

**Flintshire Local Development Plan 2015 – 2030  
EXAMINATION IN PUBLIC**

**Hearing Session Matter 7**

**Tuesday 20<sup>th</sup> April 2021**

**Provision of Sustainable Housing**

**STR11 (inc housing requirement but not allocations)**

**Hearing Statement by Flintshire County Council**

# Flintshire Local Development Plan (2015 - 2030) Examination in Public

## Flintshire County Council Statement: Matter 7: Provision of Sustainable Housing

This statement has been prepared by Flintshire County Council (FCC) in response to the Inspectors' hearing questions:

**Key Issue: Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

**Response:**

1. The LDP has set out a level of housing provision that has the ability to meet the requirements of its positive employment growth-led strategy, where the objective in terms of housing provision to support such growth is to provide a sufficient number of the right type of housing, in sustainable locations that can meet market demand. Strategic objectives 8 and 9 define the aim of facilitating economic growth, and objectives 11 and 12 set out the aim of providing sufficient housing to support this.
2. In relation to the key influences and sources of evidence to guide the Council in setting an appropriate housing requirement, the last three incarnations of the Welsh Government population and household projections (2011, 2014, and 2018 based) have all shown consistently low levels of housing demand for Flintshire. This trend amounts to a requirement for only 3-4,000 new homes over the plan period. Had the Council simply sought to set the projected trend as the requirement then with reference to the housing balance sheet provided with policy STR11 in the Deposit plan, the cumulative completions, commitments, and allowances for small and windfall site development would have been sufficient to meet this projected requirement, without the need for either strategic sites or housing only allocations.
3. This would neither have supported the employment ambitions of the plan strategy nor assisted in meeting the affordable housing need shown in the LHMA.
4. The projections that the Council therefore produced as its growth options sought to take a more positive approach than the national projection trends identified, and the relationship between housing and employment set out in the options, as well as the confirmatory relationship between options 4 and 6, serve to demonstrate that the evidence produced and used is credible and robust, as well as clearly focused on achieving the plans' goals.
5. The plan has provided enough housing to support the employment led strategy of the plan but in doing so has not gone beyond reasonable, sustainable, and

deliverable levels of provision that are justifiable, as opposed to simply over-allocating sites as some require to simply add value to land, and provide what is wanted, not what is required.

6. The Council's response to the Inspector's Preliminary Question 5 explains how the LDP Strategy is consistent/ compatible with National Policy, and 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'.

#### **Question a)**

**Is the housing requirement, based as it is on economic and job aspirations, realistic and deliverable within the plan period? How does the amount of housing proposed relate to the most recent Welsh Government household projections<sup>1</sup>? Has the UDP under-delivery been accounted for in the LDP housing requirement figure? If not, should it be?**

#### **Council's Response:**

- a.1 The housing requirement figure 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 Council acknowledges that the housing requirement figure is significantly above the prevailing trend in the national household projections, which is consistently low for Flintshire (2011, 2014, and 2018 based) it 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](#)).
- a.2 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](#))).
- a.3 With regard to delivery, actual housing completions over the first 5 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' (see Table 1A in [BP10A](#)).
- a.4 The housing requirement figure makes sufficient provision for the assessed need during its plan period (2015- 2030). The Council does not accept the argument that the LDP should also look backwards and account for under-delivered housing from the previous UDP plan period. This argument is based on the premise that an apparent under-delivery was solely the responsibility of the UDP. It takes no account of the economic climate following the 2008 recession, the reduced level of demand from potential house buyers as a consequence of

<sup>1</sup> [Subnational household projections \(local authority\): 2018 to 2043, updated August 2020.](#)

reduced lending from financial institutions, or the willingness, capacity or ability of developers to deliver new homes, all of which impacted on the ability of the UDP requirement to be delivered. These are the factors that determine delivery, as development plans do not deliver housing, rather they make sufficient provision for housing to come forward to meet the assessed requirement. The UDP did not under-provide housing to meet its housing requirement, as it was clearly considered to have made sufficient provision following the Public Inquiry into the plan.

