

# Public Document Pack

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Chief Officer (Governance)  
Prif Swyddog (Llywodraethu)



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To: Councillor Dave Hughes (Leader)

Councillors: Glyn Banks, Chris Bithell, Helen Brown, Chris Dolphin,  
Mared Eastwood, Paul Johnson, Christine Jones, Richard Jones and  
Linda Thomas

9 October 2024

Dear Sir/Madam

**NOTICE OF HYBRID MEETING**  
**CABINET**  
**TUESDAY, 15TH OCTOBER, 2024 at 10.00 AM**

Yours faithfully

Steven Goodrum  
Democratic Services Manager

Please note: Attendance at this meeting is either in person in the Delyn Committee Room, Flintshire County Council, County Hall, Mold, Flintshire or on a virtual basis.

The meeting will be live streamed onto the Council's website. The live streaming will stop when any confidential items are considered. A recording of the meeting will also be available, shortly after the meeting at <https://flintshire.public-i.tv/core/portal/home>

If you have any queries regarding this, please contact a member of the Democratic Services Team on 01352 702345.

## A G E N D A

### 1 APOLOGIES

**Purpose:** To receive any apologies.

### 2 DECLARATIONS OF INTEREST

**Purpose:** To receive any declarations and advise Members accordingly.

### 3 MINUTES (Pages 7 - 16)

**Purpose:** To confirm as a correct record the minutes of the meeting held on 25<sup>th</sup> September 2024.

TO CONSIDER THE FOLLOWING REPORTS

### STRATEGIC REPORTS

### 4 LDP ANNUAL MONITORING REPORT (Pages 17 - 160)

Report of Chief Officer (Planning, Environment and Economy) - Cabinet Member for Planning, Public Health and Public Protection

**Purpose:** To adopt the first Annual Monitoring Report following the adoption of the Local Development Plan to enable formal submission to Welsh Government.

### 5 LDP SUPPLEMENTARY PLANNING GUIDANCE (Pages 161 - 258)

Report of Chief Officer (Planning, Environment and Economy) - Cabinet Member for Planning, Public Health and Public Protection

**Purpose:** To adopt three Supplementary Planning Notes relating to Extensions and Alterations, New Housing in the Open Countryside and the Conversion of Rural Buildings as formal supplementary planning guidance so that they can carry weight as a material planning consideration alongside the adopted Local Development Plan.

### 6 INDEPENDENT REVIEW OF FLINTSHIRE HOMELESSNESS SERVICES (Pages 259 - 336)

Report of Chief Officer (Housing and Communities) - Deputy Leader of the Council and Cabinet Member for Housing and Communities

**Purpose:** To provide an update on progress in relation to the Independent Review completed by Neil Morland and outline potential efficiencies through diversification of the Councils Homeless Accommodation Portfolio.

7 **REVIEW OF HIGHWAYS ASSET MANAGEMENT PLAN (HAMP) AND HIGHWAY AND CAR PARK INSPECTION POLICY** (Pages 337 - 500)

Report of Chief Officer (Streetscene and Transportation) - Cabinet Member for Streetscene and Transportation

**Purpose:** To seek approval of the refreshed Highway Asset Management Plan (HAMP) and reviewed Highway and Car Park Inspection Policy.

8 **NEW BRIGHTON – ADOPTION OF A WELSH NAME** (Pages 501 - 508)

Report of Chief Officer (Education and Youth) - Cabinet Member for Education, Welsh Language and Culture

**Purpose:** To recommend the adoption of a Welsh name for New Brighton- Pentre Cythrel.

**OPERATIONAL REPORTS**

9 **REVENUE BUDGET MONITORING 2024/25 (MONTH 5)** (Pages 509 - 534)

Report of Corporate Finance Manager - Cabinet Member for Finance and Social Value

**Purpose:** This regular monthly report provides the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account. The position is based on actual income and expenditure as at Month 5, and projects forward to year-end.

10 **STRATEGIC EQUALITY PLAN ANNUAL REPORT 2023/24** (Pages 535 - 596)

Report of Corporate Manager – Capital Programme & Assets – Cabinet Member for Corporate Services

**Purpose:** To present the Strategic Equality Plan Annual Report 2023/24.

11 **UPDATE ON THE BUS NETWORK GRANT AND LOCAL BUS SERVICES IN FLINTSHIRE** (Pages 597 - 612)

Report of Chief Officer (Streetscene and Transportation) - Cabinet Member for Streetscene and Transportation

**Purpose:** To provide an update on the funding arrangements for local bus services through the Bus Network Grant provided by Welsh Government and to inform members of the available options to address the £270k shortfall for local bus services in Flintshire, as well as a further pressure of £47k to address the shortfall of the Bus Network Grant across the wider north Wales region.

12 **RESPONSE TO THE AUDIT WALES REVIEW “URGENT AND EMERGENCY CARE: FLOW OUT OF HOSPITAL – NORTH WALES REGION”** (Pages 613 - 668)

Report of Chief Officer (Social Services) - Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

**Purpose:** To present findings and the council response to the Auditor General’s review of the arrangements to support effective flow out of hospital in the North Wales region detailed within “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”.

13 **PROCUREMENT OF CLIENT INFORMATION SYSTEM** (Pages 669 - 672)

Report of Chief Officer (Social Services) - Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

**Purpose:** To update on progress to procure a replacement client information system to the current system (Civica PARIS).

14 **CHILDREN AND FAMILIES SAFEGUARDING HUB** (Pages 673 - 676)

Report of Chief Officer (Social Services) - Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

**Purpose:** To update on progress of implementation which will ensure a full multi-agency approach and response to safeguarding.



15 **EXPANSION OF SPECIALIST EDUCATION PROVISION** (Pages 677 - 706)

Report of Chief Officer (Education and Youth) - Cabinet Member for Education, Welsh Language and Culture

**Purpose:** To advise on the outcome of the statutory consultation exercise to reorganise specialist education provision, to recommend to proceed with the proposal and allow for publication of a statutory notice providing a 28 day notice period for objections.

16 **EXPANSION OF SPECIALIST ADDITIONAL LEARNING NEEDS RESOURCE PROVISION WITHIN THE SECONDARY EDUCATION NETWORK** (Pages 707 - 716)

Report of Chief Officer (Education and Youth) - Cabinet Member for Education, Welsh Language and Culture

**Purpose:** This report seeks COT support to progress Cabinet approval to the proposed expansion of specialist resource provision within the secondary education network.

17 **ADDITIONAL LICENSING FOR HOUSES OF MULTIPLE OCCUPATION** (Pages 717 - 722)

Report of Chief Officer (Planning, Environment and Economy) - Cabinet Member for Planning, Public Health and Public Protection

**Purpose:** To request authority to undertake a consultation exercise to consider whether 'Additional Licensing' for smaller Houses of Multiple Occupation (HMO'S) should be introduced to the county as a whole.

18 **FOOD SERVICE PLAN 2024-25 FOR FLINTSHIRE COUNTY COUNCIL** (Pages 723 - 766)

Report of Chief Officer (Planning, Environment and Economy) - Cabinet Member for Planning, Public Health and Public Protection

**Purpose:** To approve the Food Service Plan 2024-25

19 **EXERCISE OF DELEGATED POWERS** (Pages 767 - 768)

**Purpose:** To provide details of actions taken under delegated powers.

**FORWARD WORK PROGRAMME - COUNTY COUNCIL, CABINET, GOVERNANCE AND AUDIT AND OVERVIEW & SCRUTINY - FOR INFORMATION**

20 **OFFICE RATIONALISATION PROGRAMME AND COUNTY HALL CAMPUS** (Pages 801 - 806)

Report of Corporate Manager – Capital Programme & Assets - Cabinet Member for Transformation and Assets

**Purpose:** To present a report outlining phases and indicative costs for the next focused piece of work.

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 - TO CONSIDER THE EXCLUSION OF THE PRESS AND PUBLIC**

The following appendices are considered to be exempt by virtue of Paragraph(s) 15 of Part 4 of Schedule 12A of the Local Government Act 1972 (as amended).

The appendices contain details relating to employment issues and the public interest in withholding the information outweighs the public interest in disclosing the information until such time as those issues have been resolved.

21 **CONFIDENTIAL APPENDICES TO AGENDA ITEM NUMBER - OFFICE RATIONALISATION PROGRAMME AND COUNTY HALL CAMPUS** (Pages 807 - 810)

The following item is considered to be exempt by virtue of Paragraph(s) 14 of Part 4 of Schedule 12A of the Local Government Act 1972 (as amended).

The public interest in protecting their privacy outweighs the interest in disclosing the information.

22 **OUTSTANDING DEBT - WRITE OFF** (Pages 811 - 814)

Report of Chief Officer (Governance), Chief Officer (Streetscene and Transportation) - Cabinet Member for Corporate Services, Cabinet Member for Streetscene and Transportation

**Purpose:** To seek approval to write off the debt on ledger relating to Go Plant Fleet Services Ltd following the company's insolvency.

***Please note that there may be a 10 minute adjournment of this meeting if it lasts longer than two hours***

## CABINET 25<sup>TH</sup> SEPTEMBER 2024

Minutes of the meeting of the Cabinet of Flintshire County Council held as a hybrid meeting on Wednesday 25<sup>th</sup> September.

**PRESENT:**           **Councillor Dave Hughes (Chair)**  
Councillors: Sean Bibby, Chris Bithell, Mared Eastwood, Dave Healey, Paul Johnson, Christine Jones, and Linda Thomas.

**ALSO PRESENT:** Councillors: Bernie Attridge, Helen Brown, Bill Crease, David Coggins Cogan, Alasdair Ibbotson, Richard Lloyd, Ted Palmer, Andrew Parkhurst, Carolyn Preece and Sam Swash attended as observers.

**APOLOGIES:**       None.

**CONTRIBUTORS:** Chief Executive, Chief Officer (Governance), Chief Officer (Planning, Environment and Economy), Chief Officer (Social Services), Corporate Finance Manager, Corporate Manager, People and Organisational Development, Corporate Manager, Capital Programme and Assets, Strategic Finance Manager, and Housing Programme Services Manager.

**IN ATTENDANCE:** Team Leader – Democratic Services and Overview and Scrutiny Facilitator.

### 53. **DECLARATIONS OF INTEREST**

None.

### 54. **MINUTES** **([link to recording](#))**

The minutes of the meetings held on [16th and 24th July \(agenda item number 3\)](#) were submitted and confirmed as a correct record.

### **RESOLVED:**

That the minutes of the meetings be confirmed as a correct record.

### 55. **MEDIUM TERM FINANCIAL STRATEGY AND BUDGET 2025/26** **([link to recording](#))**

Councillor Johnson presented the [report \(agenda item number 4\)](#) on the Medium Term Financial Strategy and Budget 2025/26 which provided an update on the Council's concerning revenue budget position for the 2025/26 financial year.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the update be received on the Council's concerning budget position for the 2025/26 financial year in advance of consideration by relevant Overview and Scrutiny Committees; and
- (b) That the ongoing work to identify budget solutions be noted, and the approach to address the serious and major budget challenge be agreed.

**56. AUDIT WALES REPORT – FINANCIAL SUSTAINABILITY  
[\(link to recording\)](#)**

Councillor Johnson presented the [report \(agenda item number 5\)](#) from Audit Wales Report which provided an overview of the findings of a local report titled “Financial Sustainability Review – Flintshire County Council”.

Two representatives from Audit Wales were in attendance to answer any questions.

The recommendation in the report was supported.

**RESOLVED:**

That the report on Financial Sustainability from Audit Wales be noted and the organisational response be supported.

**57. ANNUAL PERFORMANCE REPORT 2023/24 TO INCORPORATE THE COUNCIL PLAN END OF YEAR PERFORMANCE REPORT 2023/24  
[\(link to recording\)](#)**

Councillor Thomas presented the Annual Performance [report \(agenda item number 6\)](#) which set out an analysis of how well the Council had performed against its Well-being objectives.

The recommendation in the report was supported.

**RESOLVED:**

That the 2023/24 Annual Performance Report, combined with the Council Plan End of Year 2023/24 Performance Report be approved, noting the performance achieved.

**58. CORPORATE SELF ASSESSMENT 2023/24  
[\(link to recording\)](#)**

Councillor Thomas presented the Corporate Self-Assessment 2023/24 [report \(agenda item number 7\)](#) which presented the findings of the Corporate Self-Assessment and details of the opportunities for improvement identified.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the findings of the Corporate Self-Assessment 2023/24 be accepted and approved; and
- (b) That the opportunities for improvement identified in the Corporate Self-Assessment 2023/24 be approved.

**59. FLINTSHIRE AND WREXHAM PSB ANNUAL REPORT 2023/24**

[\(link to recording\)](#)

Councillor Hughes presented the Flintshire and Wrexham Public Services Board (PSB) Annual [report \(agenda item number 8\)](#) 2023 which must be produced no later than one year after the publication of the previous report.

The recommendation in the report was supported.

**RESOLVED:**

That the provision of the Flintshire and Wrexham Public Services Board Annual Report 2023/24 be noted.

**60. REVENUE BUDGET MONITORING 2024/25 (MONTH 4)**

[\(link to recording\)](#)

Councillor Johnson presented the Revenue Budget Monitoring 2024/25 (Month 4) [report \(agenda item number 9\)](#) which provided the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account.

The recommendation in the report was supported.

**RESOLVED:**

That the report and the estimated financial impact on the 2024/25 budget be noted, along with the measures being put in place to improve the financial position by the end of the financial year.

**61. CAPITAL PROGRAMME MONITORING 2024/25 (MONTH 4)**

[\(link to recording\)](#)

Councillor Johnson presented the Capital Programme Monitoring 2024/25 (Month 4) [report \(agenda item number 10\)](#) which provided Capital Programme information for 2024/25.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the overall report be approved;

(b) That the carry forward adjustments be approved; and

(c) That the additional allocations be approved.

**62. TREASURY MANAGEMENT ANNUAL REPORT 2023/24**

[\(link to recording\)](#)

Councillor Johnson presented the Annual Treasury Management [report \(agenda item number 11\)](#) which was for recommendation to Council.

The recommendation in the report was supported.

**RESOLVED:**

That the draft Treasury Management Annual Report 2023/24 be presented to County Council on 21<sup>st</sup> November for final approval.

**63. RESIDENTIAL CARE SECTOR REVIEW 2024-2034 AND TY CROES ATTI PROGRESS REPORT**

[\(link to recording\)](#)

Councillor Jones presented the Residential Care Sector Review 2024-2034 and Ty Croes Atti Progress [report \(agenda item number 12\)](#) which was the starting point for how the Council could continue to respond to the challenges and increasing demands of the sector.

The recommendations in the report were supported.

**RESOLVED:**

(a) That the actions needed to mitigate the predicted shortfall in Flintshire be noted;

(b) That ways to influence the independent market to meet the growing demand, whilst taking into account the proposals within the Welsh Government's Rebalancing Care Agenda be noted; and

(c) That the progress made on the development of Ty Croes Atti be recognised.

**64. CAPITAL WORKS – PROCUREMENT OF WHQS INTERNAL WORKS**

[\(link to recording\)](#)

Councillor Bibby presented the Capital Works – Procurement of Welsh Housing Quality Standard Internal Works [report \(agenda item number 13\)](#) which sought approval to award a contract through the Procure Plus Framework.

The recommendation in the report was supported.

**RESOLVED:**

That the award of Seddon's Ltd, to carry out the Whole House Internal Work Programme, through the Procure Plus Framework, be approved.

**65. CAPITAL WORKS – PROCUREMENT WORKS RELATING TO FIRE SAFETY (HIGHRISE)  
[\(link to recording\)](#)**

Councillor Bibby introduced the Capital Works – Procurement Works Relating to Fire Safety (Highrise) [report \(agenda item number 14\)](#) which sought approval to award a contract procured through the North Wales Construction Partnership Procurement Framework.

The recommendation in the report was supported.

**RESOLVED:**

That the mini competition through the North Wales Construction Partnership Procurement Framework be approved.

**66. ANNUAL REPORT ON THE SOCIAL SERVICES COMPLAINTS AND COMPLIMENTS PROCEDURE  
[\(link to recording\)](#)**

Councillor Jones presented the Annual [report \(agenda item number 15\)](#) on the Social Services Complaints and Compliments Procedure which was to note the effectiveness of the complaints procedure with lessons being learnt to improve service provision.

The recommendation in the report was supported.

**RESOLVED:**

That the effectiveness of the complaints procedure with lessons being learned be noted.

**67. FLINTSHIRE MICRO-CARE PROJECT  
[\(link to recording\)](#)**

Councillor Jones presented the Flintshire Micro-Care Project [report \(agenda item number 16\)](#) which provided an update on Flintshire's Micro-Carer market, providing an evaluation of the project to date and key developments going forward.

The recommendation in the report was supported.

**RESOLVED:**

That the progress made in the Micro-Care project and the contribution the scheme is making in meeting demand for care in Flintshire be noted.

**68. YOUNG FLINTSHIRE PARTICIPATION MODEL**  
**[\(link to recording\)](#)**

Councillor Eastwood presented the Young Flintshire Participation Model [report \(agenda item number 17\)](#) which provided an overview of the proposed a model for children and young people to have their voice heard about matters which affected them and speak to key decision makers in the local authority.

The recommendation in the report was supported.

**RESOLVED:**

That Cabinet understands and supports the Young Flintshire Participation Model to engage children and young people in Flintshire in matters that impact on them and provide a mechanism for decision makers to hear their views.

**69. FLINTSHIRE YOUTH JUSTICE SERVICE HMIP INSPECTION**  
**[\(link to recording\)](#)**

Councillor Eastwood presented Flintshire Youth Justice Service HMIP Inspection [report \(agenda item number 18\)](#) which provided assurance on the quality of the Youth Justice Service in Flintshire.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the recommendations from the HMIP Inspection Report be noted and supported, and Members be assured of the quality of provision on the Flintshire Youth Justice Service; and
- (b) That a robust approach to seeking the identified support that is currently identified as lacking from external partners be endorsed.

**70. WINTER MAINTENANCE – DECISION MAKING REVIEW 2024**  
**[\(link to recording\)](#)**

Councillor Hughes presented the Winter Maintenance – Decision Making Review 2024 [report \(agenda item number 19\)](#) which provided an update on the proposed alterations to the current decision-making process within the Winter Maintenance Policy 2023-25.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the proposal to transition to a domain-based approach for decision making for gritting action with a step change proposed for the 2024/25 season be supported; and



- (b) That the proposal to a full mitigation to domain-based treatments from the 2025/26 season following the outcome of the step change over the 2024/25 season be approved.

**71. AUDIT WALES REPORT (SETTING OF THE WELL-BEING OBJECTIVES)**  
[\(link to recording\)](#)

Councillor Thomas presented the Audit Wales [report \(agenda item number 20\)](#) (Setting the Well-Being Objectives) which reviewed the recommendations for improvement advised by Audit Wales, along with the Council's response.

The recommendation in the report was supported.

**RESOLVED:**

That the recommendations for improvement be approved.

**72. FLINTSHIRE CONNECTS ANNUAL REPORT 2023/24**  
[\(link to recording\)](#)

Councillor Thomas presented the Flintshire Connects Annual [report \(agenda item number 21\)](#) which provided an overview of the annual performance of Flintshire Connects during 2023-24.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the Flintshire Connects annual performance 2023-24 be noted; and
- (b) That in light of reducing footfall at Flintshire Connects Centres;
  - (1) there should be a review of the service, commencing with public consultation on why usage is reducing, and what functions the service could/should provide; and
  - (2) The consultation should also explore the potential impact on those with protected characteristics of possibly reducing opening hours to reflect the reduced usage by residents.

**73. SOCIAL VALUE PROGRESS UPDATE**  
[\(link to recording\)](#)

Councillor Johnson introduced the Social Value Progress Update [report \(agenda item number 22\)](#) which presented the social value performance data for the latter six months of the financial year 2023/24.

The recommendation in the report was supported.

**RESOLVED:**

That the positive performance achieved in generation social value for quarters three and four of the financial year 2023/24 be noted and the ongoing support be confirmed.

**74. WORKFORCE SURVEY 2023**  
**(link to recording)**

Councillor Thomas presented the Workforce Survey 2023 [report \(agenda item number 23\)](#) which shared the outcomes of the latest workforce survey and sought approval for the introduction of a new set of core values.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the results of the 2023 Workforce Survey be noted;
- (b) That the progress made on addressing issues raised in the survey be endorsed; and
- (c) That the adoption of the new set of proposed Core Values be supported.

**75. CALL-IN REPORT – COUNCIL’S TRANSITION TO A RESTRICTED CAPACITY RESIDUAL WASTE COLLECTION MODEL**  
**(link to recording)**

Councillor Hughes presented the [report \(agenda item number 24\)](#) which provided an update following the call-in meeting relating to the Council’s Transition to a Restricted Capacity Residual Waste Collection Model. Having considered the decision, the Overview and Scrutiny Committee chose Option 2, to resolve that ‘the explanation be accepted but not endorsed by the Overview and Scrutiny Committee.

The recommendation in the report was supported.

**RESOLVED:**

That the Cabinet notes the decision of the Environment & Economy Overview and Scrutiny Committee call-in meeting with regard to Record No 4236 the Council’s Transition to a Restricted Capacity Residual Waste Collection Model.

**76. CALL-IN REPORT – ANNUAL REVIEW OF FEES AND CHARGES 2024**  
**(link to recording)**

Councillor Johnson presented the [report \(agenda item number 25\)](#) which provided an update following the call-in meeting relating to Annual Review of Fees and Charges 2024.

The recommendations in the report were supported.

**RESOLVED:**

- (a) That the decision of the Corporate Resources Overview and Scrutiny Committee call-in meeting with regard to Record No 44243 – Annual Review of Fees and Charges; and
- (b) That, having regard to the decision of the Corporate Resources Overview and Scrutiny Committee, Cabinet confirm its previous decision.

**77. EXERCISE OF DELEGATED POWERS**

An information [item \(agenda item number 26\)](#) on the actions taken under delegated powers was submitted and noted.

**LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985 – TO CONSIDER THE EXCLUSION OF THE PRESS AND PUBLIC**

**RESOLVED:**

That the press and public be excluded for the remainder of the meeting for the following items by virtue of exempt information under paragraph(s) 14 of Part 4 of Schedule 12A of the Local Government Act 1972 (as amended).

**78. LEISURE, LIBRARIES, PLAY AND MUSEUM SERVICES UPDATE REPORT**

Councillor Eastwood presented the Leisure, Libraries, Play and Museum Services Update report which provided an update on developments and progress made since reports were presented in May.

The recommendations in the report were supported.

**RESOLVED:**

That the progress made in exploring a new grant arrangement with Aura and an associated compliant subsidy control assessment be noted.

**79. DOMICILIARY AND RESIDENTIAL CARE BUDGET**

Councillor Jones introduced the Domiciliary and Residential Care Budget report which proposed changes to the financial assessment and charging for Domiciliary Care and Residential Care Services.

**RESOLVED:**

That the actions needed to mitigate the predicted adverse outturn in Domiciliary and Residential Care in-year budgets.

**80. MEMBERS OF THE PRESS AND PUBLIC IN ATTENDANCE**

There were no members of the public in attendance.

(The meeting commenced at 10.00 a.m. and ended at 1.55 p.m.)

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**Chair**



## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Local Development Plan Annual Monitoring Report
<b>Cabinet Member</b>	Cabinet Member for Planning, Public Health, and Public Protection
<b>Report Author</b>	Chief Officer (Planning, Environment and Economy)
<b>Type of Report</b>	Strategic

### EXECUTIVE SUMMARY

The Local Planning Authority is required to prepare and submit to Welsh Government its first Annual Monitoring Report (AMR) following the adoption of the Flintshire Local Development Plan (LDP) on 24<sup>th</sup> January 2023. The first AMR covers the first full 12-month period following adoption which is 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024. The AMR must be submitted to Welsh Government by 31<sup>st</sup> October 2024.

The monitoring of an adopted LDP is a key part of the Welsh Governments 'plan-led' planning system. The objective of plan monitoring is to establish through evidence gathering whether the Plan is delivering on its strategy, objectives, policies and proposals. Plan monitoring is a key part of informing the need for, timing and nature of a plan review.

The first AMR has been prepared based on firstly, the Monitoring Chapter in the adopted LDP written statement and secondly, the Welsh Government guidance in Development Plans Manual Edition 3. It monitors the performance of the Plan against 66 monitoring indicators.

The AMR is presented in full in Appendix 1 and includes an Executive Summary which summarises the key findings and provides answers to set questions from Welsh Government.

The AMR shows that the LDP is performing well in terms of its strategy, objectives, policies, and proposals. The LDP is still considered to be relevant, appropriate, and up to date. Housing delivery has been ahead of the Plan's housing requirement of 463 dwellings per annum but behind the Anticipated Annual Build Rate (AABR) in the housing trajectory in the adopted LDP. However, good progress has been made in terms of the Northern Gateway strategic site which is

now seeing completions with several housebuilders on site and the other housing allocations which will start delivering completions over the remaining Plan period.

The Plan is on track to deliver the housing requirement of 6,950 dwellings by the end of the Plan period, with the exception of 61 units which is less than 1% of the housing requirement. The conclusion and recommendation of the AMR is that the LDP be the subject of further AMRs to better inform the need for, timing and type of Plan review.

The AMR was considered by Planning Strategy Group at its meeting on Friday 13<sup>th</sup> September where it was endorsed, with some minor suggested amendments, to be reported to Cabinet for adoption and thereafter to be submitted to Welsh Government.

## RECOMMENDATIONS

1	That the first Annual Monitoring Report is adopted by Cabinet and submitted to Welsh Government prior to the deadline of 31 <sup>st</sup> October 2024.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE LDP ANNUAL MONITORING REPORT AMR</b>
1.01	<p>The draft AMR presented in Appendix 1 has been prepared to follow the guidance in the Development Plans Manual. It seeks to assess some 66 individual monitoring indicators that are part of the adopted LDP and is structured as follows:</p> <ul style="list-style-type: none"> <li>• Introduction – an introduction to the structure, content, and purpose of the AMR</li> <li>• Contextual Changes – whether there have been changes in legislation, national guidance or other considerations which affect the context in which the Plan operates</li> <li>• Core indicators – those monitoring indicators which are considered to be key to whether the Plan is achieving its strategy, objectives and growth levels</li> <li>• Local indicators – whether a range of Plan policies are proving effective</li> <li>• Sustainability Appraisal indicators – ensuring that the Plan is meeting the indicators built into the Plans sustainability appraisal and is working towards achieving sustainability and avoiding environmental harm</li> <li>• Conclusion and recommendation</li> </ul>
1.02	<p>The core indicators and local indicators are presented in table form. Each monitoring indicator has a unique reference (M11-66) and each table contains the following information:</p> <ul style="list-style-type: none"> <li>• The relevant LDP objective(s)</li> <li>• The relevant strategic policy</li> </ul>

- The key development management / area specific policies
- The target – what the indicator is seeking to measure – either as a quantifiable measurement or as a direction of travel
- The trigger point – the key mechanism by which to determine if the target is being met, often measured over two consecutive years allowing trends to develop and become clearly identifiable
- Justification of Target and Trigger – to provide further explanation if necessary
- Implementation – the body which is responsible for maintaining or collecting the monitoring information
- Source of Data – how and from where the monitoring information is being obtained
- Action – the outcome of the monitoring indicator (see below).
- Policy Performance – This is where the monitoring data or evidence is presented along with the commentary on the indicator and whether it is being met or not.

1.03 The Actions referred to in the list above are consistent with those in Development Plans Manual and are set out below:

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

1.04 **Core Indicators**

It is inevitable that most attention will be focussed on the core monitoring indicators relating to housing delivery. There are two key measurements of housing delivery and these are MI2 'Number of Net additional market and affordable housing' and MI1 'Annual Level of Housing Completions'.

**MI2 Number of Net additional market and affordable housing**

The Plan has an overall housing requirement of 6,950 dwellings over the 15-year period, which amount to 463 units per annum. The recorded levels of completions between the years 2015-2020 and in 2020-2021 were running ahead of that annual requirement figure of 463 units. In the subsequent three years actual completions have fallen below that figure.

However, as at the 31 March 2023 the level of actual completions over the first nine years of the Plan period were 171 units ahead of what is required. Over the Plan period to date, the actual completions are running at 482 units per annum compared with the 463 requirement i.e. 4% ahead.

### **MI1 Annual Level of Housing Completions**

In reality, housing is not delivered at a flat rate of 463 units per year. The Plan's housing requirement is met from a variety of sources of supply including existing commitments, allowance for small site windfalls, allowance for large site windfalls, the Northern Gateway strategic site and a number of non-strategic housing allocations. Elements of this supply will come forward at different times and at different rates. Therefore, in preparing the LDP it is a requirement to prepare a housing trajectory which seeks to predict when housing will be delivered on the ground, based on a formula. The calculation is known as the Anticipated Annual Build Rate (AABR) and it is this which the Plan's actual completions must be compared with. For the year 2020/21 the actual completion rate was ahead of the AABR figure for that year but since then actual completions each year have fallen short of the projected figure sought in the AABR trajectory.

The AMR sets out a number of reasons to explain why annual actual completions have not kept track with the AABR and these are:

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

Notwithstanding this, there are also a number of positive plan performance messages which are summarised as follows:

- The phosphate constraint has been resolved sufficiently to allow for the delivery of LDP growth, as a result of revised phosphate permits being issued by Natural Resources Wales for the three affected waste water treatment works (wwtw) and the confirmation from DCWW that wwtws are operating well within the permitted level of phosphates, thereby creating headroom for new development;
- Good progress is being made at the Northern Gateway site where Anwyl, Bellway, Keepmoat and Clwyd Alyn (supported by Castle Green) are on site and where Persimmon has recently committed to a further large housing plot. Completions are therefore anticipated to accelerate over future years with five developers on site;



	<ul style="list-style-type: none"> <li>The bulk of the remaining non-strategic housing allocations have planning permissions or a committee resolution to grant subject to a Section 106 agreement, and three allocations have current detailed planning applications under consideration. Edwards Homes are on site at the Connah's Quay allocation, and it is considered that completions will accelerate over coming years.</li> </ul>
1.05	<p>In a similar manner, the number of affordable housing completions (MI9) on the ground is running behind the annual affordable housing target of 151 units. To date the Plan has delivered an average of 123 affordable housing per annum. It should be noted that a large proportion of affordable housing to be delivered by the Plan will be that arising from the LDP housing allocations. Therefore, as the allocated sites start delivering completions, they will also start delivering more affordable housing. This is important again, as there is no shortfall in capacity to deliver, as the permissions are in place; it is the timing of delivery that has changed from the original housing trajectory.</p>
1.06	<p>It is evident from the adopted trajectory and revised trajectory that there is a lag in the timescales for delivering housing completions. Rather than a peak of anticipated completions in 2023/24 and then completions gradually decreasing, the anticipated peak in completions will now be in 2025/26 and then remaining relatively high before gradually decreasing. This is not a scenario whereby the Plan will not deliver its housing requirement or where there is a shortfall in the supply, but a scenario where it will be delivered differently to that intended in the adopted Plan. Members should also note that the calculations for the original trajectory that is incorporated into the adopted LDP are based on the housing baseline position at 2020, with completions projected forward from there year-on-year. This is subjective in that much of the anticipated annual completions are based on developer estimates, which from experience are always provided on a conservative basis.</p>
1.07	<p>This is borne out by the updated trajectory and completions table shown in Appendix F of the AMR where based on the latest developer estimates and the AABR calculation from those, the Plan will be within just 1% of fully delivering the 6,950 dwellings required. This is not considered to be significant and it is likely that delivery rates will be higher than anticipated to allow for the full requirement to be met. There is more than ample supply to ensure this is the case.</p>
	<p>In terms of the other core indicators, a number of further positive performance messages can be identified and summarised as follows:</p> <ul style="list-style-type: none"> <li>MI3 Spatial Distribution of Housing – the Plan seeks to anticipate the amount of housing development in each tier of the settlement hierarchy for instance 47% of all completions will be in Tier 1 Main Service Centres. Whilst there is some variance in housing delivery to date compared to the % to be attributed to each tier of the settlement hierarchy, it is difficult to set out a final spatial distribution until all elements of supply have been recorded at the end of the Plan period. However, at the present point in time the % figures do not give cause for concern.</li> </ul>

	<ul style="list-style-type: none"> <li>• MI7 Small Sites Allowance – the Plan set an allowance of 60 units per annum to come forward from unidentified small windfall sites. To date, actual site completions have averaged 85 per annum.</li> <li>• MI8 Windfall Allowance – the Plan sets an allowance of 60 units per annum to come forward from unidentified large windfall sites. In reality large site completions have averaged 67 per annum.</li> <li>• MI10 Tenure of affordable housing completions – the Plan seeks affordable housing to be delivered with a mix of 30% social rented, 30% intermediate rented and 40% low-cost home ownership following the split in the current Local Housing Strategy. This mix has only been sought since the Plan was adopted in January 2023 and it is evident that the affordable housing delivered in 2023 and 2024 is different to that sought. As with other housing monitoring indicators, the bulk of the affordable housing on allocated sites has yet to be delivered and it is anticipated that delivery will move towards the mix sought by the Plan.</li> <li>• MI13 Delivery of affordable housing thresholds and % targets – Planning permissions for large housing development of 10 units or more issued since the Plan was adopted have met the Plans % affordable housing requirements. The only exception is some phases and plots at Northern Gateway where the level of affordable housing has been informed by viability assessments.</li> <li>• MI16 Gypsy and Traveller sites / pitches built on allocated sites – Planning permissions have been issued on two of the three residential gypsy traveller allocated sites. The third site at Riverside Queensferry has been delayed due to ongoing work relating to Welsh Government proposals for the Dee Crossing.</li> <li>• MI18 Gypsy and Traveller sites / pitches built on windfall sites – the level of need for pitches in the LDP was informed by the 2016 GTAA. Members will recall from a recent report to this Group that an updated 2022 GTAA has been approved by Welsh Government. Despite this identifying a higher 5 year need of 23 pitches and a Plan period need of 27 pitches, good progress has been made in meeting this need through the issuing of permissions on allocated sites and on small windfall site proposals in line with policy HN9. Further work is being undertaken to assess the present level of provision against the revised need.</li> </ul>
1.08	<p><b>Local Indicators</b></p> <p>This section of the AMR covers a wide range of policies and topics, and the outcome of the monitoring process is that these indicators are being met by the Plan. There are a small number of indicators where there is a lack of precise data evident such as MI39 employment development outside allocations / Principal Employment Areas and MI45 relating to protected trees and woodlands, and this will be looked at more closely in future AMRs.</p>
1.09	<p><b>Sustainability Appraisal (SA) Indicators</b></p> <p>The Plan was prepared alongside what is called an Integrated Impact Assessment (IIA) which comprises a range of assessments including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language, Health and Equalities. Built into the IIA is a set of monitoring indicators and the Plan’s implementation has been assessed</p>

	<p>against these. As with the core and local indicators these are presented in a table form, with a 'direction of travel' shown in terms of the performance of the Plan such as using a '+' or '-', as per the original sustainability appraisal. The monitoring shows that the Plan is generally working towards achieving sustainable development and will not have significant environmental effects.</p>
1.10	<p><b>Conclusions</b></p> <p>The Executive Summary at the beginning of the first AMR provides a brief overview of the findings of the first monitoring exercise. More importantly, the Executive Summary provides a succinct answer to each of the questions set out in the Development Plans Manual, that Welsh Government would expect to be answered.</p> <p>The Plan is considered to still be relevant, appropriate, and delivering growth. It is accepted that the projected peak in housing delivery has been put back a year or so in comparison to that anticipated in the adopted trajectory, but there is a portfolio of allocated sites ready to start delivering. It is not a case of the Plan failing to deliver or of their being a shortfall, the Plan is simply delivering in a different manner to that anticipated in the adopted Plan, based on a 2020 housing baseline set of trajectory projections. The Plan is on course to deliver its housing requirement figure.</p>
1.11	<p>Once the AMR is published, there will no doubt be calls from developers who wish to promote their own sites in order to address the 'lag' in housing delivery. However, the present Plan led system does not allow for 'speculative' sites to come forward as was the case under the previous TAN1. In any event, given the lead in time from site identification to planning permission, to SUDS approval, discharge of conditions, to commencement on site, and based on being in year nine of the plan period, it is unlikely that any reasonably sized speculative site could make a difference to the current housing trajectory or delivery rates. The allocated sites should be given time to deliver. There will also be calls from those who oppose the Plan, for an immediate review to take place but this fails to recognise that Plan monitoring is an essential part of the Plan-led system in Wales and that it is monitoring evidence which informs a Plan Review.</p>
1.12	<p>The Plan has only recently been found sound and adopted and is still in full conformity with legislation and national guidance. This first AMR has shown that the Plan is generally performing well in delivering its objectives and strategy. It is therefore considered that the Plan be the subject of further monitoring to better inform the timing and nature of a future Plan Review.</p>

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	<p><b>Revenue:</b> there are no implications for the approved revenue budget for this service for either the current financial year or for future financial years.</p> <p><b>Capital:</b> there are no implications for the approved capital programme for either the current financial year or for future financial years</p>

	<b>Human Resources:</b> there are no implications for additional capacity or for any change to current workforce structures or roles.
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<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
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3.01	<p>The preparation of the adopted LDP involved undertaking an Integrated Impact Assessment (IIA) (see the link to this document in the Background Documents) which included Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). The preparation of the adopted LDP also had regard to the Well-being of Future Generations Act and the seven well-being principles and five Ways of Working principles. Part of the preparation of the AMR has involved the review of the monitoring indicators which are built into the IIA and the conclusion is that the Plan is delivering sustainable development. The AMR does not set new policy, but merely monitors the performance of the Plan strategy, objectives, policies and proposals. Nevertheless, impact assessments are set out below:</p> <p>Ways of Working (Sustainable Development) Principles Impact.</p> <table border="1"> <tr> <td>Long-term</td> <td>Positive (the AMR seeks to establish that the right development in the right place is being delivered so as to avoid long term harm)</td> </tr> <tr> <td>Prevention</td> <td>Positive (the AMR demonstrates that the Plan is seeking to prevent development that would not deliver well-being)</td> </tr> <tr> <td>Integration</td> <td>Positive (the AMR demonstrates that the Plan is still accord with national, regional and local guidance, plans and strategies)</td> </tr> <tr> <td>Collaboration</td> <td>Positive (the AMR has involved close working with house-building stakeholders as required by Welsh Government)</td> </tr> <tr> <td>Involvement</td> <td>Neutral (no consultation required)</td> </tr> </table> <p>Well-being Goals Impact</p> <table border="1"> <tr> <td>Prosperous Wales</td> <td>Positive (the AMR demonstrates that the Plan is delivering sustainable development which contributes to prosperity)</td> </tr> <tr> <td>Resilient Wales</td> <td>Positive (the AMR demonstrates that the Plan is preventing inappropriate and harmful development)</td> </tr> </table>	Long-term	Positive (the AMR seeks to establish that the right development in the right place is being delivered so as to avoid long term harm)	Prevention	Positive (the AMR demonstrates that the Plan is seeking to prevent development that would not deliver well-being)	Integration	Positive (the AMR demonstrates that the Plan is still accord with national, regional and local guidance, plans and strategies)	Collaboration	Positive (the AMR has involved close working with house-building stakeholders as required by Welsh Government)	Involvement	Neutral (no consultation required)	Prosperous Wales	Positive (the AMR demonstrates that the Plan is delivering sustainable development which contributes to prosperity)	Resilient Wales	Positive (the AMR demonstrates that the Plan is preventing inappropriate and harmful development)
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Prosperous Wales	Positive (the AMR demonstrates that the Plan is delivering sustainable development which contributes to prosperity)														
Resilient Wales	Positive (the AMR demonstrates that the Plan is preventing inappropriate and harmful development)														

	Healthier Wales	Positive (the AMR demonstrates that the Plan is delivering high quality development embracing Placemaking principles, which will contribute to healthier lifestyles)
	More equal Wales	Positive (the AMR demonstrates that it is delivering housing development including affordable housing and employment opportunities for residents)
	Cohesive Wales	Positive (the AMR demonstrates that the Plan is delivering high quality development which will result in attractive, viable, safe and well-connected communities)
	Vibrant Wales	No impact identified

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	There is no formal requirement for consultation required by Welsh Government as part of the preparation of and publication of an AMR. The only exception is a requirement for the Local Planning Authority to circulate housing schedules to a Stakeholder Group comprising housebuilders, as part of evidence gathering to inform the updating of the housing trajectory. This is referenced and explained within the AMR.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1 First Annual Monitoring Report.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	<p>Flintshire Local Development Plan</p> <p><a href="https://www.flintshire.gov.uk/en/Resident/Planning/Local-Development-Plan.aspx">https://www.flintshire.gov.uk/en/Resident/Planning/Local-Development-Plan.aspx</a></p> <p>Welsh Government Development Plans Manual Ed 3</p> <p><a href="https://www.gov.wales/development-plans-manual-edition-3-march-2020">https://www.gov.wales/development-plans-manual-edition-3-march-2020</a></p> <p>Integrated Impact Assessment of the Flintshire Local Development Plan Post Adoption Statement Jan 2023 (including the Sustainability Appraisal)</p> <p><a href="https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Final-Sustainability-Appraisal-Report.pdf">https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/Final-Sustainability-Appraisal-Report.pdf</a></p>

7.00	<b>CONTACT OFFICER DETAILS</b>
7.01	<p><b>Contact Officer: Adrian Walters</b>  <b>Telephone: 01352 703294</b>  <b>E-mail: <a href="mailto:Adrian.walters@flintshire.gov.uk">Adrian.walters@flintshire.gov.uk</a></b></p>

8.00	<b>GLOSSARY OF TERMS</b>
	<p><b>Annual Monitoring Report</b> of the Local Development Plan. A report submitted annually to Welsh Government by the local planning authority which assesses the effectiveness of the LDP against a set of monitoring indicators and targets.</p> <p><b>The Development Plans Manual Ed 3</b>, is an online reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p><b>Completions</b> When a planning permission is fully implemented, usually referred to in recording and monitoring house building i.e. when a dwelling is fully constructed.</p> <p><b>Strategic Environmental Assessment (SEA)</b> A formal process for assessing the effect of a larger scale plan or programme on the environment where its implementation could have significant environment consequences.</p> <p><b>Sustainability appraisal (SA)</b> A process of systematically assessing a development plan against a variety of criteria to ensure that it will achieve sustainable development (see Integrated Impact Assessment).</p> <p><b>Integrated Impact Assessment</b> A combined assessment looking at the social, economic and environmental impacts of a development plan and to assist in bringing about sustainable development. It includes Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA) and can also include Health, Equalities and Welsh Language impact assessment.</p> <p><b>Section 106 Agreements</b> A legal agreement between a Council, and applicant (and sometimes third parties) to ensure that certain actions, relevant to the development, are carried out satisfactorily, where these are not capable of being enforced through a planning condition.</p> <p><b>Sustainable urban drainage system (SUDS)</b> All new developments of more than 1 dwelling house or where the construction area is 100m<sup>2</sup> or more, will require Sustainable Drainage Systems (SuDS) for Sustainable urban drainage system (SUDS) surface water - providing drainage systems in a more natural and environmentally friendly manner, by reducing the quantity of run off, slowing the speed of run off and filtering of</p>

water in order to help reduce food risk and reduce pollutants affecting ground water quality.

**SUDS Approval Body (SAB)** - SuDS on new developments must be designed and built in accordance with the Statutory SuDS Standards published by the Welsh Ministers and SuDS Schemes must be approved by the local authority acting in its SAB role, before construction work begins.

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# Flintshire Local Development Plan 2015 – 2030

Adopted 24/01/23

## Annual Monitoring Report (AMR) 1

01/04/23 – 31/03/24

**Flintshire County Council**



**October 2024**

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## Executive Summary

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

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

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

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

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

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

The Development Plans Manual poses the following questions:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## 1 Introduction

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

### The format of the AMR

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



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

### The Plans Monitoring Framework

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

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

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

## Integrated Impact Assessment Objectives and Indicators

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

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

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

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

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

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

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

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

## 2. Significant Contextual Changes

### Introduction

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

### Legislation

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

### National Policy and Guidance

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

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

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

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

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

## Regional Context

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

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

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

## Local Context

### Economy

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

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

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

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

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

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

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

## Housing

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

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

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

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

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

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

### Population / Households

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

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

### Retail

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

### Infrastructure Projects - Energy

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

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

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



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

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

## Phosphates

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

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

### 3 Core / key Indicators

#### Introduction

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

3.3 The following actions, taken from the Development Plans Manual, have been used throughout this chapter.

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

**Indicators required by Legislation**

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

**Policy Performance:**

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

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

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

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

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

**Key Indicators applicable to all Plans**

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

**Policy Performance:**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Policy Performance:**

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

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

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

LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Action																																																		
<b>MI8 Windfall Allowance - number of dwellings delivered</b>																																																										
SO11 SO12	STR11	STR11	Annual and cumulative windfall completions as specified in the adopted housing trajectory	Annual and cumulative windfall completions falling below levels in adopted trajectory for at least two consecutive years	Ensure contribution of windfall sites allowance to plans overall housing provision, is being achieved.	FCC Developers	Annual Housing Land Monitoring Exercise	Keep monitoring																																																		
<p>Policy Performance:</p> <p>The Plan sets out an allowance for windfall completions of 60 units per annum. The delivery of windfall sites was significant during the earlier years of the Plan period as detailed in the table below. This demonstrates delivery well in excess of the 60 units per annum sought. This was discussed at the LDP Examination and set out in Examination document <a href="#">FCC014</a>.</p> <table border="1"> <thead> <tr> <th></th> <th>15/16</th> <th>16/17</th> <th>17/18</th> <th>18/19</th> <th>19/20</th> <th>20/21</th> <th>21/22</th> <th>22/23</th> <th>23/24</th> </tr> </thead> <tbody> <tr> <td>Large site annual allowance per annum</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> <td>60</td> </tr> <tr> <td>Actual large site completions per annum</td> <td>0</td> <td>16</td> <td>211</td> <td>134</td> <td>128</td> <td>0</td> <td>11</td> <td>18</td> <td>90</td> </tr> <tr> <td>Surplus / deficit per annum</td> <td>-60</td> <td>-44</td> <td>+151</td> <td>+74</td> <td>+68</td> <td>-60</td> <td>-49</td> <td>-46</td> <td>+30</td> </tr> <tr> <td>Cumulative surplus / deficit per annum</td> <td>-60</td> <td>-104</td> <td>+47</td> <td>+121</td> <td>+189</td> <td>+129</td> <td>+80</td> <td>+34</td> <td>+64</td> </tr> </tbody> </table> <p>This monitoring indicator seeks to identify completions on all windfall sites granted planning permission since 31/03/20 and any subsequent completions. It picks up windfall sites that were not included in the list of committed sites in Appendix 1 of the adopted LDP. Some information was included in the informal Housing Land Monitoring Statements for 2020-21, 2021-22 and 2022-23. This has been re-assessed and presented below.</p>										15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	Large site annual allowance per annum	60	60	60	60	60	60	60	60	60	Actual large site completions per annum	0	16	211	134	128	0	11	18	90	Surplus / deficit per annum	-60	-44	+151	+74	+68	-60	-49	-46	+30	Cumulative surplus / deficit per annum	-60	-104	+47	+121	+189	+129	+80	+34	+64
	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24																																																	
Large site annual allowance per annum	60	60	60	60	60	60	60	60	60																																																	
Actual large site completions per annum	0	16	211	134	128	0	11	18	90																																																	
Surplus / deficit per annum	-60	-44	+151	+74	+68	-60	-49	-46	+30																																																	
Cumulative surplus / deficit per annum	-60	-104	+47	+121	+189	+129	+80	+34	+64																																																	

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

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

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

**Policy Performance:**

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

<b>Central Housing Market Area</b>					
<b>Site Name</b>	<b>Date of Permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
					40%

<b>Connah’s Quay, Queensferry &amp; Broughton Housing Market Area</b>					
<b>Site Name</b>	<b>Date of permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
Highmere Drive, Connah’s Quay	21/06/23	141	49	35%	35%

<b>Garden City Housing Market Area</b>					
<b>Site Name</b>	<b>Date of permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
62898 GAR002B Anwyl	22/02/22	102	10	9%	20%
62898 GAR002C Bellway	22/02/22	166	19	10%	20%
62898 GAR002D Anwyl	22/02/22	63	8	11%	20%
63591 GAR002H (Phase 4) Bellway / Persimmon	10/03/2023	400	0	0%	20%
RES/000658/22 GAR002i (Phase 3) Bellway	25/08/2023	49	5	9%	20%

<b>Mold &amp; Buckley Housing Market Area</b>					
<b>Site Name</b>	<b>Date of Permission</b>	<b>No. Market dwellings</b>	<b>No. Affordable Units</b>	<b>% Affordable Housing</b>	<b>% Affordable Required</b>
Well Street, Buckley	13/03/24	140	56	40%	40%

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

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

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

**Policy Performance:**

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

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

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

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

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



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

**Gypsy and Traveller Sites**

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

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

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LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
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**MI17.1: Magazine Lane, Ewloe**

SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 9 pitches to be provided by 01.04.25.	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.25.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring
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**Policy Performance:**  
 Full planning permission was granted under ref 061722 on 08/12/22 for the reconfiguration of the existing site to accommodate an additional 9 pitches. Target 1 has been met but further monitoring is required to establish implementation of the pitches on the ground to ensure Target 2 is met.

