bed general needs and 14.1% older person stock.

Policy HN3 sets out the percentage of affordable housing that should be delivered on residential applications within each of the six housing market areas that sub-divide Flintshire (as defined by the LHMA). These have been informed by the Affordable Housing Viability Assessment undertaken by the DVS for the Council. Policy HN2 requires residential applications to provide a mix of dwelling types and sizes in order to meet a range of housing needs. The reasoned justification following policy HN2 highlights that developers are expected to align applications for residential development with the need identified within the latest LHMA, and must reflect the need for single person accommodation, including the need for smaller housing for the older population as the LHMA has highlighted this as an area of greatest need.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
 Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
 Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*20. What is the LDP's affordable housing target? How was it defined? Does it maximise the opportunities for delivery?*

**Council's response:**

The affordable housing target within the LDP is 2,008 dwellings. This target derives from the affordable housing need identified within the LHMA and the level of affordable housing that can be viably developed based upon the overall provision in the plan of 7,950. The latest LHMA shows that Flintshire has a need for 1,190 additional affordable homes (238 per annum over the lifetime of the LHMA 2018-2023) in order to meet the current and backlog of affordable housing need. This figure is not a target as there are a number of factors that need to be taken into consideration when setting the affordable housing target, particularly the deliverability and viability of developing this quantity of affordable homes.

Based upon the LDP's provision of 7,950 homes and the evidence within the LHMA a target of 2,008 affordable homes over the plan period is considered to be both sustainable and deliverable within Flintshire. This equates to an average delivery of 134 affordable dwellings per year over the development plan period (2015-2030). This is above the ten year average delivery rate for Flintshire of 104 affordable homes per year (2009-2019), however recent years have seen the successful delivery of 249 units in 2017/18 and 163 units in 2018/19, according to our latest affordable housing return to Welsh Government there are also 284 units planned for 2019/20. The delivery rates can vary considerably from one year to the next due the availability of Welsh Government funding towards affordable housing development, for example Social Housing Grant (SHG). Therefore the Authority cannot base the affordable housing target on past delivery rates, however they provide a level of confidence that the target of 2,008 is deliverable.

The target has been calculated as per the Development Plans Manual (Edition 3) guidance, detailing the components of affordable housing supply across the settlement hierarchy by allocations, commitments and windfall sites as follows;

	Tier 1 - Main Service Centres	Tier 2 - Local Service Centres	Tier 3 - Sustainable Settlements	Tier 4 - Defined Villages	Tier 5 - Undefined Villages	Total Affordable Housing Provision
Affordable Housing on	297	535	69	0	0	901

Allocated Sites						
Affordable Housing on Large & Small Windfall Sites	240	59	59	27	13	398
Affordable Housing on Committed Sites	470	66	137	36	0	709
<b>Total Affordable Housing Provision</b>	<b>1007</b>	<b>660</b>	<b>265</b>	<b>63</b>	<b>13</b>	<b>2008</b>

Firstly the affordable housing figure that can be delivered on the allocated sites was calculated based upon the percentages in policy HN3 which were set by the affordable housing viability assessment. This information combined with the already agreed figures from the allocations at Broadoak Holding, Connah's Quay, Maes Gwern, Mold and Chester Road, Penymynydd where the sites already have planning permission and the number of affordable dwellings has been agreed, results in a maximum delivery of 901 affordable units on allocated sites.

As the specific location of windfall sites is not known it is not possible to apply the relevant affordable housing percentage as per the housing market areas. Therefore an average of 28% across all market areas has been used, except for tiers 4 and 5 where market housing is only permitted in exceptional circumstances in order to deliver affordable housing in line with policy STR2. It is therefore presumed that 100% affordable housing will be achieved as windfall within these areas. This results in a potential for 398 affordable homes.

In addition to the allocated sites there are a number of commitments which will deliver a total of 709 affordable units over the plan period, a full list of these can be seen in the appendices of the affordable housing background paper. These sites already have planning permission so the total number of affordable units has already been determined.