- a.5 The Council is unaware of any national guidance that sets out the concept of transposing under-provision or over-provision from one plan period to another, or the mechanism for doing so. Equally the Council is unaware of any precedent with other LDPs in Wales where this has been accepted.
- a.6 In addition, to do what objectors ask in terms of adding an alleged ‘under-delivery’, this would in effect be relying on an assessment of housing demand based on out of date projections that did not look beyond 2015, which would be contrary to guidance in paragraph 4.2.6 of PPW “*The latest Welsh Government local authority level Household Projections for Wales..... will form a fundamental part of the evidence base for development plans*”, which is reiterated in paragraph 5.34 of the DPM3.
- a.7 Even if it were accepted that an alleged under-delivery should be accounted for, which it is not, the degree to which the housing requirement in the LDP over-provides above the latest Welsh Government projected level, would absorb this apparent under-provision.

**Question b)**

**Although neighbouring counties each provide for their own housing needs, does the differential in prices, particularly between England and Wales, lead to any cross-border demand for housing? If so, has this been accounted for?**

- b.1 In order to understand the future housing need and demands for housing, Local Planning Authorities are required to consider a range of data sources and information which identifies how key drivers of the local market and underlying trends will impact upon the structure of households and population over a fifteen year period and beyond.
- b.2 The general housing market context of Flintshire County and its interrelationships with other areas was analysed and considered as part of the Local Housing Market Assessment undertaken in 2014/15 and updated in 2018 ([LDP-EBD-HP3.1](#)). Through a review of migration and travel to work patterns, the Assessment was able to obtain a picture of the market dynamics of Flintshire County.

- b.3 The LHMA includes an analysis of 2011 Census migration data which suggests for example, that just over 71% of households moving in Flintshire originated from within Flintshire or Wrexham, and only some 8.8% from Cheshire West and Chester. Flintshire is therefore part of the wider functional economic area including Wrexham and Cheshire West and Chester and it experiences a high and consistent level of self containment. The Assessment found it broadly self-contained both in terms of the travel-to-work patterns of its own resident working population, with just over 63% of the employed population working within the area, and also broadly self-contained in terms of the residential location of its workforce, with almost 61% of the Borough's workers also residing within the Council area .
- b.4 Flintshire can therefore be described as a self-contained housing market in terms of both migration and travel to work and that it is an appropriate Housing Market Area for the purposes of Local Plan policy making.
- b.5 The Plan does not therefore make provision for the housing requirements of adjacent local authorities though as referenced in the response to Question a) under Matter 2, the Council has engaged with all of its neighbouring authorities to ensure cross-boundary compatibility and consistency in the Plan. It is also the case that Flintshire's housing requirement is over 60% above the level of projected growth set out in the latest national projections, CWAC allocated a significant volume of housing including significant green belt land release, and Wrexham's housing requirement is high and in line with projected growth.

**Question c)**

**The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?**

**Council's Response:**

- c.1 It is acknowledged that the complexities of the development process bring about a degree of uncertainty and as a consequence it may be that not all of the housing sites will be delivered to the timescales anticipated. Edition 3 of the Manual (para. 5.59) therefore requires that '**a flexibility allowance must be embedded into the Plan**'. While an allowance of around 10% has generally been considered reasonable to provide the necessary level of flexibility in an LDP, the Manual advises that 10% could be the starting point, but the level of flexibility will be for each LPA to determine based on local issues.
- c.2 As referenced in BP10 (para. 2.1.3) higher and lower flexibility allowances have been applied in Adopted LDP's, depending on local circumstances. The 14.4% flexibility allowance proposed in the Deposit Flintshire LDP is greater than the 10% referenced in the Manual, but as explained in [BP10](#) the Council considers the additional level of contingency to be reasonable and justified. The Council also notes that Edition 3 of the Manual now advises that in addition to the flexibility allowance, additional flexibility can be added via a 'non-delivery allowance' which can be factored into the land bank to allow for some land bank

sites not coming forward. The Manual references that where non delivery allowances have been included, these have ranged between 20-50% of the committed land supply.