**MI17.2: Gwern Lane, Cae Estyn, Hope**

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

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**MI 17.3: Riverside, Queensferry**

SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 10 pitches to be provided by 01.04.26	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.26.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring / further investigation
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**Policy Performance Monitoring**  
 The Council’s Housing Strategy Unit has commissioned planning consultants to prepare and submit a planning application for the extension of the existing Council owned and run Riverside residential park to accommodate an additional 10 pitches. The proposal would also involve the reconfiguration of the existing site.

The project is inextricably linked to the Welsh Government proposals to improve the existing bridge over the R. Dee for a new river crossing for west bound traffic and the partial re-use and improvement of the existing bridge for eastbound traffic). Delays to the A494(T) project have had knock-on effects for the progression of an application for the gypsy and traveller site. However, there are no fundamental concerns over the project proceeding.

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MI 17.4: Castle Park, Flint								
SO11 SO12	STR12	HN8	1. Planning permission to be granted on allocated site by 01.04.23 . 2. 6 pitches to be provided by 01.04.26	1. No planning permission on allocated site by 01.04.23 . 2. No pitches delivered by 01.04.26.	To ensure that the Plan is meeting identified needs through site implementation	FCC Planning Service FCC Housing Strategy	Planning Register	Keep monitoring

Policy Performance Monitoring  
 The allocation is to develop a former Council run Civic Amenity Site for a small transit site comprising 6 pitches. The Council's Housing Strategy Unit is seeking to progress a planning application for the development of the site.

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MI18 Gypsy and Traveller sites / pitches built on 'windfall' sites								
SO11 SO12	STR12	HN9	No target	Any permission for gypsy and traveller site which is not allocated	To monitor whether allocated sites are sufficient to cater for need over the Plan period and to inform future GTAA	FCC Planning FCC Housing Strategy	Planning Register	Keep monitoring

Policy Performance Monitoring  
 Policy HN9 is a criteria based policy against which windfall proposals for gypsy and traveller sites can be assessed. An updated GTAA (2022) [here](#) was approved by Welsh Government on 30/05/24 [here](#). The approved updated GTAA shows a 5 year need for 23 pitches and a Plan period need for 27 pitches. The GTAA was accompanied by an Addendum [here](#) which sought to identify an up to date position in terms of planning permissions for gypsy and traveller residential pitches. The Addendum identified that the 5 year need reduced to 2 pitches and that the Plan period need reduced to 6 pitches. In the intervening time since the drafting of the Addendum further pitches have been approved which further reduces the need for pitches. This is a

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

### Employment Development

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

#### Policy Performance

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

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

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

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

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

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LDP Objective	Strategic Policy	Policies to Monitor	Target	Trigger Point	Justification for Target and Trigger	Implementation	Source of Data	Recommended Action
<b>MI12 Job Growth</b>								
SO8 SO9	STR1 STR7	STR1	8-10,000 jobs	No trigger	To monitor whether job growth over the Plan period meets the aspirational target	FCC Regeneration	ONS	Keep monitoring

**Policy Performance:**

The Council does not maintain job growth figures as a matter of routine but can identify job creation as part of a number of key sites / developments as follows:

- Vista Business Park – Phase 1 – two of the three units have created a total of 90 jobs
- Vista Business Park – Phase 2 – anticipated 100 jobs
- Northern Gateway Plot A – Amazon 50 permanent jobs and 300 drivers
- Northern Gateway Plot B – estimated 500 jobs
- Northern Gateway Plot C – papermill 463 jobs

- Northern Gateway Phase 1 and 2 – estimated 1086 jobs

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



## 4. Local Indicators

### Introduction

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

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

**Green Wedges**

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

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

**Retail and Town / District Centres**

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

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

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

**Policy Performance**

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

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

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

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

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

**Policy Performance:**

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

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

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

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

					prejudiced by vacant units			
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**Policy Performance**

The 2019 Retail Study, which underpinned the LDP retail strategy and policies included GOAD data and maps for most of the defined town centres and district centres. For these centres 2023 GOAD data and maps have been obtained through the consultants who undertook the Retail Study. For the town centre of Buckley and the district centres of Queensferry and Saltney there is no GOAD data or maps, so bespoke survey work has been undertaken.

Given the cost of obtaining GOAD data and the resources required to do bespoke town and district centre survey work, it is not considered reasonable or necessary for this data to be collected and reviewed on an annual basis. A more realistic monitoring regime would be every 2-3 years. This would also enable the present Council programme of preparing Place Plans and other initiatives to be progressed and monitored.

The table below shows a comparison of vacancy rates in town and district centres between 2019 and 2023 and in the case of Buckley, Queensferry and Saltney, between 2023 and 2024. The comparison is to that of the average vacancy levels in the U.K which was at 12.37% in 2019, and 15.5% in 2023. This suggests there has been a gradual increase in vacancy rates throughout the whole of the U.K since 2019, this could have occurred due to the impacts of covid. The data from the latest retail survey demonstrates that the vacancy rate within Flintshire is steady, Flint saw a decrease in vacant units and Mold had no change. The other town and district centres saw some increase in vacancy levels, but most stayed below the U.K average percentage.

Town Centre	Vacancy levels according to Retail Study 2019	% of total units	U.K %	Vacancy levels 2023 / June 2024	% of total units	U.K %
Buckley	n/a	n/a	12.37	6 units	6.7	15.5
Flint	13 units	12.15	12.37	11 units	12.4	15.5
Holywell	13 units	13.68	12.37	18 units	17.8	15.5
Mold	23 units	10.85	12.37	23 units	10.5	15.5
Shotton	14 units	14.14	12.37	17 units	17.2	15.5



**Buckley**

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

**Flint**

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

**Holywell**

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

**Mold**

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

**Shotton**

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

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

\*Data being collected

**Connah’s Quay**  
 The retail survey of Connah’s Quay in 2019 showed there to be a total of 34 units and 6 were vacant. The latest retail survey results show a total of 35 units and 9 of which are vacant, this gives a percentage of 25.7%, which is higher than the U.K average.

**Queensferry**  
 There is a total of 65 units within the District Centre boundary of which 8 are vacant. The vacancy rate of 12.3 is below the UK average.

**Saltney**  
 There is a total of 17 units within the District Centre boundary of Saltney. There is 1 vacant unit which is a vacancy rate of 5.9% which is lower than the average vacancy rate in the U.K

Broughton Shopping Centre	Vacancy level rates according to Retail Study 2019	% of total units	U.K %	Vacancy level rates June 2024 according to Retail Study 2023	% of total units	U.K %
	4	9.30	12.37	3	6.4	15.5

**Broughton**  
 Although Broughton is not a defined centre within the LDP Retail Hierarchy, it is useful to monitor vacancy rates. Broughton Shopping Park is a key retail destination within the County and therefore important to monitor its health. The data shows that vacancy levels have decreased since the retail survey in 2019, the 4 vacant units gives a percentage of 6.4%, which is lower than the U.K average.

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**Community Facilities**

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

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

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

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

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

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

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

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

Each of these permissions were assessed as being policy compliant.

**Minerals Development**

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

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

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

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

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

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

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

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

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

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

**Policy Performance:**

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

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

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**Waste Development**

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



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

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

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

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

**Policy Performance:**

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

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

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

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**Green Infrastructure**

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

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

**Walking and Cycling Infrastructure**

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

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

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

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

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

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

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

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

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

**Road Schemes**

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

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

**Employment Land and Development**

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

**Policy Performance:**

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

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

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

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

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



**Open Space**

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

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

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

**Biodiversity Designations**

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

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

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

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

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

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

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

**Clwydian Range and Dee Valley AONB**

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

**Renewable and Low Carbon Energy Development**

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

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

**Policy Performance:**

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

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

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

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

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

**Development in Flood Risk Areas**

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

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

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

**Contextual Indicators – Welsh Language**

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

**Policy Performance:**

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

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



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

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

**Contextual Indicators – Employment / Unemployment**

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

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

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

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

**Contextual Indicators – Supplementary Planning Guidance**

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

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

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

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

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

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





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

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

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

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

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

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

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

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

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

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



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

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

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

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency	Predicted Effect																																																		
<p>Explanation/Analysis</p>	<p>The table below shows NOMIS data for employment by occupation between April 2023 and March 2024.</p>																																																						
	<table border="1"> <thead> <tr> <th></th> <th>Flintshire</th> <th>Flintshire</th> <th>Wales</th> <th>GB</th> </tr> </thead> <tbody> <tr> <td>Managers, Directors and Senior Officials</td> <td>6,100</td> <td>8.0%</td> <td>8.7%</td> <td>10.8%</td> </tr> <tr> <td>Professional Occupations</td> <td>17,000</td> <td>22.4%</td> <td>23.0%</td> <td>26.6%</td> </tr> <tr> <td>Associate Professional Occupations</td> <td>9,300</td> <td>12.3%</td> <td>15.4%</td> <td>15.3%</td> </tr> <tr> <td>Administrative and Secretarial Occupations</td> <td>10,500</td> <td>13.9%</td> <td>9.8%</td> <td>9.6%</td> </tr> <tr> <td>Skilled Trades Occupations</td> <td>8,000</td> <td>10.6%</td> <td>9.9%</td> <td>8.7%</td> </tr> <tr> <td>Caring, Leisure and Other Service Occupations</td> <td>5,500</td> <td>7.2%</td> <td>9.7%</td> <td>8.2%</td> </tr> <tr> <td>Sales and Customer Service Occupations</td> <td>5,500</td> <td>7.3%</td> <td>7.2%</td> <td>6.2%</td> </tr> <tr> <td>Process Plan and Machine Operatives</td> <td>8,900</td> <td>11.7%</td> <td>6.5%</td> <td>5.4%</td> </tr> <tr> <td>Elementary Occupations</td> <td>5,000</td> <td>6.5%</td> <td>9.4%</td> <td>9.0%</td> </tr> </tbody> </table>						Flintshire	Flintshire	Wales	GB	Managers, Directors and Senior Officials	6,100	8.0%	8.7%	10.8%	Professional Occupations	17,000	22.4%	23.0%	26.6%	Associate Professional Occupations	9,300	12.3%	15.4%	15.3%	Administrative and Secretarial Occupations	10,500	13.9%	9.8%	9.6%	Skilled Trades Occupations	8,000	10.6%	9.9%	8.7%	Caring, Leisure and Other Service Occupations	5,500	7.2%	9.7%	8.2%	Sales and Customer Service Occupations	5,500	7.3%	7.2%	6.2%	Process Plan and Machine Operatives	8,900	11.7%	6.5%	5.4%	Elementary Occupations	5,000	6.5%	9.4%	9.0%
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<p>The Plan seeks to provide opportunities for employment by allocating land for employment development, safeguarding existing industrial areas as Principal Employment Areas and through a framework of policies to ensure appropriate employment development elsewhere in the County. Planning Officers work closely with the Council’s Business Development Team to bring about as much benefits to the local population as possible. The delivery of the Plans allocations and policies will therefore have a positive benefit in respect of this indicator.</p>																																																							

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

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

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

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



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

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

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

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

**Conclusions**

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

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



## 6. Conclusions and Recommendations

### Conclusions

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

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

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

### **Recommendation**

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



**Appendix A - Large Sites at April 2024**

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

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

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

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

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

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

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

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

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



### Appendix C - Consultation with Stakeholder Group

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

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

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

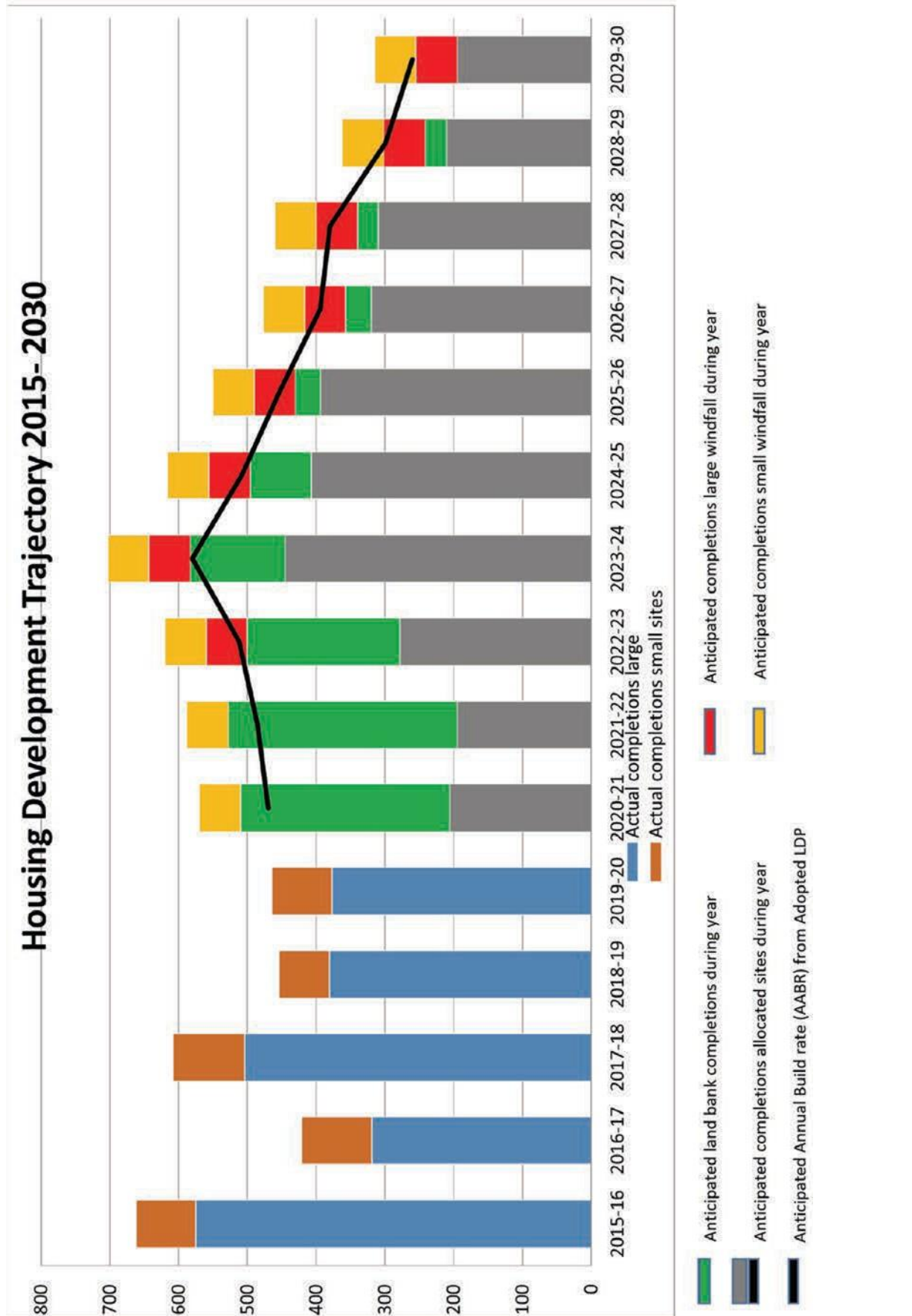
	<p>40 units off each site seems steep as an annual rate of delivery</p> <p>Strategic allocations – build/sales rates should be tapered to 36 units per year, not 40 plus, unless D&amp;B projects</p> <p>2 sales per month on the open market plus the affordables (Sec106) seems fair, if not wholly supported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



**Appendix D – Adopted Trajectory Schedule**

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

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





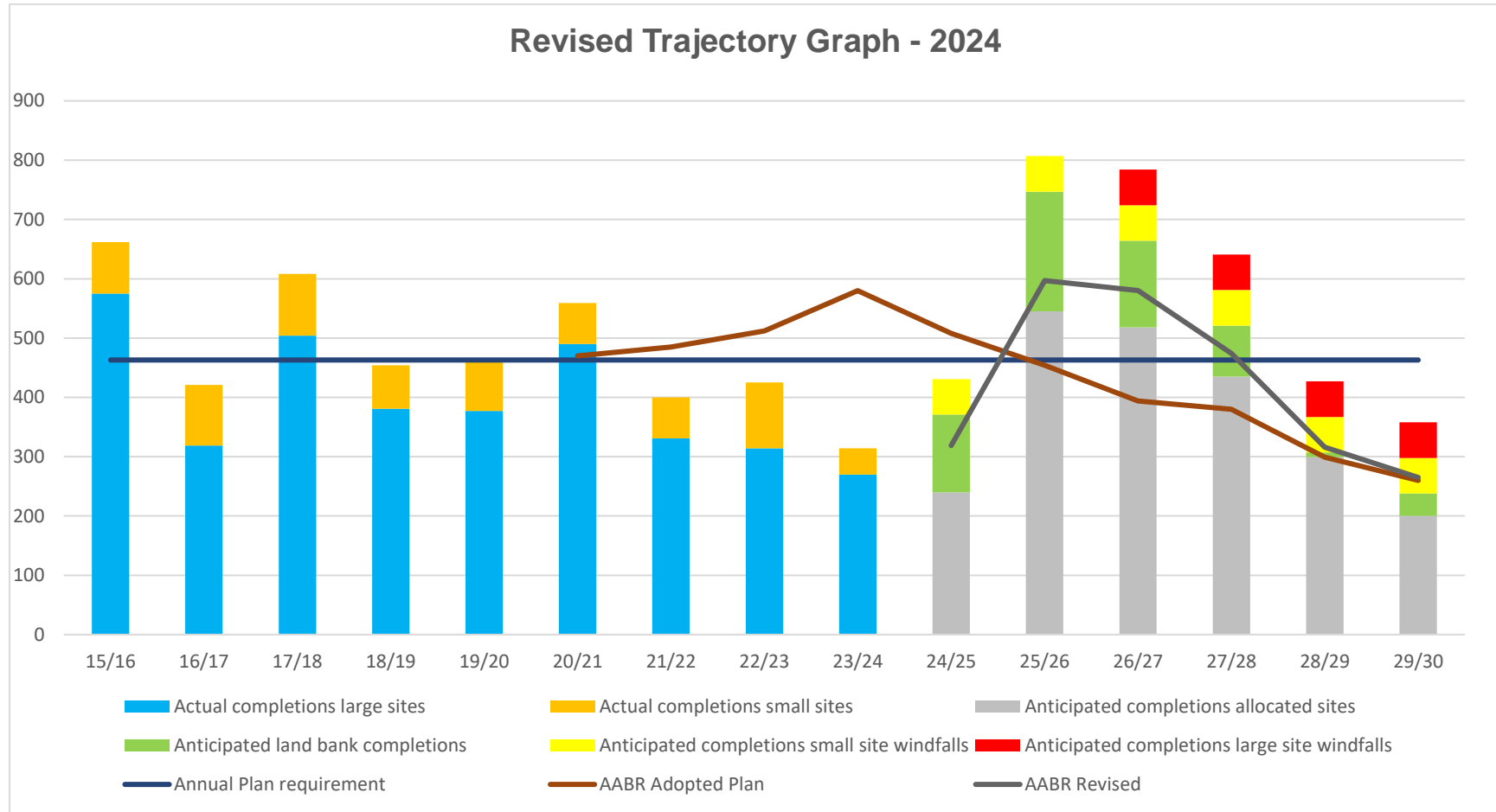


**Appendix F - Revised Housing Trajectory 2024**

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



Appendix G







## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Adoption of Supplementary Planning Guidance
<b>Cabinet Member</b>	Cabinet Member for Planning, Public Health and Public Protection
<b>Report Author</b>	Chief Officer (Planning, Environment and Economy)
<b>Type of Report</b>	Strategic

### EXECUTIVE SUMMARY

The Council is required to prepare a suite of Supplementary Planning Guidance Notes (SPGs) in relation to the recently adopted Local Development Plan (LDP). The Council has prepared the three SPGs in line with Welsh Government Guidance in Development Plans Manual Ed3 and in line with the Council's Delivery Agreement for preparing the LDP, which set out the broad approach to the subsequent preparation of SPG.

Decisions on planning applications are to be made in accordance with the adopted LDP, unless material considerations indicate otherwise. However, individual policies in the LDP can sometimes not provide the level of detail that is often required when considering particular development proposals.

The role of SPG is to provide that additional explanation to a policy in the LDP. Provided that an SPG is in line with the LDP, has been the subject of consultation and has been formally adopted by the Council, then it may be treated as a formal material consideration in the determination of planning applications.

The first three SPGs address Extensions and Alterations, New Housing in the Open Countryside and the Conversion of Rural Buildings.

Perhaps the most common type of planning application determined by the Council is that of extension and alterations to dwellings and the SPG provides clear guidance on extending a house in order to retain the character and appearance of the existing house and locality as well as the living conditions of residents.

There are a number of specific instances where new housing may be permitted outside settlement boundaries in open countryside and the SPG provides detailed advice on each type.

An important aspect of the rural part of the County is that of traditional farm and other buildings and the SPG will assist in retaining the character and appearance of such buildings as part of being converted to another use.

In all three cases the presence of an adopted SPG will ensure guidance is available which will inform the formulation of development proposals as well as their determination by officers or Planning Committee.

The three SPGs were endorsed for consultation by Planning Strategy Group on 1<sup>st</sup> December 2023 and 26<sup>th</sup> January 2024 and were the subject of a consultation exercise. The outcome of that consultation exercise was considered by Planning Strategy Group and a number of amendments to each SPG were endorsed.

Each SPG contains an appendix setting out the results of the consultation exercise and changes to each SPG. The three SPGs are all consistent with the LDP, Planning Policy Wales and Future Wales: National Plan and recommended for adoption as SPG.

## RECOMMENDATIONS

1	That the SPGs relating to Extensions and Alterations, New Housing in the Countryside and the Conversion of Rural Buildings are adopted as SPG and made available for inspection on the Council's website.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE ADOPTION OF SUPPLEMENTARY PLANNING GUIDANCE</b>
1.01	<p>The LDP was adopted on 24th January 2023 and is now the operative Development Plan in terms of determining planning applications. The adopted LDP contains references within it to SPGs and specifically, Appendix 2 of the written statement contains a schedule of SPGs to be reviewed and updated.</p> <p>Planning applications should be determined in accordance with the adopted Development Plan unless material planning considerations indicate otherwise. It is the policies of the LDP which provide the framework against which to assess and determine planning applications. However, it is often useful for additional guidance and clarification to be set out in accompanying SPG, to supplement the policy wording and explanation.</p> <p>The Welsh Government guidance in Development Plans Manual Edition 3 explains that SPG can <i>'be taken into account as a material consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight'</i>. The guidance further advises <i>'SPG does not form part of the development plan and is not subject to independent examination, but it must be consistent with the plan and with national planning policy. SPG</i></p>

*cannot be linked to national policy alone; there must be an LDP policy or policy criterion that provides the development plan 'hook' whilst the reasoned justification provides clarification of the related national policy'.*  
The Welsh Government guidance advises that SPG can:

- Provide important guidance to expand on topic-based policy to assist the implementation of the LDP (e.g. design, landscape, green infrastructure, heritage, conservation, Houses in Multiple Occupation (HMOs), renewable energy)
- Cover detail and numerical guidelines/thresholds where they may change so as to avoid the LDP becoming quickly outdated and to assist flexibility (e.g. car parking standards)
- Provide additional detailed guidance on the type of development expected in an area allocated for development in the LDP. This could take the form of a development brief or a more detailed masterplan.

The guidance also advises that SPG will carry little or no weight unless it is produced in accordance with a Community Involvement Scheme and is subject to public consultation and adopted by a Council resolution. The guidance suggests the following:

- Development management officers should be involved in SPG production;
- Relevant consultees (e.g. LDP regulations, CIS) should be consulted;
- A draft SPG should be made available for public consultation;
- SEA Regulations 'screening' process should be used, if considered necessary;
- SPG should be formally adopted by the LPA, so that proper weight can be given to it by Inspectors when determining appeals;
- Adopted SPG should include, or reference, a statement of consultation and any changes made;
- Monitoring of the effectiveness of SPG alongside the relevant policy should be undertaken.

1.02

The Delivery Agreement for the preparation of the LDP contained a section on SPGs which is in line with the above Welsh Government advice, and states:

*“Supplementary Planning Guidance*

*The Welsh Government advises that LDPs should contain sufficient policies and proposals to provide the basis for deciding planning applications, and for determining conditions to be attached to permissions, but that they should avoid excessive detail. Selective use of supplementary planning guidance (SPG) is a means of setting out more detailed site specific or themed guidance on how the policies in the LDP will be applied in particular circumstances or areas.*

*The Council will, where necessary and appropriate, make selective use of SPG as a means of providing guidance on how the policies and proposals of the LDP will be applied and implemented. Any subsequent SPG, whilst not forming part of the development plan, must relate to a LDP Policy.*

	<p><i>They may consist of guidance on specific topics, site specific briefs, design guides or action areas.</i></p> <p><i>The requirements for SPG will be identified during the plans preparatory process. In those instances where a requirement is identified its preparation will be the subject of a formal consultation exercise prior to adoption. A statement of consultation and details of representations received will be issued with the approved SPG'.</i></p>
1.03	<p>The Council currently has a legacy suite of adopted and draft SPG which were produced in the context of the Unitary Development Plan. Not all of these are proposed to be taken forward in the context of the LDP. Appendix 2 of the adopted LDP written statement contains a schedule of the SPGs to be prepared.</p> <p>The first three SPGs to be prepared and presented for formal adoption relate to:</p> <ul style="list-style-type: none"> <li>• Extensions and Alterations – A large proportion of planning applications submitted relate to house extensions and alterations. The determination of such planning applications involves the need to ensure that the proposed works safeguard the character and appearance of the existing house, site and locality and ensuring that over-development does not occur as a result of loss of private amenity space or car parking. It also involves ensuring that the living conditions of both the existing residents and adjoining residents are safeguarded. The SPG provides comprehensive guidance on such topics in the context of implementing policy HN5 of the LDP.</li> <li>• New Housing in Open Countryside – Policy HN4 sets out the types of housing development that may be permitted outside settlement boundaries and in open countryside. The SPG provides more detailed guidance on proposals for rural enterprise dwellings, replacement dwellings (Policy HN4-A), sub-division of an existing dwelling, infill dwelling in a group of houses (Policy HN4-C) and One Planet houses. It seeks to ensure that new housing development is strictly controlled and justified in line with the strong protection of open countryside stance within PPW.</li> <li>• Conversion of Rural Buildings – the rural part of the County contains a range of traditional rural buildings such as barns which form part of its built heritage. Many such buildings have outlived their intended use and it is important that new uses are found for them to ensure their survival. Policy HN4-B sets out a preference for business re-use of such buildings, or part residential part business or affordable housing before consideration is given to residential conversions. The SPG provides further guidance on the preferred uses and the circumstances when a residential conversion may be considered. It also provides detailed guidance to ensure that the scheme of conversion retains the character and appearance of traditional rural buildings.</li> </ul>
1.04	<p>Preparation of each SPG has involved engagement with Development Management officers as well as other internal consultees and stakeholders where appropriate. Following endorsement by Planning Strategy Group,</p>



	the three draft SPGs have been consulted upon and reported back to Planning Strategy Group. Further details of the consultation exercise are set out in section 3.0 of this report.
1.05	The consultation resulted in a relatively modest number of representations. Some respondents welcomed the consultation or supported the consultation but had no specific comments to make. The bulk of representations were made by Clwyd Powys Archaeological Trust (CPAT) and Natural Resources Wales (NRW). CPAT sought references throughout each SPG to archaeological matters and NRW sought references to various matters including landscape, biodiversity, flood risk and the AONB.
1.06	<p>When drafting an SPG the objective is to provide further guidance on key policies in the LDP, relating to that particular topic or type of development. It will also be necessary to reference other issues or topics that may arise in the consideration of development proposals. An SPG cannot though cover every possible issue or topic as the Plan's policies should be read as a whole in conjunction with Future Wales and PPW12 and also other SPGs.</p> <p>Where the CPAT and NRW representations are considered relevant to the subject matter of each SPG then relatively minor changes have been made, to 'flag up' such issues and provide brief guidance. However, it is not considered necessary or appropriate to include the level of detail that is often sought by the two bodies.</p> <p>Each SPG is presented in its final form and contains an appendix setting out the results of the consultation exercise and changes to each SPG. The three SPG's are all consistent with the LDP, Planning Policy Wales and Future Wales: National Plan and are recommended for adoption as SPG.</p>

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	Only minor costs will be incurred in the publication of the final adopted SPGs. However, the presence of adopted SPGs may bring savings in Development Management Officer time by improving the consideration and determination of certain development proposals.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	The preparation of the adopted LDP involved undertaking an Integrated Impact Assessment (IIA) which included Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). The Integrated Impact Assessment of the Flintshire Local Development Plan Post Adoption Statement Jan 2023 (including the Sustainability Appraisal) is included in the List of Accessible Background Documents. The preparation of the adopted LDP also had regard to the Well-being of Future Generations Act and the seven well-being principles

and five Ways of Working principles. The SPGs do not set new policy, but merely expand on policies in the LDP. Nevertheless, impact assessments are set out below:

#### Ways of Working (Sustainable Development) Principles Impact

Long-term	Positive (the SPGs recognise the need for the right development in the right place so as to avoid long term harm)
Prevention	Positive (by seeking to prevent development that would not deliver well-being)
Integration	Positive (the SPGs are in line with a variety of guidance, plans and strategies)
Collaboration	Positive (the preparation of SPG has involved collaboration with internal and external stakeholders who have a duty in delivering well-being).
Involvement	Positive (the SPGs have been the subject on an extensive public consultation)

#### Well-being Goals Impact

Prosperous Wales	Positive (by seeking to enable sustainable development which contributes to prosperity)
Resilient Wales	Positive (by embracing biodiversity net benefit as part of new development)
Healthier Wales	Positive (by ensuring high quality development which contributes to a healthier lifestyle)
More equal Wales	No impact identified
Cohesive Wales	No impact identified
Vibrant Wales	No impact identified
Globally responsible Wales	Positive (by seeking to ensure that new development makes a positive contribution to well-being)

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	<p>The preparation of Supplementary Planning Guidance is guided by the Welsh Government Publication Development Plans Manual. This requires that consultation is undertaken on draft SP and that the adopted SPG includes a statement of that consultation.</p> <p>The consultation exercise commenced on 1<sup>st</sup> December 2023 and ended on 26<sup>th</sup> January 2024. The standard six week consultation period was extended to take account of the two week Christmas and New Year holiday period. The consultation exercise featured on the Council's website <a href="https://www.flintshire.gov.uk/en/Resident/Planning/Review-of-Supplementary-Planning-Guidance.aspx">https://www.flintshire.gov.uk/en/Resident/Planning/Review-of-Supplementary-Planning-Guidance.aspx</a> . Paper copies of the consultation information and the three SPGs were made available for inspection at County Hall and Ty Dewi Sant. Direct communication was made with Members, Town and Community Councillors, statutory and non- statutory consultees and planning agents. In addition to the ability to make representations by e-mail, letter or using a standard form, the Council's own on-line consultation system <a href="https://www.smartsurvey.co.uk/s/Planning-SPG/">https://www.smartsurvey.co.uk/s/Planning-SPG/</a> was used although it should be noted that the survey is now closed.</p>
4.02	<p>Within each of the SPGs presented for adoption is an appendix which sets out the consultation comments received, the Council's response and any recommended changes to the SPG as a result of the consultation. This was reported to and considered by Planning Strategy Group on 14<sup>th</sup> March 2023. Any additional changes to the SPG's endorsed by PSG are recorded in the consultation tables within each SPG's presented to this report. Factual changes to the SPGs arising from the updated PPW12 are also incorporated.</p>

<b>5.00</b>	<b>APPENDICES</b>
5.01	<p>Appendix 1 Extensions and Alterations SPG  Appendix 2 New Housing in Open Countryside  Appendix 3 Conversion of Rural Buildings</p>

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	<p>Flintshire Local Development Plan  <a href="https://www.flintshire.gov.uk/en/Resident/Planning/Local-Development-Plan.aspx">https://www.flintshire.gov.uk/en/Resident/Planning/Local-Development-Plan.aspx</a></p> <p>Welsh Government Development Plans Manual Edition 3  <a href="https://www.gov.wales/development-plans-manual-edition-3-march-2020">https://www.gov.wales/development-plans-manual-edition-3-march-2020</a></p> <p>Integrated Impact Assessment of the Flintshire Local Development Plan Post Adoption Statement Jan 2023 (including the Sustainability Appraisal)</p>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer: Adrian Walters</b> <b>Telephone: 01352 703294</b> <b>E-mail: <a href="mailto:Adrian.walters@flintshire.gov.uk">Adrian.walters@flintshire.gov.uk</a></b>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<p><b>Supplementary Planning Guidance Notes (SPGs)</b> Supplementary planning guidance produced by a Local Planning Authority to supplement development plan policies and proposals with the intention of being a material planning consideration in the determination of planning applications. May include design guides, topic based guidance or site planning briefs.</p> <p><b>The Development Plans Manual Ed 3</b>, is an online reference document for practitioners who are responsible for, or contribute to, the preparation and implementation of development plans. It contains practical guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p><b>Delivery Agreement</b> Sets out the Council's LDP preparation timetable outlining the various stages of plan preparation, when these will be undertaken and when engagement will take place. The DA includes details of the Community Involvement Scheme (CIS), detailing who will be involved in the LDP preparation process and how and when participation and collaboration will occur; and the resources the Authority will invest in plan preparation.</p> <p><b>The Community Involvement Scheme</b> sets out how the LPA involved the community and other Stakeholders in the preparation of the Local Development Plan documents.</p> <p><b>Strategic Environmental Assessment (SEA)</b> A formal process for assessing the effect of a larger scale plan or programme on the environment where its implementation could have significant environment consequences.</p> <p><b>Sustainability appraisal (SA)</b> A process of systematically assessing a development plan against a variety of criteria to ensure that it will achieve sustainable development (see Integrated Impact Assessment).</p> <p><b>Integrated Impact Assessment</b> A combined assessment looking at the social, economic and environmental impacts of a development plan and to assist in bringing about sustainable development. It includes Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Habitats</p>

	Regulations Assessment (HRA) and can also include Health, Equalities and Welsh Language impact assessment.
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# Supplementary Planning Guidance Note

## **Extensions and Alterations to Dwellings**







## 1. Purpose

- 11 **The Council has set out in its Local Development Plan (LDP) an intention to prepare a series of Supplementary Planning Guidance Notes (SPG). The purpose of each SPG is to:**
- **assist the preparation of planning proposals and guide pre-application discussions,**
  - **guide officers in handling, and officers and councillors in deciding, planning applications,**
  - **assist Inspectors in the determination of appeals,**
  - **improve the quality of new development,**
  - **facilitate a consistent and transparent approach to decision making.**

## 2. The LDP and the need for SPG

- 21 **The Welsh Government Development Management Manual advises in para 9.1.2 that ‘Applications for planning permission must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise’. The Flintshire LDP was adopted on 24/01/23 and forms the basis for decision making alongside Future Wales: The National Plan. However, the LDP cannot provide all the detailed advice needed to guide development proposals. SPG’s can support the LDP by providing more detailed guidance on topics and issues to help the interpretation and implementation of policies and proposals. The Development Plans Manual Ed. 3 advises that ‘Supplementary Planning Guidance (SPG) can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight’. The intention of SPG’s is not to set out ‘policy’ as that is the role of the LDP, but to provide more detailed advice and guidance which expands on a particular policy or allocation in the LDP.**

## 3. Status / Preparation Process

- 31 **The Council indicated in its Delivery Agreement (DA) for the LDP that it intends to prepare SPG. The DA explained that the Council will consult on any draft SPG and, following consideration of representations, and any necessary amendments, seek formal adoption. This approach accords with Welsh Government advice in Development Plans Manual (Edition 3).**
- 32 **This SPG was consulted on for a 6-week period commencing on 01/12/23 and ending on 26/01/24. Representations and responses, together with any amendments to the draft document were considered by Cabinet at its meeting on ZZ/ZZ/ZZ who resolved to adopt this SPG. Consultation comments, responses and any amendments are set out in Appendix 1. This document should therefore be afforded considerable weight as a material planning consideration**

## 4. Introduction

- 41 **This Supplementary Planning Guidance Note (SPG) provides guidance regarding house extensions and alterations. It highlights some general principles relating to house extensions whilst seeking to promote good design for such proposals. It supports the use of Local Development Plan (LDP) policy HN5 House Extensions and Alterations.**
- 42 **Extensions and improvements are a reasonable way of achieving more space and functionality within a dwelling to meet changing needs, but care must be taken to ensure that all additions respect the historic fabric and character of the building and its locality. Whether in the open countryside or in a built-up area, proposed extensions should respect their local surroundings in terms of form, scale, aspect, design and materials. This SPG is concerned with the external appearance of the dwelling, including its scale and mass. Although the planning system does not have the right to protect the views from householders' properties, it should prevent detrimental impact on the amenity of neighbouring properties and on the character of the property and its surroundings. In this sense, the planning system operates to reconcile the needs of individuals with the wider community interest.**
- 43 **This SPG focuses on extensions and alterations to houses which require planning permission. It is accepted that there may be smaller extensions, alterations or other works such as cladding or pebbledashing, which are permitted development and do not need planning permission. Careful consideration should be given to these works to ensure that they respect the appearance of the property and locality. The guidance in this SPG should be applied where relevant.**
- 44 **It is recommended that a suitably qualified professional is employed to prepare proposals for extending or altering a dwelling. Good design need not be more expensive; indeed, it can add value to the property and result in lower maintenance costs. Examples include designing in energy efficiency and designing to prevent (or reduce) crime. Whether or not planning permission is needed, this SPG should help to bring about high quality development which will enhance the property and its neighbourhood.**
- 45 **The Welsh Government publications "Planning: A Guide for Householders Version 3" offers useful advice. A PDF is available from their website <https://www.flintshire.gov.uk/en/Resident/Planning/Pre-application-Planning-Advice.aspx> Certain minor changes - called "permitted development rights" - may be made without the need for planning permission, and these are explained in the publication "Permitted development for householders Version 2".**
- 46 **Planning permission should only be applied for once the design of the scheme has been finalised. A duty planning officer ([planningduty@flintshire.gov.uk](mailto:planningduty@flintshire.gov.uk)) will be able to offer initial advice on your proposals before you make an application. Applicants are encouraged to seek advice as part of the Pre- Application Planning Advice service with the Planning department before making any planning applications. The Pre-Application Planning Advice service will refer to relevant policies,**

**guidance and technical standards; confirm what information will be required for the planning application; identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application.**

**For more detailed advice it will be necessary to submit a pre-application enquiry and detail can be found at <https://www.gov.wales/planning-permission-permitted-development-rights-householders> Any changes sought after permission has been granted may require a fresh planning application or amended plans.**

## 5. Policy

- 51 **The Welsh Government now takes a firm view on design matters, as explained in Planning Policy Wales (PPW12) and Technical Advice Note 12 Design (TAN12). PPW states ‘the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement’.**
- 52 **TAN 12 Design states ‘Early consideration of design, well in advance of any planning application is essential to achieving good design. At the outset, appreciation of the site’s context, and the development of a vision and agreed design objectives must be established and remain central to the evolutionary process’ The Welsh Government see the design process as important part of any development and recommend as stated that design is thought out early on in the process and that any design should take into account the character and appearance of the surrounding area. At the local level one of several relevant policies in the LDP is HN5 (House Extensions and Alterations) of the LDP (see Appendix 1).**
- 53 **As a general design approach to extending existing buildings, the supporting text to policy HN5 notes that “Extensions should be subsidiary in scale to the existing dwelling and should not unacceptably harm the amenity of residents or occupiers of adjoining developments. Particular care will be needed when considering proposals to extend a building that has already been previously extended in order to ensure the resultant dwelling is in keeping with the original dwelling, site and surroundings and which retains a legible design character.” Legibility is where it is possible to look at the final scheme and ‘read’ the original dwelling alongside the extension.**
- 54 **On a similar theme of adding to existing properties, policy HN6 (Annex Accommodation) provides guidance in relation to proposals for accommodation for dependant relatives (sometimes known as “granny flats”) (see Appendix 1). Account must also be taken of Policy STR4 Principles of Sustainable Development, Design and Placemaking, PC2 General Requirements for Development and PC3 Design (see Appendix 1) whereby STR4 states that high quality, well thought out and sustainable design which improves the environment and people’s health and well-being is essential. This can be achieved by ensuring that new developments incorporate the objectives of good design and sustainable development, and that the character of existing built development is conserved or enhanced. PC3 sets out a number of criteria which, when read together, will ensure a logical and robust checklist to ensuring that new development embraces the objectives of good design and is sustainable.**

## 6. Neighbours

- 61 **In the interests of good neighbour relations, it is advisable for any householder intending to extend their property to discuss their intentions with their neighbours who will be affected by the development. On all planning applications the Council will undertake consultations with neighbours whose living conditions may be affected by the proposal.**
- 62 **It is the responsibility of the householder, applicant or agent making the proposals to ensure that any extension, solid wall or other means of enclosure is constructed on land under the same ownership and to avoid encroachment of foundations or overhanging of guttering. Details of the Party Wall, etc. Act 1996 are available at the Planning Services office.**

## 7. Additional special considerations

- 71 **Whilst the same general principles apply across the County, special considerations apply to dwellings which are:**
- **Listed buildings**
  - **In a conservation area**
  - **In the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)**
  - **In flood risk areas**
- 72 **Any alterations or extensions which affect the character or appearance of a listed building will require listed building consent as well as planning permission. Please note that this applies to the inside as well as the outside of listed buildings.**
- 73 **In conservation areas and the AONB permitted development rights are more restricted, which means that it is necessary to apply for planning permission for certain types of work which do not need an application in other areas; for instance, the volume limits for extensions are lower, and permission is required to clad the outside of the house. In a conservation area any extension to a dwelling would need to preserve or enhance the character and appearance of the conservation area and its setting. In the AONB an extension would need to conserve or enhance the natural beauty of the designated area and its setting. Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB. NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en> and <https://lucmaps.co.uk/NRWDarkSkies/>**

- 74 **Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment. This could include raising electricity sockets and use of flood resistant materials.**
- 75 **In all these sensitive areas, the Council will be looking for the most appropriate design response for the specific circumstances presented in each case. It is recommended that advice in these cases is sought at an early stage and as mentioned previously there is the pre- application service which can be used if more detailed advice is required.**

## 8. Advice on extensions and alterations

81 The following advice on extensions looks firstly at general design principles and secondly particular forms of extensions.

### Site Analysis and context

82 The local context comprises the characteristics and setting of an area in which a development is located. Understanding the site and its immediate and wider context is the basis for a meaningful and sustainable design response, and is the responsibility of all those involved in the design process. More advice can be found on site and context analysis here <https://www.gov.wales/sites/default/files/publications/2018-09/site-context-analysis-guide.pdf>

### Design

83 Good design principles when considering extensions include:

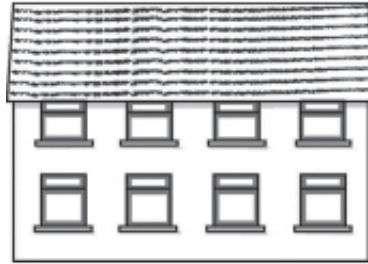
- Continuation - where the extension continues the building line and roof of the original dwelling. This suits a relatively small extension. Windows, doors and materials should match the original. This would also be suitable on a smaller property, for example a terrace of shallow depth.
- Reflection - by using the same form as the original but at a smaller scale or set back in terms of building line, or with a lower roofline. This is appropriate on larger properties with a deeper platform.
- Separation - where the original house has special features or a distinctive character which it would be difficult to emulate by either of the two previous methods, the extension could be linked by a porch, hallway or gallery. This is difficult to achieve successfully and should be carried out by a qualified architect. In some cases where a house has a particular character an extension with a modern minimalist look, may compliment the original house rather than trying to emulate the original character.

84 The extension should not result in an overdevelopment of the residential curtilage. The SPG Space Around Dwellings sets out the Council's guidelines for garden areas, parking spaces, site boundaries, distances between properties with overlooking windows, and distances to plot boundaries from the building. Extensions should also have regard to existing landscape features such as mature trees where these should be retained (see SPG Trees and Development). Extensions should not result in the loss of existing parking spaces which would result in road safety or congestion problems as a result of overspill parking. Furthermore, extensions should not lead to the loss of large areas of garden which could then lead to future applications for garden extensions, particularly in rural settlements or in the open countryside. The extension should avoid impacts on living conditions either of the residents of the extended house or to residents of nearby houses. The extended dwelling should be proportionate to the size and characteristics of the plot in which it sits.

- 85 **The focal point should be clear, and from there the other elements of the design should be placed, proportioned and detailed so as to allow the eye to “read” the whole design in an orderly way. These principles are explained better by illustrations than words. Fig. 1 shows these considerations in both good and bad terms.**

**Figure 1 Punctuation, balance and resolution**

**An unpunctuated monotonous facade compared with one containing variation and interest.**

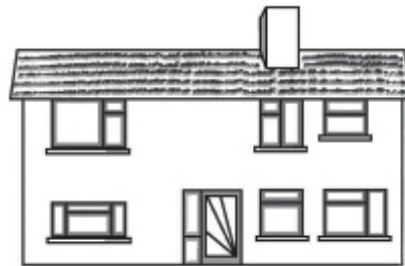


**X**



**✓**

**The restless, unsettling, jumbled form altered to a balanced composition which does not have to be symmetrical to work.**



**X**



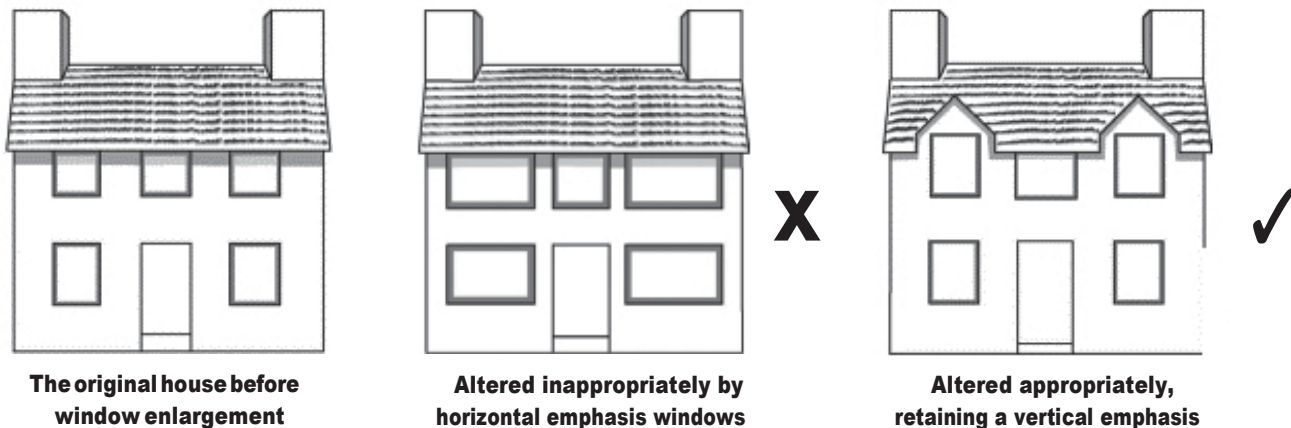
**✓**

**Both good examples introduce a focus whereas in the others the parts compete for attention**

- **When altering a house of traditional style, care should be taken of its scale and character. A simple symmetrical form is preferred rather than a design with busy details. The alteration of aspects such as doors, windows, ceiling heights etc could harm the character unless careful consideration is given to the design. It is recommended that such alterations are kept to a minimum.**
- **The proportion of solid (wall, roof) to void (windows, doors) should be carefully considered, as illustrated in Fig 2. In traditional buildings solid areas dominated voids, whereas in modern buildings the reverse is often the case. Where traditional and modern buildings adopt a vertical orientation of windows then this characteristic should be retained. Windows should always be set back deeply from the front face of walls and by a minimum of 80mm, this is also a traditional feature.**



**Figure 2 Proportions**



86 **These principles apply just as much to more modern houses as indicated by the example of a 1930's semi-detached in Fig. 3.**

**Figure 3 Good and bad ways of extending a typical 1930's semi-detached house**



The left keeps the character of the original and its features such as tile hanging and brick detailing.  
 The right introduces a flat-roofed extension, spoils the proportions, and loses original detailing.