The affordable housing target maximizes the potential delivery of the allocations, windfall and commitments within Flintshire. The Authority has already delivered a significant number of affordable homes during the early years of the development plan period as detailed in affordable housing background paper. These completed units will be accounted for as part of our committed sites that feed into calculating the affordable housing target, and demonstrate that the Authority is on track to meet this target of 2008.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*21. Will the LDP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? if not, how will this need be met over the Plan period?*

**Council's response:**

The latest LHMA shows that Flintshire has a need for 1,190 additional affordable homes (238 per annum over the lifetime of the LHMA 2018-2023) in order to meet the current and backlog of affordable housing need, with a recommended tenure split of 40% low cost homeownership, 30% intermediate rent and 30% social rented. The target within the LDP is to deliver 2,008 affordable homes across the three tenures in line with the need identified within the LHMA, this target meets the need identified within the LHMA over its five year period and also provides for additional need in the long term over the LDP period.

In addition to affordable housing being delivered through LDP mechanisms, Flintshire is also delivering affordable housing through a variety of other initiatives and projects. Principal amongst these is Flintshire's Strategic Housing and Regeneration Programme (SHARP) whereby the Council is working with a preferred development partner Wates Residential to build innovative and high quality new affordable homes. The scheme will deliver 500 new homes across the County by 2021 of which 300 will be intermediate rent (owned and managed by North East Wales Homes Ltd) and 200 social rented (managed by FCC). The Affordable Housing Background Paper provides further detail on Flintshire's approach to affordable housing delivery alongside the LDP, which confirms that the corporate approach to delivering affordable housing aligns with the tenure split in the LHMA.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*22. How have the LDP's site-specific affordable housing target(s) been defined? in which geographical locations will the target(s) apply?*

**Council's response:**

Flintshire County Council commissioned the District Valuer Service (DVS), part of the Valuation Office Agency to undertake a financial appraisal of residential development across the County in order to identify the percentage of affordable housing that can



viably be delivered within each of the housing market areas. The DVS have extensive experience in carrying out development appraisals and have completed similar work for a number of Local Authorities in Wales.

The housing market areas were initially identified through the development of LHMA's for the authority in the past, the latest LHMA reviewed these boundaries and concluded that they are still appropriate for the County based upon the latest evidence. A map of the six market areas can be seen on page 17 of the LHMA.

The viability assessment has been carried out based upon a range of different site typologies, these include sites ranging in size from 10 up to 300 units and include a mix of house types reflective of recent building trends within the County and the affordable housing requirements identified within the LHMA. These typologies are reflective of the allocated sites within the plan.

The viability assessment has used the tenure split recommended within the LHMA of 40% low cost home ownership, 30% intermediate rent and 30% social rented to calculate the viability of affordable housing within each market area. The DVS also used the recommended mix of affordable house types identified within the LHMA, and the dwelling sizes stipulated in the Design Quality Requirements (DQR) for Registered Social Landlords (RSLs). The market mix of housing (type and size) has been based upon recent building trends within Flintshire.

Assumptions have then been made regarding a number of variables including build costs using BCIS data, and house prices within each of the six market areas based upon sale prices from the Land Registry and data held by the DVS. The DVS then tested all of the site typologies within each of the six market areas at varying levels of affordable housing (10% up to 50%) to find the maximum point at which a site is viable for affordable housing based upon a benchmark land value. The results of this study can be seen in the Viability Assessment (June 2020).

<b>DVS Affordable Housing %</b>	
<b>Housing Market Area</b>	<b>Affordable Housing %</b>
Central	40%
Connah's Quay, Queensferry & Broughton	35%
Flint & Coast	15%
Garden City	20%
Mold & Buckley	40%
South Border	30%

The percentages vary across the market areas due to the average house prices likely to be achieved within those areas. For example the Flint & Coast housing market area has the lowest average house prices in Flintshire, reducing the viability of affordable housing delivery within this market area. The viability assessment has not set site specific affordable housing percentages as the site typologies used within the

study are reflective of the allocations and provide a robust assessment of the viability of all sites within each market area.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*23. How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence?*

**Council's response:**

The threshold for onsite affordable housing provision under policy HN3 is 10 dwellings. This threshold is based upon robust and tested evidence within the affordable housing viability assessment. Viability testing is sensitive to the assumptions made within the calculation, for example unit mix, build costs, house prices and the number of units on the site. The DVS were asked to test sites with less than 10 dwellings as part of the viability assessment, however from their experience these smaller sites are often more individual "one off" schemes where the build costs and benchmark land values are higher, and the inability to test for whole units can skew the results of the overall viability assessment. It was the DVS expert opinion that the provision of affordable housing on sites with less than 10 dwellings was unlikely to be viable.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*24. How will off-site contributions be used to deliver affordable housing?*

**Council's response:**

Flintshire is a stock retaining Local Authority, which means they have not transferred their social housing stock to a Registered Social Landlord (RSL). This enables the Authority to continue building and purchasing affordable housing as part of this portfolio.