- c.3 While the Deposit Flintshire LDP does not contain a specific non delivery allowance, as referenced in [BP10A](#) (Table 10A), an update of the Plan's Housing Balance sheet to 1/4/20 shows that the LDP flexibility allowance has now increased to 1260 dwellings or over 18% of the housing requirement. This is equivalent, for example, to having a flexibility allowance of 10% of the Plan's requirement (695) and a non delivery allowance of 46% of the committed supply at 1/4/20 (565 = 46% of 1221), or alternatively a flexibility allowance of 14% (973) plus a non-delivery allowance of 23.5% (287) of the committed supply.
- c.4 Analysis of the committed supply at 1.4.20, as contained in Appendix 2A to BP10A indicates that of the 56 committed sites, 16 were completed and a further 33 were either under construction or acquired by a developer with plans for commencement on site (See Appendix A attached to this statement). The remaining 7 sites have a total capacity of 250 units. While the commitments trajectory in Appendix 2A anticipates these 7 sites being developed within the Plan period, even if this was not the case and none were to be developed, the loss would be less than a non- delivery allowance of 23.5% (287 dwellings) as set out above.
- c.5 The flexibility allowance in the LDP is therefore considered to be reasonable and justified in that it allows for both a flexibility allowance slightly greater than average, along with a non-delivery allowance which is within the parameters referenced in the Manual, and which takes account of the status and deliverability of the committed supply.

**Question d)**

**Is the housing requirement over reliant on the provision of dwellings on windfall and small sites?**

**Council's Response:**

- d.1 The Development Plans manual Edition 3 recognises that both large and small windfall allowances are legitimate components of an LDP housing land supply (Table 16 & para 5.62 'Definition of Components' in the Manual). The Manual advises that the allowances for the contributions of both large and small windfall sites should have regard to past trends and other evidence, including an Urban Capacity Study.
- d.2 BP10 (para 2.5) explains how the windfall allowances incorporated in the LDP have been determined, referencing in particular the analysis undertaken by Arcadis as part of the Flintshire Urban Capacity Study (June 2019) ([LDP-EBD-HP8](#)) which looked at both past trends and the capacity of the various sources of windfalls to accommodate future windfall development. As indicated in Table 4.8 in the Urban Capacity Study, over the past 18 years to 1/4/18, the contribution to

the housing supply from windfall sites in Flintshire averaged 236 dwellings per annum, comprising 116 pa on large sites and 120 pa on small sites. However, as explained in Section 4.3 of the Study, while it is expected that windfall sites will continue to make a significant contribution to the housing land supply, it is felt unreasonable to project forward future rates based on these past rates. A cautious approach has therefore been taken and a discount of approximately 50% has been applied to both small and large windfall site contributions. The windfall allowances used in the Deposit LDP are therefore 600 units for large sites (averaging 50 per annum) and 720 units for small sites (averaging 60 per annum), over the remaining 12 years of the Plan period. BP10 recognised that in practice it is likely that the contribution from large windfall sites will be less in the very early years as they will be sites which did not have planning permission at 1/4/18 (though S106 sites will be included, as explained in para. 2.4 of BP10A).