87 **The relationship of windows to wall space should reflect the traditional balance. Care must be taken in the positioning and design / treatment of windows overlooking adjoining properties and garden areas, so as not to unacceptably reduce neighbours privacy. Generally walls of extensions should not contain any windows at first floor level where that wall is close to the boundary, unless the window is of obscured glazing. The extension should respect the spacing between buildings as this is a component of the character of the street scene. The extension should regard any repetitive spacing between buildings and fit unobtrusively into the pattern of development rather than dominating its neighbours.**

- 88 **When an extension is reasonably prominent, pitched roofs are the best solution, but there may be less visible situations at the rear of properties in which a flat roof is acceptable. The pitched roof of the extension should not be higher than that of the existing dwelling, and its pitch, angles and materials should match those of the existing structure. A flat roofed extension must be no higher than the eaves of the house.**
- 89 **Details of ridges, eaves, gutters and downpipes should be shown on the drawings. In conservation areas and on listed buildings, materials used (e.g. cast iron) will be a significant consideration.**
- 810 **Boundary enclosures such as walls, railings and gates should be taken into account, with good examples being retained as much as possible. Where original walls have been removed, consideration should be given to their reinstatement in whole or part. Where new entrances are proposed, these should be in proportion to the existing walls and hedges. Ornate ‘hacienda’ style gateways with ornate sweeping brick walls and pillars should be avoided.**

## Materials

- 811 **The external walls and the roof of the extension should normally be similar to those on the original building in terms of the type, texture and colour of materials used, as should the pointing of brickwork and stonework. Should the building have been altered inappropriately in the past, it may on occasions be better to seek to relate the extension to nearby buildings which have better retained the vernacular, that is, the indigenous local style.**
- **Sustainability - Local materials should be sourced wherever possible and the use of energy efficient materials and features.**
  - **Contrast - The use of contrasting materials can work well; for instance corrugated iron cladding has a traditional place within a countryside setting although there can be instances where contrast doesn't work well for instance glazing set in thick timber which could draw attention away from the character of the original building.**

## General Principles

- 812 **In altering a dwelling, several principles should be kept in mind:**
- **Avoid over enlargement or drastic changes in character. (See Figure 5)**
  - **Avoid the inappropriate changes, such as pseudo foreign details intended for another climate and conditions. (See Fig. 4)**
  - **Avoid unnecessary and inappropriate alteration of the buildings basic form and structure**
  - **Avoid extensions and alterations which do not have regard to the existing site and surroundings in terms of other nearby dwellings and features such as trees, hedgerows and topography**

**These principles are now examined in greater detail in terms of scale and form.**

**Figure 4 Good and bad ways of extending a traditional house**



**A typical local rural house before extension.**

**The three examples all alter the house to give increased light to the front rooms, weather protection to the front door, and reroofing and extend it with a garage; two unsympathetically and suitably.**



**With pseudo-historic details, totally unauthentic**



**Modernised, yet neither truly old nor truly modern**



**Sympathetically done in relation to the building's original character**

## Scale and form

8.13

**Any new extension should be subsidiary or subordinate in terms of overall floor area, size, height and proportion to that of the original dwelling and should sit comfortably alongside the existing house. Much will depend on the quality of the design of the proposed extension both in terms of the relationship of the extension to the existing dwelling, and the impact that the resulted extended property could have on its setting and surroundings. In terms of what constitutes 'subsidiary or subordinate', it is difficult to be precise, but up to half the original floor space could be deemed acceptable. Once a proposed extension exceeds the original floor space of the property by more than**

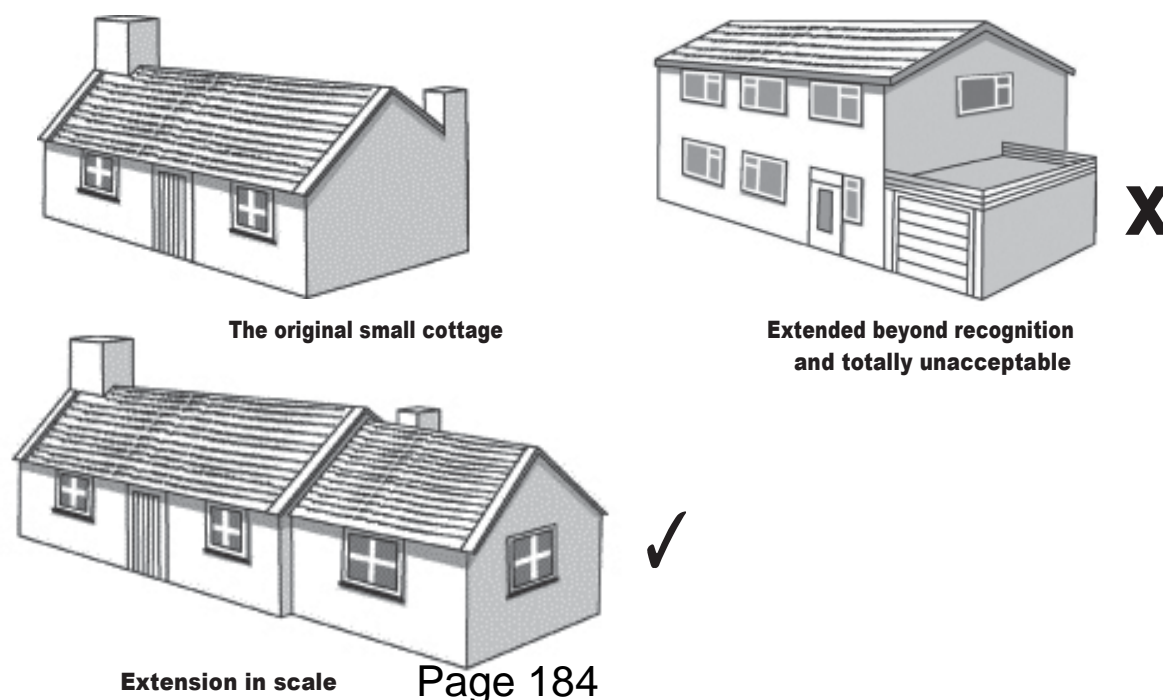
half its original area, then it will be particularly important to scrutinise the impact the proposed extension is likely to have against all the relevant considerations in the guidance provided in this SPG. The key principles that need to be adhered to are that:

- The aim should be to ensure that the extension harmonises with and complements the existing dwelling, rather than simply being added on to it. Fig. 5 illustrates the points. But it must also avoid over dominating smaller adjoining properties, in other words it should fit with its surroundings.
- The extension should ideally be centrally located on the gable, or set back slightly, to reduce its complexity and make it more traditional. Generally large windows on the gable should be avoided as they compete with the front elevation to be the focus of attention. The roof slope of the extension must be the same as that of the house. This means that the extension must be no deeper in plan than the original house. Otherwise the roof would be higher.
- The Council do not wish to specify a percentage figure for the increase in floorspace represented by an extension because this represents an 'artificial' method of assessing a proposal. However, it would be difficult to design an extension which came close to doubling (or more) the floorspace which appeared subordinate to or in harmony with the original house. This will be particularly important in the case of small rural properties with limited floorspace where proposals may come forward for large extensions which could dwarf the original.

814

There must be closer scrutiny where extensions are proposed on previously converted rural buildings; in most cases, conversion of rural buildings will have undergone an extension in the process, therefore extending further could harm the original character of the rural building. Separate guidance is contained in SPG Conversion of Rural Buildings.

Figure 5 Extending in scale



## 9. Particular forms of extensions

### Front extensions

- 91 **Normally extensions should not project forward of the existing building but in certain situations, where to do so would reflect an existing feature of the locality, they may be acceptable. For instance, where the existing building is set well back and the front extension reflects the design of the existing and does not cause detriment to the neighbouring dwellings it may be satisfactory to allow a sizeable front extension. However, opportunities for acceptable front extensions, with the exception of porches, are few and far between and it is not possible to provide specific advice or examples as each must be considered on its unique merits. The 45° guide, described under rear extensions, may be applicable.**
- 92 **It is sometimes possible to construct some porches without the need for planning permission. Whether they require planning permission or not, they should match the character and design of the existing property and should:**
- **be small in size, simple in design and respectful of the original lines of the house;**
  - **incorporate matching materials and design features;**
  - **provide a pitched roof;**
  - **not exceed the sill height of the first floor windows.**
- 93 **Homeowners may sometimes seek to introduce more light and space by replacing 'flush' windows with bay, bow or box windows. Careful consideration needs to be given such proposals on the principal elevation of a house where it is an alien feature within the locality. Such proposals which extend beyond a wall forming the principal elevation of a house will require planning permission.**

### Side extensions

- 94 **Flat roofed extensions, which do not relate to the design of the existing building, are not generally acceptable. A side extension should not fill in the gap between residential properties so as to create the impression of a terrace in a line of detached or semi-detached houses, but setting back the extension by a metre or two could maintain a visual break. Generally, the width of the extension should not exceed half the width of the existing frontage of the property, nor should it exceed half the width of the garden/plot between the property and the adjacent highway.**

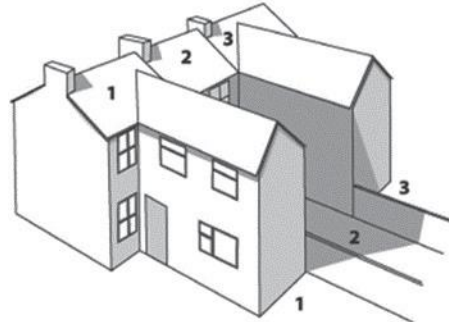
## Rear extensions

95 As always, care should be taken to avoid adversely affecting the living standards of neighbours, as explained in SPG Note 2. Space around Dwellings, Figure 6 shows examples of how not to do it.

Figure 6 Unacceptable rear extensions



Overlarge, insensitive, takes up too much of the garden and casts a shadow on the adjoining ground floor window



The middle house in this terrace is now badly overshadowed by the neighbours' overlarge extensions

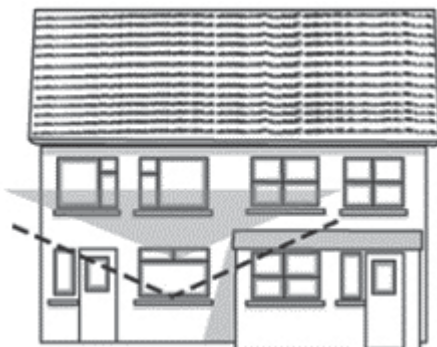
96 Generally, the Council will not permit rear extensions which are deeper than the width of the gable. The Council uses as a guide the 45° guide, explained in Figure 7. In summary, a 45° line is drawn from the midpoint of a sill of a window in a habitable room in an adjacent house. If the proposed extension would go beyond that line it would probably result in an unacceptable loss of light. The impact of the height of an extension can be assessed by drawing a line upwards at an angle of 25° and the extension should not be higher, as it would result in shadow and loss of light

Figure 7 The 45° Guide

### Example 1

Single storey rear extension  
Semi-detached house

Rear View

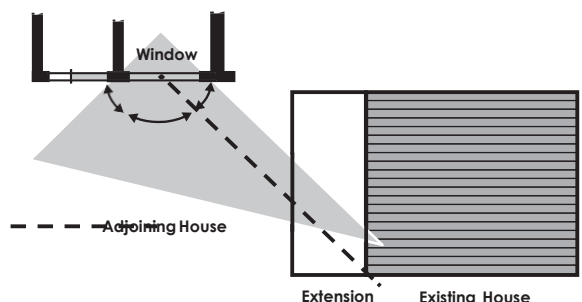


Extension acceptable provided it is limited in depth as shown below

### Example 2

Single and two storey side extension  
Detached House

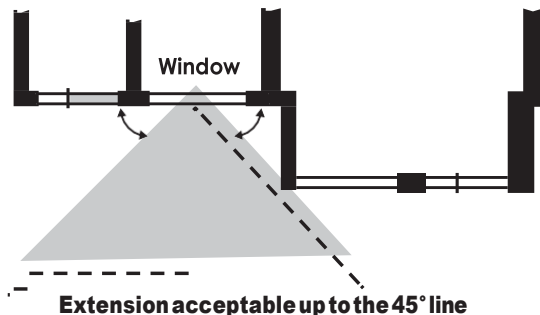
Plan View



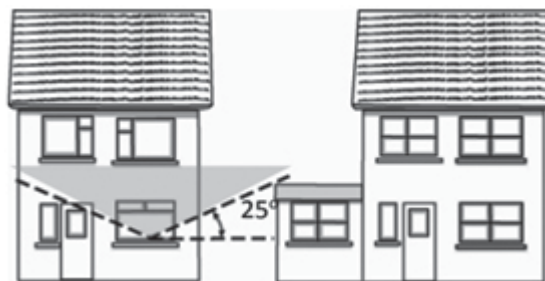
Although projecting slightly beyond the 45° line the extension is acceptable provided it is single storey as shown below



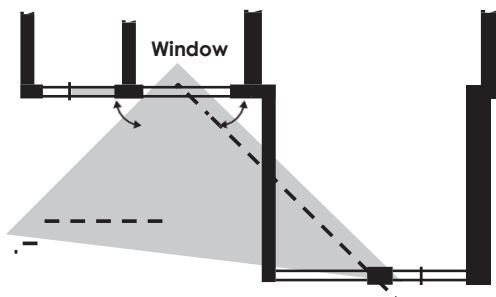
Plan View



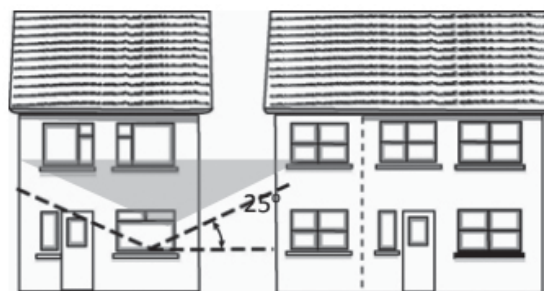
Rear View



Single storey extension acceptable as below the 25° line



Extension unacceptable as it projects Well beyond the 45° line



Two storey extension unacceptable as it is above the 25° line

97 **Two storey extensions should not normally be within 2 metres of a boundary that forms a party wall between terraced and semi-detached properties, and 1 metre of other properties. (Occasionally the only way properties can be extended is by building at the side up to the boundary, but this must be visually relieved by setting back the façade and/or lowering the ridge height.)**

98 **Roof alterations and dormer windows should be kept as small as possible so as to minimise the visual impact on the appearance of the property and the surrounding area, and to minimise the loss of privacy to neighbours. The following criteria should be met:**

- **dormer extensions should not normally be incorporated on front elevations;**
- **dormer extensions should be as small as possible and in proportion to other features of the house. Where dormers would cover and dominate a large area of the roof they will normally be refused: Dormer windows should not occupy more than 40% of the area of the roof slope and must be recessed in from the sides by at least 750mm;**
- **extensions must not project above the ridge line of the property;**
- **dormer windows should follow the vertical lines of existing doors and windows;**
- **where the use of roof space is desired, consideration should be given to the incorporation of sloping roof lights or traditionally styled dormer windows to create the**

sloping ceilings associated with attic rooms. Sloping roof lights are cheaper to install and are less intrusive than dormer windows, and can reduce the problems of overlooking.

## Other Alterations to a dwelling

- 99 **Cladding / Pebbledashing** - In a conservation area, national park or AONB, it is necessary to apply for planning permission for cladding the outside of a house, with stone, artificial stone, pebbledash, render, timber, plastic or tiling. Outside of these areas, such works will not require an application for planning permission provided the materials are of a similar appearance to those used in the construction of the house. The external treatment of a house by such works can drastically alter its appearance and harm the character and appearance of the locality, and need to be considered carefully.
- 910 **External Flue, Chimney or Soil Stack** - these are normally considered to be permitted development provided:
- a. the installation, alteration or replacement of a chimney does not project by more than 1m from the highest part of the roof.
  - b. The property is not in a conservation area, national park or AONB
  - c. In the case of a listed building, the advice of the local planning authority is sought.
- 911 The aim in all cases is to ensure that the installation is done in a manner which works efficiently but is sympathetically sited so as to be as unobtrusive as possible.

## 10. Annexes and dependant relatives' accommodation

- 101 A residential annex is accommodation ancillary to the main dwelling within the residential curtilage and must not be used as a separate dwelling as set out in Policy HN6-Annex Accommodation. It is acknowledged that an extension of the house or conversion of an outbuilding may provide an opportunity to accommodate elderly or sick relatives, or older teenagers, giving them some degree of independence.
- 102 In open countryside locations both national guidance and policies PC1 and HN4 seek to strictly control new residential development in the form of a new dwelling. In this context policy HN6 does not allow new build annexes, preferring extension to a dwelling or the conversion of an outbuilding. Within settlement boundaries there may be scope for small scale new build but often annexe proposals will be unable to have the necessary vehicular access, parking and garden area which would be necessary to operate as a separate residential unit. If, in an urban context, there was sufficient scope for a new dwelling, then a proposal could come forward as a small site 'windfall' proposal within the context of policy STR2. However, in open countryside locations, and urban locations where there are constraints on the plot and annexe, then it will be necessary for any planning consent to incorporate a planning condition requiring that the annexe remains incidental to the main house and that it is at no time to be subdivided from the main



house or occupied as a self contained unit. These restrictions would apply to current and future owners and occupants.

### 10.3 There are a number of important considerations as set out below

- **The annex should form part of the same ‘planning unit’ and it should not involve any separate garden area, vehicular access, or car parking area; the Council want to avoid the annex becoming a self contained dwelling which would result in the creation of two separate dwellings, and it will attach conditions to prevent this occurring.**
- **The layout, design and physical relationship between the house and the proposed annex will be important considerations for the Council in deciding such planning applications; the annex should be reliant in part on the main dwelling for facilities.**
- **The size and scale of the accommodation should be considered as It is unlikely that a large annex would receive permission. As a guide, the scale should be such that the annex could be used as part of the main dwelling once the dependency need has ceased.**
- **Design should be carefully considered as some aspects such as the use of rooflights can alter the character and appearance of some buildings, especially those with historic character, and they can also cause light pollution.**

## Contacts

Planning Policy	<a href="mailto:developmentplans@flintshire.gov.uk">developmentplans@flintshire.gov.uk</a>	01352 703213
Development Management	<a href="mailto:planningadmin@flintshire.gov.uk">planningadmin@flintshire.gov.uk</a>	01352 703331

## Appendix 1 - Local Development Plan Policies

### HN5 House Extensions and Alterations

**Extensions or alterations to existing dwellings will be permitted provided that the proposal:**

- a. Is subsidiary in siting scale and form to the existing dwelling, and does not represent an overdevelopment of the site**
- b. Respects the existing dwelling and surroundings in terms of design and materials;**
- c. Will not have an unacceptable impact on the living conditions of occupiers of adjoining developments.**

### HN6 Annex Accommodation

**Annex accommodation will only be permitted where it is:**

- a. An extension to an existing dwelling; or**
- b. A conversion of an existing building within the curtilage of an existing dwelling;**

**Provided that:**

- i. Its usage is ancillary to the residential use of the existing dwelling and is reliant in part on the main dwelling for facilities;**
- ii. It is limited in terms of size, scale and floor area to be reflective of the needs of the user;**
- iii. It involves no separate garden area, vehicular access, or car parking area; and**
- iv. It is in the same ownership as the main dwelling, with future occupancy controlled by means of a condition or legal agreement.**

### PC2: General Requirements for Development

**All development should:**

- a) harmonise with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape;**
- b) not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution;**

- c) take account of personal and community safety and security in its design and layout;**
- d) maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles;**
- e) not have an unacceptable effect on the highway network or highway safety as a result of problems arising from traffic generation, inadequate and poorly located parking spaces, servicing and manoeuvring;**
- f) not result in or be susceptible to problems related to foul and surface water drainage, land stability, contamination, flooding, or pollution of light, air and water, either on or off site.**

### PC3: Design

#### **All new development should:**

- a. Be of a high quality, distinctive and inclusive design which respects and enhances the site and it's surroundings in terms of it's siting, layout, scale. Height, design, density, use of materials and landscaping, and creates a sense of place;**
- b. Retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity and ecological connectivity;**
- c. Ensure that new materials are appropriate, durable and sympathetic to the character and context of the site;**
- d. Protect and enhance the townscape, architectural, historic and cultural built environment;**
- e. Incorporate suitable provision of space about dwellings, amenity space, landscaping and planting;**
- f. Create attractive, accessible and safe healthy places with natural surveillance, visibility and sensitive lighting;**
- g. Incorporate Sustainable Urban Drainage Schemes to bring about multiple benefits as an integral part of the development**
- h. Protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/ noise.**

## PC4: Sustainability and Resilience of New Development

### Development should:

- a) **be sustainably located and accessible to non-private car means of travel, so as to reduce carbon emissions;**
- b) **be designed so as to be resilient and adaptable to the effects of climate change;**
- c) **incorporate planting, landscaping and design features within a Sustainable Management of Natural Resources (SMNR) approach which mitigate the effects of climate change such as increased rainfall events and high temperatures;**
- d) **make efficient use of resources through sustainable construction techniques and materials, including layout, siting and orientation to maximise solar gain, water conservation and waste reduction; and**
- e) **incorporate renewable energy technologies and carbon sinks where appropriate.**

## STR4 Principles of Sustainable Development, Design and placemaking

**To promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable placemaking design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change.**

### To achieve this, all development should:

- i. **Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;**
- ii. **Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;**
- iii. **Be accessible and connected, allowing ease of movement;**
- iv. **Make the best use of land, materials and resources;**
- v. **Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision of open space and recreation, landscaping and parking provision in residential contexts;**
- vi. **Incorporate new, and connect to existing green infrastructure, promoting biodiversity;**
- vii. **Incorporate where possible on-site energy efficiency and renewable energy generation;**
- viii. **Ensure there is capacity and availability of infrastructure to serve new development;**
- ix. **Manage water and waste sustainably;**
- x. **Ensure that it supports and sustains the long term well being of the Welsh language**

**Appendix 2**  
**Comments and Responses to updated SPG – Extensions and Alterations**

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
<p>Buckley Town Council</p> <p style="text-align: center;">Page 193</p>	<p>could it be further clarified to state physical appearance of the building must be done in a sympathetic way that doesn't detract from the original look of the property.</p>	<p>Clarification on design instructions in order to ensure that any extension/alteration is sympathetic to original building.</p>	<p>Noted            Para 4.2 of the SPG sets the scene by emphasising that 'care must be taken to ensure all additions respect the character of the building and its locality'. The SPG provides guidance on a range of considerations such as siting, form, scale, design and materials to ensure that any extension/alteration should harmonise and complement the existing dwelling. Policy HN5 provides the policy guidance on house extensions and alterations and should be read alongside policies PC2, 3 and 4. The SPG seeks to expand on this guidance.</p>	<p>None</p>
<p>Clwyd Powys Archaeological Trust (CPAT)</p>	<p>We always encourage pre-application consultation with the Planning Archaeologists at the regional Welsh Archaeological Trust from the applicant or their architect where the fabric or character of an historic property may be impacted. Where an impact is identified and cannot be minimised or reversed then some form of archaeological mitigation by e.g. an archaeological survey,</p>	<p>To add reference to encouraging developers to seek Pre Application Planning Advice from the Welsh Archaeological Trust before submitting a planning application.</p>	<p>Part Accepted. A general note of advice encouraging all applicants to apply for Pre-Application Planning Advice would be more appropriate. The LDP is to be read as a whole, consequently all relevant policies will be considered as part of the planning application process and there are policies in the LDP which deal with the historic environment.</p>	<p>Add after the 2<sup>nd</sup> sentence in paragraph 4.5 '<b>Applicants are encouraged to seek advice as part of the Pre- Application Planning Advice service with the Planning department before making any planning applications. The Pre-Application Planning Advice service will identify</b></p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	excavation, watching brief or any combination of these may be required as a condition in accordance with TAN 24 (May 2017) and Planning Policy Wales (Feb 2021). In certain cases where an impact cannot be avoided, and the development would result in significant structural loss of historic fabric and the historic character of a building we may also object to proposals.			<b>relevant policies, guidance and technical standards; confirm what information will be required for the planning application; identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application’.</b>
Clwyd Powys Archaeological Trust (CPAT) Page 194	Extensions and annexes can be particularly damaging to sub-surface archaeology where they occur within the medieval historic core of a town or village or the building is within or adjacent to a recorded archaeological site.	4.2 include the wording... <i>'respect the historic fabric and character of the building'</i>	Accepted	Add 'historic fabric and' after 'respect' in the first sentence of paragraph 4.2 so that it reads: 'Extensions and improvements are a reasonable way of achieving more space and functionality within a dwelling to meet changing needs, but care must be taken to ensure all additions respect the <b>historic fabric and</b> character of the building and its locality’.
Clwyd Powys Archaeological Trust (CPAT)	Pre-application consultation with the Planning Archaeologists at the regional Welsh Archaeological Trust or, if the building is listed, the Built Heritage Conservation Officer, may be useful if the building is known to retain some historic fabric or historic character so that the heritage implications of the proposals can be	Add pre application discussion in para 5.2	Not accepted A previous comment concerning this issue of pre application discussions has been partly accepted, resulting in an addition to paragraph 4.5, see above.	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	discussed and mitigation agreed.			
Clwyd Powys Archaeological Trust (CPAT)		In HN5 add: <i>Does not have an unacceptable adverse impact on the historic fabric and character of a building</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)		In HN6 add: Provided that: ..... v. <i>Does not have an unacceptable adverse impact on the historic fabric, character and setting of the existing building or impact any related sub-surface archaeology.</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)		In PC2 add: <i>g. not result in the loss of the historic fabric and character of the property</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)	PC3 in d. mentions the "historic and cultural built environment" so this is OK.	None	Noted	None
Holywell Town Council	Car parking provision should be considered as part of any approved extensions to dwellings, where the number of occupants are increased	Consideration to be given to car parking provision as part of any extension proposal	Partly accepted The Parking Standards SPG sets out what the relevant parking standards are for different sizes of dwellings. The Extensions and Alterations SPG does recognise in para 8.4 that that extensions can reduce car parking standards and this needs to be carefully considered. It is not considered that further amendments are required.	None
NRW	NRW does not normally comment on householder	7.1: 'Additional special considerations':	Partly accepted	Add to para 7.1 an additional bullet point 'in

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Page 196	<p>applications within flood risk zones (see our 'Consultation topic checklist'). However, we advise that you consider including reference to betterment and building above culverts</p>	<ul style="list-style-type: none"> <li>• "Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment. This could include raising electricity sockets and use of flood resistant materials."</li> <li>• "Any works over or to a culverted main river are likely to require a Flood Risk Activity Permit (FRAP) from NRW under the Environmental Permitting Regulations (EPR) 2016. Proposals to build over existing culverts are likely to be opposed because of health and safety considerations, increased maintenance costs, and because this may preclude options to restore the watercourse in the future."</li> </ul>	<p>Proposals for the extension or alteration of a dwelling in areas of flood risk would need to be judged against policy EN14 of the LDP</p> <p>Consider it appropriate to incorporate the essence of the first bullet point in 7.1</p> <p>Consider the second bullet point is too detailed for this SPG to go into</p>	<p><b>flood risk areas'</b> and add a new paragraph with the following wording:</p> <p><b><u>Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment. This could include raising electricity sockets and use of flood resistant materials</u></b></p>
NRW	<p>We recommend that consideration or reference to protected species should also be included in the 'New Housing in the Open Countryside' and 'Extensions and Alterations to Dwellings' draft SPG's.</p>	<p>We also advise reference to European protected species derogation criteria within the draft SPG's, including:</p> <ul style="list-style-type: none"> <li>- Requirement to demonstrate the proposal preserves public health or</li> </ul>	<p>Not accepted.</p> <p>The Council has an existing SPG relating to Nature Conservation and Development and a more specialised SPG relating to Great Crested Newt Mitigation Requirements. These</p>	None



Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		<p>public safety or is imperative for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; and</p> <p>- There is no satisfactory alternative</p>	<p>will be updated and reviewed and consultation undertaken on them prior to adoption.</p> <p>The aim of this SPG is to provide guidance and highlight planning policy principles relating to house extensions and promote good design.</p> <p>Policies in the LDP and the suite of SPGs, when finalised, should be read together.</p>	
<p>NRW</p> <p style="text-align: center;">Page 197</p>		<p>Suggested wording to be added within the SPG: "For further information on the special qualities and design considerations relevant to the Clwydian Range and Dee Valley AONB we advise including cross references to the Clwydian Range and Dee Valley AONB SPG. New development should be designed to avoid or reduce light pollution and the Dark Skies SPG provides detailed practical guidance on achieving this</p>	<p>Partly accepted</p> <p>Suggest slightly amended wording</p>	<p>At the end of para 7.3 remove the text as follows: <del>There are separate SPGs relating to the AONB which provide guidance on the design and lighting for those proposing new development.</del> and replace with <b>'Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB.'</b></p>
<p>NRW</p>	<p>Paragraph 7.3. We advise ensuring the same information outlined above in relation to</p>	<p>In relation to proposals for new housing within the AONB or its setting, we</p>	<p>Not accepted</p>	<p>None</p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Page 198	Paragraph 6.13 of the New Housing in the Open Countryside SPG is also incorporated into this SPG.	advise highlighting that these proposals should typically be informed and supported by landscape and visual appraisals prepared by suitably qualified and experienced landscape professionals. We also advise stating that an early understanding of the potential landscape and visual impacts of a development can improve integration and ensure adverse effects are reduced and minimised or avoided altogether. Harm can often be avoided by selecting an appropriate site at the outset.	Policy HN5 and this SPG is concerned with extensions and alterations of existing dwellings and is supported by a suite of other policies in particular PC2 and PC3. Also, Policy EN4 relates to landscape character and policy EN5 relates to the AONB. The emphasis of policy and the SPG is that the extension or alteration is subsidiary in siting, scale and form and that it should harmonise or enhance the surrounding landscape. Given that there are also two SPGs relating specifically to the AONB, it is not considered that the level of detail being suggested here is appropriate for inclusion in this SPG.	
NRW	It would be helpful to add a reference in the SPGs to other evidence on landscape, adding that in addition to the existing SPGs on the AONB, further supporting information on the character and qualities of the AONB and its setting can be found in LANDMAP and the NRW online resources on Tranquillity and Place (Tranquillity and Place (arcgis.com)), and Dark Skies (Wales Dark Skies (arcgis.com)).	Add reference to further supporting information in relation to the character of the AONB, information should include LANDMAP and NRW online resource on Tranquillity and Place and Dark Skies, these can be found at arcgis.com	Accepted	At the end of para 7.3 add the words :- <b><i>'NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en</a> and</i></b>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
				<a href="https://lucmaps.co.uk/NRWDarkSkies/">https://lucmaps.co.uk/NRWDarkSkies/</a>
Penyffordd Community Council	Welcomes the consultation but has nothing further to add in regards to the draft SPGs	None	Noted	None
Officer Led Changes		Para 5.1	Update reference to PPW 12	In para 5.1 add '12' after PPW and in second sentence after 'PPW' add 'in para 3.9'
Planning Strategy Group	In considering representations and responses, Planning Strategy Group on 14/03/24 agreed to additional text within section 4 Introduction regarding other changes to property which do not require planning permission but which may harm the character and appearance of property and area.		New para in section 4	add new para after 4.2 with the following wording: <b>'This SPG focuses on extensions and alterations to houses which require planning permission. It is accepted that there may be smaller extensions, alterations or other works such as cladding or pebbledashing, which are permitted development and do not need planning permission. Careful consideration should be given to these works to ensure that they respect the character and appearance of the property and locality. The guidance in this SPG should be applied where relevant'</b> .



Supplementary Planning Guidance Note  
**New Housing in the Open Countryside**





## 1. Purpose

- 11 **The Council has set out in its Local Development Plan (LDP) an intention to prepare a series of Supplementary Planning Guidance Notes (SPG). The purpose of each SPG is to:**
- **assist the preparation of planning proposals and guide pre-application discussions,**
  - **guide officers in handling, and officers and councillors in deciding, planning applications,**
  - **assist Inspectors in the determination of appeals,**
  - **improve the quality of new development,**
  - **facilitate a consistent and transparent approach to decision making.**

## 2. The LDP and the need for SPG

- 21 **The Welsh Government Development Management Manual advises in para 9.1.2 that ‘Applications for planning permission must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise’ The Flintshire LDP was adopted on 24th January 2023 and forms the basis for decision making alongside Future Wales: The National Plan. However, the LDP cannot provide all the detailed advice needed to guide development proposals. Therefore, SPG’s can support the LDP by providing more detailed guidance on a range of topics and issues to help the interpretation and implementation of certain policies and proposals. The Development Plans Manual Edition 3 advises that ‘Supplementary Planning Guidance (SPG) can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight’. The intention of SPG’s is not to set out ‘policy’ as that is the role of the LDP, but to provide more detailed advice and guidance which expands on a particular policy or allocation in the LDP.**

## 3. Status / Preparation Process

- 31 **The Council indicated in its Delivery Agreement (DA) for the LDP that it intends to prepare SPG. The DA explained that the Council will consult on any draft SPG and, following consideration of representations, and any necessary amendments, seek formal adoption. This approach accords with Welsh Government advice in Development Plans Manual (Edition 3).**
- 32 **This SPG was consulted on for a 6-week period commencing on 01/12/23 and ending on 26/01/24. Representations and responses, together with any amendments to the draft document were considered by Cabinet at its meeting on ZZ/ZZ/ZZ who resolved to adopt this SPG. Consultation comments, responses and any amendments are set out in Appendix 1. This document should therefore be afforded considerable weight as a material planning consideration.**

## 4. Introduction

- 41 **This SPG explains the approach that the Council will take when dealing with proposals for new housing in the open countryside. It offers additional guidance on the interpretation and application of key policies within the LDP including the umbrella policy PC1 ‘The Relationship of Development to Settlement Boundaries’ and more specifically policy HN4 ‘Housing in the Countryside’; policy HN4-A ‘Replacement Dwellings’; and policy HN4-C ‘Infill Development in Groups of Houses’. These policies are listed in full within Appendix 1. Please note that guidance in respect of residential conversions of rural buildings (HN4-B) and affordable housing exceptions schemes (HN4-D) is set out in separate SPGs. Applicants are encouraged to seek advice as part of the Pre-Application Planning Advice service with the Planning department before making any planning applications. The Pre-Application Planning Advice service will identify relevant policies, guidance and technical standards; confirm what information will be required for the planning application; identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application.**
- 42 **In using this SPG please note that open countryside is defined in policy PC1 as land lying outside defined settlement boundaries. Settlement boundaries are identified on the LDP proposals maps.**

## 5. National and Local Planning Policy

- 51 **A fundamental principle of the LDP and Planning Policy Wales is that new development in open countryside should be strictly controlled. The plan seeks through STR2 to direct new development to existing settlements but recognises that there are particular types of housing in open countryside which may be permitted, and these are set out in this, and accompanying SPGs.**
- 52 **LDP Policy HN4 Housing in the Countryside sets out briefly the types of housing permitted in open countryside:**

### HN4: Housing in the Countryside

**Proposals for housing development outside defined settlement boundaries will only be permitted where:**

- a. **it is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN6,**
- b. **it involves the replacement of an existing dwelling (see policy HN4-A), or**
- c. **it involves the subdivision of an existing dwelling, provided the dwelling is capable of subdivision without major extensions tantamount to the erection of an additional dwelling or dwellings, or**
- d. **it involves the conversion of an existing non-residential building (see policy HN4-B), or**
- e. **it involves sensitive infill development within an appropriate group of dwellings in the countryside (see policy HN4-C)**
- f. **it is for affordable housing rural exception sites on land adjoining the settlement limits**



(see policy HN4-D), or

g. it is for a One Planet Development as defined in TAN6.

53 It is important to stress that this policy in the LDP should not be read in isolation but that the LDP policies should be read as a whole. There are a range of policies which may be applicable to new housing proposals in the open countryside, depending on the location and specifics of each proposal. However, there are a number of key policies applicable to most development proposals and these include:

- PC2 General Requirements for Development
- PC3 Design
- PC4 Sustainability and Resilience of New Development
- PC5 Transport and Accessibility

## 6. a) Rural Enterprise Dwellings

61 Criteria a of HN4 references that new dwellings for the purposes of agriculture, forestry or other rural enterprises will be permitted as defined in TAN6. Given that there is comprehensive guidance in paragraphs 4.2.37 - 38 of PPW12 and in TAN6 Planning for Sustainable Rural Communities, it is not considered necessary for the Plan to repeat this in a specific detailed policy. Similarly, this section of the SPG provides only an overview of the guidance on this form of development, with the relevant sections of TAN6 which can be found at <https://gov.wales/technical-advice-note-tan-6-planning-sustainable-rural-communities>. Applicants must read this SPG alongside the more detailed advice in TAN6.

### Does the Proposal Qualify as a Rural Enterprise Dwelling?

62 An exception to the normal strict controls on new dwellings in the countryside, is when accommodation is required to enable a rural enterprise worker to live at or close to their place of work. This is based on the needs of the rural enterprise and not on the personal preference or circumstances of the person concerned. Applications for such forms of development must be fully supported by robust evidence to enable the LPA to fully assess it. It will be necessary to determine if a proposal falls within the scope of the rural enterprise dwelling policy i.e. whether an enterprise is directly related to the management of rural land related businesses, or has a character such that it can only be located in the open countryside, or has very particular reasons for a location in the open countryside rather than in an existing settlement. TAN6 provides the following clarification ‘...qualifying rural enterprises comprise land related businesses including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting), tourism and leisure enterprises.

63 TAN6 identifies the following types of rural enterprise dwellings:

- To meet the needs of established rural enterprises (including farms) where there is a functional need for a full-time worker and the business case identifies a prospect of long term business financial sustainability.

- **To enable the transfer of control of financially stable farm enterprises to the next generation.**
- **To meet the need for additional workers on established financially sustainable farms where there is a functional need for a further 0.5 or more of a full time worker earning at least 50% of a farm worker's salary, and**
- **To meet the needs of a new rural enterprise where there is a functional need and a requirement for a full-time worker.**

64 **TAN6 sets out detailed guidance on 'new dwellings on established rural enterprises' in section 4.4, 'second dwellings on established farms' in section 4.5 and 'new dwellings on new enterprises' in section 4.6 and this guidance is not repeated here.**

65 **As dwellings permitted under the Rural Enterprise Dwellings policy will be exceptions to the normal policy of controlling on residential development in the countryside, it is necessary that the detailed justification for such dwellings is examined carefully. In this respect the rural enterprise dwelling policy requires proposals to be tested against four key tests as follows:**

### Test 1: The Functional Test

66 **The functional test requires that it is demonstrated to be essential for a worker to be readily available at most times, at or near the site of need, for an appropriate rural enterprise to function properly. It should relate to unexpected situations that may arise e.g., the extent to which the intended occupant would be needed on hand outside of normal working hours to provide essential care to animals at short notice or deal quickly with emergencies to prevent serious loss of crops or to protect livestock from theft or injury, although security on its own would not be sufficient justification.**

### Test 2: The Time Test

67 **Where a functional requirement has been established, it will be necessary to consider the number of workers required to meet it. This will take into the scope and nature of the enterprise and will normally be for a full-time worker.**

### Test 3: The Financial Test

68 **Dwellings will only be permitted when a rural enterprise can be shown to be financially sound and has good prospects for a reasonable period of time. Evidence of actual and / or potential financial performance will be required to establish whether the enterprise has a reasonable prospect of providing a reasonable market return for its operators, for at least 5 years from the anticipated completion of the proposed development.**

69 **It is also necessary to assess the size of dwelling which the enterprise can afford to build and maintain. Dwellings which are unusually large in relation to the needs of the enterprise or unusually expensive to construct in relation to the income it can sustain in the long term, will not be acceptable. It is the requirement of the enterprise not the occupier which is relevant to determining the appropriate size of a dwelling.**

610 **In some cases, it may be necessary to consider removing permitted development rights for development within the curtilage of the dwelling. Extensions to the dwelling could**

lead to it being of a size exceeding what was justified by the functional requirement, and also affect the continued use of the dwelling being available for its intended use, given the income that the rural enterprise can sustain.

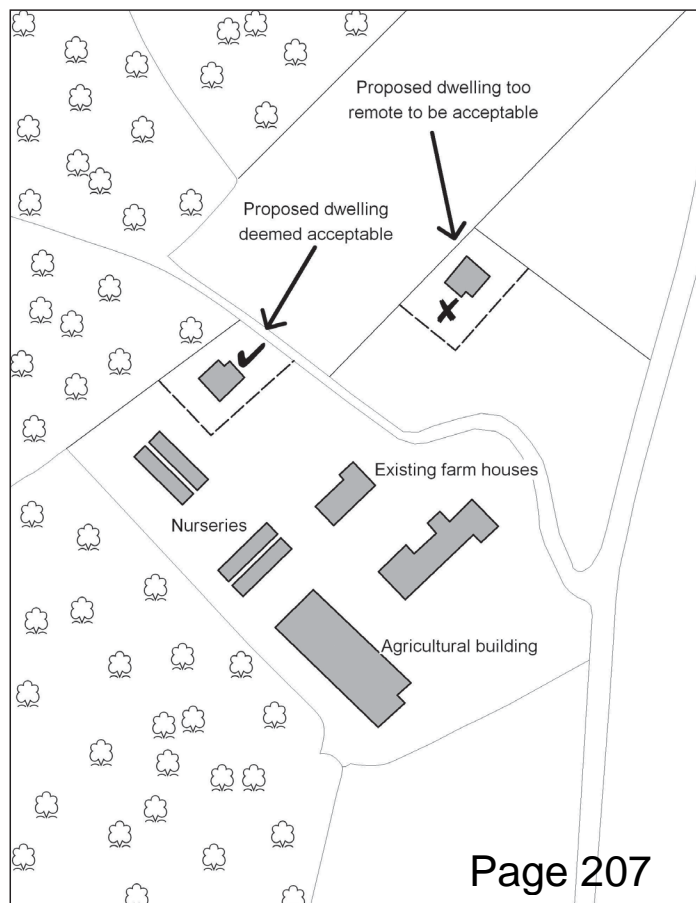
### Test 4: The Other Dwelling Test

611 **The needs of an enterprise will be considered in terms of the availability of an existing dwelling or a building suitable for conversion. If there is an existing dwelling or a building suitable for conversion, it will need to be shown by the applicant why these cannot be used to meet the needs of the enterprise for a new dwelling. It may also be necessary to investigate the history of the enterprise and whether existing dwellings or buildings have been recently sold. Consideration will be given as to whether there are other dwellings for sale or rent in the locality which may be suitable to fulfil the applicant’s requirements.**

### Other Planning Requirements Test

612 **When the need for a new dwelling has been proven, it will still be necessary for the proposed dwelling to satisfy usual planning requirements. Site specific factors must be considered, as follows:**

- **Siting - The location of the new dwelling should be closely related to the activities for which the need arises. In most cases this will mean the new dwelling being part of the main complex of buildings, although other natural landscape features may have bearing on this. Dwellings should not be isolated from the farm complex or in**



**locations that could encourage farm fragmentation. The new dwelling should fit into the landscape and not appear as a visually intrusive, isolated dwelling.**

**Fig 1**  
An example of acceptable and unacceptable siting of a enterprise workers’ dwelling in relation to the existing complex

- **Design** - Appropriate building materials and design measures are important to ensure the building relates well to existing buildings and its surroundings.
- **Size of dwelling** - The size should be related to the functional requirements of the enterprise and should be of a scale and form which respects the site and its surroundings.
- **Sustainability** - Given the remote location of some rural enterprises there may be opportunities to incorporate onsite renewable energy generation and storage technology. Measures to conserve and recycle water may also help minimise the environmental effects of new dwellings.

613 **Proposed dwellings either within or close to the Clwydian Range and Dee Valley AONB will need to satisfy the requirements of policy EN5 i.e. whether it conserves or enhances the natural beauty of the AONB, its setting and policy EN18 in terms of minimising light pollution. Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB. NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en> and <https://lucmaps.co.uk/NRWDarkSkies/>**

### Completion of a Rural Enterprise Dwelling Appraisal

614 **A planning application for a rural enterprise dwelling must be accompanied by an appraisal, containing robust evidence to justify the proposed dwelling. The appraisal should address the functional, time, financial and other dwellings tests as well as the 'Other planning requirements' test. The appraisal will be assessed initially by Planning Officers, but the LPA may, in some cases, seek an independent assessment by a specialist consultant whose fees are paid half each by the applicant and the County Council. If an applicant fails to include an appraisal as part of a planning application, or it lacks sufficient detail, then the LPA would be entitled to refuse the application on the basis of lack of proper justification for the dwelling.**

### Temporary permission

615 **Where there is uncertainty about the long-term viability of the enterprise, the Council may grant temporary permission for up to three years for a caravan or other temporary accommodation in a suitable location. This will allow a further period of assessment of the enterprise's viability and justification for a permanent dwelling. In such circumstances, the grant of planning permission for a permanent dwelling would be conditioned to ensure the removal of the temporary accommodation within 3 months of completion of the permanent dwelling.**

## Occupancy Conditions

616 **Where permission is granted under this policy for a rural enterprise dwelling, it will be necessary to ensure that the dwelling is kept available for meeting that purpose. An occupancy condition is designed to ensure that a dwelling is kept available to meet the needs of other local rural enterprises, if no longer needed by the original business. If not, consideration can be given to its use as affordable housing. If that is not appropriate, then it could be occupied by any resident dependants. Further guidance on condition is contained in TAN6.**

### Removal of an occupancy condition

617 **It is the needs of the business, not the individual, which is the overriding issue, so personal circumstances are not relevant, nor is the argument that the dwelling is no longer suitable for an agricultural worker. To justify the removal of an occupancy condition, the applicant must show what changes have occurred since the granting of the original permission (at least 5 years previously); prove there is no longer a need for an agricultural workers' dwelling on the enterprise or in the area; and provide documentary evidence that reasonable efforts have been made to let or sell the property at a realistic price (i.e. below full market value) for at least a year with the occupancy condition in place.**

## 7. b) Replacement Dwellings

7.1 **Policy HN4-A aims to establish the circumstances in which replacement dwellings will be permitted in the open countryside:**

- **the existing dwelling should be habitable in its present state, but perhaps is inadequate in terms of size, layout, basic modern facilities or has significant deficiencies such as noise, damp, subsidence, or flooding.**
- **A long abandoned, demolished or ruined building or a temporary structure such as a caravan or mobile home does not fall within the remit of this guidance as it could represent what would in effect be a new dwelling in open countryside. The building should have lawful use rights as a dwelling.**
- **In cases where the existing dwelling has local architectural and/or historical value the preference will be to explore alternative options to retain the existing dwelling through refurbishment, adaptation and/or extension. Where considered appropriate and necessary there may be a requirement for a pre-determination archaeological assessment (in accordance with TAN24). Depending on the findings consideration will be given to adding buildings of merit to the Buildings of Local Interest list or referring buildings to CADW for potential listing.**

72 **The proposed replacement dwelling will need to respect the size and characteristics of the existing house, the plot, and other houses in the locality. The replacement dwelling should not be significantly larger than the original and an increase in floorspace of greater than 50% will need to be the subject of particular scrutiny. This should not be treated as an absolute limit nor a development target, rather any floorspace increases need to be sensitive to meeting the living standards and needs whilst ensuring that the replacement dwelling does not harm the character and appearance**

of the locality.