In addition to this Flintshire County Council also own a separate housing company North East Wales Homes (NEW Homes) which leases, manages and owns properties throughout Flintshire. The company was established to increase the quantity and quality of affordable housing available across the County, providing affordable homes for those who may not qualify for social housing but for whom market housing is unaffordable or difficult to access.

Off-site contributions towards affordable housing are spent by both the Local Authority on increasing their own social housing stock and also by NEW Homes to increase intermediate provision within the County. This approach has contributed towards Flintshire's successful track record on affordable housing delivery and will therefore continue post adoption of the LDP. This method enables both the Council and NEW Homes to maximize commuted sums and affordable housing delivery by combining them with other funding streams such as Social Housing Grant (SHG). This can then be targeted towards affordable housing provision in areas that are less attractive for market led development, such as bringing empty homes back into use or towards specialist housing needs that cannot be catered for within existing stock.

**Supporting evidence:**

Background Paper 7 Affordable Housing [LDP-EBD-BP7](#)  
Local Housing Market Assessment (February 2020) [LDP-EBD-HP3.1](#)  
Affordable Housing Viability Assessment (June 2020) [LDP-EBD-HP6.1](#)

**Question:**

*25. What is the LDP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met?*

**Council's response:**

The Council has an approved [GTAA](#) (April 2016) in place which identifies a need for both permanent and transit pitches. Although a subsequent update to the GTAA was undertaken this was not able to be approved by Welsh Government as it was not a full Study. Welsh Government have confirmed that the 2016 GTAA remains a valid basis for determining need over the Plan period. The Council published an [Addendum](#) statement to this effect. The identified need for the County for residential pitches is -5 pitches for the 5 Year period and 19 pitches for the Plan period.

The Deposit LDP was accompanied by [Background Paper 6 Gypsy and Traveller Site Search](#) which explains the Council's approach to site selection. The original Call for Candidate Sites did not result in any sites coming forward for G&T sites and neither did a [Further Call for Candidate Sites](#) which focussed on minerals and waste and G&T sites. The later Invitation for Alternative Sites also did not result in any sites being proposed for G&T sites.

An assessment of sites provided by the Council's Assets Team concluded that the majority of these sites were not considered suitable with the exception of Council owned land to the rear of the existing Riverside residential site at Queensferry for an expanded residential site and also a Council owned former Civic Amenity site at Castle Park, Flint for a transit site. Both of these sites are allocated in the Plan by

virtue of policy HN8.3 Riverside Queensferry for 10 residential pitches, and HN8.4 Castle Park, Flint for a transit site of 6 pitches.

As a result of the work of the Council's Gypsy Traveller Liaison Officer a number of owners of existing authorised private residential sites expressed a need for additional pitches in the form of extensions to sites, in order to plan for the longer term growth needs of their extended families. In response to this, the Council has allocated two extensions to existing private residential sites by virtue of policy HN8.1 Magazine Lane, Ewloe for 6-8 pitches and HN8.2 Gwern Lane, Hope for 6-8 pitches.