- d.3 The housing supply trajectory included as Appendix 4 in [BP10](#) acknowledges this, reducing the large sites allowance in the early years and incorporating an allowance of 60 units per annum for the remaining years (still equating to a conservative 600 units over the remaining Plan period). The Council has now produced BP10A which comprises an update to BP10, and takes account of the revised guidance regarding housing land supply contained in Edition 3 of the Development Plans Manual. BP10A also updates the LDP housing land supply information to a 1.4.20 base date and incorporates a revised housing supply trajectory in accordance with the revised guidance. As advised in Edition 3 of the Manual, (Table 18 and para. 5.73) the revised trajectory specifically excludes large windfall completions in the first two years of the projected supply specifically to avoid issues of double counting.
- d.4 Further monitoring of completions on large windfall sites shows that over the first 5 years of the LDP period (ie 2015-2020) the contribution has totalled 489 units, averaging 98 per annum, as indicated in the table in para. 2.5.8 of BP10A (reproduced in the Council's response to Question h) in this statement). This illustrates that the large sites windfall allowance applied in the LDP is both conservative and deliverable.
- d.5 With regard to small sites, again the allowance, which equates to 600 units over the remaining 10 years of the Plan period (ie 2020-2030) is considered by the Council to be reasonable and justified. As with large sites, the Council has not sought to project forward historical rates of small sites provision, but as explained in the Urban Capacity Study, and in BP10, has applied a significant (50%) reduction in past rates going forward.
- d.6 Overall, the large and small sites allowances taken together total 1089 dwellings (as at 1/4/20) which equates to only just over 13% of the overall housing provision. In the Council's view this demonstrates that the requirement is not over reliant on the provision of dwellings on windfall and small sites.

d.7 It should be noted that in its representations at Deposit Stage (ID 412) the Home Builders Federation commented ‘*the HBF supports the Councils approach to windfall sites and commitments as identified in the Housing Balance sheet and the level of flexibility proposed*’.

**Question e)**

**Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?**

**Council’s Response:**

e.1 The housing requirement figure in the LDP is derived from the LDP’s Growth Strategy, as set out in Policy STR1 of the Deposit Plan. The Strategy was selected following the generation and consideration of several scenarios which it consulted on, as explained in the responses to the Inspectors’ Preliminary Question 16 and to Matter 3 above. The Council acknowledges that the Strategy is employment led and to a degree aspirational, as explained in the responses to the Inspectors’ Preliminary Question 14, and to question a) above. As a consequence the housing requirement (at 6,950 dwellings) is significantly high than it would be from a projection led growth strategy (+61%).

e.2 The requirement figure is not based on past housing delivery rates, but as advised in paras. 5.55-5.57 in the Manual, regard has been had to past build rates and analysis of recent past completion rates actually shows a reasonable correlation between the housing requirement figure and average past completions.

e.3 The tables below show past housing completions in the County over 15 yr, 10 yr and 5 yr periods, which average 421, 471 and 521 units pa respectively. The LDP requirement figure sits between these figures, averaging 463pa.

**15 Year Past Completions**

A	Total Previous 15 Year Completions (2005-2020)	6316
B	Average Annual Completions	421

**10 Year Past Completions**

A	Total Previous 10 Year Completions (2010-2020)	4709
B	Average Annual Completions	471

**5 Year Past Completions**

A	Total Previous 5 Year Completions (2015-2010)	2609
B	Average Annual Completions	521



- e.4 Though the housing requirement figure could be increased, doing so would be contrary to the selected growth strategy and result in increased divergence from the Welsh Government housing projections while necessitating the release of additional land for development when there is no need. The short term delivery trend is still within the average level of housing provided by the plan (530 dpa) and also helps to balance out concerns that some objectors have that the plan's trajectory will under-deliver by the end of the plan period (-600). Clearly these objectors are taking an extremely pessimistic view and by default cannot consider that the housing requirement figure should be increased.
- e.5 Having already set the housing requirement figure at a level significantly above the projections trend, and given that the plan is currently delivering on average at a rate between that required and that provided for, 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 requirement figure.
- e.6 It should be noted that In their representations on the Deposit LDP (rep 1135) Welsh Government comment '*The Welsh Government is generally supportive of the Spatial Strategy and level of homes and jobs and has no fundamental concerns in this respect*'.