- **The replacement dwelling should normally be sited on the footprint of the existing dwelling. However, there may be exceptional circumstances where a re-siting of the dwelling is justified either, where there are unacceptable environmental considerations including flooding, subsidence, noise, or other nuisance or there are identified environmental gains such as protection of trees and/or habitats and wildlife, or reducing the intrusiveness of the dwelling within the landscape. In cases involving re-siting a condition will be attached to ensure the demolition of the original dwelling. In cases where flood risk is present, the replacement dwelling should bring about flood risk betterment including the provision of a flood resilient design.**
- **The extension to a residential curtilage will be resisted, unless it is unavoidable having regard to the re-siting of a dwelling in the specific circumstances outlined above.**

**Any such extension should be the minimum required to offer adequate living standards and should be appropriately landscaped.**

**Other considerations include:**

- **The removal of any unattractive outbuildings will be acceptable, but this should not be seen as justifying a larger replacement dwelling.**
- **The replacement of properties that have been used as holiday accommodation or other temporary uses, unless it is a former dwellinghouse that is capable of reverting back to residential use, will not be permitted, as this would be tantamount to the erection of a new dwellinghouse in the countryside.**
- **A permission for a replacement dwelling may be subject to a condition removing permitted development rights.**

## **8. c) Sub-Division of an Existing Dwelling**

81 **Occasionally an existing house in open countryside may present an opportunity to be subdivided into two or more housing units. On the one hand this can represent a more efficient use of an existing dwelling but on the other hand it could result in planning harm. The following considerations should be borne in mind in considering such proposals:**

- **The dwelling should be capable of subdivision without extensions tantamount to the erection of an additional dwelling(s)**
- **The subdivision should retain the character, appearance and features of the existing dwelling**
- **The subdivision should not harm the living standards of the occupants of either the existing dwelling or additional units(s)**
- **The adequacy of existing vehicular access and parking provision and the acceptability of new access / parking in terms of highway safety and visual impact**
- **The adequacy of existing garden area to serve additional dwelling(s) - guidance on garden extensions is provided below.**

82 **The sub-division should be capable of being undertaken in a manner which does not result in harm to the character and appearance of the existing house, site and locality and**



highway safety. Any such permission may be granted subject to a condition removing permitted development rights.

## 9. d) Conversion of an Existing Building

- 91 **The residential conversion of existing buildings is contained in policy HN4-B ‘Residential Conversion of Rural Buildings’ and guidance on this type of development is set out in a separate SPG.**

## 10. e) Infill housing

- 101 **Policy HN4-C (see Appendix 2) sets out the specific situations where infill housing will be allowed in the open countryside. Infill housing development must satisfy the locational and site criteria and must meet a proven local housing need.**

### What is Infill Housing?

- 102 **An existing group of houses must form a continuous built-up frontage and/or focus of dwellings for example a crossroads and should comprise six or more dwellings.**
- **There must be an identifiable and coherent group of houses and an identifiable pattern of development which affords an opportunity for an infill plot.**
  - **A group of houses must not be interspersed by individual field parcels.**
  - **an infill housing plot should be a small gap capable of accommodating a single dwelling or two semi-detached dwellings where this the prevailing house type in the group or frontage.**
  - **a plot at the end of a line of dwellings is not an infill plot, as it represents an extension to built development whilst a plot in a loose or sporadic pattern of buildings represents further intensification of that sporadic development. Such forms of development would cause planning harm to open countryside.**
  - **An infill plot should not represent an important landscape, nature conservation, historic or other amenity feature which should be retained.**
  - **Normal planning considerations should apply to infill dwellings in terms of securing adequate space about dwellings and private amenity space in order to secure adequate living standards for the occupants of the proposed dwelling and existing dwellings.**
  - **A new dwelling should be of a scale, character and form which respects the plot and surrounding dwellings. The end result should be a new dwelling which sits comfortably within the plot and its surroundings, and which respects the character and appearance of the locality, rather than harming open countryside.**

**Fig 2 Infill development -  
Examples of acceptable and unacceptable locations**



**Note:** The acceptable locations would still have to be acceptable in relation to other normal planning considerations.

## What is Proven Local Housing Need?

- 103 **There are two types of local housing need that could be met through an infill development, and these are:**
- a. **Key workers who need to live within a particular locality in connection with a rural enterprise such as farm, forestry workers who currently live too far away as to be practical for their employment (e.g. animal husbandry); and**
  - b. **Low-income local households lacking their own housing, or living in housing which is inadequate or unsuitable, who are financially unable to provide for their own needs in the housing market without assistance.**
- 104 **Given the two different types of local housing need it will be important for applicants to ensure that their proposals are clear by identifying upfront the type of local housing need they are seeking to address. This can be done in a covering letter, Design and Access Statement or in a Planning Statement.**

## Local Housing Need - Rural Enterprise Workers

- 105 **For applicants seeking to demonstrate local housing need on the basis that they are a rural enterprise worker, sufficient evidence must be provided to demonstrate the need for that worker to live in that specific locality and that the type of work justifies the need to be closely located to their workplace. In all cases it must be demonstrated that the intended user of the proposed dwelling needs to live within the locality and there are no suitably appropriate alternatives such as the purchase of an existing home within the locality where the need has been demonstrated.**
- 106 **The evidence that would normally be required to support a new ‘worker dwelling’ should address the points below. Any personal information will be redacted and kept confidential.**
- **Details of the household to occupy the dwelling including their current home address; the ownership status of their current home; the household worker’s length of time at that address; the current workplace and length of time at that workplace; and the nature/function/type of the workplace.**



- **Local links with the locality of the proposed development and proximity of locality to workplace eg family ties, place of employment.**
- **Reasoning as to why it is essential that they live close to work and the reasoning for choosing that locality; and reasoning for proposing a new build as opposed to purchasing an existing home within the locality.**

## Local Housing Need - Affordable Housing Needs

10.7 **For applicants seeking to demonstrate affordable housing need, sufficient evidence will be required to demonstrate that there is an affordable housing need within that specific locality. In all cases it must be demonstrated that the intended occupant of the proposed development has local linkages within the community. These local links are primarily working in the community and/or living within the community for at least the last five years. Other local links can include family ties to the locality. However, in all instances it must be demonstrated that the applicant lacks sufficient income and house equity to allow them to gain a home within that locality through normal unsubsidised methods.**

10.8 **The evidence that would normally be required to support affordable home proposals should address the following points:**

- **Details of the household which will occupy the affordable housing including their current home address; the ownership status of their current home; the reason why their home is inadequate; and length of time at that home address.**
- **Local links with the locality the proposal is made within and proximity of locality to workplace**
- **Reasoning as to why that locality has been chosen; and reasoning for proposing a new build as opposed to purchasing an existing home within the locality.**

10.9 **In addition to the above, applicants should complete an Application for Affordable Home Ownership, forms can be obtained from the Housing Strategy Unit. This information will be held in confidence and will not be available for public view. The application form will be assessed by a Registered Social Landlord and the Housing Strategy Unit to identify whether the individuals are in affordable housing need. The findings of this process will inform the LPA as part of the planning application consultation. This information will reveal whether the development would contribute to meeting an affordable housing need given the known level of affordability for the applicant and the availability and cost of homes currently on the market.**

## Local Housing Need - Securing Community Benefits

10.10 **In permitting either workers' dwellings or affordable housing the LPA need to ensure that conditions are applied, and legal agreements signed to ensure that any local needs housing delivered is retained for as long as required by the community.**

10.11 **In the case of proposals seeking to meet affordable housing needs there will be a need for planning conditions restricting the development to affordable homes only. In addition, a legal agreement would have to be secured to control the future resale of the property at an appropriate affordable price and to ensure that the property was only occupied by households in affordable housing need. In drafting the legal agreement, it would be an**

**important consideration to ensure that sequential preference be given firstly to:**

- **those individuals in affordable housing need with local links to the community where the property is located;**
- **with lesser preference given to individuals from surrounding community areas;**
- **and finally, preference from individuals from elsewhere within the County.**

**10.12 If it transpired that no households could be identified that met any of the above requirements then it would be important to consider whether the property was required to meet housing needs, but this would have to be the matter of a new planning application for variation of planning condition and the extinguishment of the legal agreement.**

**10.13 In order that the proposed infill dwelling may be properly assessed in relation to its site and surroundings and in terms of meeting a proven local need, a full planning application should be submitted.**

## **11. f) Affordable Housing Exception Sites**

**11.1 Policy HN4-D provides guidance in respect of Affordable Housing Exception Schemes and seeks to facilitate the provision of affordable housing on sites adjoining settlement boundaries where there is an evidenced housing need, as an exception to normal planning controls over new housing development. Guidance on this type of development is set out in a separate SPG ‘Affordable Housing’.**

## **12. g) One Planet Developments**

**12.1 Welsh Government guidance on One Planet Developments is contained in para 4.2. 39-40 of PPW12, in TAN6 Planning for Sustainable Rural Communities and in a Practice Guidance Note ‘Using the One Planet Development Ecological Footprint Calculator’. TAN6 defines One Planet Development as “development that through its low impact either enhances or does not significantly diminish environmental quality. One Planet Developments should initially achieve an ecological footprint of 2.4 global hectares per person or less in terms of consumption and demonstrate clear potential to move towards 1.88 global hectares over time.” One Planet Development Proposals will be assessed in accordance the TAN6 definition and the OPD Practice Guidance (October 2012) to ensure compliance with the national approach.**

**12.2 Policy HN4 does not provide specific or detailed guidance on this form of development as there is well established policy and guidance produced by Welsh Government and also noting the lack of applications for this type of development in Flintshire. Any applications for One Planet Developments will be determined against other relevant policies in the LDP and the advice in PPW12 and TAN6.**

## 13. Garden Extensions in the Countryside

- 131 **Although the LDP has no specific policy on this subject, the LPA often receives planning applications to extend garden areas. Planning permission is required to extend the garden of a dwelling onto land, which is used for another purpose, often agricultural land, as this is a material change of use. Enlarging residential gardens, changing plot boundaries and introducing domestic paraphernalia such as fencing and sheds introduce urban features which can have a significant visual impact.**
- 132 **Garden extensions into open countryside will only be permitted where the overall character and appearance of the locality is not harmed. It will be necessary to have regard to several considerations:**
- **the amount of garden area presently available relative to the size of house (see SPG Space Around Dwellings) and the size of the extension sought**
  - **the relationship with the garden areas of any adjoining dwellings in terms of a consistent pattern**
  - **the existence of an appropriate physical boundary or the creation of an appropriate new boundary**
  - **the details of the boundary treatment in terms of fencing or native planting, which is typical of the locality**
  - **the visibility of the extension from any public vantage points such as roads or public rights of way**
  - **the extent to which the extension would bring about safety benefits such as the provision of an improved vehicular access or parking**
  - **the extent to which the extension would improve the provision of essential services such as domestic fuel tanks**
  - **the extent to which the proposal would lead to the loss of best and most versatile agricultural land**
  - **Any planning permission being conditioned to remove permitted development rights to prevent new structures such as sheds, garages, greenhouses and house extensions**
  - **Any planning permission being conditioned to ensure any necessary planting or landscaping treatment is undertaken and maintained.**
  - **Any proposed garden extension has no adverse impact on the historic environment.**

## Contacts

**Planning policy- [developmentplans@flintshire.gov.uk](mailto:developmentplans@flintshire.gov.uk) 01352 703213**

**Development management- [planningadmin@flintshire.gov.uk](mailto:planningadmin@flintshire.gov.uk) 01352 703331**

## Appendix 1: Flintshire Local Development Plan Policies

### HN4: Housing in the Countryside

**Proposals for housing development outside defined settlement boundaries will only be permitted where:**

- a) it is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN6,**
- b) it involves the replacement of an existing dwelling (see policy HN4-A), or**
- c) it involves the subdivision of an existing dwelling, provided the dwelling is capable of subdivision without major extensions tantamount to the erection of an additional dwelling or dwellings, or**
- d) it involves the conversion of an existing non-residential building (see policy HN4-B), or**
- e) it involves sensitive infill development within an appropriate group of dwellings in the countryside (see policy HN4-C)**
- f) it is for affordable housing exception sites on land adjoining the settlement limits (see policy HN4-D), or**
- g) it is for a One Planet Development as defined in TAN6.**

### HN4-A: Replacement Dwellings

**The replacement of a dwelling outside settlement boundaries will only be permitted if:**

- a) the existing building has lawful use rights as a dwelling;**
- b) the existing dwelling is habitable or capable of being made habitable without works which are tantamount to the construction of a new dwelling;**
- c) the existing dwelling does not have significant local historical or architectural interest;**
- d) the new dwelling is not significantly larger than the existing dwelling and reflects the character and traditional building style of the locality in terms of its siting, design, form, and the materials used;**
- e) the replacement dwelling should be located on the site of the existing dwelling, or in exceptional circumstances where an alternative siting within the curtilage will address an existing site constraint or bring about an overall environmental improvement; and**
- f) there is no extension to the existing residential curtilage.**

## HN4-C: Infill Development in Groups of Houses

**Outside settlement boundaries infill development for one or two housing unit(s) may be permitted, provided that the proposal is to meet a proven local housing need and:**

- a) comprises a small gap which is not an important landscape, nature conservation, historic or other amenity feature within a clearly identifiable small group of houses within a continuously developed frontage;**
- b) does not constitute, or extend existing ribbon development which would be detrimental to the character and appearance of open countryside, and does not create fragmented development; and**
- c) respects adjacent properties and the surrounding area in terms of its siting, form, design and scale, and does not represent overdevelopment of the site.**

### Appendix 3 Comments and Responses to updated SPG – New Housing in Open Countryside

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Buckley Town Council	it was unclear if annexes could be built if they were attached to house/building	Clarification on annexes	Not accepted This SPG is concerned with new housing in the open countryside and the Council do not define annexe accommodation as new housing. Annex usage should be ancillary to the residential use of the existing dwelling and is reliant in part on the main dwelling for facilities. Therefore annex accommodation is not included within the SPG. The LDP has a specific policy HN6 which relates to Annex Accommodation and further guidance on this type of development is contained in section 10 of the SPG on Extensions and Alterations to Dwellings.	None
Clwyd Powys Archaeological Trust (CPAT)	Developers should be encouraged to seek advice as part of a pre-planning consultation with the Planning Archaeologists of the regional Welsh	To add reference to encouraging developers to seek pre planning advice from the Welsh Archaeological Trust before submitting a planning application.	Partly accepted. A general note of advice encouraging all applicants to apply for Pre-Application Planning Advice would be more appropriate. The LDP is to be read as a whole, consequently all relevant policies will be considered as	Add to the end of Paragraph 4.1 as follows, ' <b>Applicants are encouraged to seek advice as part of the Pre- Application Planning Advice service with the Planning department before making any planning applications. The Pre-</b>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	Archaeological Trust to discuss any impacts and the mitigation that may be necessary		part of the planning application process and there are policies in the LDP which deal with the historic environment.	<b>Application Planning Advice service will identify relevant policies, guidance and technical standards; confirm what information will be required for the planning application; identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application.'</b>
Clwyd Powys Archaeological Trust (CPAT)	For Policy HN4 it may be worth adding extra text.	HN4 add ...it has no adverse impact on any component of the historic environment	Not Accepted. Changes to policy wording in the LDP can only be made when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)	In 7.1 we welcome this paragraph below: <ul style="list-style-type: none"> <li><i>In cases where the existing dwelling has local architectural and/or historical value the preference will be to explore alternative options to retain the existing dwelling through refurbishment, adaptation and/or extension. Where considered appropriate and necessary consideration will be given to adding buildings of merit to the Buildings of Local Interest list.</i></li> </ul>	None	Noted	None



Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Clwyd Powys Archaeological Trust (CPAT)	<p>It is also good to see that HN4-A includes the below line which will help a lot with non-designated buildings of traditional or vernacular interest....</p> <p><i>c) the existing dwelling does not have significant local historical or architectural interest;</i></p>	None	Noted	None
Clwyd Powys Archaeological Trust (CPAT) 221	<p>It should be noted that replacement dwelling proposals may attract the need for pre-determination archaeological assessment in accordance with TAN 24 (May 2017) to understand the age, condition, development and importance of the structure in relation to the proposals. The subsequent report may require changes to the design and layout to mitigate impacts before the application is submitted. Dwellings</p>		Accepted	<p>Amend bullet point 3 in Paragraph 7.1 as follows, 'In cases where the existing dwelling has local architectural and/or historical value the preference will be to explore alternative options to retain the existing dwelling through refurbishment, adaptation and/or extension. Where considered appropriate and necessary <b>there may be a requirement for a pre-determination archaeological assessment (in accordance with TAN24). Depending on the findings,</b> consideration will be given to adding buildings of merit to the Buildings of Local Interest list or referring buildings to CADW for potential listing.</p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	which are found to be of potential national importance may also be recommended to Cadw for a listing assessment.			
Clwyd Powys Archaeological Trust (CPAT)		In 14.2 add the bullet point:  'that any proposed garden extension has no adverse impact on any component of the historic environment'	Partly accepted	Add a bullet point to paragraph 14.2 as follows: <b>"Any proposed garden extension has no adverse impact on the historic environment "</b>
Holywell Town Council	New housing should stay within the aesthetics of a particular open countryside area. Materials should be used for future sustainability based on the climate change being experienced currently.	None	Policies PC2, PC3 and PC4 within the LDP set out the policy stance on issues such as the sustainability of new development and ensuring that development is appropriate to the locality in terms of siting, form, design and materials. The objective of this SPG is to provide additional explanation and clarity on the broader policy principles relating to new housing development in the countryside. The use of materials must balance sustainability considerations with the appearance of development and it would be inappropriate for the SPG to be prescriptive as each case must be considered on its particular merits.	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
NRW	Section 7.2 refers to replacement dwellings where the existing dwelling is subject to unacceptable environmental considerations, including flooding. We advise that a sentence concerning betterment is included	7.2 add: "Flood risk betterment including provision of a flood resilient design (e.g. raising electricity sockets and use of flood resistant materials) should be fully considered in the design of any replacement dwelling".	Partly accepted. Consider that the inclusion of a simplified wording is reasonable	Add a new sentence at the end of the first bullet point in 7.2 as follows, ' <b>In cases where flood risk is present, the replacement dwelling should bring about flood risk betterment including the provision of a flood resilient design</b> '.
NRW  Page 223	We also advise referring to the Planning for the Dark Night Sky in the AONB SPG and emphasising the importance of dark skies to the conservation and enhancement of natural beauty within the AONB.	6.13 add: "For further information on the special qualities and design considerations relevant to the Clwydian Range and Dee Valley AONB we advise including cross references to the Clwydian Range and Dee Valley AONB SPG. New development should be designed to avoid or reduce light pollution and the Dark Skies SPG provides detailed practical guidance on achieving this"	Partly accepted  Consider that the inclusion of a slightly different wording is appropriate	In paragraph 6.13 at the end of the first sentence add the following, ' <b>and policy EN18 in terms of minimising light pollution</b> '.  Add a new sentence at the end of para 6.13 as follows, ' <b>Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB.</b> '
NRW		Following Paragraph 6.13, and in relation to proposals for new housing within the AONB or its setting, we advise highlighting that these proposals should	Partly accepted.  Consider that the above amendments to para 6.13 highlight the need to recognise the special qualities of the AONB when designing	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 224</p>		<p>typically be informed and supported by landscape and visual appraisals prepared by suitably qualified and experienced landscape professionals. We also advise stating that an early understanding of the potential landscape and visual impacts of a development can improve integration and ensure adverse effects are reduced and minimised or avoided altogether. Harm can often be avoided by selecting an appropriate site at the outset</p>	<p>development, particularly when the SPG is read in conjunction with policy EN5 of the LDP. It is not considered that the detailed wording sought is either necessary or appropriate.</p>	
NRV	<p>We recommend that consideration or reference to protected species should also be included in the 'New Housing in the Open Countryside' and Alterations to Dwellings' draft SPG's</p>	<p>We also advise reference to European protected species derogation criteria within the draft SPG's, including:</p> <ul style="list-style-type: none"> <li>- Requirement to demonstrate the proposal preserves public health or public safety or is imperative for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; and</li> </ul>	<p>Not accepted.</p> <p>The Council has an existing SPG relating to Nature Conservation and Development and a more specialised SPG relating to Great Crested Newt Mitigation Requirements. These will be updated and reviewed and consultation undertaken on them prior to adoption.</p> <p>The objective of this SPG is to provide further clarity on the broad planning policy principles applying to different types of housing development in the open countryside.</p>	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		- There is no satisfactory alternative	Policies in the LDP and the suite of SPGs, when finalised, should be read together.	
NRW	we advise that you consider including reference to the following guidance: Natural Resources Wales / How we can all help protect groundwater in Wales and in particular the 'Environment Agency's approach to Groundwater Protection' document, adopted by NRW and referenced in the above NRW guidance	Add reference to NRW guidance:  Natural Resources Wales / How we can all help protect groundwater in Wales  And  Environment Agency's approach to Groundwater Protection' document	Not accepted. Policy EN15 of the LDP seeks to protect Water Resources and this would include groundwater. This is not considered to be an issue in relation to the majority of proposals for it to warrant being included in the SPG.	None
NRW	It would be helpful to add a reference in the SPGs to other evidence on landscape, adding that in addition to the existing SPGs on the AONB, further supporting information on the character and qualities of the AONB and its setting can be found in LANDMAP and the NRW online resources on Tranquillity and	Add reference to further supporting information in relation to the character of the AONB, information should include LANDMAP and NRW online resource on Tranquillity and Place and Dark Skies, these can be found at <a href="http://arcgis.com">arcgis.com</a>	Accepted	Add at the end of para 6.13 the following, ' <b>NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at</b> <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en</a>  and  <a href="https://lucmaps.co.uk/NRWDarkSkies/">https://lucmaps.co.uk/NRWDark Skies/</a>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	Place (Tranquillity and Place (arcgis.com)), and Dark Skies (Wales Dark Skies (arcgis.com)).			
Penyffordd Community Council	Welcomes the consultation but has nothing further to add in regard to the draft SPGs	None	Noted	None
Officer Led Changes		Para 6.1	Update reference to PPW 12	In paragraph 6.1 add '12' after PPW and change the paragraph reference from '4.2.6 to 4.2 37' to <b>'4.2.37 to 4.2.38'</b>
Page 226		Para 13.1	Update reference to PPW 12	In paragraph 13.1 add '12' after PPW and change the paragraph reference from '4.2.38 – 39' to <b>'4.2.39 to 4.2.40'</b>
		Para 13.2	Update reference to PPW 12	In paragraph 13.2 add '12' after 'PPW'.







# Supplementary Planning Guidance Note

## Conversion of Rural Buildings





## 1. Purpose

- 1.1 The Council has set out in its Local Development Plan (LDP) an intention to prepare a series of Supplementary Planning Guidance Notes (SPG). The purpose of each SPG is to:
- assist the preparation of planning proposals and guide pre-application discussions,
  - guide officers in handling, and officers and councillors in deciding, planning applications,
  - assist Inspectors in the determination of appeals,
  - improve the quality of new development,
  - facilitate a consistent and transparent approach to decision making.

## 2. The LDP and the need for SPG

- 2.1 The Welsh Government Development Management Manual advises in para 9.1.2 that ‘Applications for planning permission must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise’. The Flintshire LDP was adopted on 24th January 2023 and forms the basis for decision making alongside Future Wales: The National Plan. However, the LDP cannot provide all the detailed advice needed to guide development proposals. Therefore, SPG’s can support the LDP by providing more detailed guidance on a range of topics and issues to help the interpretation and implementation of certain policies and proposals. The Development Plans Manual Edition 3 advises that ‘Supplementary Planning Guidance (SPG) can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight’. The intention of SPG’s is not to set out ‘policy’ as that is the role of the LDP, but to provide more detailed advice and guidance which expands on a particular policy or allocation in the LDP.

## 3. Status / Preparation Process

- 3.1 The Council indicated in its Delivery Agreement (DA) for the LDP that it intends to prepare SPG. The DA explained that the Council will consult on any draft SPG and, following consideration of representations, and any necessary amendments, seek formal adoption. This approach accords with Welsh Government advice in Development Plans Manual (Edition 3).
- 3.2 This SPG was consulted on for a 6-week period commencing on 01/12/23 and ending on 26/01/24. Representations and responses, together with any amendments to the draft document were considered by Cabinet at its meeting on 22/22/22 who resolved to adopt this SPG. Consultation comments, responses and any amendments are set out in Appendix 1. This document should therefore be afforded **Page 20** the weight as a material planning consideration.

## 4. Introduction

- 41 **This guidance note explains the approach that the Council will take when dealing with proposals for the change the use of and conversion of rural buildings. It offers additional guidance on the interpretation and application of policy HN4-B Residential Conversion of Rural Buildings but will also be applicable to policies including PE3 Employment Development Outside Allocated Sites and Principal Employment Areas, PE4 Farm Diversification, and PE12 Tourist Accommodation, Attractions and Facilities.**
- 42 **Many of the buildings in Flintshire’s countryside form an important part of the County’s rural heritage, but changing economic and social circumstances mean that some are no longer required for their original purposes. Amongst these are barns, outbuildings, schools, churches and chapels. In principle it is reasonable that new uses should be found for them, thus utilising an existing resource and reducing pressure for new greenfield development, whilst also assisting the rural economy. But such schemes of renovation and conversion must be undertaken in a manner which respects the heritage, character, appearance and features of the original building.**
- 43 **The commonest form of rural conversion tends to be the conversion of barns and other redundant rural buildings into residential use, which allows many people to find homes in a quiet rural setting where they would not be allowed to build a new dwelling. However, from a sustainability and building conservation point of view, residential conversion is the least desirable. Welsh Government supports the conversion of buildings for employment purposes. Examples of business re-use which will be acceptable in principle include agriculture and forestry related activities, light industry, offices, storage and distribution, tourism, sport and recreation. Only where conversion for business purposes, part business-part residential or affordable housing is proven to be not feasible will conversion to residential use be considered.**

## 5. Policy

- 51 **Planning Policy Wales (Edition 12) (PPW) sets out national policy guidance in respect of the development and use of land. A key objective is the re-use of suitable previously developed land and buildings to minimise land take on greenfield sites. In para 5.6.8 of PPW Welsh Government advises that planning authorities should adopt a positive approach to the conversion of rural buildings for business re-use.**
- 52 **Further guidance is contained in para 3.2.1 of Technical Advice Note 23 Economic Development (TAN23) which states that ‘The re-use and adaptation of existing rural buildings has an important role in meeting the needs of rural areas for commercial and industrial development, and tourism, sport and recreation. In recognising this local planning authorities are expected to adopt a positive approach to the conversion of rural buildings for business re-use, especially those buildings located within or adjoining farm building**

**complexes, on this basis that:**

- **they are suitable for the specific re-use;**
- **conversion does not lead to dispersal of activity on such a scale as to prejudice town and village vitality;**
- **their form, bulk and general design are in keeping with their surroundings;**
- **imposing conditions on a planning permission overcomes any planning objections, for example on environmental or traffic grounds, which would otherwise outweigh the advantages of re-use;**
- **if the buildings are in the open countryside, they are capable of conversion without major or complete reconstruction;**
- **conversion does not result in unacceptable impacts upon the structure, form, character or setting where the building is of historic and/or architectural interest.**

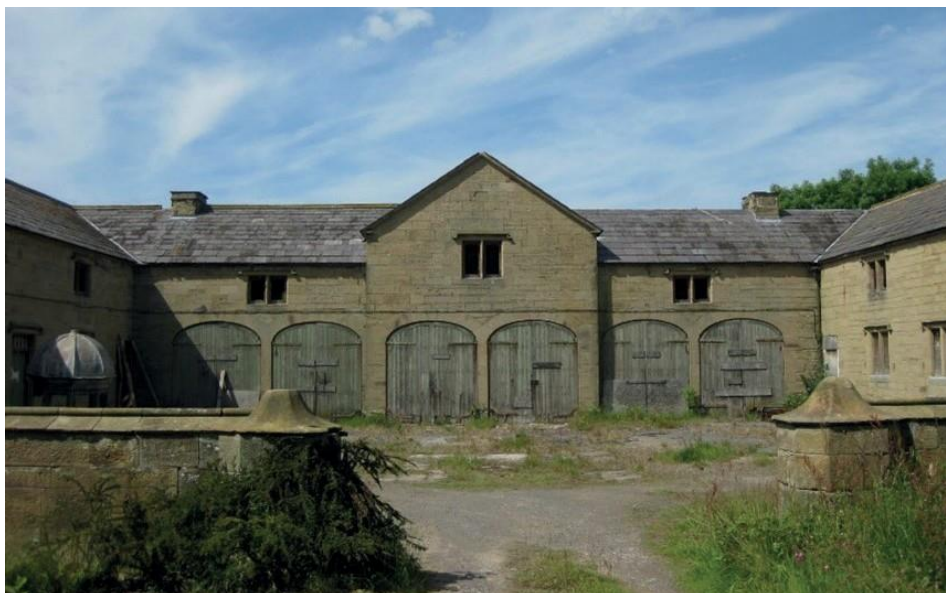
53 **TAN23 also states in para 3.2.2 ‘Residential conversion of rural buildings which have ceased to be used for industrial or commercial purposes, including agriculture, need to be assessed on their impact including their impact on the fabric and character of historic buildings. In areas where the creation of local employment is a priority, local planning authorities may include policies within the development plan which prohibit residential re-use unless:**

- **The applicant has made every reasonable attempt to secure suitable business re-use and the application is supported by a statement of the efforts which have been made; or**
- **Residential conversion is a subordinate part of a scheme for business re-use; or**
- **The resulting housing will contribute to an identified need for affordable housing for local need’.**

54 **Welsh Government guidance in para 3.2.3 is clear that ‘If the existing building is unsuitable for conversion without extensive alteration, rebuilding or extension, or if the creation of a residential curtilage would have a harmful effect on the character of the countryside, the same considerations relating to new house building in the open countryside will apply’.**

55 **The key policy in the LDP is HN4-B Residential Conversion of Rural Buildings and the wording of this and other relevant policies is set out in Appendix 1. Rather than looking at each policy in detail, this Note attempts to look at underlining principles and guidelines**

## 6. Preferences for the Re-use of Rural Buildings Business re-use



### a) Business re-use

61 **As explained above, the national and local policy context is that the preference for the re-use of rural buildings is for:**

- **business re-use; or**
- **Residential conversion where a subordinate part of a scheme for business re-use; or**
- **affordable housing for local need.**

62 **In Flintshire the Council supports new rural business development or affordable housing taking place through the re-use of existing buildings, given the vital role of small rural enterprises in promoting a more diverse rural economy and the community benefits of bringing about affordable housing.**

63 **Acceptable uses in principle include offices, digital technology, light industry (including food and timber related business uses), storage and distribution, and tourism. In all cases it is important that:**

- **The conversion must be achieved without causing problems such as unacceptable disturbance, visual intrusion, noise, smell, excessive traffic generation or by detracting from highway safety;**
- **The buildings must be suitable for the uses proposed, with prefabricated or temporary buildings unlikely to be considered suitable, except in very specific circumstances for a business re-use.**

64 **Farm diversification is needed to assist in maintaining the economic viability of farm enterprises. In addition to the above uses, small scale retailing clearly related to but ancillary to the farm, such as the sale of farm or local produce or value added food products may be acceptable. The inclusion of a “farm plan” explaining how the proposals fit into and support the operation of**

**the farm will be useful in assessing the diversification proposal.**

**b) Combined business and residential use**

**65 In some cases a building may be capable of supporting a combined usage, and given the increasing trend for home working and family-based businesses, this would be acceptable in principle provided that the residential element is subordinate to the business use. This is often known as a ‘live-work’ unit and is more than just simply ‘working from home’.**

**Such proposals should be supported by a business plan explaining the nature and operation of the business and why a residential element is necessary. Careful consideration will need to be given to the relative floorspace given over to the business and residential elements, and planning conditions may be imposed on any planning consent to control this.**

**c) Local Needs Housing**

**66 In some instances the re-use of a rural building for affordable housing to meet evidenced local needs may be appropriate. To be suitable, a building would need to be accessible to local public transport as well as local facilities and services in order to bring about sustainable development. The housing would need to have mechanisms in place to ensure that it is affordable both initially and in perpetuity. Further advice on affordable housing is set out in Affordable Housing SPG.**

**Evidencing the Intended Re-use**

**67 The LPA will require all applicants to submit a statement setting out the steps taken to determine the suitability or feasibility of using a property for business purposes, part business-part residential, or affordable housing, to include the points set out below.**

**Physical suitability of the building, site and surroundings**

- The building should be of permanent and substantial traditional construction and materials;**
- The building should be structurally sound and capable of re-use without substantial reconstruction;**
- The building should be suitable in size to accommodate the proposed use, without significant extension;**
- Extensions or modifications will only be considered where they are essential to a scheme proceeding and are of a scale and nature which do not detract from the character and appearance of the original building;**
- Any features of architectural or historic interest are retained;**
- The building should be capable of being converted without inappropriate alterations in terms of windows, doors etc;**
- A business re-use would not be harmful to the amenity of nearby residents through noise and emissions or excessive traffic generation;**
- The access to the building and the local highway network are adequate to cater for the nature and volume of traffic likely to be generated;**
- Sufficient parking and manoeuvring space is available within the site.**



68 **Further guidance in terms of whether a building is physically suitable for a residential use is set below. The policy approach is slightly more flexible in considering whether buildings are suitable for an employment use, as these typically involve less physical changes to a building in order to secure such a use. By contrast, a residential re-use tends to necessitate physical changes to a building to achieve arrangements of rooms and to achieve natural light and these works are more likely to harm the character and appearance of a traditional rural building.**

### Economic feasibility for re-use

69 **Where the building is physically suitable for business re-use or for part residential / part business or affordable housing, the applicants should demonstrate the use is financially feasible, allowing for the purchase and conversion costs and the likely sale or lease price. They should demonstrate that all possible sources of grant aid for the business reuse have been explored. In this respect, Business Wales <https://businesswales.gov.wales/> and the Development Bank of Wales [www.developmentbank.wales](http://www.developmentbank.wales) may be able to assist. In respect of affordable housing, discussions should take place with the Council's Housing Strategy Team or with Housing Associations. Financial and personal information will be treated in confidence by the LPA.**

610 **In those cases where existing rural buildings are suitable for business re-use, applicants will need to demonstrate that every reasonable attempt has been made to find a business re-use, or the residential use is subordinate to business re-use, or alternatively the housing will contribute to an identified need for affordable housing in the locality. The Council will require that the property is marketed for sale or for lease at a reasonable price for a period of at least one year and a statement prepared of the genuine efforts taken to secure a business re-use. Further guidance on this aspect is set out in Appendix 2.**

## 7. Residential re-use

71 **As explained above additional considerations are necessary to determine whether a building is suitable for a residential use and these are set out below:**

- **the building should be a traditional rural building which makes a positive contribution to the locality;**
- **The building should not have undergone radical extension or alteration such that it no longer makes a positive contribution to its surroundings;**
- **The building should not be modern or utilitarian, either in construction or appearance, whereby it makes little visual contribution to their surroundings.**

72 **Only when a building is considered to be physically suitable for residential re-use, and the building has been marketed for business, part business-part residential or affordable housing, without success, will consideration be given to a residential re-use**



## 8. Conversion of community facilities

- 8.1 **Planning Policy Wales highlights that the economic and social role of local shops and public houses should be taken into account when assessing proposals to change their use to residential, whereas a positive approach should be taken towards schemes for conversion to village shops, and to pubs in villages which have lost such provision. Policy PC12 Community Facilities seeks to retain such uses and further guidance on the requirements of this policy is set out in Retention of Local Facilities SPG.**

## 9. Redundancy of the building

- 9.1 **Many rural buildings will have become redundant from their previous use, perhaps as a result of their size or unsuitability to accommodate and meet modern needs and practices. Where a replacement agricultural building is proposed, any replacement building should be carefully sited and designed so that it sits comfortably within the farm complex and countryside.**

## 10. Design considerations

- 10.1 **The re-use of rural buildings should retain the character which justifies their preservation in the first place and not give the appearance of new inappropriate or harmful development in the countryside. This represents a considerable challenge, particularly for residential conversions where it is necessary to ensure sufficient natural light to ensure adequate internal living conditions.**
- 10.2 **Sympathetic conversions can be difficult to achieve and require considerable design skills and experience. It is advisable to use the services of a qualified architect or surveyor.**



**The RIBA and the RICS can supply details of practices:**

- **Royal Institute of British Architects, 66 Portland Place, London. W1B 1AD (Telephone 020 7307 3700)**
- **Royal Institution of Chartered Surveyors, 12 Great George Street, Parliament Square, London SW1P 3AD (Telephone 020 7334 3781 or 020 7695 1618)**

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In addition, advice can be found in a best practice guide, “Converting Historic Farm Buildings in Wales”, which was produced jointly by Cadw, Welsh Government and Monmouthshire County Council in 2004 and available here [https://cadw.gov.wales/advice-support/historic-assets/listed-buildings/best-practice-guidance?](https://cadw.gov.wales/advice-support/historic-assets/listed-buildings/best-practice-guidance?gl=1*brmnz*ga*NDk1MjczNzA1LjE2OTk4NzQyNzQ.*ga_B2BCVKM874*MTcwMDAzNTgzNS4xLjEuMTcwMDAzNjcwNC42MC4wLjA.#section-caring-for-war-memorials-in-wales)

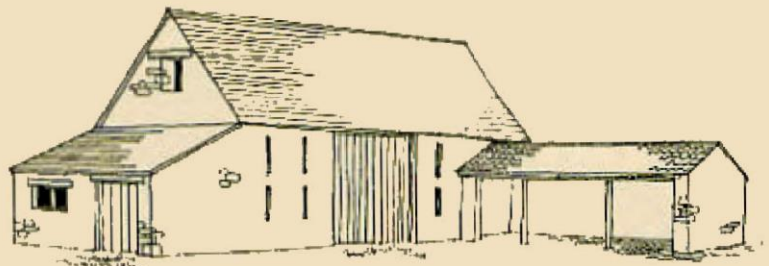
[gl=1\\*brmnz\\*ga\\*NDk1MjczNzA1LjE2OTk4NzQyNzQ.\\*ga\\_B2BCVKM874\\*MTcwMDAzNTgzNS4xLjEuMTcwMDAzNjcwNC42MC4wLjA.#section-caring-for-war-memorials-in-wales](https://cadw.gov.wales/advice-support/historic-assets/listed-buildings/best-practice-guidance?gl=1*brmnz*ga*NDk1MjczNzA1LjE2OTk4NzQyNzQ.*ga_B2BCVKM874*MTcwMDAzNTgzNS4xLjEuMTcwMDAzNjcwNC42MC4wLjA.#section-caring-for-war-memorials-in-wales)

The following diagram from that guidance note illustrates many of the key messages:

### Alternative approaches to converting a typical barn

#### Top:

A typical unconverted barn, with tall doors to the threshing area, few openings for light, and no chimney.



#### Middle:

It is quite possible to create a standard modern house from such a building but the features of the barn have made no contribution to the final product.



#### Bottom:

An alternative design for conversion preserves the original openings and roofline. Plank doors have been retained and glazing kept to a minimum. Domestic requirements such as plumbing are hidden.



## Existing Features

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**Traditional rural buildings tend to have historic and architectural features which are an integral part of their character and appearance. These can be external brick or stone detailing, ventilation slits, external shutters and simple boarded doors and machinery such as winches. It is important that these features are sympathetically retained as part of the scheme of conversion.**

### Roof

- **Avoid raising the roof, altering the pitch, or installing windows in the roof.**
- **Dormers will almost always be inappropriate, particularly where the existing building has no dormers, unless there is a clear precedent for their use on buildings in the locality.**
- **Vent pipes and flues protruding from the roof should be avoided.**
- **Roof slates/tiles should be repaired and re-used where possible.**
- **The number of roof lights should be kept to a minimum and should be flush with the roof surface and not overly large in proportion in relation to the roof.**
- **The position, number and size of solar or photo-voltaic cells should not adversely affect the appearance of the building.**


### Walls

- **Retain existing openings and if further openings are required old blocked up openings should be utilised.**
- **Minimise the use of new window and door openings - where they are essential, ensure they are sympathetic in terms of the overall proportions of the building as well as design, proportions and materials.**
- **Where openings need to be blocked up, sympathetic materials should be used to show where the original opening was located.**
- **Large barn doors should be retained, either by glazing or by using them for garaging.**
- **Avoid fussy, over-elaborate details.**
- **Any repointing should be done using traditional materials and methods to match existing.**





## Windows and Doors

- **Traditional or vernacular windows and doors should be retained and repaired wherever possible.**
  - **New or replacement windows and doors should match originals or reflect the character of the building or those used in buildings in the locality.**
  - **New window and door frames should be recessed at least 10cm to give depth to a facade.**
- 
- **The preference is for traditional wooden windows and doors but in very exceptional circumstances other materials such as upvc or aluminium may be considered subject to its visual appearance, its suitability for the building and the provision and approval of samples'**
  - **Timber should be painted rather than stained although sustainably sourced local hardwoods may be left untreated.**
  - **Modern up and over garage doors will not be acceptable.**

## Internal Features

- **Internal character features such as exposed beams, roof timbers, original fittings and tiled, wooden or stone floors, should be retained and incorporated in the conversion.**
- **The subdivision of internal space where it forms an integral part of the building's character, will not be appropriate.**

## Extensions

- **The emphasis in any conversion scheme is that the building in its present form is suitable for the intended use. At the time of considering a conversion scheme, minor extensions will only be allowed in exceptional circumstances, where they are genuinely required to facilitate a residential conversion (rather than merely adding extra bedrooms) may be acceptable provided that it is ancillary in scale and in keeping with the character and appearance of the building.**
- **Large extensions will not be acceptable.**
- **Conservatories, porches, dormers, and other extensions that are inherently domestic in design will be resisted. (Porches, if required, should be provided internally).**
- **To avoid later extensions which are out of character the Council will remove permitted development rights for alterations to the building.**

- **In the case of residential conversions, garaging and storage requirements should be met through existing buildings or other structures on site.**

### Drainage and Waste

- **Rainwater gutters and downpipes should be kept to a minimum, in black finished cast iron or aluminium.**
- **External pipework such as soil and vent pipes should be positioned internally and kept to a minimum.**
- **Sustainable methods of treatment and disposal of wastewater should be incorporated in the conversion wherever possible.**
- **Refuse storage and recycling facilities should be as unobtrusive as possible.**
- **Schemes for more than 1 unit of accommodation will require a sustainable drainage scheme (SuDS).**

### Heating and Ventilation

- **Chimney stacks are unlikely to be acceptable.**
- **Heating system flues should have a minimal visual impact and be of appropriate material and colour.**
- **Consideration should be given to sustainable sources of heat such as ground / air source heat pumps, provided that the necessary equipment and machinery can be incorporated sensitively within the scheme of conversion.**
- **Underfloor heating can help avoid the clutter often associated with radiators.**

### External areas

- **Curtilages should be kept to the minimum area required for the intended occupation and use of the building and should ideally follow existing boundary features.**
- **Boundaries are best hedged with species native to the locality, or constructed using stone/brick, or simple post and rail fences. Wherever possible existing boundaries should be retained and repaired or supplemented with new planting.**
- **The curtilage should be kept as uncluttered as possible, particularly in terms of residential paraphernalia such as sheds, gazebos, etc. In granting planning permission for residential conversions, the Council may remove permitted development rights for structures that would normally be permitted development.**
- **Use brick or stone setts or cobbles, retaining as much of these features, where existing, as possible.**
- **In the conversion of farm buildings, hard landscaping is appropriate to courtyards and soft landscaping elsewhere, retaining existing features where possible. Hard surfacing outside the original farmyard area should be minimised, and manicured lawns and gardens should also be avoided.**

- **External features of interest associated with the original use of the building should be retained and incorporated into the layout and design of the curtilage.**
- **Parking should be sensitively sited and designed and meet the Council's requirements in SPG Parking Standards.**
- **Vehicular access should be gained from an existing access onto the public highway and should avoid either the creation of new access points or driveways across open land.**
- **Services such as LP gas and oil tanks and septic tanks should be sited unobtrusively and screened.**
- **Storage areas which may be required for employment projects should be sensitively and unobtrusively sited or screened effectively.**
- **Lighting should be appropriately sited and designed and of a brightness which reduces light pollution yet provides adequate levels of security.**

### Sustainability

- **Local materials, such as sustainably harvested timber, that require less transportation should be used where possible in order to reduce the carbon footprint of development.**
- **Efforts should be made to ensure that the carbon footprint of the building be reduced through the highest standards of insulation, energy and water efficiency and renewable energy.**



### Relationship to other buildings and uses

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**Consideration should be given to privacy and overlooking issues where dwellings are located nearby or where the proposed scheme of conversion involves more than one residential unit. SPG Space Around Dwellings provides advice on reasonable minimum separation distances as well as private garden space. Schemes of conversion should also have regard to nearby land uses and operations in terms of ensuring that occupants enjoy satisfactory living standards.**

### Protected species

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**Many old buildings may contain species such as barn owls and bats which are protected under the Wildlife and Countryside Act 1981. The applicant will need to undertake a survey before the application can be considered, and where protected/schedule 1 species are present the LPA will consult the Natural Resource Wales (NRW) when they require further advice on its results and the mitigation measures required. To damage or destroy a bat site is an offence even if committed unknowingly. The County Ecologist will be happy to give advice.**

## Listed buildings and conservation areas

- 10.7 **Some rural buildings being considered for conversion will be listed as being of architectural or historic interest. A separate application for listed building consent must be made for any alterations which would affect the special character of such buildings. The Council's Built Conservation Officer will be able to give advice.**

## Area of Outstanding Natural Beauty

- 10.8 **The Clwydian Range and Dee Valley is designated as an Area of Outstanding Natural Beauty on account of its landscape quality and scenic beauty. Proposals for conversions either in or close by the AONB will need to satisfy the requirements of policy EN5 i.e. where it conserves or enhances the natural beauty of the AONB and its setting. Particularly high standards of design and materials will be required in schemes. The retention and improvement of dark skies at night is an important objective for the AONB. Lighting in new development should be designed to protect the night sky and the nocturnal environment. Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB. NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en> and <https://lucmaps.co.uk/NRWDarkSkies/>**

## Removal of permitted development rights

- 10.9 **Permitted development (PD) rights are certain minor changes which can be made without needing to apply for planning permission. In order to avoid loss of the building's character, the Council will remove PD rights when granting permission for residential conversions through the imposition of a planning condition. This means that any subsequent additions or alterations, such as garages, sheds, extensions, conservatories and roof alterations, will require planning permission.**

## Making a planning application for a conversion

- 10.10 **It is advisable to consult Development Management before submitting a planning application. The Council offers a pre-application service in order to secure advice on a proposed development, prior to the submission of a planning application. Details of the pre-application service can be found here <https://www.flintshire.gov.uk/en/Resident/Planning/Pre-application-Planning-Advice.aspx>. Pre-application consultation with the Planning Archaeologists of the regional Welsh Archaeological Trust is advised, to discuss any impacts arising from conversion and the mitigation that may be necessary. All planning applications should be made using the 1App standard planning application form or submitted on-line. Before submitting an application, reference should be made to the 'Planning Application Requirements' document, available online or from the Planning Services Offices. Conversions will require an application**

**for full planning permission and will specifically require:**

- **A design and access statement.**
- **Elevations and plan drawings, existing and proposed.**
- **Cross sections where relevant.**
- **Landscaping details showing existing and proposed, hard and soft landscaping.**
- **Report by a structural engineer/surveyor.**
- **Marketing report (for residential projects only) and a statement of the efforts made to secure a business re-use for the building.**
- **Ecology survey report.**
- **Flood Consequences Assessment where necessary**

## **Contacts**

**Planning Policy -  
Development Management  
Ecologist  
Built Conservation Officer -**

developmentplans@flintshire.gov.uk  
planningadmin@flintshire.gov.uk  
conservation@flintshire.gov.uk

01352 703213  
01352 703331



## Appendix 1 LDP Policies

### PC1: The Relationship of Development to Settlement Boundaries

New development will be permitted within settlement boundaries as defined on the Proposals Maps, on allocations and within Principal Employment Areas subject to complying within other Plan policies.

Outside settlement boundaries new development will be permitted for:

- a. the specific forms of housing development as set out in policies HN4/HN4-A/HN4-B/HN4-C/HN4-D;
- b. the specific forms of employment development as set out in employment policies;
- c. development related to agriculture, minerals extraction, rural diversification, tourism, leisure and recreation, and existing educational and institutional establishments, provided there is no unacceptable impact on the social, natural and built environment and subject to complying with other Plan policies;
- d. other development which is appropriate to the open countryside and where it is essential to have an open countryside location, rather than being sited elsewhere.