Since the consultation on the Deposit Plan the residents promoting the two private site extensions have reassessed their proposals and suggested revised proposals. This is commented on in the Council's detailed responses to objections to these two sites. However, in summary at Magazine Lane, Ewloe (HN8.1) the suggested revised proposal was to accommodate additional pitches on the existing site within the existing permitted red line given the size of the site and generous existing layout, rather than on the allocated extension site. At Gwern Lane (HN8.2), Hope the suggested revised proposal was a smaller extension in site area and number of pitches. These revised proposals have now progressed to Planning applications as detailed below:

- HN8.1 Magazine Lane, Ewloe – 061722 Reconfiguration of the existing site into a smaller "Close" style arrangement which will allow more efficient use of the available existing space. The intention is for 10 additional static caravans to be placed on site, without the need to expand beyond the current site boundaries – under consideration. If this application is granted planning permission there would be no need to take forward the extension land proposed in policy HN8.1, and the Council would be minded to consider this as a MAC to the plan.
- HN8.2 Gwern Lane, Hope – 061271 Change of use of land for extension of existing site to provide up to 6 Gypsy Traveller Pitches [4 net additional pitches] – under consideration

In terms of residential pitches the three allocations have the potential to create up to 24 pitches which comfortably meets the identified need in the GTAA of 19 pitches over the Plan period.

**Supporting evidence:**

Gypsy and Traveller Accommodation and Assessment 2016 [LDP-EBD-HP7](#)

Further Call for Candidate Sites [LDP-FPD-CS2](#)

Background Paper LDP06 Gypsy Traveller Sites [LDP-EBD-BP6](#)

Background Paper LDP06 Gypsy Traveller Sites Addendum [LDP-EBD-BP6.1](#)

**Question:**

*26. What is the LDP's strategy for employment? Has it been informed by an employment land review? consistent with the requirements of national*

*policy? Has it had regard to the key drivers for change in the employment market?*

**Council's response:**

The Plans employment Strategy is based on an aspirational but realistic approach to job creation and employment development given the importance of the County in terms of the existing Deeside Development Zone and the North Wales Growth Vision. The LDP is focused on promoting and enhancing Flintshire's role as an economic hub and driver for growth both locally, regionally, and in a national context. The strategy is therefore deliberately focused on supporting employment growth and contributing to the wider regional growth ambition. Policy STR1 of the written statement sets out the quantum of the Plan's strategy which seeks to make provision for between 8,000 to 10,000 jobs and makes available a portfolio of 139.67 hectares of employment land. The reasoned justification to policy STR1 (paragraphs 5.6-5.9 of the Deposit Written Statement) sets out this context whereby the strategy is employment-led and has a degree of economic aspiration, mirroring that set out as part of the North Wales Growth Vision. This is also picked up and further explained both in the introduction to part 6 Strategic Policies – Supporting a Prosperous Economy in the Deposit Written Statement as well as the supporting text to policy STR7 in that section dealing with Economic Development, Enterprise, and Employment. At the heart of the Plan's employment aspirations and provision are the two strategic mixed use allocations at Northern Gateway and Warren Hall as detailed in policy STR3, which are committed sites which have both been given added impetus to come forward by their position as part of the Deposit LDP Growth Strategy and context in the North Wales Growth Deal.

The preparation of the Plan has involved a Joint Employment Land Review in 2015 carried out with Wrexham CBC using specialist consultants. The outcome of this original assessment produced relatively 'flat' levels of future employment growth (particularly manufacturing) which were partly based on modelling based on recessionary growth trends. The same consultants then undertook further work for Flintshire in the form of further scenario modelling in terms of employment forecasts to 2030 and this is contained in [Further Employment Growth Scenarios Assessment](#) in 2015. This also took account of the growth options work done in relation to setting a housing requirement figure. This further worked concluded that there was potential for 8,000 to 10,000 jobs which could be derived from the two strategic sites allocated in the plan if they reached their full capacity, and with further support from the wider employment land portfolio.. These job levels provided the level of ambition and aspiration required from a Flintshire perspective and to contribute to the level of regional ambition within the North Wales Growth Vision. Given uncertainty of growth levels from the original ELR projections using a Cambridge Econometrics model the projected land need was relatively low. Three further scenarios were devised to augment the projected employment of the Cambridge Econometrics model to accommodate this additional growth potential. The growth sectors within these scenarios generated a demand for between 31.3 to 50.6 hectares of employment

land. The higher of these additional growth projection scenarios equated to a job growth of 7,200 which is in broad alignment with the slightly higher ambition set by the Council that derives from the capacity of the strategic sites to deliver jobs.