#### **Question f)**

**Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?**

#### **Council's Response:**

- f.1 In the Council's view, committed sites should not be included as allocations in the Plan and to do so would be contrary to Welsh Government guidance as contained in Edition 3 of the Development Plans Manual. The Manual specifically requires (Para 5.6.2 – Definition of Components) Allocations, Commitments and Windfall sites '*to be separated to aid clarity of the Plan and avoid double counting*'.
- f.2 While the delivery of housing sites is dependent on a variety of factors, including timing, phasing, infrastructure, funding and potential constraints, as committed sites already have planning permission there should generally be greater certainty regarding their early delivery within the LDP period (though see response to Question c) above re flexibility and non-delivery allowances).
- f.3 If planning permission lapses on any committed sites prior to the commencement of development then the sites will be removed from the committed supply and would only be included if/when a new permission was granted. This has already happened with some sites included in the Deposit Land supply at 1/4/18, which have been removed from the land bank in the updated 1/4/20 land supply figures as a result of planning permission having lapsed (these sites are listed in the note

below the commitments table comprising Appendix 2A to BP 10A). This process would form part of the annual monitoring required to prepare the AMR.

**Question g)**

**Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix1), and allocations which are carried over as such from the UDP, will be delivered during the Plan period? What is the evidence?**

**Council's Response:**

g.1 As explained previously the Council has updated the housing land supply information to a 1/4/20 base date for the Examination and this information is contained in Background Paper 10A. Appendix 2A in BP10A comprises an updated development trajectory of Committed sites as at 1/4/20, while Appendix 3A comprises an updated trajectory of Allocated sites.

g.2 With regard to Committed sites the Council is confident that, based on its' information, and as outlined in the Trajectory attached as Appendix 2A to BP10A, it is likely that all the committed sites will be developed within the Plan period. As referenced in the response to question c) above an analysis of the committed sites listed in Appendix 2A indicates that, at 1/4/20, of the 56 committed sites, 16 were completed and a further 33 were either under construction or acquired by a developer with plans for commencement on site (See Appendix A attached to this statement). While the commitments trajectory in Appendix 2A anticipates the 7 sites remaining also being developed within the Plan period (though generally later in the period), even if this was not the case the flexibility/ non deliver allowance built into the housing provision would provide for any resultant potential loss, as explained in the response to question c).

g.3 With regard to the Allocated sites, again based on the information it has, as indicated in Appendix 3A of BP10A, the Council considers that, with the possible exception of an element of the Northern Gateway Strategic site (140 units), all the allocated sites are likely to be completed within the Plan period. As indicated in Table 3A, of the 13 allocated sites, 5 now have planning permissions, (though are Not included in the committed sites having Planning permission at 1/4/20 to avoid Double counting). Further, three of these sites are actually now in build (Maes Gwern, Mold, Chester Rd., Penymynydd, and Northern Gateway). Further details on the situation in respect of the allocated sites is included in the Council's response to the Inspectors' Preliminary Question 10 and set out in respective Statements of Common Ground.

**Question h)**

**How does the LDP avoid the issue of double counting in respect of large windfall sites?**

**Council's Response:**

h.1 In the response to Question d) above it is explained that the revised housing trajectory included as Appendix 4A to BP 10 excludes large windfall completions in the first two years of the projected supply. This accords with the advice

contained in Edition 3 of the Manual, (Table 18 and para. 5.73) and has been undertaken specifically to avoid issues of double counting, (on the basis that completions in the first two years are unlikely to have occurred on windfall sites which didn't have planning permission at 1.4.20).

h.2 Monitoring of actual completions on large windfall sites over the first 5 years of the LDP period (ie 2015-2020) shows that in fact windfalls can and have contributed completions within two years of the base date as indicated in the table in para. 2.5.8 of [BP10A](#) (extract copied below). Nevertheless the Council acknowledges the principle that going forward the potential for double counting should be avoided in the first two years of the projected supply.