### PE3: Employment Development Outside Allocated Sites and Principal Employment Areas

New industrial, office and warehousing development proposals will be permitted within settlement boundaries where there are no suitable or available allocated sites or sites within Principal Employment Areas and which conform to Policies PC2, PC3 and PC4.

Outside settlement boundaries new industrial, office and warehousing development will be permitted through the:

- i. conversion of existing buildings provided that:
  - a. the building is structurally sound and capable of conversion without major or complete reconstruction, tantamount to the erection of a new building; and
  - b. the building is suitable for the specific re-use; and
  - c. any inherent traditional historic or architectural features of merit in

the building are retained;

ii. development of land on the edge of settlement boundaries of tier 2 local service centres, tier 3 sustainable settlements, and tier 4 defined villages provided that:

- a. there are no more suitable sites or buildings available either within a nearby settlement boundary or on brownfield land; and
- b. it is specifically for a rural activity which cannot be located elsewhere; and
- c. the development is of an appropriate scale and well related to the form of the settlement and does not exacerbate ribbon development or result in a fragmented pattern of development; and
- d. a logical new site boundary is formed, utilising existing features wherever possible, or suitable boundary treatment, supplemented by sensitive landscaping measures.

In all cases the development should not involve external storage or operations which would be harmful to residential amenity or to the character and appearance of the area.

## PE4: Farm Diversification

Proposals for farm diversification comprising the conversion and / or the limited extension of existing buildings, or in exceptional circumstances sensitively located and designed new build, will be permitted where:

- a. the proposed diversification activity is run in conjunction with the main farm enterprise; and
- b. any retail proposals are small scale, and specifically related to the farm operation or farm diversification scheme, and do not unacceptably harm local shops or facilities; and
- c. the proposal does not involve external storage or operations which would be harmful to residential amenity or the character and appearance of the area; and

In the case of new build the buildings are of a scale, siting, design and materials appropriate to the site and surroundings and are well related to existing buildings in the main farm complex.

In the case of conversions the building is suitable for the specific re-use and any inherent traditional historic or architectural features of merit are retained.

## PE12: Tourist Accommodation, Facilities and Attractions

The development of new or extensions to existing self-catering and serviced tourist accommodation and tourist attractions and facilities will be permitted within defined settlements where proportionate in scale to the site and its surroundings.

Outside defined settlement boundaries development will be permitted in the form of:

- a. the extension to existing tourist accommodation and facilities; or
- b. the conversion of existing buildings whereby in accordance with TAN6:
  - i. the building is structurally sound and capable of conversion without extensive rebuilding, extension or alteration tantamount to the erection of a new dwelling;
  - ii. any traditional historic or architectural features of merit are retained; and
  - iii. any curtilage included to provide amenity space or associated parking or other facilities should not harm the character and appearance of the area;
- c. non-permanent accommodation such as chalets, pods, glamping and tent camping sites;
- d. new build tourist attractions and facilities outside settlement boundaries if:
  - i. an open countryside location is essential;
  - ii. the proposal cannot be accommodated within an existing building or within a defined settlement boundary;
  - iii. the development is based upon a geographically restricted resource or activity.

The occupancy of tourist accommodation will be restricted to holiday use only.

## HN4: Housing in the Countryside

Proposals for housing development outside defined settlement boundaries will only be permitted where:

- a. it is for the purposes of agriculture, forestry or other rural enterprise as defined in TAN6,
- b. it involves the replacement of an existing dwelling (see policy HN4-A), or
- c. it involves the subdivision of an existing dwelling, provided the dwelling is capable of subdivision without major extensions tantamount to the erection of an additional dwelling or dwellings, or
- d. it involves the conversion of an existing non-residential building (see policy HN4-B), or
- e. it involves sensitive infill development within an appropriate group of

dwellings in the countryside (see policy HN4-C)

- f. it is for affordable housing exception sites on land adjoining the settlement limits (see policy HN4-D), or
- g. it is for a One Planet Development as defined in TAN6.

## HN4-B: Residential Conversion of Rural Buildings

The change of use to a dwelling of an existing non-residential building outside settlement boundaries will only be permitted where:

- a. if suitable for employment use, the building has been advertised at a reasonable price for sale or lease for an employment generating use, for a period of at least one year without success; or
- b. residential conversion is a subordinate part of a scheme for business re-use; or
- c. the resultant housing would contribute to an identified need for affordable housing to meet local needs.

provided that:

- i. the building is structurally sound and capable of conversion without significant extension, extensive rebuilding, or external alteration, as evidenced by an independent structural survey;
- ii. the building has a traditional character due to its form, bulk and general design, in keeping with its surroundings, and is worthy of retention and re-use;
- iii. the scheme of conversion does not prejudice the character of the building or the rural character of the locality and retains any inherent traditional architectural and historic features which merit retention;
- iv. The creation of a residential curtilage does not have a harmful effect on the character of the countryside;
- v. reasonable standards of living conditions are provided by the proposal.

## Appendix 2:

### The marketing assessment

**In cases where a building is considered to have potential for a business re-use it will be necessary for the applicant to demonstrate that all reasonable efforts have been made to secure a business re-use. Conversions to residential use will not be allowed unless there is clear evidence that there is no demand for a business use. This must explain the attempts made to market the building for business use over a period of at least one year in North Wales, Cheshire and Merseyside at a reasonable price for sale or lease. A planning application will need to be accompanied by a statement addressing the following points:**

#### The marketing exercise must include:

- ◁ **Marketing through a recognised and independent property agent.**
- ◁ **Continuous advertisement on the agents own website and publications.**
- ◁ **Regular advertising for at least a year in a local / regional newspaper / specialist publications / websites (for the first month this should be intensive advertisement and marketing).**
- ◁ **A ‘for sale’ and / or ‘to let’ board on the site frontage throughout the period (any decision to not have a display board must be sufficiently justified).**
- ◁ **Notification to Flintshire County Council’s Economic Development Unit.**

#### Evidence must include:

- ◁ **Copies of the sales particulars.**
- ◁ **Copies of all advertisements with dates.**
- ◁ **Details of when and where the advertisement was displayed by the agent, and the latter’s particulars.**
- ◁ **Details of the number of enquiries / viewings.**
- ◁ **Details of any offers received and an explanation of why they were not accepted.**
- ◁ **A short statement by the agent of the building’s viability for business use in the light of the marketing exercise.**

### Appendix 3 Comments and Responses to updated SPG – Conversion of Rural Buildings

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Clwyd Powys Archaeological Trust (CPAT)	All development proposals to convert a rural building, or alter its curtilage, have the potential to impact the historic fabric, layout and character of a building, particularly buildings which may be of traditional or vernacular interest. These buildings may be listed or non-designated and they may, or may not, be included in the Historic Environment Record. Developers should be encouraged to seek advice as part of a pre-planning consultation with the Planning Archaeologists of the regional Welsh Archaeological Trust to discuss any impacts arising from conversion and the mitigation that	Add bullet point to paragraph 10.10: “It is advisable to carry out Pre-application consultation with the Planning Archaeologists of the regional Welsh Archaeological Trust to discuss any impacts arising from conversion and the mitigation that may be necessary.”	Partly Accepted The SPG already encourages all applicants to apply for Pre- Application Planning Advice. However, it is accepted that development proposals for the conversion of traditional rural buildings are more likely to raise archaeological considerations. Referencing pre-app contact with CPAT is considered reasonable and beneficial.	Add reference to Pre application consultation by adding after the 2nd sentence in paragraph 10.10: <b>‘Pre-application consultation with the Planning Archaeologists of the regional Welsh Archaeological Trust is advised, to discuss any impacts arising from conversion and the mitigation that may be necessary.’</b>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	<p>may be necessary. It should be noted that conversion proposals may attract the need for pre-determination archaeological assessment in accordance with TAN 24 (May 2017) to understand the age, condition, development and importance of the structure in relation to the proposals. In 10.10 it may be worth re-iterating pre-application consultation with the Planning Archaeologists of the regional Welsh Archaeological Trust to discuss any impacts arising from conversion and the mitigation that may be necessary. It would be useful if the application details included a set of clear internal and external photographs to aid a decision on whether the building retains features of traditional vernacular or historic interest.</p>			
Clwyd Powys Archaeological Trust (CPAT)		<p>In paragraph 4.2 include...</p> <p><i>But such schemes of renovation and conversion must be undertaken in a manner which respects the <u>heritage</u>, character,</i></p>	Accepted	<p>Add the word 'heritage' to the final sentence of Paragraph 4.2 so that it reads:</p> <p>" But such schemes of renovation and conversion must be undertaken in a manner which respects the <b>heritage</b>, character, appearance</p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		<i>appearance and features of the original building.</i>		and features of the original building.”
Clwyd Powys Archaeological Trust (CPAT)	Elsewhere in this document there are some good references to retaining any features of historical or architectural interest e.g. 5.2, 6.7 and these are welcomed.	None	Noted	None
Clwyd Powys Archaeological Trust (CPAT)		PE4 should include..... <i>any traditional historic or architectural features of merit are retained</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)		HN4 should include.....it has no adverse impact on any component of the historic environment	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
NRW	We welcome the reference to Protected Species in Section 10.6 of the 'Conversion of Rural Buildings' draft SPG	10.6 update the wording to: <i>“The applicant will need to undertake a survey before the application can be considered, and where protected/schedule 1 species are present, the LPA are to consult Natural Resources Wales (NRW) when they require further advice on its results and the mitigation measures required”</i>	Accepted	Update wording in para 10.6 as follows: 'The applicant will need to undertake a survey before the application can be considered, <b>and where protected/schedule 1 species are present</b> and the LPA will consult the Natural Resource Wales (NRW) <b>when they require further advice</b> on its results and the mitigation measures required'
NRW	We note references are made within the draft SPGs regarding policy and guidance for the Clwydian Range and Dee Valley Area of	There should be consideration in regards to external lighting and it's affect on nocturnal wildlife	Partly accepted The council have an SPG on Planning for the Dark Night Sky in the AONB which addresses lighting in regards to	Change the wording in para 10.8 to: <b>'Lighting in new development should be designed to avoid or reduce light pollution protect the night sky and the nocturnal environment, and the SPG Dark</b>



Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	<p>Outstanding Natural Beauty (AONB). External lighting is referenced in 'Conversion of Rural Buildings'. However, no apparent consideration has been given to external lighting effects on nocturnal wildlife. We therefore advise that this is included.</p>		<p>nocturnal animals. However, it is considered reasonable to make brief</p>	<p><del>Skies provides detailed practical guidance on achieving this'</del></p>
NRW		<p>Suggested wording to be added within the SPG :-                      "For further information on the special qualities and design considerations relevant to the Clwydian Range and Dee Valley AONB we advise including cross references to the Clwydian Range and Dee Valley AONB SPG. New development should be designed to avoid or reduce light pollution and the Dark Skies SPG provides detailed practical guidance on achieving this"</p>	<p>Partly accepted                       Suggest slightly amended additional wording</p>	<p>In para 10.8 delete 'For further information on the special qualities and design considerations relevant to the Clwydian Range and Dee Valley AONB reference should be made to the Clwydian Range and Dee Valley AONB SPG' and add at the end of the para <b>'Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB.'</b></p>
NRW	<p>Paragraph 10.8. We advise ensuring the same information outlined above in relation to Paragraph 6.13 of the New Housing in the Open Countryside SPG is also incorporated into this SPG</p>	<p>In relation to proposals for new housing within the AONB or its setting, we advise highlighting that these proposals should typically be informed and supported by landscape and visual appraisals prepared by suitably qualified and experienced landscape professionals. We also advise stating</p>	<p>Partly accepted                       Suggests slightly amended wording to para 10.8 (in addition to the changes recommended above). However, it is not considered that every conversion of a rural building will require a</p>	<p><i>Change the wording to paragraph 10.8 as follows:                      'The Clwydian Range and Dee Valley is designated as an Area of Outstanding Natural Beauty on account of its landscape quality and scenic beauty. Proposals for conversions either in or close by the AONB will <del>be judged against the conservation and enhancement of its natural beauty.</del> need to satisfy the requirements of policy</i></p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		that an early understanding of the potential landscape and visual impacts of a development can improve integration and ensure adverse effects are reduced and minimised or avoided altogether. Harm can often be avoided by selecting an appropriate site at the outset.	landscape or visual appraisal.	<b>EN5 i.e. <i>whether where it conserves or enhances the natural beauty of the AONB and its setting.</i> Particularly high standards of design and materials will be required in schemes.</b>
NRW	It would be helpful to add a reference in the SPGs to other evidence on landscape, adding that in addition to the existing SPGs on the AONB, further supporting information on the character and qualities of the AONB and its setting can be found in LANDMAP and the NRW online resources on Tranquillity and Place (Tranquillity and Place (arcgis.com)), and Dark Skies (Wales Dark Skies (arcgis.com)).	Add reference to further supporting information in relation to the character of the AONB, information should include LANDMAP and NRW online resource on Tranquillity and Place and Dark Skies, these can be found at arcgis.com	Accepted	Add at the end of para 10.8 the words: ' <b><u>NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at</u></b> <a href="https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en">https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/evidence-to-inform-development-planning/landmap-the-welsh-landscape-baseline/?lang=en</a>  <b><u>and</u></b>  <a href="https://lucmaps.co.uk/NRWDarkSkies/">https://lucmaps.co.uk/NRWDarkSkies/</a>
NRW	We advise that Section 10 (Design Considerations) should include a section on flood risk, since other aspects of design consideration have been included	Suggested text :- "Flood Risk - Conversion of buildings located within flood zones or near watercourses may require a Flood Consequences Assessment. In such cases the LPA will consult Natural Resources Wales. Where a conversion is deemed to be an increase	Partly accepted  Proposals for the conversion of rural buildings in areas of flood risk would need to be judged against policy EN14 of the LDP.  However, it would be appropriate to add a new	Add a new bullet point under para 10.10 ' <b>Flood Consequences Assessment where necessary</b> '

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		<p>or intensification of land use vulnerability (e.g. agricultural to residential conversion), the proposed development will need to fully comply with TAN15.</p> <ul style="list-style-type: none"> <li>o Flood risk betterment including provision of flood resilient design (e.g. raising electricity sockets and use of flood resistant materials) should be fully considered in the design of any like for like conversions. " </li></ul>	<p>bullet point referencing the need for a Flood Consequences Assessment where necessary in the list of planning application documents in para 10.10.</p>	
NRW	<p>We also advise reference to European protected species derogation criteria within the draft SPG's</p>	<p>Add the following criteria within the SPG when mentioning European protected species</p> <ul style="list-style-type: none"> <li>- Requirement to demonstrate the proposal preserves public health or public safety or is imperative for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; and</li> <li>- There is no satisfactory alternative</li> </ul>	<p>Not accepted</p> <p>The objective of the SPG is to provide further clarity on the policy requirements relating to that form of development and to flag up issues that may arise in the consideration of development proposals. Whilst it is reasonable to flag up nature conservation and biodiversity issues, it is not necessary or appropriate for each SPG to go into such detail when the LDP addresses this in EN6 and there is a separate SPG relating to nature conservation which is to</p>	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			be updated and reviewed.	
Penyffordd Community Council	Welcomes the consultation but has nothing further to add in regards to the draft SPGs	None	Noted	None
Planning Strategy Group		In considering representations and responses, Planning Strategy Group on 14/03/24 agreed to amend slightly the outright avoidance of upvc windows and doors, recognising the need to balance cost considerations with the visual appearance of the material and its suitability for the building.	Accepted	Suggest in 'windows and doors' section replace the existing wording 'Avoid the use of UPVC' with ' <b>The preference is for traditional wooden windows and doors but in very exceptional circumstances other materials such as upvc or aluminum may be considered subject to its visual appearance, its suitability for the building and the provision and approval of samples</b> '
Officer led changes	Update reference to Planning Policy Wales 12. PPW 11 is mentioned in Para 5.1.	Update PPW reference	Accepted	Change from PPW11 to PPW12 in paragraph 5.1







## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Homelessness “Independent Review” Report – Neil Morland & Co Housing Consultants
<b>Cabinet Member</b>	Deputy Leader of the Council and Cabinet Member for Housing & Communities
<b>Report Author</b>	Chief Officer (Housing and Communities)
<b>Type of Report</b>	Strategic

### EXECUTIVE SUMMARY

Homelessness is a statutory service that continues to be under significant strain. External factors associated with the cost-of-living crisis and housing market conditions are increasing the levels of homelessness and the risks associated with homelessness for the people of Flintshire. As a result, this places more burden operationally and financially on the Council.

The need to offer accommodation and support to everyone who is homeless and at risk of rough sleeping continues to be a significant capacity and financial challenge. The local private sector housing market has seen significant challenges with fewer properties available each year and many landlords leaving the market, which in turn creates homelessness as properties are being sold and residents are asked to leave, whilst at the same time meaning fewer properties are available to support the relief of homelessness. Social housing supply in Flintshire does not meet the needs of the homeless cohort and social housing re-lets have reduced significantly over the last five years.

As a result of these challenges and an ever-increasing safety net for homelessness through progressive and person-centred legislation in Wales, expenditure on homeless has increased significantly over the last two years. All national and local trend data and projections suggest that demand for homelessness services and homeless accommodation will increase for the foreseeable.

In response to growing concerns over the financial implications of increasing levels of homelessness, the Chief Executive engaged an Independent Consultant (Neil Morland & Co.) to complete a review of the Councils Homelessness Service and the Council’s approach to tackling homelessness more broadly.

The report by Neil Morland is attached (Appendix 1) as is work that is already underway in response to service capacity to meet growing demand (Appendix 4) along with cost projections for a number of ongoing activities that will support the transformation of homeless accommodation through moving away from costly hotel and bed and breakfast provision (Appendix 5).

## RECOMMENDATIONS

1	Informal Cabinet note the findings and recommendations from Neil Morland & Co. and support this report to progress through the committee cycle with regular updates to be shared with Members in terms of progress against recommendations.
2	Informal Cabinet note the additional cost benefit information developed since last Informal Cabinet Meeting that demonstrates the anticipated efficiencies that could potentially be achieved.
3	Informal Cabinet support the principle of cost avoidance and spend to save efficiencies to fund additional staffing capacity within the Housing & Prevention Service through diversifying the homeless accommodation portfolio, to maximise opportunity for successfully reducing spend on homeless accommodation.
4	Informal Cabinet note the need for Houses of Multiple Occupation (HMO's) within the homeless accommodation diversification plans, and offer advice and support to Officers for engagement with local Ward Members and committees such as Planning Committee and Scrutiny Committees to emphasise the importance of supporting well managed HMO's for use as homeless accommodation.

## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE INDEPENDENT HOMELESS SERVICE REVIEW REPORT</b>
1.01	<p><b>Statutory Homeless Services</b> Local Authorities have duties as outlined in the Housing Wales Act 2014 Part 2, with regards to the prevention of homelessness and the management of homelessness when it occurs. Within the accessible documents detailed in section 6 of this report there is more information about the duties within this legislation (Helping Your Understand Housing Wales Act 2014).</p> <p>When considering the core team activities for the Statutory Homeless Team this includes the following:</p> <ul style="list-style-type: none"> <li>• Homeless Case Management</li> <li>• Homeless Accommodation Management</li> <li>• Homeless Accommodation Costs</li> </ul>



1.02	<p><b>Funding Homeless Services</b></p> <p>Whilst a significant amount of funding is provided for prevention activity through the Housing Support Grant (HSG) to offer early intervention and homeless prevention activities in many forms, statutory services cannot be funded through HSG. Therefore the Council Fund is the main source of funding for the delivery of statutory homelessness services. This extends to:</p> <ul style="list-style-type: none"> <li>• Homeless Officers and other staff dealing with Homeless Duties and Assessments</li> <li>• Homeless Accommodation costs through lease charges and hotel accommodation expenditure</li> <li>• Staff costs associated with the management of homeless accommodation</li> <li>• Other costs associated with duties around homelessness such as storage costs and removals when people become homeless</li> </ul> <p>Costs associated with the delivery of homelessness services, and specifically homeless accommodation are the largest growth area of expenditure for the Council and present a significant financial challenge.</p> <p>This is a considerable concern for the Council and as highlighted in the recent Audit Wales Review of Homelessness Services in Flintshire (released January 2024) is unsustainable given the current levels of funding and in the current financial landscape.</p> <p>As part of the Councils response to areas of concern and high levels of expenditure, the Chief Executive engaged independent consultants to review the homeless service.</p> <p>This review by Neil Morland &amp; Co. considers performance, legislative compliance, effectiveness of service delivery and scope for service improvement and efficiency.</p>
1.03	<p><b>Consultancy Services – Neil Morland &amp; Co Housing Consultants</b></p> <p>Neil Morland &amp; Co Housing Consultants are management consultant specialising in public and social housing policy and practice. Formed in 2011, Neil Morland &amp; Co Housing Consultants work throughout Britain and Ireland, with national and local governments, housing associations, voluntary organisations, and others, to improve the quality and potential of housing services and strategies.</p>
1.04	<p><b>Scope of the Independent Review</b></p> <p>Flintshire County Council has commissioned the review to understand the quality of the homelessness and housing advice services it provides and what potential there is for improvement.</p> <p>Like all local authorities, Flintshire County Council has a legal obligation to provide advice and assistance to households who are homeless or threatened with homelessness. Following a recent increase in the levels of homelessness over the past year, Flintshire County Council wants an independent view and assessment of the effectiveness and efficiency of its:</p>

	<ul style="list-style-type: none"> <li>• Housing advice, homelessness prevention and options services</li> <li>• Homelessness strategy, services, and applications</li> <li>• Temporary accommodation for statutory homeless households</li> </ul> <p>The Council wants the review to take account of statutory guidance published by the Welsh Government and positive practice identified in research commissioned by the Welsh Government. It has asked for the following questions to be considered:</p> <ul style="list-style-type: none"> <li>• Is the service achieving its statutory duties?</li> <li>• Is the service meeting the needs of people who are homeless or threatened with homeless?</li> <li>• Is the service delivering value for money?</li> <li>• What is the services track record in delivering improvements?</li> <li>• How well does the service manage performance?</li> <li>• Does the service have capacity to improve?</li> </ul> <p>The Council has asked for a report which includes a synopsis of the current position and operational effectiveness as well as offering clear recommendations for improvement in the context of the challenges all local authorities in Wales particularly and across the UK are facing in delivering homelessness services.</p>
1.05	<p><b>National Policy - Homelessness</b></p> <p>In October 2023 Welsh Government published a White Paper on Ending Homelessness in Wales. Consultation for the White Paper closed on the 16<sup>th</sup> January 2024. Welsh Government have received over 160 formal responses and are now reviewing these responses.</p> <p>A wide range of changes to legislation relating to homelessness are outlined within the White Paper, with the most notable changes outlined below:</p> <ul style="list-style-type: none"> <li>• S66. Statutory Prevention Duty to be triggered at six months risk of homelessness not current two months</li> <li>• Abolition of the priority need test – all eligible residents/households to be offered full duties</li> <li>• Merging of the s73 Relief Duty and s75 Full Duty</li> <li>• Changes to Local Connection Test – variation and additional protections for certain groups of people</li> <li>• Significant changes to the Intentionality Test principles</li> <li>• Firming up the Personal Housing Plan (PHP) process on a legal footing and creating statutory review points for PHP’s</li> <li>• Improved standards relating to homeless accommodation duties</li> <li>• Changes to the Allocations Code of Guidance for Social Housing to increase access for homeless households</li> <li>• Statutory Powers for Local Authorities to compel Housing Associations to take homeless nominations</li> <li>• Extending “partners duties” around homelessness to a wider group of public sector services</li> <li>• Introducing a “duty to identify and refer” homelessness on a range of public sector services</li> </ul>

	<ul style="list-style-type: none"> <li>• Introduction of a Housing Sustainment Duty to support risks of repeat homelessness</li> </ul> <p>There is an acknowledgement from Welsh Government that in light of the ambition of the changes suggested, and the current housing pressures across Wales, there will need to be careful consideration to the cost implications of the suggested changes and the timeframes for the roll out of additional duties within any new Act.</p> <p>All Local Authorities and a wide range of partners across Wales have responded formally and continue to make representations about the current financial challenges associated with Welsh Governments ambitions around ending homelessness at the present time, and in light of additional statutory responsibilities suggested within the White Paper.</p>
1.06	<p><b><u>Key Conclusions of the Independent Review</u></b></p> <p>The key findings and conclusions of the review will be outlined by Neil Morland and Tim Grey from Neil Morland &amp; Co. during the meeting but in summary the conclusions are as follows:</p> <ul style="list-style-type: none"> <li>• The Council is achieving its statutory homelessness duties. Corporate culture and governance arrangements concerning homelessness are excellent. It is easy to access homelessness assistance. Online advice and information for service users' needs to be improved. The Council does not experience high volumes of complaints about its homelessness and housing advice service. Consultation and feedback mechanisms for service users are in place but it's unclear how any feedback is put to use and whether people know about what changes have happened as a result of sharing their views.</li> <li>• The Council is meeting the needs of people who are homeless or threatened with homelessness. The provision of temporary accommodation that is accessible for people with physical disabilities, is demonstrative of the Council's ethos towards customer care. Nevertheless, service users should be more involved in influencing and improving service. Partnerships are focused on the needs of service users. There is an effective approach to dealing with people experiencing domestic abuse. There is good awareness of and response to legislative changes.</li> <li>• Spending on homelessness duties is not always delivering value for money. Council costs are comparable to others, allowing for local contacts, performance, and policy choices. In the longer term, value for money can be improved through more partnership working and better procurement of temporary accommodation.</li> <li>• The current leadership team overseeing homelessness and housing advice service clearly have delivered improvements.</li> <li>• The Council does well to manage the performance of its homelessness and housing advice service. There are numerous plans in place to make further improvements, including the rapid housing transition plan and recommendations made by Audit Wales. A dedicated staff member</li> </ul>

	<p>needs to be employed to ensure aims and future plans are coordinated, robust and delivered. There are arrangements and a culture in place to support continuous improvement of the homelessness and housing advice service.</p> <ul style="list-style-type: none"> <li>The homelessness and housing advice service does have the capacity to improve, provided it is equipped with sufficient financial, staffing and IT resources. Spending on homelessness, needs to be reflective of casework activity and temporary accommodation levels. The proposed staffing restructure needs to be approved and progressed as quickly as possible. The in-house IT system needs to be swiftly progressed to reach its full potential or an off the shelf model needs to be purchased.</li> </ul>
1.07	<p><b>Independent Review Recommendations</b></p> <p>As referenced within the Review Report, the Council is already aware of much of what has been said in the report and has set out a large number of areas where it wishes to make changes and improvements, notably in the Rapid Rehousing Transition Plan.</p> <p>That said the Review Report rightly provides a number of recommendations (11 in total) that the Council should prioritise in response to the current challenges faced around homelessness in Flintshire, these are summarised at appendix 2.</p>
1.08	<p><b>Responding to the Independent Review</b></p> <p>Regular Updates will be provided to the Ending Homelessness Board who will oversee not only this Improvement Plan but also the Councils Rapid Rehousing Transition Plan which is required by Welsh government.</p> <p>Where appropriate the established delivery groups of the Ending Homeless Board (Appendix 3) will be tasked with actions to implement changes to service delivery that are required across the Council to better respond to the current challenges around homelessness. Whilst many of these challenges are housing supply focussed the report supports the fact, they are not exclusively housing related and improved collaborative working across services is required to prevent more homelessness, manage residents expectations and deliver safe services for people experiencing homelessness..</p> <p>As outlined in the Council’s Rapid Rehousing Transition Plan all services within the Council and other public sector services will need to work together to “ensure homelessness is everyone’s business” in Flintshire. The Ending Homelessness Board is leading on this agenda and a Rapid Rehousing Strategic Co-ordinator is soon to be appointed using Grant Funding from Welsh Government.</p>

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	Detailed below are the cost implications associated with the delivery of Homelessness Services in Flintshire:

**Revenue:** Statutory Homeless Services are funded through Council Fund. Additional duties placed on Councils and the current demands on services and emergency housing is resulting in additional expenditure and budget pressures when the Council is already facing significant financial challenges. Whilst some grant is available for 2023-2024 for emergency housing and other discretionary funding, this is not sufficient to cover the full scale of the financial risk.

The Neil Morland review picks up on insufficient staffing capacity for homelessness and the restructure of the Housing & Prevention Service. Whilst Housing Support Grant (HSG) can be utilised to compliment statutory homeless services, they cannot exclusively fund homeless services.

Significant work in recent months has been undertaken to review modelling of costs associated with delivery of homelessness services in Flintshire, with a sharp focus on reducing spend on homeless accommodation. Efficiencies can be achieved through better prevention work to avoid more people becoming homeless, and through the planned transformation of homeless accommodation. By creating other forms of homeless accommodation, we can move away from costly and unsuitable homeless accommodation.

However, efficiencies through using alternative forms of homeless accommodation cannot be truly maximised if the service is not appropriately staffed. More information about this can be found within the Risk and Mitigations section of this covering report (3.00 Impact Assessment and Risk Management).

The Housing & Prevention staff structure and associated cost are attached as Appendix 4. Appendix 4 also outlines the increase in demand for service through homeless caseloads and households in homeless accommodation data.

Whilst the Neil Morland review recommends 30+ Homeless Officers and 12 Temporary Accommodation Officers, levels of staffing outlined in Appendix 4 are more realistic. The planned restructure will bolster current staffing levels and will create opportunity for better quality services for residents through prevention activities and safe and effective management of alternative forms of homeless accommodation. 58% of the expenditure linked to the increase in staffing is covered through HSG and 42% is Council Fund.

Financial modelling has been undertaken for the homeless service and the potential reduction to the current pressure in the medium term financial strategy for 2025/26 of £7.500m. The financial options are as follows:

1. Implementation of the staffing structure (Appendix 4) to improve homeless prevention outcomes and maximise housing costs recovery rates.
2. Increased number of alternative properties including utilising the D2 model

	<p>3. Increased number of HRA properties including house shares utilising TACP funding where available</p> <p>The potential efficiencies of these recommended measures could bring the pressure for 2025/26 within a range of £3.500m - £5.500mm therefore reducing the pressure by a minimum of £2.00m however, it is important to note that this is based on demand levels staying within the range we have seen over the last 18 months and any spikes in demand could further increase the financial pressure to the service.</p> <p><b>Capital:</b> Creating supply of housing will require significant capital investment and have been flagged early within the Councils Capital Programme. The Flintshire Housing Prospectus has been approved by Council and shared with our Housing Partners and Social Housing Grant supports ambitious plans to increase housing supply at scale and pace. The Transitional Accommodation Capital Programme (TACP) grant regime also supports the purchase and redevelopment of accommodation for the purpose of move on accommodation or additional homeless accommodation. A summary of progress to date and further plans to increase supply of homes through the TACP grant is in Appendix 6.</p> <p><b>Human Resources:</b> The Homeless Team has seen a significant amount of turnover in staff in recent years. Further recruitment as part of the Housing &amp; Prevention Service restructure is required as referenced above and within Appendix 4. Opportunities to fund posts and salaries is being maximised through Housing Support Grant and other funding streams such as the Rapid Rehousing Co-ordinator Funding.</p> <p>Levels of sickness and work-related stress is closely monitored within this high demand service. Vicarious trauma because of difficult cases which can cause significant distress to staff. This is managed through a range of additional support activities on top of the Councils Corporate Employee Assistance Programme (Vivup). Additional staff require additional capacity for supervision and management to ensure staff are supported with their casework and for their well being.</p> <p>Page 16 onwards of Appendix 1 titled Staffing Structure highlights the challenges and potential response to adopting safe staffing levels for casework and accommodation management based on current levels of homeless service demand.</p>
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<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	<p>The following risks and mitigations have been identified by way of control measures:</p> <p><b>Risk:</b> Failure to respond corporately to the issues highlighted in the Independent Review will likely result in further high-cost expenditure on homelessness and mean the Council will not be able to meet its statutory duties around homelessness in the the short term and also in the long term as legislative changes occur.</p>

**Mitigations:**

- Respond to the findings of the Independent Review and the associated Recommendations (11 in total).
- Delegate responsibility to the Ending Homelessness Board to oversee the response to the Independent Review and ensure regular updates to COT, Scrutiny Committees and Cabinet
- Ensure services associated with homelessness activity are appropriately targeted and delivered to support homelessness agenda e.g. Social Services for vulnerable people experiencing homelessness, Voids Repairs for timely return of empty properties for HRA housing allocations to homeless households etc

**Risk:** Workforce will be insufficient to meet levels of demand for homeless services and will fail to deliver on the Councils statutory obligations for homelessness and the Rapid Rehousing Agenda.

**Mitigations:**

- Achieve efficiencies through cost avoidance on hotel accommodation through additional prevention work, and management of alternative forms of homeless accommodation by recruiting additional staff.
- Support the Housing & Prevention Service restructure on principle of invest to save (£396,333 in staff to realise in excess of £1million efficiencies).
- Recruit and retain a sufficient scale of workforce, whom are appropriately skilled and trained are available to deliver homelessness and temporary accommodation services.
- Constantly review levels of homeless cases and homeless accommodation to flex with changes in service demand

**Risk:** Providing poor services to people who experience homelessness and exposing them to significant disruption (out of county placements) and potential risk in homeless accommodation settings through unsafe housing management practices.

**Mitigations:**

- Invest in additional staff for the Homeless Team to enable safe caseloads, improved casework and prevention outcomes (see p16 onwards Appendix 1 – Staffing Structure)
- Ensure that additional accommodation taken on to the Councils homeless accommodation portfolio, has sufficient staff to adhere to property compliance for health & safety and industry standards.
- Budget for repairs and maintenance within those additional properties taken on to the homeless portfolio to maintain safe housing conditions.

**Risk:** Continue to be reliant on costly B&Bs and Hotel Provision as the main source of homeless accommodation and as a result costs continue to escalate creating further budget pressures as a result of barriers to homeless accommodation diversification (example HMO applications refused for homeless accommodation).

	<p><b>Mitigations:</b></p> <ul style="list-style-type: none"> <li>• Adopt the options outlined within Appendix 5 and monitor their impact and potential for increasing scale in future years.</li> <li>• Develop a communication strategy for engagement with elected members so they understand the benefits of well managed HMO's with the homeless accommodation portfolio.</li> </ul> <p><b>Risk:</b> People placed in homeless accommodation are not supported or managed and as a result become more vulnerable or challenging and as a result place additional pressures on other services and the community (example: residents causing anti social behaviour creates demand for Police and FCC Housing Officers along with disruption within neighbourhoods).</p> <p><b>Mitigations:</b></p> <ul style="list-style-type: none"> <li>• Ensure that additional accommodation taken on to the Councils homeless accommodation portfolio, has sufficient staff levels to ensure residents are managed in line with the terms and conditions of their occupancy agreements.</li> <li>• Support the planned restructure to ensure capacity within the workforce to meet the needs of vulnerable people experiencing homelessness.</li> </ul>										
3.02	<p><b>Ways of Working (Sustainable Development) Principles Impact</b></p> <table border="1" data-bbox="320 1059 1385 1787"> <tr> <td data-bbox="320 1059 743 1207">Long-term</td> <td data-bbox="743 1059 1385 1207">Positive – Increase in targeted support and alternative delivery methods to ensure services are inclusive for all.</td> </tr> <tr> <td data-bbox="320 1207 743 1391">Prevention</td> <td data-bbox="743 1207 1385 1391">Prevention - Preventing homelessness through ensuring there is adequate support and accommodation to cater for a range of peoples needs.</td> </tr> <tr> <td data-bbox="320 1391 743 1503">Integration</td> <td data-bbox="743 1391 1385 1503">Positive – Increased integration between services and partner organisations.</td> </tr> <tr> <td data-bbox="320 1503 743 1644">Collaboration</td> <td data-bbox="743 1503 1385 1644">Positive – Increased collaboration between services, partner organisations and service users.</td> </tr> <tr> <td data-bbox="320 1644 743 1787">Involvement</td> <td data-bbox="743 1644 1385 1787">Positive – Service user involvement to help shape effective services so that support is timely and person centred.</td> </tr> </table>	Long-term	Positive – Increase in targeted support and alternative delivery methods to ensure services are inclusive for all.	Prevention	Prevention - Preventing homelessness through ensuring there is adequate support and accommodation to cater for a range of peoples needs.	Integration	Positive – Increased integration between services and partner organisations.	Collaboration	Positive – Increased collaboration between services, partner organisations and service users.	Involvement	Positive – Service user involvement to help shape effective services so that support is timely and person centred.
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3.03	<p><b>Well-being Goals Impact</b></p> <table border="1" data-bbox="320 1861 1385 2078"> <tr> <td data-bbox="320 1861 743 2078">Prosperous Wales</td> <td data-bbox="743 1861 1385 2078">Positive – With additional funding more jobs will be created to deliver housing related support on a greater scale within Flintshire. Opportunities to support the labour market through training and development opportunities are being</td> </tr> </table>	Prosperous Wales	Positive – With additional funding more jobs will be created to deliver housing related support on a greater scale within Flintshire. Opportunities to support the labour market through training and development opportunities are being								
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		considered in conjunction with colleagues from Communities for Work.
	Resilient Wales	Positive – Creating services that are prevention focused and build resilience to avoid households becoming homeless
	Healthier Wales	Positive – Reduction in rough sleeping, overcoming health inequalities associated with homelessness and poor housing conditions and investment to increase targeted support for people with housing issues and mental ill-health
	More equal Wales	Positive – Services are delivered in a way that are inclusive for all. Consideration has been given to local and regional gaps in provision for often marginalised communities such as the homeless, those with mental health or substances issues and the LGBTQ+ community.
	Cohesive Wales	No Impact
	Vibrant Wales	No impact
	Globally responsible Wales	No impact

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Consultation with the workforce and partners has been undertaken as part of the Independent Review
4.02	Engage with residents to ensure there is a culture of involvement and service user insight within homelessness services (recommendation from Audit Wales and Neil Morland & Co.) Work is already underway on a Resident Involvement Framework with Shelter Cymru Take Notice Service.
4.03	Consultation with staff and the Unions as part of the restructure of the Housing & Prevention Service.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1: Neil Morland & Co Independent Review Report Appendix 2: High Level Recommendations (11) Appendix 3: Ending Homelessness Board Governance Structure Appendix 4: Housing & Prevention Service – Revised Structure and cost

	Appendix 5: Homeless Accommodation Transformation Activities Appendix 6: TACP Progress and Pipeline Summary
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<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	<a href="#">Neil Morland &amp; Co - Housing Consultants</a>
6.02	<a href="#">Ending Homelessness in Wales: High Level Action Plan 2021-2026</a>
6.03	<a href="#">Ending Homelessness White Paper Responses</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Martin Cool, Housing & Prevention Service Manager <b>Telephone:</b> 07880 423234 <b>E-mail:</b> <a href="mailto:martin.cool@flintshire.gov.uk">martin.cool@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<p><b>Rough Sleeper:</b> A person who is homeless and who sleeps without adequate shelter, typically on the streets of a town or city. Includes people living in sheds, outbuildings etc. People who sleep rough or are at risk of sleeping rough now meet priority need thresholds (see 8.03).</p> <p><b>Housing Support Grant:</b> Early intervention housing related support programme targeted at people in housing need and at risk of homelessness. The HSG programme brings the historic funding streams for Supporting People, Homelessness Prevention and Rent Smart Wales grants into 1 single funding stream.</p> <p><b>Priority Need:</b> Categories of people who are protected the most when assisting people under the Housing Wales Act 2014 homeless legislation. Those in Priority Need are owed accommodation duties.</p> <p><b>Transitional Accommodation Capital Programme:</b> Grant funding to bring forward good quality longer term accommodation at pace to support everyone in housing need (those in temporary accommodation and initial accommodation for resettlement).</p> <p><b>Rapid Rehousing:</b> Rapid Rehousing is an internationally recognised approach which ensures that anyone experiencing homelessness can move into a settled home as quickly as possible, rather than staying in temporary accommodation for long periods of time.</p> <p><b>Houses of Multiple Occupation:</b> House in Multiple Occupation often abbreviated to HMO is a technical term to signify that people of multiple households (i.e. not a single family unit) are living in the same building.</p>

	Typically, each resident has their own rental contract for the period of occupation.
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# A review of Flintshire County Council's homelessness and housing advice services

July 2024



**Tim Gray & Neil Morland**



**NEIL MORLAND CO**  
HOUSING CONSULTANTS

## **Flintshire County Council**

Flintshire County Council is a unitary local authority, founded on 1st April 1996, that is located in North East Wales. Flintshire County Council administers the full range of local government services for the area, including administering public law homelessness functions.

## **Neil Morland & Co Housing Consultants**

Neil Morland & Co Housing Consultants are management consultant specialising in public and social housing policy and practice. Formed in 2011, Neil Morland & Co Housing Consultants work throughout Britain and Ireland, with national and local governments, housing associations, voluntary organisations and others, to improve the quality and potential of housing services and strategies.

**Acknowledgement:** This report was commissioned and funded by Flintshire County Council. Thanks go to Vicky Clark and Martin Cooil for their invaluable assistance during the research and writing of this report.

**Disclaimer:** All views and any errors contained in this report are the responsibility of the authors. The views expressed should not be assumed to be those of Southwark Council or any of the persons who contributed to this report. The information contained in this report is accurate at the date of publication. The information in this report should not be considered financial or legal advice. Southwark Council, nor Neil Morland & Co Housing Consultants, are not authorised to provide financial or legal advice. No responsibility can be taken by the commissioners or the authors of this report for any loss or damage incurred, by any persons or organisation acting or refraining from action as result of any statement in this report.

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# Executive Summary

## Key findings

The Council seeks to effectively communicate its service users, potential service users, community and stakeholders about its homelessness and housing advice service. However, consultation could be carried out about the quality and effectiveness of the service with service users and stakeholders.

The service is responsive to the diversity of the community. More could be done to make sure that all users, or potential users have fair and equal access to the service.

A provision of good quality effective and appropriate housing advice has been developed. More homelessness prevention and options to help people remain in their existing home or obtain accommodation, would be beneficial.

Appropriate advice is provided to all homeless people and those at risk of homelessness, across all tenures. There should be an increase in provision to help people remain in their existing home, whenever safe to do so.

The Council has strategies and plans set out activities to prevent homelessness and make sure there is sufficient accommodation and support available for people who will become homeless or who are at risk of becoming so. The local rapid rehousing strategy set up plans for access to appropriate accommodation for those who no longer require supported housing or are ready to move from temporary accommodation.

Achieving local objectives to tackle homelessness will only be effective if there are sufficient staffing resources, both operationally and strategically, to deliver local action plans.

The service is efficient, effective and customer focused and homelessness casework is administered in line with the relevant legislation, codes of guidance priority needs orders and good practice.

The provision of temporary accommodation for homeless household is not always appropriate and not always suitable. Furthermore, there is not enough support for those placed in it.

The Council needs a plan to reduce the number of households in bed and breakfast accommodation, as this provision is costly.

The Council could better maximise the impact of its resources for homelessness and housing advice services, by making better use of its own housing stock.



The Council could achieve better value for money by establishing partnerships and improving its performance to service users. For example, temporary accommodation could be procured with neighbouring local authorities, collection of charges from service users could be improved.

The Council could more smartly procure temporary accommodation to achieve better value for money, which would also benefit households who are homeless.

Overall, the Council operates a good quality homelessness and housing advice service, and there is excellent potential for the service to further improve.

## **Key conclusions**

The Council is achieving its statutory homelessness duties. Corporate culture and governance arrangements concerning homelessness are excellent. It is easy to access homelessness assistance. Online advice and information for service users' needs to be improved. The Council does not experience high volumes of complaints about its homelessness and housing advice service. Consultation and feedback mechanisms for service users are in place but it's unclear how any feedback is put to use and whether people know about what changes have happened as a result of sharing their views.

The Council is meeting the needs of people who are homeless or threatened with homelessness. The provision of temporary accommodation that is accessible for people with physical disabilities, is demonstrative of the Council's ethos towards customer care. Nevertheless, service users should be more involved in influencing and improving service. Partnerships are focused on the needs of service users. There is an effective approach to dealing with people experiencing domestic abuse. There is good awareness of and response to legislative changes.

Spending on homelessness duties is not always delivering value for money. Council costs are comparable to others, allowing for local contacts, performance and policy choices. In the longer term, value for money can be improved through more partnership working and better procurement of temporary accommodation.

The current leadership team overseeing homelessness and housing advice service clearly have delivered improvements.

The Council does well to manage the performance of its homelessness and housing advice service. There are numerous plans in place to make further improvements, including the rapid housing transition plan and recommendations made by Audit Wales. A dedicated staff member needs to be employed to ensure aims and future plans are coordinated, robust and

delivered. There are arrangements and a culture in place to support continuous improvement of the homelessness and housing advice service.

The homelessness and housing advice service does have the capacity to improve, provided it is equipped with sufficient financial, staffing and IT resources. Spending on homelessness, needs reflective of casework activity and temporary accommodation levels. The proposed staffing restructure needs to be approved and progressed as quickly as possible. The in-house IT system needs to be swiftly progressed to reach its full potential or an off the shelf model needs to be purchased.

# Introduction

This review has been carried out by Neil Morland & Co housing consultants at the request of Flintshire County Council, and looks at the operation and performance of the Council's homelessness and housing advice service.

The review takes place at a time of great change and at a time of exceptional pressure for homelessness service across Wales.

In the recent past the Covid pandemic changed the landscape for the delivery of homelessness and housing advice services across Wales radically and for the long term. This includes a shift in how services are delivered and how communication is managed. It also includes a profound change in the expectation of the Welsh government on local authorities in respect of accommodating single people who would not previously have been in priority need.

The Welsh government has also required every local authority in Wales to produce a Rapid Rehousing Transition Plan over the period 2022 to 2027, and in its recent white paper has confirmed its intention to abolish homelessness priority need altogether.

This new requirement to accommodate more single people has coincided with increased homelessness demand, especially as a result of more evictions from the private rented sector and the cost of living crisis.

Across Wales the combination of these and other changes has led to an increase in the use of temporary accommodation and especially to a marked increase in the use of bed and breakfast or hotel accommodation, especially for single people.

In Flintshire this has been exacerbated by the acute lack of 1-bed accommodation available to let in either social housing or in the private rented sector, leading to a recent period in which the use of hotels has grown rapidly and at great expense to the Council.

This review follows the review of the homelessness and housing advice service recently completed by Audit Wales, and comes at a time of transition following the completion of the Flintshire Rapid Rehousing Transition Plan and the establishment of the Flintshire Ending Homelessness Board, and prior to the implementation of the Council's planned restructure of the homelessness and housing advice service.

## Scope and methodology

Flintshire County Council has commissioned the review in order to understand the quality of the homelessness and housing advice services it provides and what potential there is for improvement.

Like all local authorities, Flintshire County Council has a legal obligation to provide advice and assistance to households who are homeless or threatened with homelessness. Following a recent increase in the levels of homelessness over the past year, Flintshire County Council wants an independent view and assessment of the effectiveness and efficiency of its:

- Housing advice, homelessness prevention and options services
- Homelessness strategy, services and applications
- Temporary accommodation for statutory homeless households

Flintshire County Council wants the review to take account of statutory guidance published by the Welsh Government and positive practice identified in research commissioned by the Welsh Government. Flintshire County Council has asked for the following questions to be considered:

- Is the service achieving its statutory duties?
- Is the service meeting the needs of people who are homeless or threatened with homelessness?
- Is the service delivering value for money?
- What is the services track record in delivering improvements?
- How well does the service manage performance?
- Does the service have capacity to improve?

Flintshire County Council has asked for a report which includes a synopsis of the current position and operational effectiveness as well as offering clear recommendations for improvement in the context of the challenges all local authorities in Wales particularly and across the UK are facing in delivering homelessness services.

In order to deliver this review, Neil Morland and Co has carried out the following activities: Semi-structured one-to-one interviews key Flintshire County Council officers across a range of services and with external stakeholders including Shelter, probation, substance misuse services and housing association partners.

Focus groups with key stakeholders, including officers working in the homelessness and housing advice service, external and internal partners, and service users at the Glanrafon homelessness hub.

Analysis of information provided to applicants.

Analysis of homelessness data published by the Welsh Government and the Council to compare levels of homelessness in Flintshire to other Welsh local authorities.

Analysis of a selection of Flintshire's policies, procedures and homelessness decision letters.

Examination and analysis of data provided by the Council in a variety of areas.