In commenting on the Preferred Strategy, the Welsh Government did not object to the level of housing and employment growth but asked the Council to clarify both the relationship of the job growth in the Plan with the ELR and subsequent work done to support it, as well as the relationship to the HRF selected. To respond to this, the Council's employment consultant BE Group provided further advice ([Employment and Housing Advice – April 2019](#)) which was published alongside the Deposit LDP to set in context these relationships and address the request for clarification made by the Welsh Government. The Welsh Government in their formal comments on the Deposit LDP are supportive of the overall growth strategy and level of jobs and housing growth provided for.

**Supporting evidence:**

Employment Land Review [LDP-EBD-EM1](#)

Further Employment Growth Scenarios [LDP-EBD-EM2](#)

Employment and Housing Advice [LDP-EBD-EM3](#)

**Question:**

*27. Does the LDP allocate land for new employment development? if so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?*

**Council's response:**

The Plan has not identified any 'new' employment allocations as those allocated are already part of an established employment land portfolio in Flintshire that have been reassessed and where appropriate carried forward from those identified in the adopted UDP. However, not all employment allocations that were in the [adopted UDP](#) and identified in the [Employment Land Review](#) have been carried over into policy PE1 General Employment Land Allocations as explained in the table following para 10.1 of the explanation to the PE1 in the Deposit LDP Written Statement. The Plan has allocated two mixed use strategic sites which together comprise significant strategic employment provision. The site referred to as Northern Gateway (STR3A) accounts for 72.4 ha of employment land and Warren Hall (STR3B) accounts for 22.70ha of employment land. Together these represent 69% of the overall employment land provision in the plan. The remaining employment allocations in PE1 comprise smaller sites, with the exception of PE1.2 Manor Lane / Hawarden Park Extension which comprises 18.20ha. As explained in paras 3.44 to 3.52 of the written statement, the Plan seeks to provide a portfolio of employment land which provides flexibility in terms of location, type of site and size.

The portfolio of employment land in the Plan is therefore higher than that which would be required based on previous take up and forecast take up of employment land. It is

also slightly above the further employment growth scenarios identified by the Council's employment consultants but where there is general alignment and recognition of the Council's desire to be ambitious and in doing so match the ambition embedded in the North Wales Growth Deal vision. The Plan seeks a more aspirational approach to jobs growth in view of the importance of the County and the two strategic sites in the context of the North Wales Growth Deal, where both are recognised for their potential contribution to North Wales Growth. Given that the portfolio of employment land comprises existing sites either on the edge of or in close proximity to settlements and within the growth hub set out in the Wales Spatial Plan and the draft National Development Framework, it is not considered that a sequential approach is necessary, and the ELR has also assessed each of these sites in terms of their fitness for purpose and whether alternative uses could be considered and concluded that the primary use and demand remains for employment.

**Supporting evidence:**

A Growth Deal for North Wales [LDP-EBD-EM4](#)

Mersey Dee: Unlocking Our True Potential [LDP-EBD-EM5](#)

Employment Land Review [LDP-EBD-EM1](#)

**Question:**

*28. Will the LDP provide protection for existing employment sites? if so, what protection will be afforded, and how have the sites been selected?*

**Council's response:**

The Plan provides protection in two different ways. The first is by virtue of policy PE6 Protection of Employment Land which seeks to protect existing employment land and buildings. The policy adopts a criteria based approach to considering development proposals which result in the loss of employment land and buildings. The second is by virtue of policy PE2 Principal Employment Areas (PEAs). The policy identifies 30 geographical areas which are identified on the proposals maps. These areas are based on existing industrial estates or areas where there is a mix of existing employment land and buildings, commitments, vacant land, and in some cases employment allocations (policy PE1). The policy therefore acts to clearly delineate these employment areas where the clear focus is on employment related development. However the PEA's also permit further employment development in the form of 'windfalls' subject to meeting other Plan policies. In the light of representations from NRW, amendments are proposed to both the policy wording and the explanation, and these will be set out in a Statement of Common Ground with NRW which will be submitted to the Examination in due course.

The Council apologises to the Inspectors for not being able to provide this SoCG at submission as having proactively led attempts to work with NRW since January 2020 and provided them with significant control over the specification of further work to satisfy their original concerns, they have latterly asked for even more work to be done. This is underway and relates to a small number of employment sites and flood risk. The Council will continue to work with NRW in order to find common ground and thereby fully satisfy their original concerns.