**Windfall Completions on large sites 2015-2020 (ie sites not allocated in either the UDP or LDP and not having pp at 1.4.15)**

	2015-16	2016-17	2017-18	2018-19	2019-20	Total 2015-20
Large Windfall	0	16	211	134	128	489

**Question i)**

**What will be the implications for the delivery of the housing requirement of the comparatively short plan period at adoption?**

**Council's Response:**

i.1 There are no negative implications for future housing delivery from the likely adoption date of the plan. This is supported by a number of evidenced factors:

- The level of actual completions to date since 2015 (2,609 or 511 dpa);
- The fact that this is slightly above the average requirement in the plan, but within the average level of provision;
- The delivery profile shown by the revised housing trajectory in BP10A and in particular reference to the Average Annual Build Rate (AABR) which is achievable and deliverable given the availability of allocated sites from 2022 onwards.

i.2 In essence the plan is clearly 'on track' in terms of delivery, has more than sufficient supply with flexibility to maintain this delivery, has a more than achievable AABR for the remaining plan period, and does not need to play 'catch up' in terms of accelerated or excessive build rates, given it has delivered housing as required during the plan period to date.

**Question j)**

**Is the wording of Policy STR11 appropriate, particularly the use of the word 'expected' and the inclusion of the final paragraph?**

**Council's Response:**

j.1 The Council considers the wording of Policy STR11 to be appropriate, including the use of the word 'expected', and the inclusion of the final paragraph.

- j.2 The aim of policy STR11 is to ensure the sustainable delivery of housing sites across Flintshire. Removing the sentence “The delivery of new housing on these sites **will be expected to**” would in the Council’s view, dilute the impact of this policy and limit the sustainability of new residential schemes. The Council considers it appropriate that the Policy remains as worded to ensure applications meet the key sustainability criteria listed in the policy, and summarised below, which will result in the efficient development of land for housing purposes.
- i) Affordable housing – the provision of affordable housing is a key priority of Welsh Government in PPW11. The Plan reflects this and the policy is signposted to a more detailed policy HN3 Affordable Housing.
  - ii) Making most efficient use of land – a key planning principle, whatever the size of development is to make the most efficient use of land through an appropriate density.
  - iii) Securing a mix of housing on a site is also a well established principle. Clearly there will be some developments where this is not possible, but this will be the exception rather than the rule.
  - iv) The requirement to provide for specific housing needs is caveated by the term ‘where appropriate’ recognising this will not be applicable to every site.
  - v) Making provision for infrastructure to mitigate the impacts of development is a well established planning principle and must be related in scale and kind to the development concerned.
  - vi) The last criteria is explicitly only applicable to rural areas and not every site.
- j.3 Having looked at each criteria in turn and how they represent well established planning principles and good practice, it is unclear why a developer would not embrace them as part of planning residential developments rather than arguing that they are onerous and unreasonable, which is contrary to the principles of sustainable development and place making. Whilst there is a clear ‘expectation’ in PPW that all of these are reasonable requirements of sustainable development, and to assist the Inspector the Council would not object to the replacement of the term ‘expected to’ with ‘should’.
- j.4 The last paragraph of the policy is merely setting out that the Plan will seek to achieve a continuous supply of housing land to enable delivery of the overall housing requirement and the availability of housing land will be regularly monitored as part of the Annual Monitoring Report, as now advised in Edition 3 of the Manual. It points developers to seek to utilise all potential sources of supply as well as the even greater importance of monitoring supply via the trajectory and AMR. As set out in the Council’s Hearing Statement for Matter 1e), the Council acknowledges that the revocation of TAN 1 and its requirement to demonstrate a 5 year supply, together with the revised guidance in Edition 3 of the Manual, will necessitate revisions to the Plan’s monitoring provisions relating to the housing supply, and also to the wording of paras. 7.9 and 7.10 in the Deposit Plan.