Consideration of relevant Council plans, reports, documents and financial information  
Site visits to temporary accommodation.

Regular consultation and dialogue with service heads throughout the review period.

We would like to express our thanks for the time given by council officers, external partners and service users to meet with us and to provide detailed written information.

# Findings

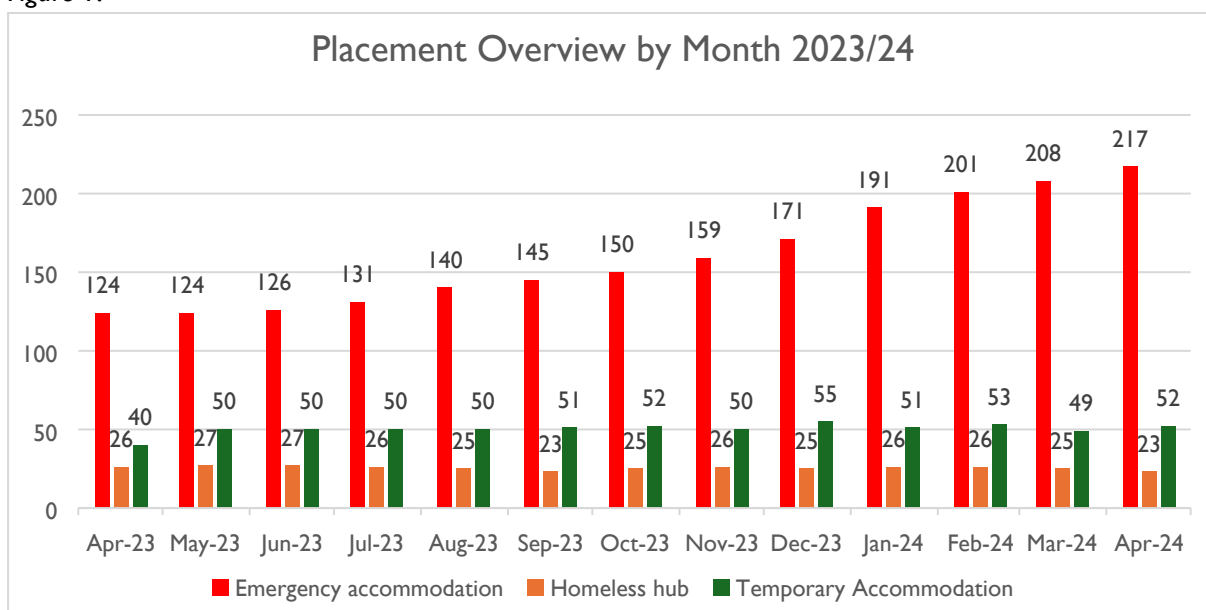
## Flintshire in context

The clear and overarching problem in Flintshire is that the number of households in temporary accommodation has been rising quickly and that this increase has almost entirely been in the use of Bed & Breakfast (B&B) or other hotel accommodation.

The number of households in emergency accommodation rose by 75% from 124 in April 2023 to 217 in April 2024, with 191 of those placements in hotel accommodation, 15 in holiday accommodation and 11 in Mostyn Lodge, a mid-19<sup>th</sup> century inn that was latterly converted into a hotel, which today provides temporary accommodation for single homeless men.

If this rate of expansion were to continue unchecked, then there could be over 360 households in hotels by April 2026.

Figure 1.



Why is this the case?

Comparing Flintshire with other local authorities in Wales, the published data suggests that temporary accommodation in Flintshire is still below the Wales average per 10,000 households. At the end of September 2023<sup>1</sup> there were 28 households per 10,000 in TA in Flintshire, compared with 41 for Wales as a whole.

<sup>1</sup> The latest period for which household TA figures are available  
<https://statswales.gov.wales/Catalogue/Housing/Homelessness/Temporary-Accommodation>

However, TA in Flintshire has been growing faster than in Wales as a whole, with a 50% increase in the number of individuals in TA between April 2023 and February 2024 in Flintshire compared to an 11% increase in Wales over the same period.

It is also true that a higher percentage of TA in Flintshire is B&B compared to the Wales average. In February 2024 58% of the individuals in TA in Flintshire were in B&B compared with 33% for Wales. 52% of children under 16 in TA in Flintshire were in B&B compared to 24% for Wales.

And as Figure 1. shows, this percentage is currently growing every month.

There are limitations in comparing Flintshire’s recent performance on homelessness with other local authorities in Wales as the relevant data on homelessness presentations, homeless prevention and homelessness relief outcomes is only available for other local authorities up to the end of March 2023. As the rapid growth in TA in Flintshire has primarily happened in 2023/24, it would be helpful to have benchmarking information available for that period in order to make a comparison.

Nevertheless, it is possible to discover a partial picture of how Flintshire ranks across Wales on a number of measures, based on the published statistics.

Figure 2.

Period	Measure	Flintshire	Wales	Flintshire rank in Wales (out of 22 LAs)
2022/23	Households threatened with Homelessness within in 56 days -Rate per 10,000 households (Section 66)	48	67	12th highest
2022/23	Households successfully prevented from Homelessness – Percentage (%) (section 66)	59%	59%	8th highest
2022/23	Households assessed as homeless and owed duty to secure – Rate per 10,000 households (Section 73)	49	91	22nd highest (i.e. lowest)
2022/23	Households successfully relieved from Homelessness – Percentage (%) (Section 73)	41%	30%	6th highest
Feb-24	Individuals in TA per 10,000 households	55	85	14th highest
Feb-24	Dependent children in TA per thousand households	8	23	18th highest
Feb-24	Individuals in B&B and hotels per 10,000 households	32	28	8th highest
Feb-24	Dependent children in B&B and hotels per 10,000 households	4.3	5.5	10th highest
Feb-24	Percentage of individuals in TA who are in B&B	58%	33%	8th highest

Feb-24	Percentage of dependent children in TA who are in B&B	52%	24%	4th highest
Oct 23 to Feb 24	Growth in number of individuals in TA per 10,000 households between October 2023 and February 2024	10	3	4th highest

In addition to these statistics, Flintshire only had one reported individual sleeping rough in February 2024 and no more than 4 people reported sleeping rough at any time since April 2023.

It is also noteworthy that, although the way the statistics are presented makes ranking difficult in these areas, in the period from April 2023 to September 2023, Flintshire had a far higher proportion of applicants than the Wales average where homelessness duties had ended due to applicant non-cooperation and also where applicants were assessed as not in priority need for assistance.

Flintshire also had slightly higher than average numbers of households found to be not homeless or threatened with homelessness compared with other Wales authorities.

Taken together, this statistical evidence leads to a number of conclusions:

- When considered as a proportion of the population, in 2022/23 Flintshire had a lower-than-average number of households owed a S66 prevention duty and the lowest number of households in Wales owed a S73 relief duty.
- However, this has changed in 2023/24. Based on a comparison of the published six-month figures for April to September 2023 and for the year 2022/23, the number of S66 duties in Flintshire grew by 45% whilst the number of S66 duties in Wales fell by 1%. The number of relief duties in Flintshire climbed by 64% in Flintshire but by only 4% in Wales.
- Therefore, although faced with relatively low demand in 2022/23 compared to the rest of Wales, homelessness demand, as measured by the number of S66 and S73 duties owed, has risen much faster in Flintshire than in Wales in 2023/24.
- Flintshire was better than average in Wales at both successful homelessness prevention and especially successful homelessness relief in 2022/23. Also, based on the Flintshire council 2023/24 end of year performance report, the percentage of successful homelessness preventions and reliefs was maintained in 2023/24 compared to the previous year.



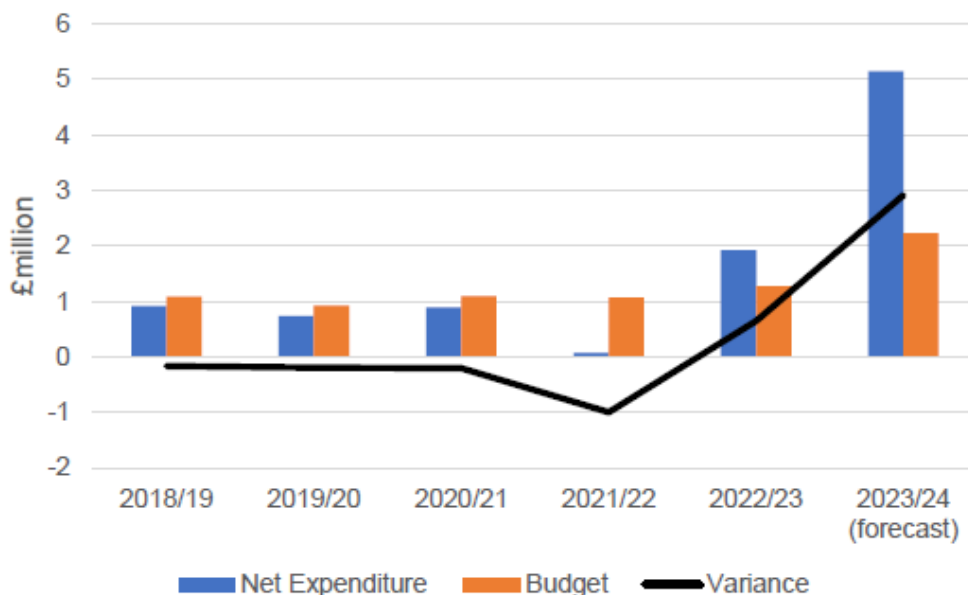
- Although growing faster than in Wales as a whole, the number of people in TA per 10,000 households was still lower than the Wales average in February 2024 and much lower for the number of dependent children in TA.
- However, the percentage of both adults and especially children in TA who are in B&B or hotel accommodation are well above average, with the percentage of children in TA who are in B&B or hotel accommodation, the 4th highest in Wales.
- The growth in the number of people in TA in Flintshire over the 4 months from October 2023<sup>2</sup> to February 2024 was the 4th highest in Wales per 10,000 households.

## Financial situation

The December 2023 Audit Wales report on Flintshire’s homelessness service analysed net expenditure by Housing Solutions between 2018/19 and the forecast spend for 2023/24. As shown in Figure 3, expenditure increased significantly in 2022/23 from the Covid related low in 2021/22 and then dramatically in 2023/24.

Figure 3.

Housing Solutions spend, 2018-2019 to 2023-2024 (forecast)



The main reason for the rapid rise in expenditure is the increased costs of hotel accommodation matching the large increase in the usage of this accommodation in 2023/24.

<sup>2</sup> October 2023 is the earliest date these published figures

Costs of hotel accommodation used by Flintshire range from block booked accommodation at an average of £89 per night to over £125 per night, with unit costs tending to increase as more supply is required and the supply of less expensive accommodation is exhausted.

Approximately £9.40 per night is eligible for Housing Benefit subsidy for hotels, meaning a net cost to the council of approximately £95 per night on average, which may be expected to rise with inflation over time.

As a result, each B&B or hotel room costs the council approximately £35,000 net per year without including management and support costs, or any shortfall in income collection.

On this basis, the approximately 235 rooms per year currently in use cost the council over £8m per year.

If B&B use continues to rise at the current rate, the council estimates a potential cost in 2025/26 of around £14.7m which would include a budget pressure of around £11.2m.

Clearly, costs of this kind are extremely difficult for Flintshire to absorb, and urgent action is needed to reduce them.

The Council has identified a number of options with the potential to reduce the use of B&B, which are discussed later in the report.

## **Audit Wales report**

The Council's homelessness service was reviewed by Audit Wales between April 2023 and October 2023, with a report published in December 2023.

The review was attempting to answer the question: "In seeking to address homelessness, is the Council effectively adapting its strategic intent to deliver a long-term sustainable preventative approach?"

In summary, Audit Wales concluded that "Flintshire Council is delivering a high-quality service, but this is unsustainable with its current funding".

Underpinning this conclusion, as well as highlighting the financial pressures shown in Figure 3. above, the report observed that:

- The Council understands the factors impacting on the homelessness situation it currently faces and how these factors are changing over time, and that it draws on

evidence from a range of internal and external sources.

- The homelessness service works well with partners and has communicated its strategy and objectives across service areas and with senior leaders and Members.
- The homelessness service has built an excellent reputation with external partners for its openness and professionalism.
- The strategic relationship with Registered Social Landlords is good.
- The Homelessness service is facing an increase in demand, with presentations becoming more complex and expectations of service users higher than before.
- The Council faces difficult decisions to ensure the service is sustainable in the future and is currently trying to provide a service to meet demand on a budget that does not meet this ambition.

The Audit Wales report recommends that:

- “To ensure the service is sustainable operationally and strategically, the Council ensures that funding is available to maintain its levels of service or make decisions on service delivery based on funds available.”
- “The Council ensures arrangements for evaluating its homelessness activities are applied to all activities so it can provide assurance of its impact on service users and efficiencies.”
- “To better understand the needs of residents, the Council should widen its engagement activity with residents to cover the development and evaluation of all services.”

## **The operation of the service**

The Flintshire Homelessness and Housing Advice Service is planning to restructure in the near future. This will include growth in the number of officers employed by the service in order to better meet increased demand and the increased number of households in TA as well as building in more strategic capacity to plan for changes in the medium and longer term, including delivering the Council’s Rapid Rehousing Transition Plan 2022 to 2027.

The restructure is currently in the phase where the jobs in the proposed new structure are being evaluated and the budget finalised.

Our understanding is that the restructure is long awaited by the staff in the service, many of whom feel under considerable pressure.

## **Staffing structure**

A successful staffing structure is one where employees is sufficient number of staff so that everyone has a manageable workload. There is nothing set down in law or statutory guidance that stipulates acceptable caseload levels. Therefore, it is left to local authorities to determine for themselves the number of cases that an officer might be responsible for managing. As a consequence, caseload levels vary considerably across the country.

However, social work practice standards, which are broadly applicable for homelessness practitioners, offer some useful advice to make decisions about caseload levels for homelessness officers.

The Local Government Association (LGA) advises, as part of a standards for employers of social workers, that employees should not experience excessive workloads, as this can result in unallocated cases and long waiting times for people needing help. The LGA goes on to recommend that local authorities should:

- I. Use a system of casework allocation, which has been jointly agreed with employees and line managers to set transparent safe working levels.
- II. Make sure employee's workloads are regularly assessed, with each employee, to take account of work complexity, individual worker capacity and time needed for supervision and continuous professional development.
- III. Make sure that cases are allocated transparently, with prior discussion with individual employees and with due consideration to experience and existing caseloads.
- IV. Make sure that an employee's professional judgement about casework issues is respected and encourage employees to declare anything that might affect their ability to carry out that role competently or may affect their fitness to advise and assist.
- V. Take contingency action when workload demands exceeded staffing capacity and report regularly to senior managers about workload and capacity issues.
- VI. Publish information about average caseloads.

Research in Scotland as recommended limit of 15 cases for children's social workers and 20 to 25 for peers carrying out adults and criminal justice work. Research showed that when caseload levels reached unmanageable levels, people ended up working unpaid overtime to

keep on top of their workload, leading to a poor work-life balance, people spending less time on training and professional development, and ultimately resulting in burnout and people choosing to lead their role or become absent from work due to sickness.

When taking account 723 households were provided with assistance by the Council over the course April to September 2023 (the period of time for which the most recent official statistics are available), and even assuming employees would typically hold a case load of 30, (slightly higher than the recommended number for social work practitioners, but taking account of the fact that the responsibilities of homelessness caseworkers are different to that of social workers), total of 24 employees would be required to ensure that everybody had safe caseload levels. Two or three team leaders would be required to ensure people are properly supervised, if recommended employee manager ratios (i.e. between five and nine directly reporting employees for each manager) are adhered to.

In terms of how casework is divided, it has become common practice across many local authorities for some staff to concentrate on prevention casework and other staff to concentrate on relief and main duty casework. If workloads were divided in this way, approximately one third (e.g. eight) of employees would need to be deployed on administering assistance under section 66, with a further 50% (e.g. 12) of employees being deployed to administer assistance under sections 73 and 75. The remaining number of employees (e.g. four) would be deployed on triage work (e.g. fulfilling the advice duty, determining whether an application for assistance is being made and if so whether the application should be taken).

To make sure that officers are able to competently practice all aspects of homelessness law, many local authorities rotate officers across different aspects of the service, with the area of responsibility they are deployed to changing every 6 to 12 months. Often, local authorities will ask casework officers to develop specialisms in specific types of casework, particularly those where people are more likely to experience homelessness, such as:

- People released from prison or use attention
- Care leavers
- Former members of the regular armed forces
- Victims of domestic abuse
- Person leaving hospital
- Person suffering from a mental illness or impairment
- Any other group that are at particular risk of homelessness

In some areas, these posts are funded in addition to the core casework officers, from revenue Grant made available by National government, or regional and local public bodies that have an interest in assisting the various groups of people listed above.

In addition to having sufficient numbers of casework offices, The LGA recommend that each local authority has a specific post who is responsible for overseeing the local homelessness strategy. This role is vital to ensuring the strategy action plan is delivered fully and on time. It recognises that the skills associated with strategic enabling work are different to those needed for operational casework.

When taking account of the number of households in temporary accommodation at April 2024, a further 12 officers would be required to oversee the administration of temporary accommodation functions. This in turn would necessitate one or two team leaders.

Based on the number of people reported as sleeping rough in April 2024, at least one post would be required to provide assistance to rough sleepers in the local authority area.

Further number of officers would be required to administer housing allocation functions, primarily managing applications to join the housing waiting list, and making offers of accommodation. The local government ombudsman has previously advised that local authorities should complete assessment of an application to join housing way less within six weeks of an application being received. This timeframe should be used to calculate the total number of staff required to administer housing application functions. Based on and indicative analysis of housing waiting list numbers available from the council, approximately nine employees would be required to administer housing allocation casework, plus one team leader. A more thorough analysis of allocations and lettings caseload would need to be done to determine an exact number.

There is a common perception that the complexities and responsibilities associated with housing allocation casework are lighter than that of homelessness casework. This perception leads to many local authorities employing not enough housing allocation caseworkers and often employing them on a lower salary than that of homelessness caseworkers. This leads to backlogs in decision-making and higher than necessary staff turnover. The truth is, both housing allocation and homelessness case officer's have the same set of responsibilities. Both required to provide advice, both are required to assess housing needs of a person and their household, both are required to understand how an array of vulnerabilities will affect the housing options of an individual, both are required to determine whether a person is eligible for housing assistance using the same statutory framework, decisions made by both types of offices have the same legal consequences and culpability. Therefore, the only logical conclusion is that housing allocation officers should be enumerated at the same rate as homelessness officers.

In summary, taking account of all the information above, a possible staffing structure for Flintshire Council might look something like this:

- 1x Head of Service
- 5x team leaders

- 24x homelessness caseworkers
- 6x specialist officers
- 1x rough sleeper officer
- 1x strategy officer
- 9x housing allocation caseworkers

The proposed new staffing structure devised by the Council aligns close enough with what is set out above.

### **Feedback from staff**

Feedback from officers in the homelessness service at a workshop conducted for the review and through individual conversations brought out a number of important points.

- Overall, there was a good sense of teamwork within the service, with staff feeling supported by management and being supportive of each other.
- This extended to working constructively with other parts of the council and other agencies, and understanding the pressures other services were under even though there were a number of examples given of where better joint working would be helpful.
- Officers working in the service for over a decade reported that the service is the busiest it has ever been. Caseloads are sometimes 70+ per officer when 25 to 35 would be more manageable.
- The number of presentations and assessments has increased markedly. This is backed up by the data in the council's end of year performance report, which shows the number of presentations to the homelessness service increasing by 25% from 1,598 in 2022/23 to 2,005 in 2023/24, and the number of presentations progressing to a S62 homelessness assessment rose by 40% from 911 in 2022/23 to 1,274 in 2023/24.
- There was agreement that the number of people approaching the council for homelessness assistance with high or complex support needs had increased, with mental health being a particular issue.
- Although co-operation and joint working with other services is good, there are more people who are not getting support elsewhere, and the homelessness service is left to provide support as they have a statutory duty to offer accommodation, and this cannot be successfully achieved in many cases without addressing other issues.

- Particular issues mentioned where cases where individuals were transitioning from children's social services without a good enough plan and where people are being discharged from hospital without accommodation to move to without a proper plan.
- The Renting Homes Wales Act<sup>3</sup> was also felt to have caused an increase in the number of evictions from the private rented sector in advance of its provisions coming fully into force.
- Staff felt that their ability to engage in effective homelessness prevention work was hindered by the amount of time spent dealing with emergencies, often associated with a relatively small number of people with high needs. This could mean that staff simply don't have enough time to work on S66 prevention cases.
- It was also felt by some officers that not all service users want to have their homelessness prevented, as they may see being accepted as homeless as a route to a council flat. This is partly an out-of-date notion, but also has some truth to it as more and more social housing is let to homeless households to reduce the financial pressures on the council.
- It was felt that positive change was going on in the service, through improved training, a problem-solving approach to find the right solutions for individuals, and through customer journey mapping.
- We were told about a number of examples of people who were hard to help where the councils had been flexible and gone out of its way to assist to find a solution that worked. This was a source of pride within the service and was felt to be an approach actively supported by senior officers.
- It was felt that more could be done using social media and other avenues to help people access services earlier, and to help themselves more effectively, which could reduce the need to accommodate people in an emergency, often in B&B and often outside Flintshire.
- The part of the service working with prison and probation service to assist ex-offenders leaving custody was believed to be effective although hampered by the lack of accommodation options available.
- The team would welcome having specialist workers on mental health and substance misuse embedded in the team. There was a feeling that staff were having to deal with support for people with high needs, but without having the necessary expertise.

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<sup>3</sup> <https://www.legislation.gov.uk/anaw/2016/1/contents>



- Although far more hotels are being used, in many cases outside Flintshire, regular visiting support is provided by officers. However, because resources are stretched it can be difficult to provide a good service, especially if there is a lack of cover due to sickness absence.
- Some officers felt more could be done to make use of PRS accommodation, but this would need work and dedicated resource to build relationships with the sector.
- A number of people called for a clearer plan to improve things, with a sense that lots of things get talked about but are not necessarily delivered. The restructure was cited as an example of this, as it appears this has been promised for a long time as a way of alleviating pressure on the service, but has still not happened.

## Access to the service

The Flintshire Council website has a section on ‘homeless or at risk of homelessness<sup>4</sup>’.

This sets out a summary of how the ‘homeless team’ can help followed by answers to frequently asked questions:

- I’ve received notice from my landlord
- I’m struggling to pay my rent
- I’m struggling to pay my mortgage
- My relationship has broken down and my partner is asking me to leave
- I want to leave my partner as I do not feel safe
- I want to leave my home or my family/relatives have asked me to leave
- I’m experiencing harassment from my neighbour / landlord

There is also a link to Streetlink, the Housing Support Programme strategy and explanations of the various duties in the Housing (Wales) Act 2014.

The telephone numbers of the ‘Homeless’ team and the out of hours service are clearly available and readers are encouraged to contact the service by phone as soon as possible. Links to Shelter and the Citizens Advice are also displayed.

Although the website text is clear and contains relevant information, in our view it has some flaws:

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<sup>4</sup> <https://www.flintshire.gov.uk/en/Resident/Housing/Housing-and-Prevention/Homeless-or-At-Risk-of-Homelessness.aspx>

- The text is aimed at people with quite a high level of literacy and has links to a number of complex documents. It is not clear that it would be very accessible to the average service user. An example of well written housing advice information can be found at AdviceAid, whose content and materials are tailored to satisfy government standards around clarity and usability. For further information about advice, clicking [here](#). AdviceAid materials are used by local authorities throughout England, for an example, these are being used by Shropshire Council, clicking on the following link [here](#).
- Much of the text is framed in the language of homelessness and the council's offer under the homelessness legislation rather than around housing advice and housing options, short of applying as homeless.
- There are no step-by-step routes to potential solutions online.
- Also, there does not appear to be communication around housing advice and housing options available on social media. This is a gap, especially considering that 35% of those in temporary accommodation are aged under 35. Voluntary organisations often make very effective use of social media, to promote their campaigns and target information to specific audiences. Examples of marketing campaigns and videos used by the End Youth Homelessness can be found by clicking [here](#).

## **Policies/procedures**

We were given access to a number of policies and procedures and the Council's standard homelessness decision letters. We were also shown a template personal housing plan (PHP) for those assessed as being owed a homelessness duty.

The Council recognises that work is needed to improve the comprehensiveness of its procedures and there is considerable work going on to develop or update these.

We were shown the following:

- Draft Domestic Abuse procedure
- Draft Family and Friends Evicting procedure
- Draft Personal Housing Plan procedure
- Draft Renting Homes Act Notices procedure
- Draft S85 Review procedure
- Final Assessment procedure
- Final Duty Day procedure
- Final Out of Hours procedure

- Homelessness Accommodation Policy

These generally seemed clear and appropriate. However, they are in a traditional descriptive format and lack flow charts, decision trees, or checklists, which would be helpful to ensure they are followed in practice. There is an opportunity to make better use of IT to integrate these procedures into standard workflows.

There are a number of procedures which it would be beneficial for the service to have, which do not appear to exist. These include, notably:

- A temporary accommodation procurement policy
- A temporary accommodation placement policy

We also felt that the current PHP template could be improved to have a greater emphasis on homelessness prevention and relief options.

We note that one of the goals of the Council's rapid rehousing plan is to develop a comprehensive homelessness prevention toolkit. When complete, this should be referenced and incorporated into PHP guidance, preferably as part of the IT casework system, to ensure that viable prevention and relief options are followed.

There is also scope to make better use of existing resources to improve processes and procedures. An example of this is the Welsh government approved youth homelessness positive pathway guidance<sup>5</sup>, which sets out good practice for both housing and children's services, working together in 5 service areas:

- Information and advice for all young people and families
- Targeted early intervention
- Integrated response ('hub' or 'virtual hub') and gateway to commissioned accommodation and support
- Commissioned accommodation and support
- Range of Housing Options

Whilst this would need adaptation for Flintshire and may be challenging to implement fully, it provides a good basis for what an appropriate service should look like, without having to go back to first principles.

## Data and IT

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<sup>5</sup> <https://www.gov.wales/sites/default/files/publications/2019-03/positive-pathway-guidance-and-good-practice.pdf>

The Council's data system is in the process of development in house, with an ambition to link different areas of activity across one system and for this to generate regular dashboard reports and to support and monitor casework across a number of activities, not just homelessness.

This is a work in progress, with the current system having improved markedly over the past year, but with a lot of functionality still to develop.

This means that currently the ability to keep track of service outputs and casework through the IT system is limited.

There are pros and cons to developing an in-house system. Positive aspects include that the system can, in principle, be tailored to Flintshire's specific requirements, and can be adapted and modified more flexibly than if changes need to be requested from an external supplier. There may also be reductions in cost compared to buying an off the shelf system, although we were not able to analyse this.

On the other hand, it is taking some time to make the system fit for purpose, when off the shelf systems delivering most if not all of Flintshire's are available to purchase. We also noted that development of the system is reliant on one specialist working within the Council, and that that individual is working on a number of projects for the council in parallel, so that the homelessness IT system development has to compete with other priorities.

Overall, the reporting capacity of the system which would allow real time tracking of the performance of the system, including numbers in TA and costs, currently seems limited.

The system also currently lacks capacity to prompt appropriate casework activity and monitor whether it has been carried out. This is one of the areas currently under development.

## **Temporary Accommodation**

As already discussed, perhaps the biggest problem the service has is the lack of suitable accommodation available, with the biggest shortfalls being for single person households and for larger families.

This is the case for both settled accommodation and temporary accommodation.

At the end of April 2024, Flintshire had 292 households in temporary accommodation, up by 54% from 190 a year earlier.

Of those 292 households, 191 were in hotels, up 103% from a year earlier. 15 were in holiday accommodation placements, and 11 were in Mostyn Lodge a privately owned B&B.

These are all recognised by the Council as emergency accommodation placements which are not suitable for long stays, with many of the hotels outside Flintshire in areas such as Rhyl and Chester. Some accommodation is in areas which are isolated for any households without a car, such as hotels along the A55.

In addition to this, 23 single people were in the Glanrafon homelessness hub, which is supported accommodation with support commissioned from the Wallich using individual Bunkabin portacabins and a central office and communal space. This is mostly used for people with support needs, and despite the challenges of the accommodation site, appears to be well managed and to meet the short term needs of those accommodated there.

Another 20 households live in council owned stock, some of which has been bought and converted to TA use with the help of Welsh Government Transitional Accommodation Capital Programme (TACP) funding.

Based on accommodation we saw on our visit, much of this accommodation is of a high standard and the Council has been innovative in buying and converting buildings such as old pubs.

A further 32 households live in accommodation which has been leased by the council.

As shown above in Figure 1, although the number of households placed in owned and leased TA has grown by 30% in percentage terms over the 12 months between April 2023 and April 2024, from 40 households to 52 households, this growth has not in any way kept pace with the increasing number of households the Council has needed to accommodate, with the difference being taken up by the use of more hotels.

The reasons for this boils down to the fact that more people are moving into TA than are able to move out into settled accommodation, and it has not been possible for the Council to find alternative TA other than hotels and some holiday accommodation placements to meet this need.

## **Settled accommodation supply**

### **Existing social housing**

The 2021 Census shows that 14.5% of households in Flintshire live in social rented accommodation, the 13<sup>th</sup> highest proportion in Wales out of 22 local authorities. 13.3% of households live in the private rented sector, the second lowest proportion in Wales.

There are 9,919 social rented homes in Flintshire<sup>6</sup> of which 7,312 are owned by the council and 2,607 are owned by housing associations.

Of these 9,919 homes, 10% are non-sheltered 1-beds<sup>7</sup> and studios and just 2% are 4-bed accommodation or larger.

This compares to 34% of housing register demand being for 1-bed non-sheltered accommodation and 8% of demand being for 4-bed accommodation or larger.

In terms of the demand from households owed a homelessness duty, approximately 75% of demand is for 1-bed general needs accommodation, including 35% for 1-bed accommodation for people aged under 35.

The number of social lettings in Flintshire was 539 in 2023/24<sup>8</sup> , down by almost 28% over a five-year period.

Lettings to both council and housing association properties are allocated through the Single Access Route To Housing Partnership (SARTH) covering Flintshire, Conwy and Denbighshire.

However, since the Covid pandemic 50% of social lettings across all partners are intended to be let as direct offers to homeless households nominated by the council.

Although this policy is still in place only around 20% of lettings in Flintshire were made through a direct homelessness offer in 2023/24.

We are informed that this is not due to unwillingness by the SARTH partners, but is because of the shortage of lettings of 1-bed general needs accommodation.

Flintshire Council data suggests that 72 S73 relief and S75 full duties were ended in the social rented sector in 2023/24.

This is simply not enough to meet demand.

A review of the SARTH allocations process across the partnership is about to be commissioned.

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<sup>6</sup> Based on information from the Flintshire Rapid Rehousing Transition Plan

<sup>7</sup> Including 23 studios

<sup>8</sup> Based on data up to the end of Q3 2023/24

## **Voids**

An important contributory factor to the lack of settled accommodation to meet homelessness demand is the number of void properties.

At the beginning of May 2024 there were 262 council voids. 94 of these were 1-beds, 100 2-beds, 64 3-beds and only 4 properties 4-bed or above.

Void levels appear to have been roughly steady over 2023/24 after rising steadily from about half that number in 2020/21

If more voids could be let, it might make a significant contribution to reducing the number of households in TA.

However, around half the current 262 voids are for sheltered properties and we understand that the improved Welsh government standards for social housing lets, are adding to the complexity and costs of void works, making it hard to radically decrease void numbers.

We were also informed that there are significant issues arising from the delay between void properties being allocated to households needing accommodation and the property becoming ready to let. Analysis of council properties which are currently void shows that on average they have been void for 154 days, with this rising to 266 days for sheltered flats. This indicates that the average time between a property becoming void and being let is considerably longer than this.

This issue was presented as a barrier to timely move on from temporary accommodation, including for families even though there should in principle be enough lets of family sized accommodation to avoid families having to be in temporary accommodation for long periods.

If it were possible to halve the number of council voids in one year and if half of those additional lettings were to go to homeless households, this would deliver around an additional 65 lets to homeless households. Whilst this would make a contribution to reducing the growth in the numbers in emergency accommodation (which grew by 93 in 2023/24) it would not be sufficient to halt that growth.

## **New social housing development**

The Flintshire Housing Needs Prospectus was amended in August 2023 and explicitly recognises the need for more one-bed accommodation to meet homelessness demand as well as specialist housing provision, including wheel chair adapted and larger properties,

supported housing for specific client groups and a new homelessness temporary accommodation hub.

The current housing Programme Delivery Plan (PDP), which in theory covers the next three years, but which we were informed is likely to take five years to deliver in practice, includes 363 social homes, of which 100 are one-beds, 164 two-beds, 81 three-beds and 18 four-beds or larger.

Despite the recognition in the prospectus that one-beds represent the highest demand, the majority of properties in the development pipeline are family homes, with an average of only 20 one-beds per year (based on five-year delivery) being planned. This is partly because many of the proposed developments in the PDP were commissioned before the current homelessness crisis.

Whilst this new housing supply is clearly positive, it seems clear that it can only make a small contribution to meeting homelessness demand.

The Council has made active use of Welsh Government Transitional Accommodation Capital Funding Programme (TACP) to buy and refurbish properties such as old pubs for use as high quality TA.

## **Private rented accommodation**

In terms of opportunities to prevent and relieve more homelessness into PRS accommodation, the Council commissioned a report from arc4 in 2022 reviewing the private rented market across Flintshire, which was updated in August 2023.

This report analysed Zoopla data on PRS accommodation and found that across Flintshire only 6.75% of properties advertised for rent between 2018 and 2023 were available at Local Housing Allowance (LHA) rates, with 33% of properties available at LHA + 10%.

Zoopla lettings may not reflect all available lettings at the lower end of the market, and the report also shows that in some areas of the county, such as Flint, a significantly higher proportion of properties are available at LHA and LHA +10% levels. Nevertheless, overall, this shows a very constrained situation on PRS affordability.

In addition to the lack of affordability at LHA level rents prior to April 2024 (when LHA was increased), the number of properties to let has also decreased markedly. According to arc4's analysis, the total number of PRS properties recorded as available to let on Zoopla fell from 798 in 2019 to 329 in 2022 and 157 in the first six months of 2023.



This reduction may be due to a combination of factors including rising mortgage interest rates and the impact of Rent Smart Wales<sup>9</sup>.

In addition to the reduced number of lets and the low percentage of properties available at LHA rents, only around 15% of properties coming onto the market through Zoopla are one-bed flats or houses, whereas Flintshire’s homelessness demand is mainly for households with a one-bed requirement, as described above.

Taken at face value this indicates that prior to April 2024 only around 35 one-bed properties were coming into the market at LHA rents per year<sup>10</sup> in Flintshire.

However, this ignores properties not advertised on Zoopla and also ignores houses in multiple occupation (HMOs), of which there are around 350 such houses according to the Flintshire Housing Strategy 2019/24.

It also does not take into account the rise in the LHA rates in April 2024 to at least notionally reflect 30<sup>th</sup> percentile rents. The changes to LHA rates from April 2024<sup>11</sup> are shown in Figure 4.

Figure 4.

<b>Flintshire BRMA</b>	<b>Weekly LHA Apr 2023 to Mar 2024</b>	<b>Weekly LHA Apr 2023 to Mar 2024</b>	<b>Weekly increase £</b>	<b>Weekly % increase</b>
Shared Accommodation	£87.50	<b>£87.50</b>	<b>£0.00</b>	<b>0%</b>
1 bedroom	£92.05	<b>£103.56</b>	<b>£11.51</b>	<b>13%</b>
2 bedroom	£120.82	<b>£136.93</b>	<b>£16.11</b>	<b>13%</b>
3 bedroom	£136.93	<b>£159.95</b>	<b>£23.02</b>	<b>17%</b>
4 bedroom	£184.11	<b>£212.88</b>	<b>£28.77</b>	<b>16%</b>

This shows a 13% increase in LHA rates for 1-bed and 2-bed properties and slightly larger increases for 3 and 4 bed properties.

Although the number of properties, and especially 1-bed properties, available at LHA rents is still likely to be small, the difference between median monthly rents in Flintshire reported by arc4 as £185 pw across all property sizes between January and June 2023 and the cost of hotel accommodation at around £700 per week or more is very significant.

This suggests that options to make more use of private rented sector accommodation could be cost effective for Flintshire.

<sup>9</sup> <https://rentsmart.gov.wales/en/home/>

<sup>10</sup> 329 total listings in 2022 x 15% 1-beds x 6.75% at LHA = 33.1

<sup>11</sup> <https://www.gov.wales/local-housing-allowance-lha-rates-april-2024-march-2025>

## Work with other agencies/ departments

As part of the review, we spoke to a number of officers working in other parts on the Council, external stakeholders including Shelter, Citizens Advice, probation, substance misuse services, the Wallich, and housing associations with stock in Flintshire.

We also attended a meeting of the Partnership and protocols delivery subgroup of the Flintshire ending homelessness board, and a focus group of external partners.

The feedback from external partners about working with Flintshire's homelessness and housing advice service was extremely positive, with more than one agency saying that Flintshire is the best council in North Wales in terms of positive engagement with the homelessness service.

Positive features which were highlighted included:

- Colocation with Shelter in the housing options office, with Shelter playing a specific role in providing advice to people facing homelessness in the PRS
- Flintshire being willing to engage in a positive way to find pragmatic and sometimes creative solutions for service users
- Flintshire consistently finding accommodation for people leaving prison and facing homelessness
- The openness of the council to work collaboratively with other organisations

This was contrasted with some neighbouring councils who organisations considered significantly less willing to collaborate with them.

The main negative points raised by external organisations were:

- The difficulties of achieving positive outcomes for clients placed in hotels, especially those outside Flintshire and specifically hotels along the A55 which are very isolated for anyone without a car.
- An unresolved issue with one housing association about the lack of information sharing for ex-offenders referred by Flintshire, which had led to that housing association no longer accepting tenants with offending histories referred by the Council. However, only one housing association highlighted this as a problem.
- The time it can take between acceptance for a council tenancy and the property being ready to move in, which can sometimes be months, when a client who is ready to move on from TA or supported housing but cannot do so.
- The opposite problem where a service user is made an offer of social housing and is expected to move in within days, when this may be very difficult for them e.g. because the property is unfurnished.

Internal Council colleagues were also generally positive about working with the homeless service. Some issues discussed were:

- The need for better and more structured joint working between children's services and homelessness, especially for young adults leaving care but also for young people who were hard to place, and sometimes ended up in very expensive placements which were less than ideal. There was interest in setting up a joint team across children's services and housing to improve this.
- The need for more consistent support for tenants with support needs who moved into council tenancies.

There was also a recognition that both homelessness services and social services are over stretched and need to work together as well as possible to ensure that the council works effectively in partnership to support clients, especially those with high support needs or complex needs, rather than arguing over which service takes responsibility for what.

Resolving these issues is one of the main reasons for the existence of the partnership and protocols group which we attended, although the group was at an early stage at the time of the review.

There was also some evidence of a tension between the need to move more households from TA into social housing, and the difficulties of converting sheltered accommodation to general needs in order to achieve this. A particular issue highlighted was the difficulty in tenants with experience of homelessness and elderly people living next to each other during the period of transition.

## **The Council's plans**

It is clear from these findings that the Council is facing a number of major issues, which can be summarised as follows:

1. The number of households in TA is growing rapidly.
2. Nearly all this growth is in emergency hotel accommodation. This is both unsuitable and financially unsustainable. Much of the accommodation is outside Flintshire.
3. Although most households in hotels are single person households, there are also too many families with children in hotels, even though the supply of settled family accommodation is much better than the supply of settled accommodation for singles.

4. There is a very significant lack of accommodation for single people, both in social housing and in the private rented sector. This is a major factor in the growth of TA.
5. There is also a lack of TA which is not hotels, so that much too high a proportion of those in TA are in hotels.
6. The ability of officers in the homelessness team to reduce the number of people entering TA is limited by a lack of officers, as the team has not grown to match increased demand and the increased number of households in TA.
7. The ability of the team to prevent and relieve homelessness is also constrained by an increase in the number of households using the service who have complex needs, and the lack of capacity in other services to meet these needs, leading to much of the teams' time being taken up in dealing with a minority of high needs cases.

The Council is already well aware of these challenges and has set out a number of ways in which to attempt address the issues. These are set out in a number of reports and plans:

## **Homelessness Budget Pressure – Options Paper**

The Homelessness Budget Pressure - Options Paper agreed in November 2023, sets out the large and growing overspend on emergency accommodation and puts forward a number of options for increasing accommodation supply and mitigate the position, all of which were agreed in principle.

The agreed options are:

Option 1a Progress with the sheltered housing review to develop recommendations for current schemes.

This has the potential to redesignate a proportion of sheltered housing as general needs accommodation, which could be used to house homeless households

Option 1b - Reduce or remove the age thresholds for mini-group properties which is currently 50 years plus

This could allow the use of some or all current sheltered mini-group homes to be let to homeless households in TA. Around 40 units of this accommodation are let per year, but there are potential issues mixing this client group with older people

Option 2a - Replicate Glanrafon Homeless Hub in another location with use of modular accommodation modules

Option 2b - Replicate Glanrafon Homeless Hub through purchase of a large building or development of purpose-built accommodation

Option 3a - Increase SARTH Homeless Direct Lets quota from 50% to 100%

This option has the problem that current 50 % quota is not being met and that it would not increase the number of 1-bed units available to let. Based on discussion as part of this review, it is also likely to meet resistance from at least some of the SARTH partners.

Option 3b - Place a temporary hold on non-urgent moves for social housing applicants via the Common Housing Register.

Option 3c - Allocate two-bedroom Council housing to people who are homeless, have a one bedroom need and do not qualify for sheltered accommodation.

This option would require a top up from the Council for anyone receiving housing benefits. The top up would be far smaller than the cost of hotel accommodation but would continue indefinitely.

Option 4a - Take more Council housing from HRA to use as temporary accommodation and create house shares for single people.

Option 5a - Improve the private sector leasing scheme offer to attract more landlords

This would increase the costs of the scheme but by far less than the costs of hotel accommodation. There may also be options to let this accommodation at enhanced rates of housing benefit if it is used for single people with support needs, which could reduce costs considerably.

Option 5b - Target long-term empty properties for Council Lease Scheme

Option 5c - Offer enhanced landlord incentives to end homelessness duties in the private rented sector

This option may however be restricted by the number of 1-bed properties to rent, as discussed above in relation to the arc4 analysis

Option 5d - Exploring the use of a Rent Guarantee Scheme

This fulfils a similar purpose to option 5c, and is also constrained by the available supply.

Although exploration of all these options has been agreed, it appears that in most cases that they have not been explored far enough to produce quantified and costed options which can be rapidly progressed.

This is essential if the use of emergency accommodation is to be reduced.

It is evident that there are complications in converting sheltered accommodation to general needs use in the short term at scale and the options to replicate Glanrafon homeless hub will take time to bring to fruition.

However, there are good options here, which could be progressed quickly. Although they all have down sides and do not solve the fundamental problem of homelessness demand being greater than the supply of affordable settled one-bed accommodation, options 3c, 4a, and 5a in particular could have the potential to bring about significant reduction in the use of hotel accommodation quite rapidly, if progressed with urgency.

## **Rapid Rehousing Transition Plan**

The Council's Rapid Rehousing Transition Plan (RRTP) 2022 to 2027 has recently been finalised. The plan meets the requirement for all Councils to move away from the provision of TA towards a rapid rehousing model and offers a thorough analysis.

The RRTP sets out five priority objectives:

P1: Tackling homelessness through robust and effective partnership working

P2: Remodelling our approaches to data, systems, policies and service delivery

P3: Ensuring support is available to everyone who needs it

P4: Transforming our temporary housing offer

P5: Increasing the supply of affordable housing and removing barriers to people accessing affordable housing promptly

Key actions set out in the RRTP include:

- Restructuring the Council's Housing Support and Homelessness Service (as discussed earlier in this report)
- Recruitment of a Rapid Rehousing Strategic Co-ordinator to ensure that the plan is implemented
- Recruitment of a Data analyst

- Development of ‘diversionary activities’ for residents of TA
- IT improvements including giving partner agencies access to the IT casework system and improving reporting capacity
- Commissioning a housing first provider and increasing housing first capacity
- Join the All Wales Private Sector Leasing Scheme
- Development of a complex needs supported housing project
- Ensuring all staff working within services funded by Flintshire’s housing support grant are paid the ‘real living wage’

These are only some of a great many actions detailed in the RRTP action plan, the great majority of which are scheduled for completion by the end of 2024.

Although the actions in the RRTP action plan appear desirable and well thought through, they look unrealistic within the timescale set out in the action plan. This is especially the case as the Rapid Rehousing Strategic Co-ordinator is yet to be recruited, and there is very limited existing strategic capacity within the service.

## **Ending Homelessness Board**

The Council has recently set up an Ending Homelessness Board to oversee the delivery of the RRTP in Flintshire and provide strategic direction and corporate and multi-agency commitments to ending homelessness.

The board’s membership is comprised of senior officers from across the Council, including Housing and Communities; Planning, Environment and the Economy; Governance; Streetscene and Transportation; Corporate Finance; Social Services; Education and Youth; People and Organisational Development.

The board has a number of subgroups reporting to it covering the areas of Communications and Engagement; Homeless Options Delivery; Processes and Protocols; Commissioning & Planning.

In principle, the board and its subgroups should provide an excellent resource to ensure that the whole council is working to implement the RRTP in a co-ordinated way.

We were not in a position by the end of the review to make an assessment of how well this is working on practice.

# Conclusions

Flintshire County Council, like other local authorities in Wales is facing increasing homelessness pressures. This is partly due to a combination of more homelessness due to acute shortage of affordable accommodation, increased evictions from the private rented sector, declining social lettings and the continuing cost of living crisis.

But this is only part of the picture. The legislative and policy landscape has also changed, with the relaxation of priority need rules since Covid meaning that more single people in particular, now meet the criteria for the Council to owe them an accommodation duty. This increased responsibility for councils is only likely to increase in the short to medium term as the Welsh government has signalled a clear intention to follow Scotland and abolish priority need altogether.

Our overall impression of the Flintshire homelessness service is that it is well managed and operates both effectively and compassionately. The service is also well regarded by external partners.

However, this is seriously undermined by the service's increasing reliance on the use of very expensive and unsuitable hotel accommodation, much of it outside Flintshire. This is mostly for single people but, too often, also for families with children. This is both unsustainable financially and likely to lead to poorer outcomes for the households the Council is trying to help.

It is essential that concerted action is taken to reduce this use of hotel accommodation, even if this means making difficult choices and, in some cases, means planned expenditure on a spend to save basis.

There is also potential to improve the service through the planned restructure, through better joint working with households facing homelessness across the council, through improved policies and procedures, and through improved IT.

Better communication is also needed, both to encourage households to seek help earlier, when homelessness is still preventable, and to manage expectations that homelessness assistance will lead to the offer of a 1-bed council or housing association property. There are simply not enough 1-bed social lettings for this to be the case within the foreseeable future.

Our analysis leads to the following main conclusions:

1. The Flintshire Homelessness and housing advice service is well led by Martin Cooil and Vicky Clark, who offer clear leadership and maintain a supportive environment



for staff despite the pressures on the service.

2. Morale in the service appears to be good, despite the increased pressures due to rising demand and increased numbers of households in emergency accommodation,
3. The service is generally very well regarded by external partners and is considered better than that of many neighbouring authorities in terms of responsiveness and willingness to work in partnership,
4. The service appears to be sensitive to the needs of its customers with an emphasis on finding appropriate solutions that match the needs of service users and a willingness to be creative. This approach comes from the top.
5. However, there are few structures or mechanisms for the views and feedback of service users to be taken into account in monitoring the effectiveness of the service or in planning future service development,
6. Although the service works in partnership with other council departments including adult and children's social services, there is room for improvement and better joint working, especially to improve the approach to working with clients with complex needs and vulnerable young people. An opportunity should be taken to remind partners of the duty to cooperate to tackle homelessness, which covers both strategic and operational homelessness functions, so the expectations are clear amongst all partners.
7. There is also scope for improvement in the way the Council communicates to those needing housing advice or facing a risk of homelessness, particularly through greater use of social media.
8. The number of households in TA in Flintshire is not exceptional compared to other Welsh authorities but it has been growing faster than most other Welsh authorities recently.
9. We have found no evidence that this is due to a softer approach to homelessness than other Welsh authorities. The service is however very strongly opposed to gatekeeping, which is against the letter and the spirit of the Welsh homelessness legislation and guidance.
10. The number and proportion of households living in emergency hotel accommodation is much too high and growing rapidly. This is both financially and ethically unsustainable, especially as much of the accommodation is outside Flintshire and geographically isolated for residents without access to a car.