**Supporting evidence:**

LDP Deposit written statement [LDP-KSD-DEP1](#)

**Question:**

*29. What is the LDP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period?*

**Council's response:**

The County has a well-established retail hierarchy comprising 5 town centres, 3 district centres and 21 local centres as defined in policy PE7 of the [Deposit LDP](#). In addition to this, and sitting outside the retail hierarchy is the Broughton Shopping Park. As highlighted in the explanation to policy STR9 there is no one town centre which is dominant in terms of its retail offer and each has its own character, retail offer and other leisure or cultural attractions. It is not a case of 'one size fits all' and each centre has its own issues and opportunities. The Plan has therefore focusses on putting in place a policy framework which reflects the Welsh Government 'town centres first' approach within which strategies and action plans can be formulated and progressed.

One clear way in the which the Plan has sought to respond to the declining health of town and district centres, particularly in respect of retail offer, is to adopt a more pragmatic approach to development proposes or changes of use in Primary Shopping Areas (policy PE8). This recognises that the role of town centres is changing, with less prominence of retail uses and a wider role in terms of acting as a social meeting place, rather than purely for shopping.

The Council commissioned consultants to undertake a [Retail Study](#) of the County. This involved an assessment of the performance of each town and district centre and Broughton Shopping Park before moving on to examine current retail and leisure expenditure patterns and undertake an assessment of retail needs. Over the Plan period it has been calculated that there is no identified need for new convenience retail floorspace and a modest capacity for new comparison retail goods floorspace of 635sqm gross (508 sqm net sales). It has since been accepted by the Council that one of the commitments at Saltney Retail Park referred to in para 5.5 of the Retail Study, has expired in terms of its planning permission. This has the effect of increasing the capacity over the Plan period for comparison goods to 4028sqm net.

The Plan has deliberately not sought to make retail allocations given the number of town and district centres in the County. Also, previous allocations for retail and commercial development in the adopted UDP have not come to fruition and demonstrates the difficulty in allocating small sites. An allocation in one town or district centre could effectively prevent a development proposal coming forward in another centre. The Plan therefore allows development proposals to come forward either in response to market demand or as a result of town centre action plans or strategies. Policies would also allow for new convenience floorspace in response to allocated housing sites and this has previously occurred in Penyffordd / Penymynydd



with the development of a new Coop convenience store, following several appeal decisions allowing speculative housing development.

**Supporting evidence:**

Deposit LDP Written Statement – Sept 2019 [LDP-KSD-DEP1](#)

Retail Study – Apr 2019 [LDP-EBD-RET1](#)

**Question:**

30. What is the LDP's strategy/policy framework for the following areas:

- a) Welsh language
- b) Air quality
- c) Biodiversity and ecological networks
- d) The historic environment
- e) Minerals
- f) Waste management
- g) Renewable and low carbon energy
- h) Transport, and
- i) Planning obligations?

**Council's response:**

- a) Welsh Language - Policy STR 4 Principles of Sustainable Development Design and Placemaking of the Deposit Plan (pages 56 to 59) provides strategic guidance in criterion x, in respect of the Welsh Language. This is supplemented by Policy STR 10 Tourism, Culture and Leisure (Pages 83 to 85) which includes conserving and enhancing the cultural heritage of the county including the Welsh Language. The plans evidence base and approach to the Welsh language is set out in the [Background Paper 12 The Welsh Language](#).
- b) Air Quality – Air quality in North Wales is monitored in Flintshire as part of a North Wales collaborative approach, undertaken by consultants. The [2019 Air Quality Progress Report](#) identifies that there are no Air Quality Management Areas (AQMA's) and therefore no requirement for Action Plans. However it is known that there are localised air quality issues alongside the major roads such as the A494(T) and A55(T) and in this context Welsh Government have recently introduced 50mph restrictions along the A494(T) Aston Hill. However, air pollution is not considered to represent an overriding issue in respect of the Plans spatial strategy and allocations. The broader context of cleaner petrol and diesel engines and reduced emissions, hybrid vehicles and ultimately the Government commitment towards electric powered vehicles only being sold from 2030 should see improvements in air quality across the board. Policy EN18 provides guidance in respect of development and pollution or nuisance.
- c) Biodiversity and Ecological Networks – Policy STR13 of the Deposit Plan provides strategic guidance in respect of the natural environment and is supplemented by detailed policies EN6 which addresses Sites of Biodiversity Importance and policy EN7 which addresses Trees, Woodlands and Hedgerows. These two policies should also be read alongside EN3 'Undeveloped Coast and Dee Estuary Corridor' and EN2 Green Infrastructure. Ongoing discussions with NRW in relation to a number of the Plans policies

has led to a reconsideration of the wording of policy EN5 and this will be addressed in a Statement of Common Ground with NRW to be issued closer to examination.