## **Appendix A**

### **Status of Committed sites as at 1/4/20**

Site & ref.	Built 2018- 19	Built 2019- 20	Site capacity	Units Rmng	U/C	2020- 21	2021- 22	2022- 23	2023- 24	2024- 25	2025- 26	2026- 27	2027- 28	2028- 29	2029- 30	Comments
Wilcox Coach Works, Afonwen (AFN006)			19	19						6	6	7				RM granted 16/11/18. & site sold Oct. 2019
Central garage, Bagillt (BAG034)			11	2	2											UC- nearing completion
Former British Legion, Bagillt (BAG038)		4	10	6	3	3										UC-Revelation properties/Quatrefoil Homes
Brook Farm, Buckley (BUC065)			16	16					8	8						Renewal granted & site to be marketed.
Mount Pool, Buckley (BUC079)			20	20		5	15									Acquired by Thompson Devs. Est. start on site Autumn 2020
F G Whitley Depot, Buckley (BUC080)		5	39	34	6	0	10	10	8							Under Construction
Adj. Mill Lodge, Buckley (BUC220 )			19	19			19									Site works commenced
Adj. Alders & Langdale, Buckley (BUC179)	3		20													COMPLETED
Side of 61, Brunswick Rd., Buckley (BUC202)			10	10			10									WWHA RM app & expected start on site March 2021
Jubilee Rd./Manor Drive, Buckley (BUC206)	14		14													COMPLETED

Buckley Health Centre, Padeswood Rd., Buckley (BUC204)	24		24														COMPLETED
Summerhill Farm, Caerwys (CAE007)		8	67	59		5	18	18	18								Under construction
<b>Site &amp; ref.</b>	<b>Built 2018-19</b>	<b>Built 2019-20</b>	<b>Site capacity</b>	<b>Units Rmng</b>	<b>U/C</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>	<b>2025-26</b>	<b>2026-27</b>	<b>2027-28</b>	<b>2028-29</b>	<b>2029-30</b>	<b>Comments</b>	
				1.4.20													
Station Yard/Depot, Coed Talon (COE007)			49	49				9	20	20							Reserved matters approved & owner in discussion with developer
Adj. Fairoaks Drive, Connah's Quay (CON036)	4	8	46	16	13		3										Under construction
Territorial House, High St., Connah's Quay (CON111)	11		11														COMPLETED
Albion Social Club (CON 123)			30	30	30												Under construction- -Clwyd Alyn HA
West of Greenwood Grange, Chester Rd.(DOB005)		24	24														COMPLETED
Woodside Cottages, Drury (DRU021)			23	23				8	8	7							Site clearance commenced
Side of 59, Wood Lane,		23	23														COMPLETED



Hawarden (EWL019)																	
South of the Larches, Ewloe (EWL043)	1		10	2	1	1											Under construction
Greenhill Ave., Ewloe (EWL044)	15		41														COMPLETED
Boar's Head Inn, Ewloe (EWL059)			31	31	31												Under Construction-Pennaf
Croes Atti, Flint (FLI002)	70	91	644	220	60		40	40	40	40							Persimmons site now completed. .Anwyl Ph 4- Under const.
Flint working men's club (FLI048)	4		15	11			4	4	3								4 uc last yr now demolished & no activity.
<b>Site &amp; ref.</b>	<b>Built 2018-19</b>	<b>Built 2019-20</b>	<b>Site capacity</b>	<b>Units Rmng</b>	<b>U/C</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>	<b>2025-26</b>	<b>2026-27</b>	<b>2027-28</b>	<b>2028-29</b>	<b>2029-30</b>	<b>Comments</b>	
Flint Sports & Social Club (FLI066)		12	12														Wales & West-COMPLETED
Earl Lea site, Flint (FLI070)	73		73														COMPLETED
Ystrad Goffa Court, Flint (FLI077)	19		19														COMPLETED
Pandy Garage, Oakenholt (FLI089)			16	16		4	12										New site-acquired by developer
Rear St Andrews Church, Garden City (GAR012)			12	12	12												Under Construction-Wates