11. There is scope to do more work to prevent and relieve homelessness without the need to enter TA, to move people out of TA more rapidly and to provide alternative forms of TA to reduce the use of hotels.
12. However, the council is hampered in this by the lack of 1-bed accommodation available to let in both social housing and the private rented sector.
13. There is scope to reform the way offers of social housing accommodation are made to reduce the time between acceptance of an offer and being able to move in due to delayed void works. This is a particular serious issue when it means families with children are living in hotels while they wait for accommodation to be ready.
14. The service is overstretched operationally and also in its capacity to develop and implement effective strategies to mitigate current problems.
15. The proposed restructure of the service appears well thought through and should make a significant contribution to service improvement. However, the restructure has taken a long time to bring together and should now be implemented as soon as possible. It's imperative that as soon as possible there is sufficient numbers of staff so that everyone can have a safe caseload level.
16. The work the service has been doing to update its policies and procedures and to upgrade its IT system is welcome, but there is much still to be done.
17. The recommendations agreed by the Council to increase supply of accommodation and move people out of emergency accommodation could work if implemented with speed at the required scale.
18. However, the Council lacks a clear quantified plan to achieve this. This risks creating a sense of drift and delay, with ever increasing costs to the Council as the use of emergency accommodation continue to rise, and difficult choices such as greater use of shared housing, conversion of sheltered accommodation to general needs, and increased use of private rented accommodation for TA and to end homelessness duties, are not made.
19. The Council's Rapid Rehousing Transition Plan appears clear and comprehensive. However, the objectives need to be implemented more smartly, with clear prioritisation and timescales to achieve each goal.
20. The establishment of the Ending Homelessness Board and its sub-groups bodes well for the adoption of a whole council approach to meeting the objective of the RRTP. It is important that having set up the structure for this that it delivers tangible results.

# Recommendations

The Council is already well aware of much of what has been said in this report and has set out a large number of areas where it wishes to make changes and improvements, notably in the Rapid Rehousing Transition Plan.

It is not the role of the review to critique the RRTP or to reinforce all its recommendations. However, it is clear that the Council is already aware of much of what needs to be done.

These recommendations are therefore limited to a number of key areas, which clearly relate to our conclusions about the service. It is recognised that there is some overlap between these recommendations and what the Council has already decided it wishes to do over the next several years.

## Recommendation One

The Council should develop a clear, costed, two-to-three-year model which balances increased use of emergency accommodation against the mitigation measures it intends to adopt to reduce the use of emergency accommodation.

This should include scenarios where demand continues to increase, stays the same or reduces.

It should also include the range of agreed measures 1a to 5d with a clear timetable for implementation of each measure and the expected contribution which each one can make to reducing the use of emergency accommodation.

The costs associated with implementing each measure should be compared to the avoided costs of hotels.

This will allow a planned approach to reducing the use of emergency accommodation. This can be adapted as time goes on depending on actual demand and actual progress in implementing the different measures.

## Recommendation Two

The Council should calculate to what extent 1-bed self-contained accommodation could be available to meet single homelessness demand in best- and worst-case scenarios.

If there is not enough one-bed accommodation available to meet expected demand then it should plan to increase the use of shared accommodation for single person households to meet the gap, whether in social housing or leased PRS accommodation or HMOs.

## Recommendation Three

The Council should examine the potential to make greater use of supported accommodation to meet homelessness demand and the possibilities of claiming enhanced rates of housing benefit associated with supported housing to contribute to the costs. This may be especially relevant where it is necessary to use shared accommodation due to a lack of one-bed supply as described in recommendation two.

The housing benefit regulations allowing under 35s to claim the one-bed LHA rate after a period of three months in supported housing should form part of this consideration.

#### **Recommendation Four**

The Council should expedite the sheltered housing review, so that it can be clear how many extra properties will be able to let to homeless households over a defined time period and include these in the model.

#### **Recommendation Five**

The Council should implement the planned restructure of the homelessness service with as little further delay as possible.

#### **Recommendation Six**

The Council should consolidate the various plans for the homelessness service including the RRTP into one plan, with a clear timetable and clearly allocated resources to achieve each objective. The implementation of this plan should be monitored closely by the ending homelessness board.

#### **Recommendation Seven**

The Council should consider opportunities for better joint working across departments and with external agencies to work with key client groups such as young people leaving care and service users with complex needs.

This should include creating integrated teams where this would be beneficial and avoid the potential for silo working

#### **Recommendation Eight**

The Council should review and update its online and other communications related to homelessness and housing advice with the objectives of:

- I. Improving accessibility for services users with limited literacy
- II. Tailoring communications to different groups with different ways of accessing information
- III. Making greater use of social media
- IV. Providing greater opportunities for self help

- V. Encouraging those at risk of homelessness to come forward earlier, when homelessness can still be prevented
- VI. Managing expectations to reflect the current acute shortage of affordable accommodation compared to local housing need

### **Recommendation Nine**

The Council should consider how it can develop greater collaboration with neighbouring local authorities on homelessness.

Areas of cooperation could include:

- I. benchmarking key parameters such as costs of TA, operational caseloads, staffing costs and performance of homelessness prevention and relief
- II. joint commissioning of services where beneficial
- III. joint training and secondments
- IV. co-development of policies and procedures
- V. lobbying of the Welsh government

### **Recommendation Ten**

The Council should develop mechanisms to include the views and feedback of people with lived experience in its processes for appraisal and development of the service, especially where these involve changes to customer facing processes and procedures.

This could include periodic user satisfaction surveys and the establishment of one or more service user focus groups.

The Council could also consider ways to recruit more people with lived experience of homelessness and receiving support into employed roles within the service.

### **Recommendation Eleven**

The Council should consider increasing its strategic and commissioning capacity beyond what is already planned, given the increasing changes from the Welsh government, the large number of actions in the RRTP, the need to increase TA and other accommodation supply, and the need for policy and IT development.

# NEIL MORLAND CO

HOUSING CONSULTANTS

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## **Summary of Recommendations from the Neil Morland & Co. Independent Review of Homeless Services in Flintshire**

### **Recommendation One**

The Council should develop a clear, costed, two-to-three-year model which balances increased use of emergency accommodation against the mitigation measures it intends to adopt to reduce the use of emergency accommodation.

This should include scenarios where demand continues to increase, stays the same or reduces.

It should also include the range of agreed measures as outlined in the Housing Pressures Option Paper (1a to 5d) with a clear timetable for implementation of each measure and the expected contribution which each one can make to reducing the use of emergency accommodation.

The costs associated with implementing each measure should be compared to the avoided costs of hotels.

This will allow a planned approach to reducing the use of emergency accommodation. This can be adapted as time goes on depending on actual demand and actual progress in implementing the different measures.

### **Recommendation Two**

The Council should calculate to what extent 1-bed self-contained accommodation could be available to meet single homelessness demand in best- and worst-case scenarios.

If there is not enough one-bed accommodation available to meet expected demand then it should plan to increase the use of shared accommodation for single person households to meet the gap, whether in social housing or leased PRS accommodation or HMOs.

### **Recommendation Three**

The Council should examine the potential to make greater use of supported accommodation to meet homelessness demand and the possibilities of claiming enhanced rates of housing benefit associated with supported housing to contribute to the costs. This may be especially relevant where it is necessary to use shared accommodation due to a lack of one-bed supply as described in recommendation two.

The housing benefit regulations allowing under 35s to claim the one-bed LHA rate after a period of three months in supported housing should form part of this consideration.

### **Recommendation Four**

The Council should expedite the sheltered housing review, so that it can be clear how many extra properties will be able to let to homeless households over a defined time period and include these in the model.

**Recommendation Five**

The Council should implement the planned restructure of the homelessness service with as little further delay as possible.

**Recommendation Six**

The Council should consolidate the various plans for the homelessness service including the RRTP into one plan, with a clear timetable and clearly allocated resources to achieve each objective. The implementation of this plan should be monitored closely by the ending homelessness board.

**Recommendation Seven**

The Council should consider opportunities for better joint working across departments and with external agencies to work with key client groups such as young people leaving care and service users with complex needs.

This should include creating integrated teams where this would be beneficial and avoid the potential for silo working

**Recommendation Eight**

The Council should review and update its online and other communications related to homelessness and housing advice with the objectives of:

1. Improving accessibility for services users with limited literacy
2. Tailoring communications to different groups with different ways of accessing information
3. Making greater use of social media
4. Providing greater opportunities for self help
5. Encouraging those at risk of homelessness to come forward earlier, when homelessness can still be prevented
6. Managing expectations to reflect the current acute shortage of affordable accommodation compared to local housing need

**Recommendation Nine**

The Council should consider how it can develop greater collaboration with neighbouring local authorities on homelessness.

Areas of cooperation could include:

1. benchmarking key parameters such as costs of TA, operational caseloads, staffing costs and performance of homelessness prevention and relief
2. joint commissioning of services where beneficial
3. joint training and secondments
4. co-development of policies and procedures
5. lobbying of the Welsh government

**Recommendation Ten**

The Council should develop mechanisms to include the views and feedback of people with lived experience in its processes for appraisal and development of the



service, especially where these involve changes to customer facing processes and procedures.

This could include periodic user satisfaction surveys and the establishment of one or more service user focus groups.

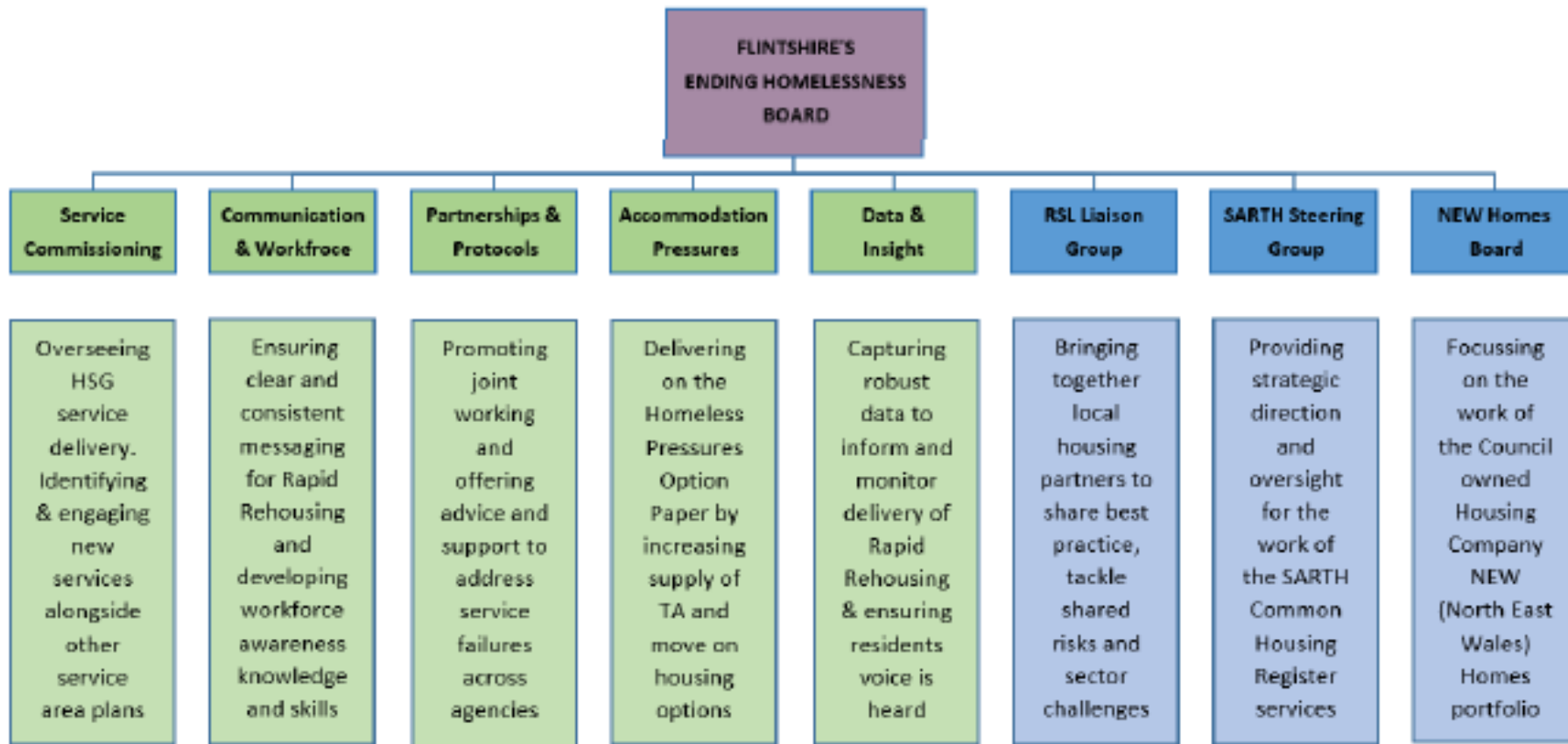
The Council could also consider ways to recruit more people with lived experience of homelessness and receiving support into employed roles within the service.

**Recommendation Eleven**

The Council should consider increasing its strategic and commissioning capacity beyond what is already planned, given the increasing changes from the Welsh government, the large number of actions in the RRTP, the need to increase TA and other accommodation supply, and the need for policy and IT development.

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Appendix 3: Ending Homelessness Board Governance Structure



<b>ENDING HOMELESSNESS BOARD</b>	Responsible for the oversight and successful delivery of the Rapid Rehousing Transition Plan and role out of Rapid Rehousing in Flintshire
<b>DELIVERY GROUPS</b>	Leading on the delivery of specific workstreams and activities outlined within the Action Plan for Rapid Rehousing and accountable to the Ending Homelessness Board
<b>COMPLIMENTARY WORK STREAMS</b>	Existing forums that already provide strategic oversight and delivery of services aligned to the Rapid Rehousing Agenda and housing and homelessness in Flintshire

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## Appendix 4: Staffing Structure, Costings and Service Demand Data

### STAFFING STRUCTURE

The Housing & Prevention Service requires additional staffing to respond to the significant increase in demand for homelessness services and for accommodation. Detailed below is the proposed staff structure, which has been revised on the back of the recommendations of Neil Morland & Co.

Staffing numbers is increasing from 40.77FTE to 72.46FTE. The increase in staff will enable the following:

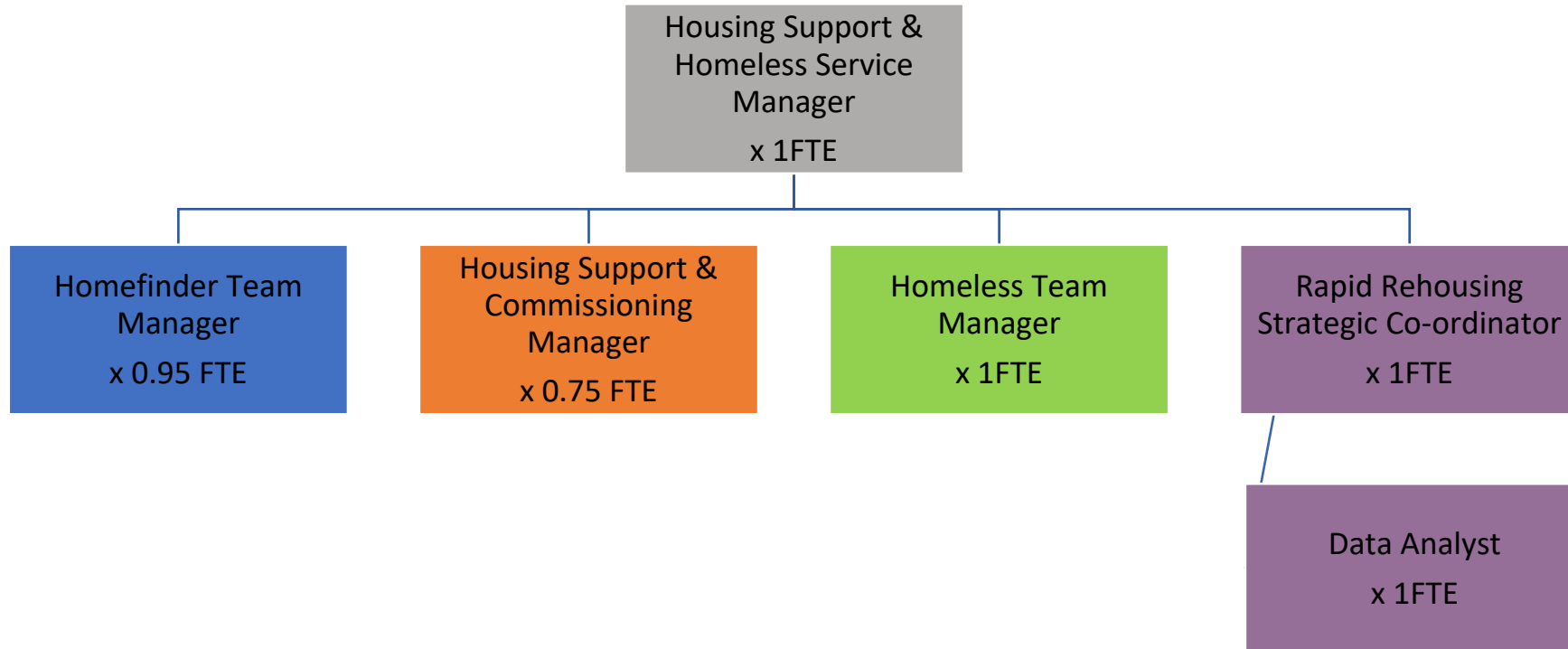
- Additional capacity within the Homeless Team to reduce caseloads and offer better quality of legal compliance on homeless casework, more assistance for residents for prevention of homelessness and improved staff welfare
- Additional capacity for the management of homeless accommodation of all forms. Scope to improve rent collection performance with more staff and tackle poor resident conduct more robustly
- Additional management support for additional staff
- Free up Team Managers to enable them to focus on service improvements
- Deliver additional services such as Diversionary Activities for people experiencing homelessness
- Signing up to the All Wales Leasing Scheme (AWLS)
- Deliver the Rapid Rehousing Transition Plan
- Evidence performance, impact and cost benefit associated with rapid rehousing and homelessness service delivery

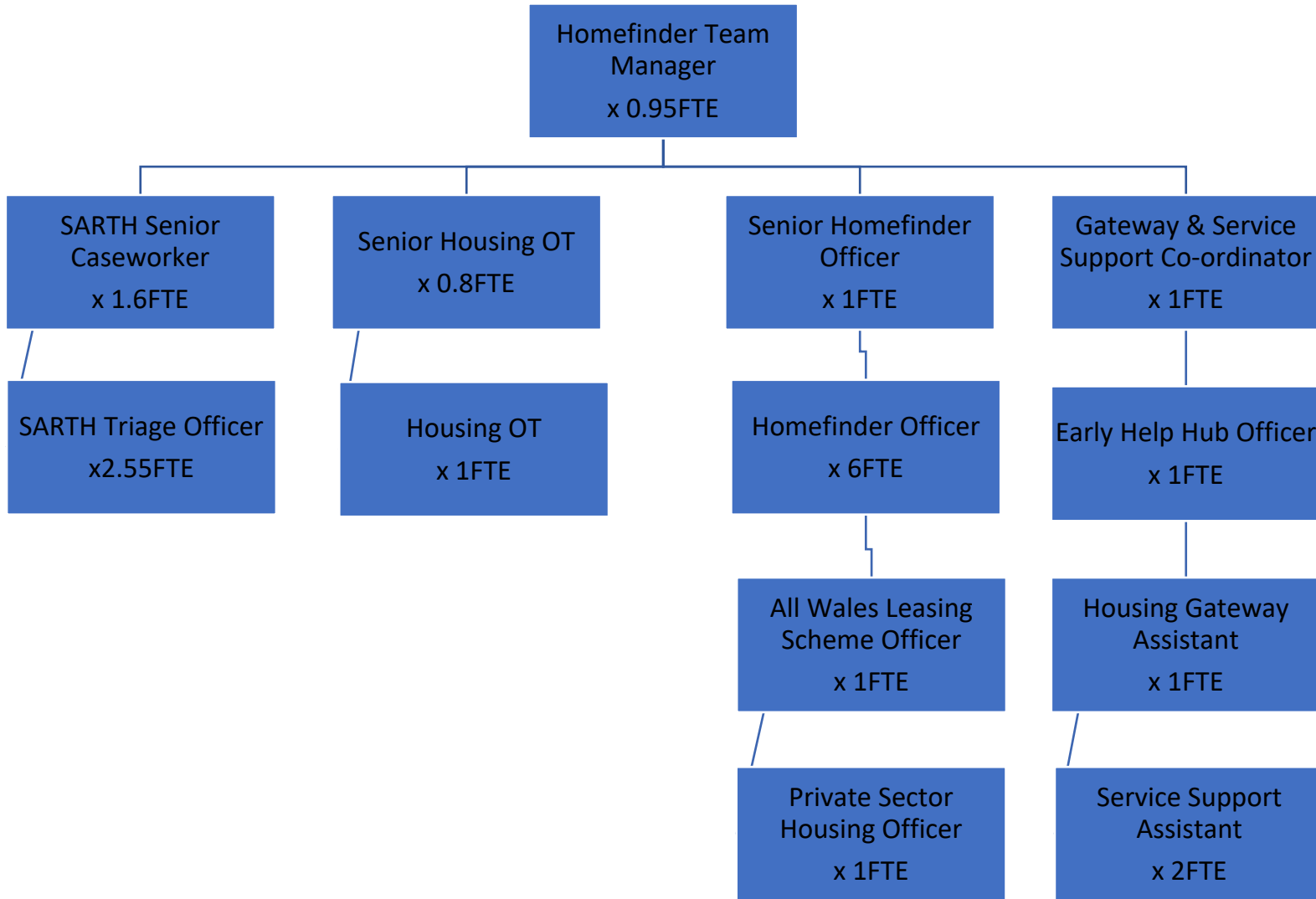
The restructure is to be funded through a mixture of grants, Council Fund and contributions from housing partners for management of the Common Housing Register - Single Access Route to Housing(SARTH). The funding gap £396,333 can be met through diversifying the homeless accommodation portfolio and moving away from costly hotels through the interventions outlined in Appendix 5.

**COSTING FOR SERVICE STRUCTURE**

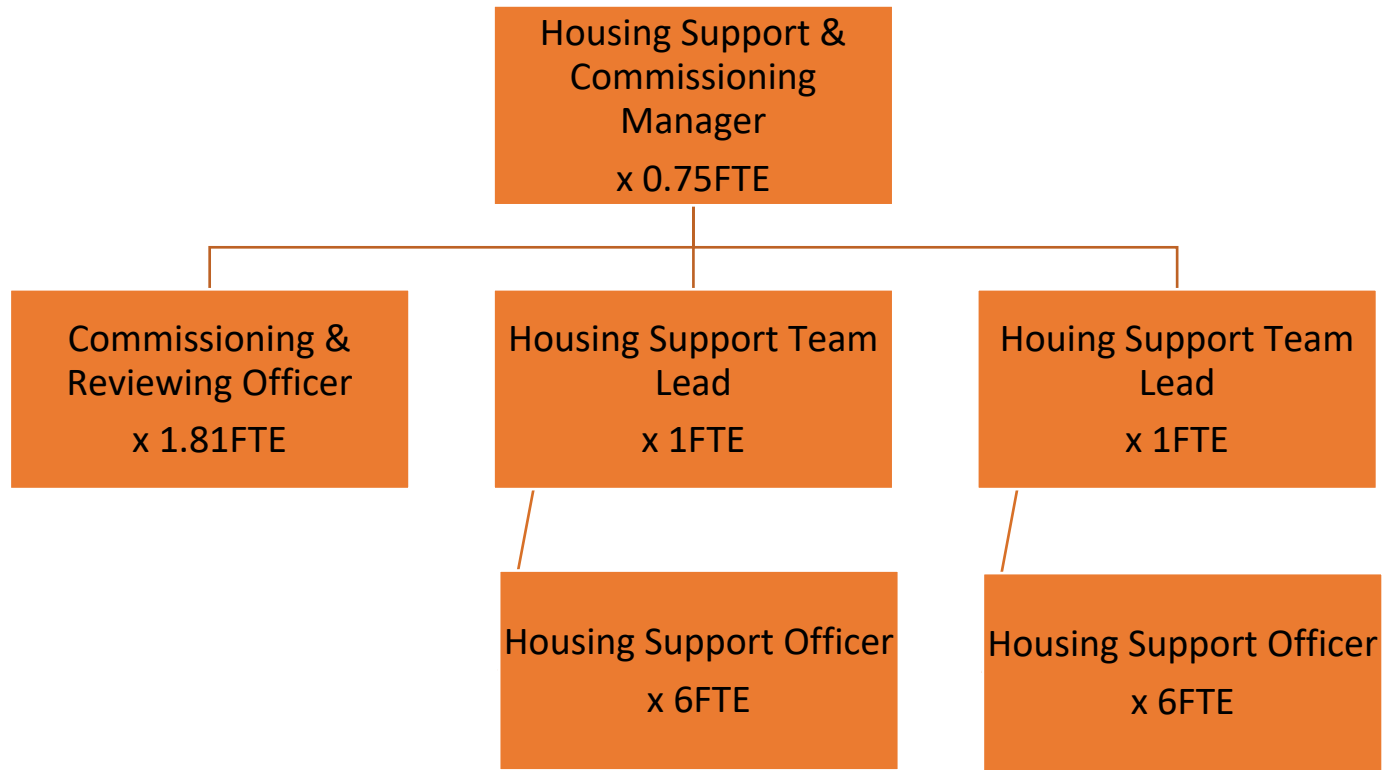
	<b>25.26</b>
<b>CF Budget Net of HSG Income Target</b>	£ 1,031,557
<b>Proposed New Structure Costs</b>	£ 3,331,994
<b>Shortfall in Funding</b>	<b>2,300,437</b>
<b>Funding Streams to offset Shortfall</b>	
HSG Funding	-£ 1,530,162
10% Man Fee on HSG	-£ 158,290
Rapid ReHousing	-£ 52,739
Sarth Partner	-£ 62,062
HRA Contribution	-£ 52,739
AWLS Funding	-£ 48,111
<b>Total Grant Funding</b>	<b>-£ 1,904,104</b>
<b>Shortfall</b>	<b>396,333</b>

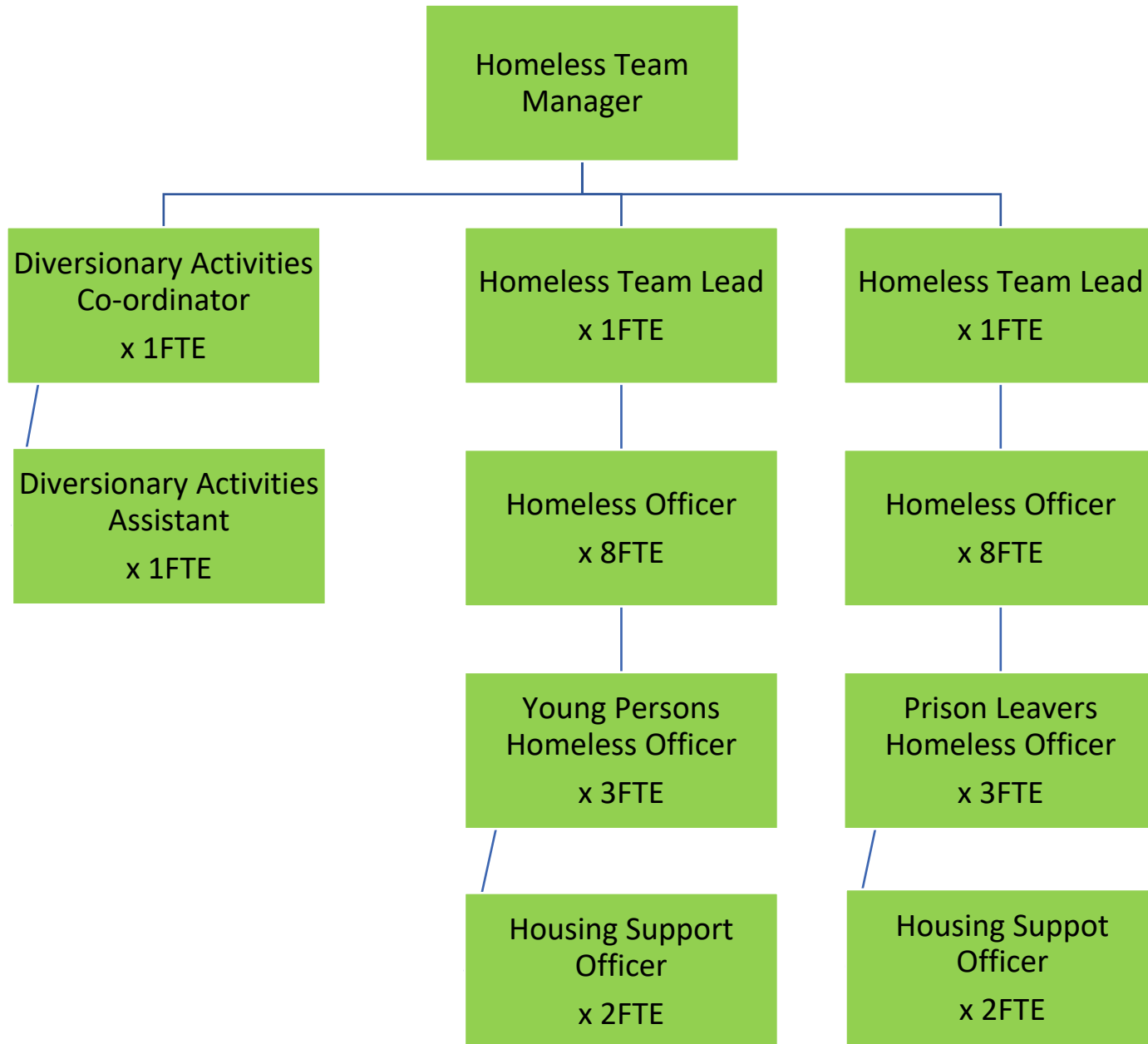
STAFFING STRUCTURE











## **SERVICE DEMAND**

As previously reported to COT, Scrutiny Committee and Cabinet in recent years, there has been a significant increase in demand for homelessness services. These increases are primarily driven by:

- Failing housing market conditions and challenging private rental sector
- Changes to legislation requiring more people to be owed homeless duties including interim housing duties
- Cost of Living crisis
- Barriers to people moving on and exiting homelessness (lack of social housing and acute shortage of 1 bed general needs properties)

All of the above has led to more people being owed assistance by the Council under Housing Wales Act 2014, with an increased caseload for the Homeless Team and large numbers of people requiring homeless accommodation.

**Homeless Officer Caseloads – All Open Cases**

	All Open Homeless Cases
31 <sup>st</sup> March 2022	343
31 <sup>st</sup> March 2023	590
31 <sup>st</sup> March 2024	735

**UP 113%**

**Households in Homeless Accommodation**

	Households in Homeless Accommodation
31 <sup>st</sup> March 2022	101
31 <sup>st</sup> March 2023	184
31 <sup>st</sup> March 2024	282

**UP 179%**

## Appendix 5: Homeless Accommodation VfM

### Using Council Stock To Meet Homeless Demands

#### OVERVIEW

The Homeless Department already has access to approx 40 HRA properties (30 self contained properties and 10 house shares)

This table shows the costs associated with 2 people sharing a 3 bed property. This 2 person model means mini HMO licensing is not required. 3 people sharing can be considered in future.

A commitment of 10 additional units of lower demand 2 and 3 bed homes is in place from the HRA each year.

The approach will also be explored with our social housing partners.

HRA 3 Bed Properties for 2 person house share model	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Furnishing and renewals of furnishings	4,000		1,000		1,000		1,000		1,000	
Electric	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Gas	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Water	260	5.0%	273	5.0%	287	5.0%	301	5.0%	316	1,437
WiFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Council Tax	1,410	5.0%	1,480	5.0%	1,554	5.0%	1,632	5.0%	1,714	7,790
Cleaning Costs (2hrs pw)	2,086	3.0%	2,148	3.0%	2,213	3.0%	2,279	3.0%	2,347	11,073
Rent - £125 pw to HRA	6,375	-	6,375	0.0%	6,375	3.0%	6,566	3.0%	6,763	32,454
Depreciation - 10%	638		638		638		657		676	3,245
Repairs - £1400pa - inc annual checks	1,400		1,400		1,400		1,400		1,400	7,000
<b>Total</b>	<b>17,789</b>		<b>18,217</b>		<b>18,664</b>		<b>19,342</b>		<b>20,050</b>	<b>94,062</b>
HB Income - Assumed 70% collection rate	- 5,783		- 5,783		- 5,783		- 5,783		- 5,783	- 28,917
Service Charge Income £30 - Assumed 70% collection rate	- 2,142		- 2,142		- 2,142		- 2,142		- 2,142	- 10,710
Cost to FCC	9,864		10,291		10,738		11,417		12,124	54,435
<b>Total</b>	<b>65,700</b>	5.0%	<b>68,985</b>	5.0%	<b>72,434</b>	5.0%	<b>76,056</b>	5.0%	<b>79,859</b>	<b>363,034</b>
Potential Efficiencies to Council per unit (2 people)	- 55,836		- 58,694		- 61,696		- 64,639		- 67,735	- 308,599
Potential Efficiencies fir 10 House Shares (20 people)	- 558,359.70		- 586,938.36		- 616,958.46		- 646,389		- 677,345.81	- 3,085,991.02

## Aquiring Additional Properties Through TACP Grant Funding

### OVERVIEW

Welsh Government have provided significant funding to increase housing supply for use as homeless accommodation or social housing to relieve homelessness  
Flintshire have been awarded a indicative award of £2,943,208 for 24/25.

There is potential for additional funding to be made available in year and in future years via TACP

This table shows the costs associated with 2 people sharing a property aquired througth the TACP grant. This 2 person model means mini HMO licensing is not required.

A minimum of 10 properties and potentially more will be used to provide homeless accommodation

Those properties not used for homeless accommodation will be prioritised for people who are homeless or at risk of homelessness to ease pressures on homeless accommodation.

TACP properties to be used as 2 person house shares	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Furnishing and renewals of furnishings	4,000		1,000		1,000		1,000		1,000	
Electric	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Gas	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Water	260	5.0%	273	5.0%	287	5.0%	301	5.0%	316	1,437
WiFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Council Tax	1,410	5.0%	1,480	5.0%	1,554	5.0%	1,632	5.0%	1,714	7,790
Cleaning Costs (2hrs pw)	2,086	3.0%	2,148	3.0%	2,213	3.0%	2,279	3.0%	2,347	11,073
Rent - £125 pw to HRA	6,375	-	6,375	0.0%	6,375	3.0%	6,566	3.0%	6,763	32,454
voids - 10%	638		638		638		657		676	3,245
Repairs- £1400pa - inc annual checks	1,400		1,400		1,400		1,400		1,400	7,000
	<b>17,789</b>		<b>18,217</b>		<b>18,664</b>		<b>19,342</b>		<b>20,050</b>	<b>94,062</b>
HB Income - Assumed 70% collection rate	- 5,783		- 5,783		- 5,783		- 5,783		- 5,783	- 28,917
Service Charge Income £30 - Assumed 70% collection	- 2,142		- 2,142		- 2,142		- 2,142		- 2,142	- 10,710
Cost to FCC	<b>9,864</b>		<b>10,291</b>		<b>10,738</b>		<b>11,417</b>		<b>12,124</b>	<b>54,435</b>
B&B cost (assumed rate of £90 pn)	<b>65,700</b>	5.0%	<b>68,985</b>	5.0%	<b>72,434</b>	5.0%	<b>76,056</b>	5.0%	<b>79,859</b>	<b>363,034</b>
Potential Efficiencies to Council per unit (2 people)	- 55,836		- 58,694		- 61,696		- 64,639		- 67,735	- 308,599
Potential Efficiencies for 10 House Shares (20 people)	- 558,359.70		- 586,938.36		- 616,958.46		- 646,389		- 677,345.81	- 3,085,991

## 9 Room HMO - Leased Option

### OVERVIEW

This property is to be taken onto the Council Lease Scheme for use as homeless accommodation from 1st September 2024.

It will provide much needed housing for 9 single males who are currently in hotels

Property has been signed off as compliant by Housing Enforcement but to enhance health & safety compliance we are installing a sprinkler system and CCTV

The property owner is a developer who is eager to buy housing in Flintshire for potential use by the Council to meet current homeless accommodation pressures.

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Cost to Install Sprinkler System & CCTV	12,000									
Ongoing maintenance costs outside of annual checks	9,000	5.0%	9,450	5.0%	9,923	5.0%	10,419	5.0%	10,940	49,731
Electric	2,924	5.0%	3,070	5.0%	3,224	5.0%	3,385	5.0%	3,554	16,157
Gas	3,670	5.0%	3,854	5.0%	4,046	5.0%	4,248	5.0%	4,461	20,279
Water	995	5.0%	1,045	5.0%	1,097	5.0%	1,152	5.0%	1,209	5,497
WiFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Council Tax	3,240	5.0%	3,402	5.0%	3,572	5.0%	3,751	5.0%	3,938	17,903
Cleaning Costs	4,700	3.0%	4,841	3.0%	4,986	3.0%	5,136	3.0%	5,290	24,953
Rent	45,900	-	45,900	0.0%	45,900	3.0%	47,277	3.0%	48,695	233,672
Grants - 5%	2,295		2,295		2,295		2,364		2,435	11,684
<b>Total</b>	<b>85,145</b>		<b>74,299</b>		<b>75,507</b>		<b>78,219</b>		<b>81,034</b>	<b>394,205</b>
BB Income - Assumed 70% collection rate	- 26,536		- 26,536		- 26,536		- 26,536		- 26,536	- 132,678
Service Charge Income £30 - Assumed 70% collection rate	- 9,828		- 9,828		- 9,828		- 9,828		- 9,828	- 49,140
Cost to FCC	48,782		37,935		39,144		41,855		44,671	212,387
<b>Total</b>	<b>295,650</b>	<b>5.0%</b>	<b>310,433</b>	<b>5.0%</b>	<b>325,954</b>	<b>5.0%</b>	<b>342,252</b>	<b>5.0%</b>	<b>359,364</b>	<b>1,633,653</b>
Potential Saving to Council	- 246,868		- 272,497		- 286,810		- 300,396		- 314,694	- 1,421,266

## Purchasing Enhanced Temporary Housing On Block Booking Arrangement

### OVERVIEW

We are currently in discussions with a company based in South Wales but looking to work in North Wales. The company delivers temporary accommodation services for 11 Welsh LAs already.

The model is an intensive housing solution for homeless people and households and offers a 24/7 management and support service.

Contract and procurement advice is being undertaken for a 5 year contract period and due diligence has proven that the company and service comes highly recommended by Welsh Council peers.

The company buy up and refurbish properties and will target areas at request and also focus on long term empty homes to bring them back into use.

There are approx 100 households placed in out of county hotels and the focus of this housing solution will be on bringing people back in county

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
40 X Single bed accommodation										
Annual Charge - £50 pn x 40 Single units	730,000	3.0%	751,900	3.0%	774,457	3.0%	797,691	3.0%	821,621	3,875,669
Annual Charge - £100 pn x 5 x 2 bed House	182,500	3.0%	187,975	3.0%	193,614	3.0%	199,423	3.0%	205,405	968,917
Annual Charge - £100 pn x 3 x 3 bed House	109,500	3.0%	112,785	3.0%	116,169	3.0%	119,654	3.0%	123,243	581,350
Annual Charge - £100 pn x 2 x 4 bed House	73,000	3.0%	75,190	3.0%	77,446	3.0%	79,769	3.0%	82,162	387,567
	<b>1,095,000</b>		<b>1,127,850</b>		<b>1,161,686</b>		<b>1,196,536</b>		<b>1,232,432</b>	<b>5,813,504</b>
HB Income - Assumed 70% collection rate	- 120,816		- 120,816		- 120,816		- 120,816		- 120,816	- 604,080
										-
Cost to FCC	<b>974,184</b>		<b>1,007,034</b>		<b>1,040,869</b>		<b>1,075,720</b>		<b>1,111,616</b>	<b>5,209,424</b>
A and B cost (assumed single rate of £90 pn, family rate of £140 pn)	<b>1,825,000</b>	5.0%	<b>1,916,250</b>	5.0%	<b>2,012,063</b>	5.0%	<b>2,112,666</b>	5.0%	<b>2,218,299</b>	<b>10,084,277</b>
Potential Saving to Council	- 850,816		- 909,216		- 971,193		- 1,036,946		- 1,106,683	- 4,874,853



### Block Booking Local Hotel for Exclusive Use as Homeless Accommodation

#### OVERVIEW:

There are ongoing discussions with a local hotel for the Council to secure exclusive use of the hotel for homeless households.

A nightly rate of £65 has been negotiated to include bed and breakfast.

Exclusive use of the hotel provides greater opportunity to "parachute" in services that people experiencing homelessness require and reduces risk to other guests

There are approx 100 households placed in out of county hotels and the focus of this housing solution will be on bringing people back in county

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
38 x Single bed accommodation										
Annual Charge - £65 pn x 38 Single units	901,550	3.0%	928,597	3.0%	956,454	3.0%	985,148	3.0%	1,014,702	4,786,451
Security costs £130,000 pa	130,000	3.0%	133,900	3.0%	137,917	3.0%	142,055	3.0%	146,316	690,188
	<b>1,031,550</b>		<b>1,062,497</b>		<b>1,094,371</b>		<b>1,127,203</b>		<b>1,161,019</b>	<b>5,476,639</b>
HB Income - Assumed 70% collection rate	- 112,039		- 112,039		- 112,039		- 112,039		- 112,039	- 560,196
										-
Cost to FCC	<b>919,511</b>		<b>950,457</b>		<b>982,332</b>		<b>1,015,163</b>		<b>1,048,979</b>	<b>4,916,443</b>
Average B and B cost (assumed single rate of £90 pa)	<b>1,248,300</b>	5.0%	<b>1,310,715</b>	5.0%	<b>1,376,251</b>	5.0%	<b>1,445,063</b>	5.0%	<b>1,517,316</b>	<b>6,897,645</b>
Potential Saving to Council	- 328,789		- 360,258		- 393,919		- 429,900		- 468,337	- 1,981,202



## Appendix 6: TACP Homeless Provision

Transitional Accommodation Capital Programme (TACP) funding must deliver housing for those households who are homeless or threatened with homelessness. Priority is given to households in temporary accommodation or those who will need temporary accommodation shortly.

In the financial year 2023/24 £1.966 million was used to bring back into use 104 homes (includes 5 Registered Social Landlord- RSL). They were all allocated to homeless households mostly as permanent accommodation and a few for temporary accommodation.

6 new homes (4x 3bed houses and 2x 4 bed houses) were acquired by RSL's "off the shelf" and were let to homeless households in March 2024 using Social Housing Grant of £1.055 million as an alternative to TACP.

A further 6 new homes (4x 3 bed houses and 2x 1bed flats were or will be created by conversion/acquisition) with £0.89 million.

10 homes were acquired (9x council and 1x RSL) utilising £1.209 million to provide 1x 3bed house, 3x 2 bed houses, 2x 2bed flats and 4x 1bed flats. These will be used as temporary accommodation. Some of the 2 bed flats are ensuite, so can be utilised to accommodate 2x single households sharing. One has been completed and handed over to the homeless team, 9x more are pending for later this year subject to TACP construction bids to WG.

In addition, FCC has used its own resources to acquire an ex-shared ownership house which will be converted to allow 2x single households sharing as temporary housing.

For 2024/2025 we were notionally allocated £2.943 million for TACP. A bid was submitted as follows:

- £0.950 million for 26 voids brought back into use (20x FCC and 6x RSL)
- £0.467 million to refurbish the 10 acquired homes referred to above
- £0.752 million to acquire and refurbish a further 7 homes (a mix of modern flats and older ex-right to buy houses)
- £0.808 million to enable an RSL to acquire 3x3bed houses and 1x 4bed house "off the shelf".

All of the above should be delivered by 31<sup>st</sup> March 2025.

A further pipeline of reserve schemes has been prepared should more resources become available as follows.

Additional 33 voids costing £1.036 million.

Additional acquisitions 19 costing £1.892 million

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Review of Highways Asset Management Plan (HAMP) and Highway and Car Park Inspection Policy
<b>Cabinet Member</b>	Cabinet Member for Streetscene and Transportation
<b>Report Author</b>	Chief Officer (Streetscene & Transportation)
<b>Type of Report</b>	Strategic

### EXECUTIVE SUMMARY

This report provides an update on the county's Highway Asset Management Plan (HAMP) and Highway and Car Park Inspection Policy to ensure that Cabinet members are informed about the current status and future plans for highway asset management.

The report provides an explanation of how the Council utilises the principles of the HAMP to guide the strategy for managing and maintaining the highway infrastructure. It highlights improvements, challenges, and opportunities, and outlines a strategic path forward. The report underscores the importance of effective asset management and compliance with regulations, whilst emphasising the critical role of the highway network, worth over £1.2billion, in maintaining economic and social connectivity, both within Flintshire and for the wider region, as well as supporting key Council objectives and meeting the needs of future generations.

We have committed to reviewing the HAMP every 5-7 years and this report explains how we intend to report on the key assets and progress against our improvement plan over that period utilising Annual Status Reports (ASRs), progress reporting and policy review when necessary.

### RECOMMENDATIONS

1	That Cabinet approves the revised HAMP as presented in this report and as attached in <b>Appendix 1</b> .
2	That Cabinet approves the revised Highway & Car Park Inspection Policy as a Maintenance Manual in <b>Appendix 2</b> .
3	That Cabinet supports the outlined procedure to provide updates and performance reporting to inform future reviews of both the HAMP and the Maintenance Manual.

4	That Cabinet endorses the content of this report and supports the review of the Highway Asset Management Plan (HAMP) and the current arrangements and actions of the portfolio to maintain the highway network.
5	That Cabinet supports the additional recommendations made by the Environment & Economy Overview & Scrutiny Committee to write to the First Minister about the lack of funding in highway assets and maintenance, along with provision of training on HAMP for scrutiny committee members as advised in this report.