- d) The Historic Environment – Policy STR13 of the Deposit Plan provides strategic guidance in respect of the built and historic environment and this is supplemented by three detailed policies with EN8 covering the Built Historic Environment and Listed Buildings, EN9 covering Conservation Areas and EN10 covering Buildings of Local Interest.
- e) Minerals – Policy STR16 in the Deposit LDP sets out the strategic planning principles in respect of Minerals development and further commentary is provided in [Background Paper 4 Minerals](#) which accompanied the Deposit Plan. Policy EN23 safeguards minerals resources and policy EN24 defines buffer zones around minerals sites. Policy EN25 identifies two site allocations to meet the need for limestone and two site allocations to meet the need for sand and gravel. All site allocations are extensions to existing minerals sites, rather than entirely new sites. Further work is being undertaken in respect of meeting the higher need in the Regional Technical Statement 2 and this involves a collaboration agreement with neighbours Wrexham and Denbighshire, which will be made available closer to examination. Policy EN26 is a criteria based policy applicable to all minerals development and policy EN27 provides guidance in respect of secondary and recycled aggregates.
- f) Waste management – Policy STR15 waste management. Further commentary is also contained within [Background Paper 5 Waste](#) which accompanied the Deposit LDP. Policy EN19 provides the basis for new development to address waste management issues. Policy EN20 identifies a buffer zone around an existing landfill site at Alltami. Policy EN21 identifies sites which are considered acceptable in principle to accommodate waste management uses, although the policy does allow waste management uses in areas or sites outside of the named sites, subject to certain criteria. The policy is to be read alongside policy EN22 which sets out criteria against which proposals will be assessed. Policy STR16 in the Deposit LDP.
- g) Renewable and low carbon energy – Policy STR14 Climate Change and Environmental Protection provides strategic guidance in respect of renewable energy and provides the basis for detailed policies EN12 and EN13. The Council has taken a proactive approach to developing renewable energy, with solar farms on its own land. Policy EN1 references two solar farm allocations at Crumps Yard, Connah’s Quay (planning permission) and Castle Park, Flint (planning permission and under construction). Policy EN13 also identifies Solar Indicative Local Search Areas which are identified on the proposals maps. Further work is being undertaken by specialist consultants to undertake a landscape assessment to refine the areas of search and this will be published closer to examination. The Deposit LDP was accompanied by a [Renewable Assessment Report](#) and accompanying [maps](#).
- h) Transport – Policy STR5 Transport and Accessibility in the Deposit LDP provides a strategic context for the detailed policies PC5 to PC11. Policies seek to ensure that new development provides appropriate transport infrastructure,

links in with Active Travel networks and proposals and public transport. The Plan seeks to safeguard the operation of Hawarden Airport and protect disused railway lines. Policy PC11 provides a context for development proposals at Mostyn Docks. The Plan safeguards a number of road schemes in policy PC10 and this includes the Welsh Government proposals for the A494(T) / A55(T) / A548 (Red Route) in the form of a new link road from Deeside Industrial Estate to the A55(T) at Northop. Given the importance of Deeside in terms of economic growth there are a number of transport schemes projects in place as set out in the [Deeside Plan](#) which seek to:

- Maximise the benefits of regional transport infrastructure investment.
- Use transport infrastructure investments to unlock further economic growth opportunities.
- Support modal shift from the private car to more sustainable patterns of movement.
- Develop solutions to reduce current congestion and ensure that transport, economic growth and housing are considered in parallel to reduce negative impacts from future growth.
- Encourage active travel through green infrastructure corridors and investment in cycling and pedestrian infrastructure.