Nant Y Gro, East of Gronant Hill (GRO011)			41	41			20	21									PP granted 3/8/18 (Wates)- Awaiting discharge of condition.
Rainbow Inn, Ruthin Rd. Gwernymynydd (GYM013)	3	4	17	4	2		2										Under construction
Land adj. Siglen Uchaf, Gwerymynydd (GYM019)			10	10				5	5								Land sold & further application in preparation
Land at Friar's Gap, Hawarden (HAW013)	1	1	31	2		1	1										Under construction
Land at Kinnerton Lane, Higher Kinnerton (HIG022)	31	13	56	12	12												Under construction
Lluesty Hospital, Holywell (HOL028)			89	89	42		20	27									Under construction
East of Halkyn Rd., Holywell (HOL015)			44	44			24	20									WWHA – expected start now Autumn 2020
Ysgol Fabanod, Perth Y Trefyn, Holywell (HOL098)		55	55														Completed(WWHA)
<b>Site &amp; ref.</b>	<b>Built 2018-19</b>	<b>Built 2019-20</b>	<b>Site capacity</b>	<b>Units Rmng</b>	<b>U/C</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>	<b>2025-26</b>	<b>2026-27</b>	<b>2027-28</b>	<b>2028-29</b>	<b>2029-30</b>	<b>Comments</b>	
Ty Carreg, Stryt Isa, Hope (HCA071)			15	15		6	9										Reserved matters granted –Revelation

															properties Ltd. Start in Oct./ Nov 2020
Bromfield Timber Yard, Mold (MOL020)			122	122							30	30	30	32	Unlikely to be developed within next 5 years
Former Broncoed Works (MOL045)	3	6	88	9	9										Under construction
94 Wrexham Rd., Mold (MOL100)			11	2	2										
Bryn Awel Hotel, Mold (MOL120 )			23	23			23								New site (WWHA)
Issa Farm, Mynydd Issa (MYN033)			59	59	27	5	27								Under construction - Macbryde Homes.
Rose Lane/ Synnyside, Mynydd Isa (MYN028)			58	58			25	25	8						Ciwyd Alyn-start on site est. Nov. 2020
Ffordd Hiraethog, Maes Pennant, Mostyn (MOS012 )			10	10					10						New site-SHARP scheme, Wates
New Brighton Service Station (NEW005)	21	2	24												COMPLETED
Cae Eithin, Village Rd., Northop Hall (NOH001)	9		94												COMPLETED
Llys Dewi, Penyffordd (PFD002)	6	21	27												COMPLETED
Off Rhewl Fawr Rd., Penyffordd (PFD001)	1		18	8			8								Balance is Grwp Cynefin scheme - est. start Dec. 2020

Site & ref.	Built 2018- 19	Built 2019- 20	Site capacity	Units Rmng	U/C	2020- 21	2021- 22	2022- 23	2023- 24	2024- 25	2025- 26	2026- 27	2027- 28	2028- 29	2029- 30	Comments
North of Coed Mor, Penyffordd (PFD020)			23	23				7	8	8						Site recently sold
Rhos Road, Penyffordd (PYF039)			40	40		10	20	10								Hilbre homes site
Hawarden Rd., Penyffordd (PYF042)			32	32	2	10	20									Under construction- Macbryde Homes
1-3 Pierce St., Queensferry (QUE013)			16	16				16								Info. from developer (Vivio devs.)
The Stores House, Rhes Y Cae (RHE002)			10	7			3	2	2							Under construction
Allied Bakeries, Saltney (SAL018)	35	36	74													COMPLETED
Sewage Works, Wats Dyke Way, Sychdyn (SYC001)	33	10	43													COMPLETED
<b>TOTAL</b>	<b>381</b>	<b>323</b>	<b>2478</b>	<b>1221</b>	<b>254</b>	<b>50</b>	<b>333</b>	<b>222</b>	<b>138</b>	<b>89</b>	<b>36</b>	<b>37</b>	<b>30</b>	<b>32</b>	<b>0</b>	

### Notation

Completed Sites	
Developer on site	
Acquired by developer with plans to develop	