In addition to the Red Route there are proposals for a number of transport schemes which will improve the accessibility of the Deeside area and bring about a more sustainable transport system. These schemes and projects are progressing alongside the LDP and include:

- Service and station improvements on the Wrexham Bidston Railway line
- improvements to railway stations at Shotton and Hawarden Bridge
- a new railway station at Deeside Parkway and at Broughton Parkway
- park and ride at Deeside Industrial Park (planning permission)
- proposed truck stop
- bus service improvements
- road capacity improvements
- active travel improvements- walking and cycling.

- i) Planning obligations – The [Deposit LDP](#) sets out in STR6 the approach in respect of planning objections for services, facilities and infrastructure. This policy will also link with [Background Paper LDP03 Infrastructure Plan](#).

**Supporting evidence:**

Background Paper 12 Welsh Language [LDP-EBD-BP10](#)

[2019 Air Quality Progress Report](#)

Deposit Plan Written Statement - Sept 2019 [LDP-KSD-DEP1](#)

Background Paper 4 Minerals [LDP-EBD-BP4](#)

Background Paper 5 Waste [LDP-EBD-BP5](#)

Renewable and Low Carbon Energy Assessment July 2019 [LDP-EBD-RE1](#)

Renewable and Low Carbon Energy Assessment Sept 2019 Maps [LDP-EBD-RE2](#)

A55/A494/A548 PC10.1 Welsh Government letter [LDP-EBD-TR1](#)  
A55/A494/A548 PC10.1 Welsh Government map [LDP-EBD-TR1.1](#)  
A494(T) PC10.5 R. Dee to Ewloe Welsh Government map [LDP-EBD-TR2](#)  
Deeside Plan [LDP-EBD-TR3](#)  
FCC Review of Strategic Highways Schemes [LDP-EBD-TR4](#)  
Background Paper 03 Infrastructure Plan [LDP-EBD-BP3](#)

**Question:**

*31. Does the LDP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?*

**Council's response:**

The Deposit LDP incorporates a monitoring framework which sets out a series of monitoring indicators, targets, trigger points and actions which will form the basis for future monitoring of the Plan's performance. These indicators are specific and measurable and include both local indicators proposed by the Council and indicators required by legislation and applicable to all plans

As required by legislation (and outlined in the Development Plans Manual Edition 3 (March 2020) the Council will produce an Annual Monitoring Report (AMR) for publication and submission to Welsh Government, in which the Council will identify whether (based on an assessment against the identified monitoring indicators, targets and trigger points) the strategic objectives and proposals of the Plan are being achieved and whether the Plan's policies are being implemented as anticipated. The AMR will outline the steps that the Council intends to take to address any underperforming policies, involving a range of possible actions, from further monitoring to Plan review if necessary, as outlined in Table 30 of the Edition 3 of the Manual.

It is acknowledged that the Monitoring Framework will need to be reviewed and refined through the Examination process. For example the requirement for LPA's to monitor their housing land supply and maintain a 5 year supply of housing land was removed in March 2020 when Technical Advice Note 1 (TAN 1) was revoked in its entirety and the housing delivery section of Planning Policy Wales (Edition 10) was amended to remove the 5 yr housing land supply requirement.

As a consequence and in accordance with the new guidance contained in Edition 3 of the Manual, the Council will be preparing a new trajectory for inclusion in the LDP showing how the Plan's housing requirement will be met over the Plan period. The trajectory will incorporate an Anticipated Annual build Rate (AABR) calculated based on a formula contained in the Manual. The trajectory will be updated annually, both up to and following Adoption of the LDP taking into account actual annual completions during the Plan period. The new guidance requires LPA's to monitor actual completions, both annually and cumulatively since the start of the Plan period, against the AABR in the trajectory as part of the LDP Annual Monitoring Report. This itself will necessitate an amendment to Monitoring Indicator 1 in the submitted LDP Monitoring

Framework, though as acknowledged above further refinements are likely to be required through the Examination process.

**Supporting evidence:**

[Development Plans Manual Edition 3: Final Version \(March 2020\)](#)

[Planning Policy Wales Edition 10 \(December 2018\)](#)

LDP Deposit written statement [LDP-KSD-DEP1](#)