## **REPORT DETAILS**

<b>1.00</b>	<b>BACKGROUND TO THE HIGHWAY ASSET MANAGEMENT PLAN (HAMP)</b>
1.01	The highway network is the highest valued infrastructure asset owned by the Council, with the carriageway and footway asset alone valued in excess of £1 billion. The safe and usable condition of the network is essential in maintaining economic and social connectivity, both within Flintshire and with the wider region. The HAMP framework provides the principles for managing the network, recognising the importance of the highway infrastructure in supporting a number of the Council's key objectives.
1.02	Flintshire County Council as the 'Highway Authority' has a statutory duty to maintain all adopted highways, including highway structures within the county (excluding Trunk Roads). This is carried out notwithstanding the following increasing pressures that continue to exist: <ul style="list-style-type: none"> <li>• Limited budgets</li> <li>• Limited staff resources</li> <li>• An ageing network with a backlog of maintenance requirements</li> <li>• Increasing public expectations in respect of highway condition</li> </ul>
1.03	Asset management is a strategic approach to highway maintenance that identifies the optimal allocation of resources for the management, operation, preservation, and enhancement of the highway infrastructure to meet the needs of current and future customers. However, it needs to be recognised that the condition of the highway network will naturally continue to deteriorate each year and, without sufficient annual investment, the overall condition of the network will decline.
1.04	Residents, businesses and visitors in Flintshire rely on the local highway infrastructure, and the principle of applying an Asset Management strategy is to improve the management of the highway asset in respect of those components that are maintainable at public expense in the most cost-effective way possible with the available funding. Our aim is to ensure effective and efficient, proactive maintenance of the asset to ensure both a safe and serviceable condition in support of the Council's key objectives.
1.05	Currently the Council allocates the following financial resources to be made available for investment through HAMP, which are recognised in the Council's medium term financial strategy (MTFS):

	<ul style="list-style-type: none"> <li>• Capital Investment - £1.500m (granted annually on submission of a bid)</li> <li>• Revenue Allocation - £0.225m</li> </ul> <p>Previously, Flintshire County Council has benefited from Welsh Government (WG) capital grant funding through the Highways Refurbishment Grant (2018-2021); however, this funding stream was removed by WG in 2020-2021. Subsequently, an additional revenue grant (issued March 2021) of £571k was given to Flintshire in 2021-2022 as a one-off payment, which helped to fund planned maintenance for carriageways.</p> <p>This additional funding from WG was critical in maintaining the network and the council has made WG aware of the importance of protecting this funding source in future years. This additional funding has not been available in recent years and there is no indication of additional funding in the coming years.</p>
1.06	<p>Ideally, the authority would like to achieve a continuance of the current condition level – this is known as “Steady State”. The level of capital investment required to achieve this position was calculated in 2016 as £2,745,680 per annum, and this figure has been recalculated in 2024 and more than £3.92m per annum is now required. This level of investment would simply maintain the condition of the carriageways alone and the required investment level does not consider the deteriorating condition of other highway assets such footways, structures, and the street lighting / electrical infrastructure network.</p> <p>Given the deteriorating condition of the carriageway (road network), much of the available funding is therefore allocated to this particular asset, with minimal budget allocation to the other asset types to deal with emergency and critical issues.</p>
1.07	<p>The Council operates an approved inspection regime for all assets, which ensures that the funding allocated to each element is sufficient to ensure the asset is safe and fit for purpose and thus ensures that we comply with our statutory requirement to maintain the network.</p> <p>Any available funding therefore needs to be carefully allocated to provide maximum benefits. All roads are surveyed to develop programmes for each year’s resurfacing, surface dressing and patching programmes, ensuring that the most effective use of funds is allocated to those areas in most need of corrective or preventative maintenance.</p>
1.08	<p>Regular safety inspections are carried out on all assets of the network, which involves the Streetscene Area Coordinators visiting each section of the highway infrastructure at the approved scheduled frequency. During the inspections, any defects that may be present are noted, and the required maintenance repair work arranged. Safety inspections are carried out on all carriageways (roads), footways and cycleways and on all publicly accessible car parks operated by the Council.</p>
1.09	<p><b><u>Revised HAMP</u></b>  We have been supported in the review of the HAMP by EXP Consulting, a consultancy firm appointed to assist the County Surveyor Society Wales (CSSW) to deliver specialist roads/highway asset management advice and training to the professional association of local authority chief officers who operate at the strategic tier of local government in Wales.</p>

	<p>EXP have reviewed our available data and previous submissions to WG over a number of years to assist us in reviewing our approach to the strategic management of the highway asset.</p>
1.10	<p>This revised HAMP provides a clear overview of the content and format of the Highway Asset Management Plan, along with necessary revisions and additions to address funding assumptions, risk, asset status, and future funding considerations.</p>
1.11	<p>The purpose of refreshing the HAMP is to appropriately inform the council of the risks across the highway asset groups, and to present a clear strategy to manage the asset with the available resources, in the landscape of increasing costs and static or diminishing funding of both revenue and capital, and ageing infrastructure.</p>
1.12	<p>Three issues are addressed in the revised HAMP (Appendix 1):</p> <ol style="list-style-type: none"> <li>1. Despite a significant backlog of deferred maintenance, addressing it within a short timeframe would be impractical, even with ample funds available. However, it remains the council's responsibility to acknowledge this backlog and work towards its resolution over an extended period.</li> <li>2. With competing demands for resources, informed decision-making is paramount. To facilitate this, we intend to develop a long-term plan (HAMP), report on its progress annually (Annual Status Reports (ASRs)), and improve it as necessary, based on evolving circumstances and improved data.</li> <li>3. Certain practices warrant refinement at present, including the Highway Inspection Policy, the 5-day response time and our approach to managing and monitoring skid resistance through Sideways-force Coefficient Routine Investigation Machine (SCRIM). It is imperative to streamline these processes to enhance efficiency and effectiveness.</li> </ol>
1.13	<p>This will require a revision of inspection regimes (included in the Action Plan) and adjusted remediation times, which are now included within the Highway Inspection Policy, and a reprioritisation of investment through the annual programme of works across asset groups and asset type to reflect the challenges and restrictions we currently face. This will be set out in the long-term strategy within the HAMP, which will be reported on regularly through the ASRs to update the Council on its risk and challenges.</p>
1.14	<p><b>Revised Highway and Car Park Inspection Policy</b>  To align with the County Surveyor Society Wales (CSSW) recommended practices, the previous Highway and Car Park Inspection Policy will be developed as a "Maintenance Manual" (see <b>Appendix 2</b>).</p> <p>A Maintenance Manual creates a place to formalise and record how things are done with descriptive identification of roles, responsibilities and competencies, details of the asset register, an outline of our risk management approach, the network hierarchy, the inspection regime, including defect types and the intervention levels and repair regimes.</p>



1.15	EXP have recommended that the realignment of the inspection and repair policy to the 'Maintenance Manual' recommended practice is undertaken as soon as possible to allow the HAMP to include scheme identification and prioritisation methods.
1.16	The council's policy for inspection and repair of highways was last updated in 2018, with a revision made in 2021. This report sets out the results of a recent review which recommends an updated policy. The policy has been reviewed as part of an exercise to review and update our approach to management of highway assets (roads, including footways, streetlights, bridges and other associated assets signs, lines etc).
1.17	<p>The review was undertaken by EXP using a method developed for that purpose by CSS Wales (CSSW). The review identified several areas where council practice could be improved and aligned with accepted good practice. EXP's findings are detailed below.</p> <ul style="list-style-type: none"> <li>i. The current repair regime does not include any guidance relating to the size of a defect following the publication of a revised Code of Practice in 2016. Inspectors are expected to assessed defects using an assessment of risk. There is no specified method of doing this and it consequently results in assessment that are largely the personal judgement of an individual.</li> <li>ii. The CSSW method includes dimensional criteria (depth and length/width) that guide what is actionable. Inspectors are still able to record defects that do not meet these criteria and to increase the priority of a defect when they assess that it is warranted.</li> <li>iii. 15 of the 22 Welsh authorities include dimensional criteria within their maintenance standards.</li> <li>iv. Our current repair regime does not differentiate between busy roads and quiet roads. A review of the highway carriageway hierarchy (within the Action Plan) will allow us to do this in the future.</li> <li>v. The CSSW minimum standards reflect the higher level of risk that is presented by a defect on a road carrying 20,000 vehicles a day compared to a residential street that may carry 300 vehicles a day (or less).</li> <li>vi. 10 of the 22 Welsh authorities currently employ different regimes for different road hierarchies (levels of use).</li> <li>vii. Our repair regime does not differentiate between the response to a large defect or a small defect, other than 'a situation with potential to cause serious injury or accident,' which receives a response time described currently as 'Immediate Response - Make Safe, Restricted Access or Temporary Repair', otherwise, if any defect is considered as actionable during inspection it is assigned a 5-day response time.</li> <li>viii. CSSW minimum standards apply a higher level of response to defects on busier roads, which is specified as a next working day response.</li> <li>ix. This approach, or a close variant of it, e.g. 24 hrs, is used by 20 out of the 22 Welsh authorities.</li> </ul>

	<ul style="list-style-type: none"> <li>x. Our regime of 5 days for all non-critical safety defects is a higher standard than the CSSW minimum standard for smaller actionable defects on all roads.</li> <li>xi. The CSSW minimum standard response time for a maintenance defect is 28 days or 3 months minimum, depending on the level of use of the road.</li> <li>xii. All other Welsh authorities use a regime like this. There is greater variance on standards on these defects (referred to as "maintenance defects" in the CSSW Minimum standards).</li> <li>xiii. Flintshire's compliance in completing repairs to the council's standard is low. For the last 3 years less than 25% of defects have been repaired within the specified response time.</li> <li>xiv. It must be noted that there are other authorities with low compliance. Most authorities are managing to repair "safety defects" by the end of the next working day more than 85% of the time. The compliance level drops to 65% for "maintenance defects".</li> </ul> <p>In addition to the service provided to users, Flintshire's position when defending third party claims is severely weakened by the low level of repair completion compliance.</p>
1.18	<p>The change of policy will be accompanied by training of inspectors to use the method which is expected to create greater consistency in the assessment of defects, leading to a more uniform level of service across the council network, and aligned to the implementation of a procured highways asset management system.</p> <p>CSS Wales published a set of recommended minimum standards for inspection and repair in September 2019, which are attached as appendices (see <b>Appendix 3-6</b>). The following documents are appended as reference in support of this policy:</p> <ol style="list-style-type: none"> <li>1. <b>CSSW Risk-Based Approach Summary</b> - summarises the method proposed by CSSW for Welsh authorities to respond to the Code of Practice, 2016, requirement to adopt a risk-based approach.</li> <li>2. <b>CSSW Risk-Based Approach</b> - detailed method proposed by CSSW for Welsh authorities to respond to the Code of Practice, 2016, requirement to adopt a risk-based approach.</li> <li>3. <b>CSSW National Minimum Standards Inspection and Repair Regimes</b> - minimum standards of inspection and repair recommended by CSSW as part of the risk-based approach.</li> <li>4. <b>CSSW Risk-Based Approach Rationale</b> - an explanation of the logic and analysis applied to arrive at the method and the minimum standards.</li> </ol>
1.19	<p><b><u>HAMP Improvement Plan</u></b></p> <p>The HAMP also include an improvement plan (see <b>Appendix 7</b>), which will be reviewed and progress reported annually, along with the Annual Status Reports (ASRs) for each major asset group. The improvement plan prioritises changes in</p>

	procedures and training to embed them across the teams, and data collection and systems improvements to facilitate more robust performance analysis.
1.20	Prioritising an improvement plan ensures efficient resource allocation, enhances safety, and maintains network performance. It allows for proactive risk management, statutory compliance, and long-term sustainability. This plan also provides accountability and transparency in decision-making, ensuring that critical needs are addressed first.
1.21	<p><b><u>Annual Status Reports (ASRs)</u></b> Four annual status reports have been included with this report:</p> <ul style="list-style-type: none"> <li>i. Carriageways ASR 2023 (see <b>Appendix 8</b>)</li> <li>ii. Footways ASR 2023 (see <b>Appendix 9</b>)</li> <li>iii. Structures ASR 2023 (see <b>Appendix 10</b>)</li> </ul> <p>Further work is required to finalise ASRs on road markings, street lighting and traffic signals asset groups, and these will be presented to Cabinet again once available.</p>
1.22	<p>The purpose of Annual Status Reports (ASRs) in the context of Highway Asset Management Planning, as supported by EXP Consulting for the County Surveyors Society Wales (CSS Wales), is to provide a comprehensive overview of the current condition and performance of the highway network. These reports serve several key functions:</p> <ul style="list-style-type: none"> <li>• <b>Monitoring Asset Condition:</b> ASRs track the current status of highway assets, such as roads, structures, and street furniture, helping authorities understand the overall health of their network.</li> <li>• <b>Performance Evaluation:</b> The reports assess how well the network is performing against predefined performance indicators. Include review the investment and works undertaken to maintain the asset group.</li> <li>• <b>Data-Driven Decision Making:</b> ASRs provide evidence-based insights that guide resource allocation and planning decisions. By analysing trends in asset condition and performance, the reports help prioritise maintenance and repair activities, ensuring that investment is directed where it is most needed.</li> <li>• <b>Risk Management:</b> The reports identify areas of potential risk, such as deteriorating infrastructure, and suggest options for mitigating these risks through targeted interventions.</li> <li>• <b>Strategic Planning:</b> ASRs support long-term strategic planning by offering different options for managing the highway network, including cost-benefit analysis and lifecycle planning. This enables local authorities to make informed decisions about future investments and interventions.</li> <li>• <b>Accountability and Transparency:</b> By documenting the condition and performance of the highway network, ASRs provide transparency to stakeholders, including the public, elected officials, and funding bodies such as Welsh Government, ensuring accountability in the management of public assets.</li> </ul>

	In summary, the Annual Status Reports are crucial tools in highway asset management, providing the necessary data and analysis to ensure effective, efficient, and sustainable management of the highway network.
1.23	The service will present annual updates on the major asset groups using the ASR methodology, along with progress updates on the improvement plan and any necessary policy reviews identified through the analyses of data, ensuring alignment with the objectives outlined in the Highway Asset Management Plan (HAMP). This will be included in future forward work planning for committees.
1.24	<p>The diagram below shows the relationship between the HAMP and other Council plans, strategies, and policies.</p>
1.25	The Environment & Economy Overview & Scrutiny Committee, at its meeting on 8 <sup>th</sup> October, supported the revised HAMP strategy and requested that an additional recommendation be included that the Leader and Cabinet write to the First Minister about the lack of funding for investment in highway assets.
1.26	The Environment & Economy Overview & Scrutiny Committee also requested that officers arrange for bespoke training on HAMP for scrutiny committee members to better understand the annual status reports (ASRs) and relationship with HAMP, and it was agreed that this would be arranged through EXP consulting in due course. Any training provided will be free of charge.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	<p><b>Revenue Budget:</b> The revised Highway Asset Management Plan (HAMP), which prioritises addressing the backlog of minor repairs over resurfacing, will address increasing pressures on revenue budget. Minor repairs, although typically less expensive individually, will be managed efficiently through careful planning and resource allocation.</p> <p>This proactive approach will allow us to tackle issues before they escalate into more significant problems, thereby reducing the need for costly interventions in the future. The revenue budget will be adjusted to accommodate the shift towards more frequent, smaller-scale repairs, ensuring the network is maintained to a high standard utilising the plant and equipment already available to the service.</p>

2.02	<b>Capital Budget:</b> While larger resurfacing schemes may still be required in the future, this strategy allows us to prioritise capital investment where it will have the most impact, minimising deterioration and maximising the efficiency of our spending at this time.
2.03	<b>Human Resources:</b> The increased emphasis on minor repairs will be supported by our existing workforce, with strategic use of external contractors as needed. This approach provides flexibility and scalability in operations, ensuring that we can manage the increased volume of smaller repairs without overburdening our resources. Workforce planning will focus on optimising the deployment of teams to manage this shift efficiently.
2.04	<b>Other Resources:</b> By adopting a new approach to HAMP, we will optimise the use of materials and equipment, reducing waste and improving overall efficiency. The increased demand for repairs will be managed through streamlined processes and close coordination with external contractors, ensuring that all resources are utilised effectively to maintain service levels.
2.05	<b>Technology:</b> A data-driven approach will be central to the success of this strategy. By investing in advanced asset management technology, we will enhance our ability to prioritise, track, and execute minor repairs. This will enable us to manage the backlog effectively and ensure that decisions are based on real-time data and evidence, improving overall network performance and minimising disruption. Funding of has already been committed to replace the existing highway asset management system (Mayrise replacement) in 2024-2025.
2.06	<b>Other Implications:</b> This shift towards a more proactive, repair-focused strategy aligns with our commitment to maintaining the network to a high standard while being fiscally responsible. It will also enhance public satisfaction by addressing visible issues more promptly. Our policies and procedures will be updated to reflect these new priorities, ensuring clarity and consistency in our operations, while ongoing stakeholder engagement will help communicate the benefits of this change in focus.
2.07	Highway maintenance operations on the highway network are predominantly carried out by Streetscene staff and resources are supplemented by local contractors as and when necessary.

<b>3.00</b>	<b>IMPACT ASSESSMENT &amp; RISK MANAGEMENT</b>
3.01	The highways maintenance service has undertaken various risk assessments on the procedures involving highway inspection, which are outlined within the policy.
3.02	Safety defects identified during Highway Safety Inspections should be repaired within the specified timelines. Failure to comply with this will result in the Council being liable to claims from road users. The annual programme of preventative maintenance (resurfacing, surface dressing and patching) should reduce the occurrence of safety defects on the network.

3.03

A full integrated impact assessment is required and is attached in **Appendix 3** of this report, which elected members are advised to read.

**Ways of Working (Sustainable Development) Principles Impact**

<p>Long-term</p>	<p>Positive – The Ways of Working principles may impact how the highway asset management plan (HAMP) considers the future needs and challenges of the transport system, how it prevents or reduces negative impacts on the environment and society, how it integrates with other policies and objectives, how it collaborates with stakeholders and partners, and how it involves the public and communities in the planning process. Having a highways asset management plan that sets out the strategy and objectives for maintaining and improving the road network will: -</p> <ul style="list-style-type: none"> <li>• Improve safety and reliability of the road network</li> <li>• Reduce costs and environmental impacts</li> <li>• Increase customer satisfaction and economic benefits</li> </ul> <p>Create better alignment with corporate priorities and stakeholder expectations.</p>
<p>Prevention</p>	<p>Positive – By applying the sustainable development principles to the highway asset management plan, we can prevent future trends such as environmental degradation, social inequality, economic decline and cultural erosion. They can also ensure that the highway network supports and facilitates connectivity, well-being and resilience within Wales and beyond.</p>
<p>Integration</p>	<p>Positive - The highway asset management plan helps with integration by:</p> <ul style="list-style-type: none"> <li>• Providing an integrated framework for the delivery of highway maintenance services across the road network.</li> <li>• Aligning the highway objectives and priorities with the well-being goals and the corporate plan of the council.</li> <li>• Considering the interactions and impacts of the highway network on other aspects of well-being, such as health, environment, economy and culture.</li> <li>• Working with other departments, organisations and sectors to share information, resources and best practices</li> </ul>
<p>Collaboration</p>	<p>Positive – The highway asset management plan helps with collaboration by enabling the local authority to:</p> <ul style="list-style-type: none"> <li>• Working with other public bodies, private contractors, community groups and stakeholders</li> </ul>

	<p>to deliver highway maintenance services in a coordinated and efficient way.</p> <ul style="list-style-type: none"> <li>• Sharing data, information, resources and best practices with other organisations and sectors to improve the performance and quality of the highway network.</li> <li>• Engaging with users, customers and residents to understand their needs, expectations and feedback on the highway services.</li> <li>• Aligning the highway objectives and priorities with the national transport strategy and the well-being goals of Wales</li> </ul>
Involvement	<p>Neutral - The highways asset management plan will need to:</p> <ul style="list-style-type: none"> <li>• Focus on the needs of users and the community, and their active involvement in the development and review of policies, priorities and programmes.</li> <li>• Engage with users, customers and citizens to understand their needs, expectations and feedback on the highway services.</li> <li>• Provide information, consultation and participation opportunities for the public and stakeholders to influence the decision-making process.</li> </ul>
<b>Well-being Goals Impact</b>	
Prosperous Wales	<p>Positive - Providing a transport system that helps to keep people mobile and connected, supports economic prosperity, enhances environmental resilience, improves public health, reduces inequalities, fosters social cohesion, promotes cultural diversity and contributes to global responsibility. A well-managed HAMP supports economic growth by providing a reliable and efficient transport network that facilitates the movement of people and goods, reduces congestion and travel costs, and attracts investment and tourism.</p>
Resilient Wales	<p>Positive – Enhances environmental sustainability by adopting a lifecycle approach that minimises the use of natural resources, reduces waste and emissions, and improves the resilience of the highway assets to climate change and extreme weather events.</p>
Healthier Wales	<p>Positive - Improves public health by promoting active travel modes such as walking and cycling, reducing air and noise pollution, improving road safety and accessibility, and creating attractive and liveable public spaces.</p>
More equal Wales	<p>Positive - Reduces social inequalities by ensuring that the highway assets are maintained to a safe and serviceable condition, that the needs and preferences of different user groups are considered,</p>

		and that the benefits and costs of highway maintenance are distributed fairly.
	Cohesive Wales	Positive – Fosters social cohesion by engaging with the local communities and stakeholders in the planning and delivery of highway maintenance, by respecting the local character and identity of the places, and by enhancing the connectivity and integration of the communities.
	Vibrant Wales	Positive - Supports cultural diversity by recognising the importance of the highway assets as part of the cultural heritage of Wales, by protecting and enhancing the historic and natural features of the highway network, and by promoting the use of Welsh language in the communication and signage of highway maintenance.
	Globally responsible Wales	Positive - Contributes to global responsibility by aligning with the international standards and best practices of highway asset management, by aligning with the UK Road Liaison Group Code of Practice for Well-managed Highway Infrastructure, by supporting the UK's commitment to reduce greenhouse gas emissions by 80% by 2050, and by sharing best practices and learning from other highway authorities, and by demonstrating leadership and innovation in highway maintenance.
<p>The policy also links to the Council's <b>Well-being Objectives</b> 2022-2023 in terms of supporting safer communities and limiting the impact of the Council's services on the natural environment and supporting the wider communities of Flintshire to reduce their own carbon footprint.</p> <p>The HAMP also aims to contribute to the Council's priorities in terms of providing a well-connected, safe and clean local environment and supporting people in need by creating resilient communities where people feel connected and safe.</p>		

<b>4.00</b>	<b>CONSULTATIONS REQUIRED / CARRIED OUT</b>
4.01	<p>Consultation has taken place with:</p> <ul style="list-style-type: none"> <li>• With the Cabinet Member</li> <li>• Operational service teams and stakeholders</li> <li>• EXP Consulting via County Surveyor's Society Wales</li> </ul>
4.02	Consultation undertaken with the Environment & Economy Overview & Scrutiny Committee with additional recommendations made. The revised HAMP was supported by the Scrutiny Committee.
4.03	A communications plan will be developed and implemented once the new strategy is adopted and approved.



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<b>5.00</b>	<b>APPENDICES</b>
5.01	HAMP ( <b>Appendix 1</b> ), Maintenance Manual ( <b>Appendix 2</b> ) CSSW Risk-Based Approach Summary ( <b>Appendix 3</b> ) CSSW Risk-Based Approach ( <b>Appendix 4</b> ) CSSW National Minimum Standards Inspection & Repair Regimes ( <b>Appendix 5</b> ) CSSW Risk-Based Approach Rationale ( <b>Appendix 6</b> ) HAMP Improvement Plan ( <b>Appendix 7</b> ) Carriageways ASR 2023 ( <b>Appendix 8</b> ) Footways ASR 2023 ( <b>Appendix 9</b> ) Structures ASR 2023 ( <b>Appendix 10</b> )

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	Highways Act 1980.
6.02	Railways and Transport Act 2003
6.03	Traffic Management Act 2004
6.04	UKRLG Code of Practice – “Well Managed Highway Infrastructure” - <a href="http://www.ukroadsliaisongroup.org/en/codes/">http://www.ukroadsliaisongroup.org/en/codes/</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Barry Wilkinson, Highway Network Manager <b>Telephone:</b> 01352 704656 <b>E-mail:</b> <a href="mailto:barry.wilkinson@flintshire.gov.uk">barry.wilkinson@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<b>Financial Year (FY):</b> the period of 12 months commencing on 1 April  <b>Budget:</b> a statement expressing the Council's policies and service levels in financial terms for a particular financial year. In its broadest sense it includes both the revenue budget and capital programme and any authorised amendments to them.  <b>HAMP:</b> Highway Asset Management Plan - A strategic framework for managing the Council's highway infrastructure, aiming to ensure optimal allocation of resources for maintenance, operation, and enhancement of roads, footways, and other transport assets.

**Well Managed Highway Infrastructure:** An industry developed approach that sets out guidance and advice for the management and maintenance of highway infrastructure and assets.

**Highway Authority:** The legal body responsible for maintaining adopted highways within its jurisdiction. For Flintshire County Council, this excludes Trunk Roads.

**Carriageway:** The part of the highway used by vehicles, commonly referred to as the road.

**Footway:** Pedestrian pathways alongside roads, often called pavements.

**MTFS (Medium Term Financial Strategy):** The Council's financial plan for allocating resources over the medium term.

**Capital Investment:** Funds allocated for long-term infrastructure projects, such as road repairs.

**Revenue Allocation:** Ongoing operational budget for maintenance and smaller works.

**Steady State:** Maintaining the highway network in its current condition through adequate funding.

**Deferred Maintenance:** Postponed maintenance leading to a backlog of required works.

**SCRIM (Sideways-force Coefficient Routine Investigation Machine):** Equipment used to measure skid resistance on road surfaces.

**Annual Status Report (ASR):** Yearly reports on the condition and performance of highway assets groups.

**Risk-Based Approach:** A method of prioritising maintenance based on risk levels, as recommended by the 2016 Code of Practice.

**Inspection Regimes:** Regular inspections to monitor the condition of highways and identify required repairs.



**Flintshire County Council**

**Highway Asset Management Plan**

**2024 - 2029**

## Foreword

The council's highway network is a crucial asset, integral to the daily lives of our residents and vital to the economic and social wellbeing of the area. Whether it's travelling to work, attending school, accessing services, or enjoying leisure activities, our roads, footways and highways infrastructure are an essential part of daily life.

*"Maintaining our highway network to a safe and appropriate standard is a significant challenge, particularly in the face of difficult financial times. It is essential that we manage our highways infrastructure efficiently, balancing immediate needs with long-term sustainability. We must ensure that our investment today meets the demands of tomorrow, delivering value for money whilst ensuring the safety and usability of the network.*

*This Highway Asset Management Plan (HAMP) outlines our strategic approach for managing the council's highway assets over the next five years. The highway infrastructure asset is a significant and diverse asset including carriageways and footways, bridges and structures, street lighting, traffic signals and drainage.*

*Developed in accordance with national guidance, the Council is committed to the principles of recognised best practice in highway asset management to enable informed decisions to be made about the levels of investment and maintenance funding required, which will assist us with targeting our resources to where they can be most effective. This plan is the result of careful planning and analysis, taking into account the external challenges we face, such as the impact of the changing climate, budget constraints and limited resources. It is therefore imperative that we adopt a long-term approach and ensure that funding is spent in the most efficient and cost-effective way. Our commitment remains clear: to provide a safe, effectively maintained and well managed highway network that supports the economic prosperity of Flintshire.*

*Despite the current financial challenges, we will continue to prioritise the needs of our communities and ensure that our highway assets remain fit for purpose, now and in the future."*

Chief Officer, Streetscene & Transportation

## Document Control

Version Number	Amendments Made	Date
v1	Nil – Original	09 September 2024
<b>Next Review Due</b>	<b>Stage 2 consideration (tbc)</b>	<b>September 2026</b>

## Council Approval

Version Number	Council Committee	Date
v1	<b>Cabinet (tbc)</b>	<b>14<sup>th</sup> October 2024</b>

## Responsibility for the Plan

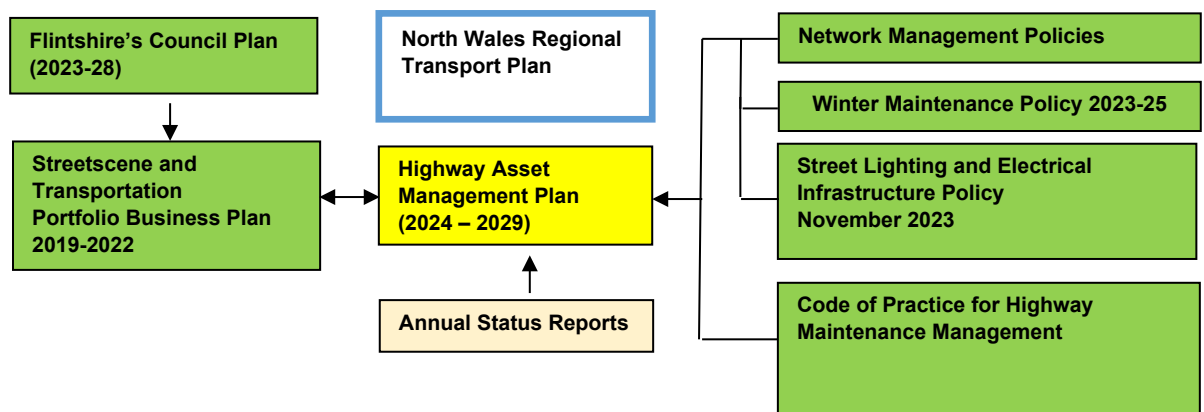
The responsibility for the delivery of and updating of this plan are shown below

Council Officer	Responsible for
Mr Barry Wilkinson	Delivery of the plan
Mr Barry Wilkinson	Updating of the plan

## References

1. CSSW Highway Asset Management Planning - Recommended Practices.
2. Code of Practice for Highways “Well Managed Highway Infrastructure”, October 2016

## Relationship with other Council Plans and Strategies



## Summary

The council's plans for the highway asset for the period 2024 to 2029 recognise the financial constraints the council is working within. The plan targets ensuring user safety and then mitigating against deterioration. A concerted effort to reduce defects on roads will be the priority for 2024 to 2026. At the end of this period a review will be undertaken to determine if priority works are required of bridges (scour protection and strengthening) and lighting column replacement.

### 2024 to 2026

#### **Carriageways: *target reduction in defects and limit deterioration***

- Annual funding of approx. £900k will be invested in surface treatments, patching and minor repairs
  - Repair of approx. 3,500 defects identified from routine inspection
  - Patching approximately 8,000 sqm of road each year
  - Surface treatments on approximately 7.6km of road each year
- Annual funding of approx. £500k on the repair of additional carriageway defects
  - Repair of additional defects approx. 7,000 per annum

#### **Footways: *condition may deteriorate over the plan period***

- Approximately £100k p.a. will be invested in patching and slurry surfaces for footways
  - Patching approximately 1,300 sqm of footway each year
  - Slurry treatment, approximately 12,000 sqm of footway per year.
- Annual funding of approx. £150k on the repair of footways defects
  - Repair of approx. 1,500 footway defects per annum

#### **Street Lighting: *manage column condition***

- Annual funding of £150k will be invested in life-expired columns identified by structural testing
  - Aim will be to maintain the current level in need of immediate replacement
- Annual funding of approx. £150k on the repair of street lighting faults
  - Repair defects to current standard, repairing approx. 1,500 per annum

#### **Structures: *reduce the number of structures in a very poor condition***

- Annual funding of approximately £245k
  - Undertake refurbishment works to identified structures in very poor condition
- Flintshire Bridge Maintenance
  - The Flintshire Bridge has a detailed maintenance plan which has been approved and requires funding.

**Traffic Signals, *continue to maintain in an operable state***

- Annual funding of approximately £150k.
  - Undertake planned works to traffic signals in poor or failing condition

**Road Marking, *maintain markings in a legible condition***

- Annual funding of approximately £180k.
  - Remark of illegible markings identified by condition survey
  - Instigate cyclic remarking regime

**2027 to 2029**

At the end of 2026 a review of the HAMP will be undertaken. The review will consider the results of work to investigate if scour protection works are required at certain bridges, whether some bridges need strengthening and whether there is a need to increase investment in the replacement of aged street lighting columns. The effectiveness of the strategy between 2024 and 2026 in reducing the level of carriageway detects and minimising deterioration of all assets will be considered. Stage 2 of this plan will be published based on this assessment.

## 1. Introduction

This plan sets out the council's plans for our highway assets for the period 2024-2029.

### Purpose

The purpose of the HAMP is to:

- Define the service standards that users can expect
- Explain the strategies to be implemented to achieve these standards

### Context

This plan has been developed in accordance with the CSSW recommended highway asset management planning practices <sup>(1)</sup> and the other council plans and strategies shown above. The plan is consistent with the council's corporate approach to asset management.

The standards, targets and spending assumptions contained within this HAMP will be monitored and an annual status report produced, which will be provided to senior management and members along with any recommended changes to the plan.



### Stages

This plan involves 2 stages. Stage 1 from 2024 to 2026 will focus on repairing additional quantities of carriageway and footway defects with the aim of ensuring user safety and reducing exposure to defects. This will be accompanied by targeted replacement works on assets to minimise deterioration. At the end of this period a review will be undertaken and the strategy for Stage 2 will be confirmed. During stage 1 investigations will be made into issues relating to potential need for Scour protection at bridges, the strength of some bridges and the condition of street lighting columns. The results of these investigations will inform the priority for works in Stage 2.



## 2. Highway Assets

The highway asset is made up of roads, footways, bridges, streets lights, traffic signals and street furniture.

The council's highway assets covered by this plan are:

- 1,183km carriageways
- 938km of footways
- 21,300 streetlights on 20,370 columns
- 3,250 illuminated signs and bollards
- 52 signalised junctions
- 62 signalised pedestrian crossings
- 372 bridges and culverts
- 27 retaining walls (estimated)
- Approx. 30,000 items of street furniture

The plan does not cover bus stops, private roads and bridges, council owned bridges not on or crossing the highway network and decorative, seasonal lighting.

### Data

Asset data for some assets is currently limited. Sample surveys and local estimates have been used to include them within this plan. To ensure that future plans are based on better information a Data Improvement Plan <sup>(2)</sup> has been created to support this plan.

## 3. External Pressures

**This plan has considered relevant external pressures.**

### Asset Growth

Over the last 10 years the council taken over the maintenance of 20 km of additional road. These roads create will create need for maintenance, management and associated funding in future years as they age.

### Weather

This plan assumes average winter conditions. If, harsh winters are experienced it can be expected that additional damage to road surfaces will occur and the council will need to repair significantly more potholes and to potentially adjust the standards in this plan.

### Flooding

Climate change is resulting in an increased frequency and intensity of storm events. The increase in such storms places pressure on highway drainage infrastructure that the roads were not designed for and flooding can occur. Extreme flood events can damage the road. When flood events occur, resources are deployed to respond. This may involve clearing land slips or repairing part of roads eroded by flood waters. Such events may impinge upon the ability to meet the targets in this plan unless additional resources (and funding) are made available.

## Service Standards

**Service standards define what users can expect.**

### Services Standards

Service standards in this plan have been set with reference to:

➤ **Inspection**

- Routine inspections for safety and to record maintenance defects

➤ **Safety**

- The number of critical incidents/defects requiring an immediate (2hr) response
- The number of “safety” defects requiring a (24hr) response

➤ **Condition**

- The percentage of the asset in a “poor” (red) condition
- The percentage of the asset that should be “considered for maintenance”, (amber) condition
- The number of maintenance defects requiring a 7-day response

Inspection and reactive repair standards are set out in the council’s highway maintenance manual. This plan assumes those standards will be consistently met. The specific standards that users can expect from each highway asset group during the plan period are shown below (section 5).

### Strategies

The strategy to be applied for each asset group to achieve the standards is given in the section below. The strategies include predictions of the types and quantities of works required to deliver the standards. The strategies aim to prioritise the repair or replacement of elements of each asset in a manner that will achieve the standard at the best possible short and long-term cost.

### Works Programmes

The strategies will be used to create programmes of works. Records of potential works are maintained for each asset based on the results of inspection and condition surveys. These records are used to derive works programmes.

### Funding Assumptions

The standards included in the plan are based upon levels of funding that are indicated. Significant changes in these funding levels would result in the standards in the plan needing to be revised.

## 4. Carriageways

The council manages 1,183km of roads; 495km of classified (A, B & C roads) and 688km unclassified

### Standards

#### Safety

The council's targets for carriageway defect repair are:

Repair of Defects*	Standard	Anticipated Annual Quantity
Critical defects shall be made safe within	2 hours	20
Safety defects shall be rectified by	End of Next Working Day	230

*\*definition of critical and safety defects for carriageways are given in the maintenance manual*

#### Typical defects:

A **critical** carriageway defect is one that poses immediate danger to users such that it is appropriate to guard it until it can be coned off or repaired. Such defects occur rarely but warrant prompt attention to ensure user safety. The response to a critical defect refers to the time to attend the site and to make the safe site.

**Safety** defects are those that pose an imminent risk of injury to road users, requiring a response as soon as possible to remove a potential risk of injury to users.



#### Condition

**Maintenance defects** are defects that pose a lesser danger to users and are typically repaired to prevent them deteriorating into safety defects. The time to repair them reflects the reduced risk they pose to users.

The council's targets for carriageway maintenance defect repairs are:

Repair of Maintenance Defects	Standard	Quantity#
Maintenance defects (high priority) shall be rectified within	1 month	1,000
Maintenance defects (medium priority) shall be rectified within	3 months	2,000

*#typical annual quantities*

The council's targets for carriageway condition (measured by condition surveys) for the duration of the plan are:

Measured Condition	Road Class	A	B	C	U
Percentage in a poor condition shall be kept below		5%	5%	10%	20%
Percentage that should be “considered for maintenance” shall be kept below		30%	30%	30%	40%



### Strategies

The strategy for carriageways comprises of:

- the continued repair of reactive repairs
- repair of minor defects
- capital investment in patching and surface treatment

### Repair of Defects

Safety defects such as potholes are identified by a regime of inspection or notified to the council by users. Safety defects are assessed based upon the risk they pose to users and their repair prioritised in accordance with the council’s maintenance manual. Routine and reactive repairs are expected to continue at current levels throughout the period of this plan. This plan assumes that the works gangs currently deployed to repair safety defects will continue to do so and that the quantities of repair required will be like those experienced in recent years.

### Repair of Minor Defects

The condition survey has identified a large quantity of minor defects of varying sizes which do not meet the criteria for reactive repair. These defects are scattered on all road classes around the county. Funding will be provided to repair an amount of these defects. The purpose of these repairs is to reduce the number of defects present on the network and reduce the exposure of users to defects.

### Patching

Patching programmes will be undertaken to repair all areas of carriageway assessed as poor condition which are not included in the resurfacing and surface treatment programmes. These smaller areas tend to be located on roads which are in generally good condition which may not be considered for planned treatments for many years.

**Resurfacing and Surface Treatment**

The current level of condition on classified roads (A, B and C Roads) is reasonably good. Flintshire’s classified road condition survey results rank them as having some of the best local authority roads in Wales. This has come through continual investing in planned maintenance treatments. The county procured a condition survey of the unclassified roads in May 2022. The results showed the level of poor condition of unclassified roads is much higher than the classified roads. This is due to the lower levels of historical investment.

The strategy for this plan is to invest all the planned maintenance investment on unclassified roads. Most treatments will be surface treatments as these will enable more roads to be treated. The classified roads will therefore deteriorate during the period of the plan.

**Works**

The strategy detailed above is expected to require the following amounts of works to be undertaken.

**Reactive Repair**

Between 3,000 and 3,500 highway defects are predicted to be repaired annually from identification during routine inspections.

**Minor Defect Repair**

Between 6,000 and 7,000 highway defects are predicted to be repaired annually.

**Planned Maintenance**

It is estimated that the following approximate annual quantities of treatments will be carried out during the first period of the plan.

Road Class	A	B	C	U
Resurfacing (Corrective Maintenance)	-	-	-	-
Surface Treatment (Preventative Maintenance)	-	-	-	7,000 – 8,000sqm
Patching (Corrective Maintenance)	7,000 - 8,000 sqm			

**Annual Works Programme**

A rolling programme is maintained of all roads where maintenance should be considered. A prioritisation process documented in the council’s highway maintenance manual is used to create an annual programme of work that is approved by council and published.

The prioritisation process ensures that the strategy is implemented and that there is a documented method for choosing which schemes get completed first.



## Funding Assumptions

The works quantities detailed above are based upon the following anticipated funding levels:

Works Type	Annual Funding Required
Planned	£900k
Routine & Reactive	£500k

## 5. Footways

The council manages 938km of footways.

### Standards

#### Safety

The council's targets for footway safety defect repairs are:

Repair of Safety Defects*	Standard	Quantity#
Critical defects shall be rectified or made safe within	2 hours	10
Safety defects shall be rectified or made safe within	24 hours	90

*\*definition of critical and safety defects for carriageways are given in the maintenance manual*

*#typical annual quantities*



#### Condition

The council's targets for footway maintenance defect repairs are:

Repair of Maintenance Defects	Standard	Quantity#
Maintenance defects (high priority) shall be rectified within	1 month	500
Maintenance defects (medium priority) shall be rectified within	3 months	1,000

*#typical annual quantities*

The council's targets for footway condition (measured by condition surveys) are:

Measured Condition		
Percentage in a poor condition shall be kept below		0.5%
Percentage that should be "considered for maintenance" shall be kept below		25%





## Strategies

The strategy for footways comprises of:

- the continued repair of reactive defects
- patching sections of footway in poor condition
- preserving the life of footways by applying slurry treatments

### Repair of Defects

Safety defects such as potholes and trip hazards are identified by a regime of inspection or notified to the council by users. Safety defects are assessed based upon the risk they pose to users and their repair prioritised in accordance with the council's maintenance manual. Routine and reactive repairs are expected to continue at current levels throughout the period of this plan. This plan assumes that the works gangs currently deployed to repair safety defects will continue to do so and that the quantities of repair required will be like those experienced in recent years.

### Patching

The condition information shows that the areas of footways in poor condition are small and scattered around the county. The most cost-effective option is to repair all the poor sections with a patch. It is proposed to complete all the patches in the first year of this plan.

### Slurry Treatments

The footway asset is ageing. The condition survey has clarified this ageing by identifying surface defects including cracking, chip loss and fretting. The slurry treatment is used to extend the life of the footway by covering the surface defects. The treatment will be used on footways with areas of surface defects greater than 50sqm. This will maximise the amount of treatment completed. Larger areas of surface defects are more likely to reflect age than smaller areas which may be due to some other factor.

## Works

The strategy detailed above is expected to require the following amounts of works to be undertaken.

### Reactive Repair

Between 1,500 and 1,600 footway defects are predicted to occur annually.

**Planned Maintenance**

It is estimated that the following approximate annual quantities of treatments will be carried out during the period of the plan.

Strategy	Indicative Area of Works / Year		
	2024/25	2025/26	2026/27
Programme of footways slurry treatments.	4,000 sqm	4,000 sqm	4,000 sqm
Programme of patching	1,280 sqm	-	-

**Funding Assumptions**

To undertake the amounts of works detailed the following funding will be required annually.

Works Type	Annual Funding Required
Planned	£100k
Reactive	£150k



## 6. Street Lighting

The council manages 21,300 lanterns on 20,370 columns.

### Standards

#### Safety

The council's targets for street lighting safety faults are:

Repair of safety defects	Target Standard
Critical defects shall be rectified or made safe within	2 hours

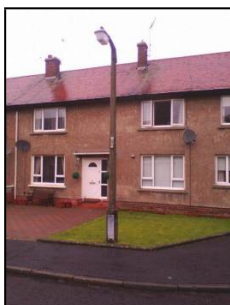
A critical defect could be an exposed cable, or column on the verge of collapse (for example having been hit by a vehicle). The standard is to attend and make the site safe within 2 hours. NB. It may not always be possible execute a permanent repair within this timescale.



#### Condition

The council's targets for street lighting maintenance faults repairs are:

Repair of maintenance defects	Target Standard	
	Standard	Compliance
Maintenance defects (high priority) shall be rectified within	24 hours	90%
Maintenance defects (low priority) shall be rectified within	10 working days	90%



The council's targets for street lighting column condition (measured by structural testing) are:

Measured Condition		Standard
<b>Percentage in a poor condition;</b> the percentage of street lighting columns testing results requiring instant removal or retesting in one year shall be kept below		<3%
<b>Percentage that should be “considered for maintenance”;</b> percentage of street lighting columns testing results requiring retesting within three years shall be kept below		<20%

## Strategies

The strategy for street lighting comprises of the repair of faults together with ongoing capital investment in column replacement.

### Repair of Faults

Faults are identified via inspection or from user notification.

### Column Renewals

The council will continue to undertake structural column testing following GN22. At the end of 2022/23 there were 1,000 columns which were identified as to be planned for removal. It is estimated that up to 160 columns could require immediate removal annually over the period of this plan. During the first phase of this plan the quantity of columns which are renewed will be those identified as requiring immediate removal from the test result. If the testing result identify more columns than there is funding the replace then there may also be a need to remove some columns for safety reasons and not replace them instantly.



### Lantern Renewals

The oldest LED lanterns have been installed for almost 10 years. There are currently no identified issues with these lanterns. A need for bulk replacement of lanterns is not anticipated during the period of this plan.

### Cable Renewals

There will be no cable renewals in the first phase of this plan. Cable faults will be repaired when identified.

## Works

The strategy detailed above is expected to require the following amounts of works to be undertaken.

**Reactive Repair**

It is expected that current levels of faults will continue during the first phase of the plan. These are typically around 5 critical faults, 10 safety faults and 1,500 maintenance faults.

**Planned Maintenance**

It is estimated that the following approximate annual quantities of treatments will be carried out during the period of the plan.

<b>Strategy</b>	<b>Quantity</b>
Programme of Column Renewals	160 columns

**Funding Assumptions**

To enable the amounts of works detailed above to be carried out the funding shown will be required:

<b>Works Type</b>	<b>Annual Funding Required</b>
Planned	£320k
Energy	£990k
Reactive	£100k

## 7. Highway Structures

The strategy for highway structure comprises of the targeted refurbishment of structures in a very poor or poor condition combined with a regime of routine maintenance.

### Standards

#### Safety

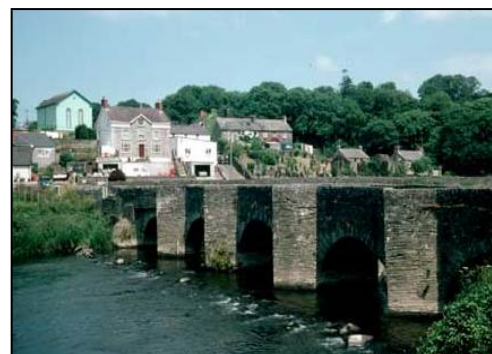
Measured By	Standard
Critical defects shall be made safe within	2 hours

#### Condition

		Standard
<b>Percentage in a poor condition;</b> the percentage of structures with a BCcrit of very poor kept below		2%
<b>Percentage that should be “considered for maintenance”;</b> the percentage of structures with a BCcrit of poor kept below		10%

### Strategies

- The Council has 7 structures in a very poor condition and a further 45 structures in a poor condition that require refurbishment works.
- The strategy is to target addressing the works required on structures in a very poor first
- Routine maintenance will be undertaken on 20% of the structures every year.
- Reactive maintenance will be undertaken when required
- All works required on the Flintshire Bridge will be completed.



### Works

The strategy detailed above is expected to require the following works to be required

#### Reactive Repair

The strategy requires the deployment of work gangs/other agencies on reactive repairs and emergency make safe response.

**Planned Maintenance**

Structure Type	Indicative No of Structures for Refurbishment Works / Year		
	2024/25	2025/26	2026/27
Road Bridges	3	1	1
Culverts and Subways	1	1	1
Footbridge	1	0	0

**Funding Assumptions**

To undertake the amounts of works detailed the following amounts of estimated funding will be required annually.



Works Type	2024/25	2025/26	2026/27
Reactive	£20k	£20k	£20k
Routine	£35k	£35k	£35k
Planned	£50k	£50k	£50k
Flintshire Bridge	£120k	£20k	£37k

## 8. Traffic Signals

The strategy for traffic signals is to carry out reactive and routine repairs required to keep the signals operating and replace them when they become obsolete or unreliable.

### Standards

#### Safety

Measured By	Target Standard
Critical defects shall be rectified or made safe within	2 hours
Safety Defects	4 hours

#### Condition

Maintenance Defects	Standard
Maintenance defects (high priority) shall be rectified within	24 hours
Maintenance defects (low priority) shall be rectified within	7 Days

### Strategies

- The aim of the traffic signals maintenance strategy is to ensure that all traffic signals are operating 99% of the time and all equipment remains in a safe condition.
- There are currently 6 traffic signals that are assessed as 'poor' or 'failing'. These sites will be renewed within the first 3 years of the plan.



### Works

#### Reactive Repair

It is expected that current levels of faults will continue during the first phase of the plan. This will include 12 critical faults, 180 safety faults and 180 maintenance faults.

#### Planned Maintenance

It is estimated that the following approximate annual quantities of treatments will be carried out during the period of the plan.

<b>Strategy</b>	<b>Quantity</b>
Programme of Traffic Signal Renewals	2 traffic signals

### **Funding Assumptions**

To enable the amounts of works detailed above to be carried out the funding shown will be required:

<b>Works Type</b>	<b>Annual Funding Required</b>
Planned	£150k
Energy	£100k
Reactive	£40k

## **9. Other Assets**

**Other assets that form part of the highway require maintenance as described below.**

### **Road Marking**

Faded road marking is identified by highway inspectors during routine inspections. In 2021/22 a road marking condition survey identified that more than 20% of road markings were not visible.

It is planned to complete the remark of the markings which were identified as not visible during 2024/25. From 2025/26 an annual remarking contract will be undertaken with the aim of eliminating road markings that are not visible. Faded markings that are still visible will still be present but will be remarked before they become illegible. A cyclic remarking regime will be developed once the data is gathered to determine the appropriate remarking interval.

To enable the amounts of works detailed above to be carried out the funding shown will be required:

<b>Work Type</b>	<b>Annual Funding Required</b>		
	<b>2024/25</b>	<b>2025/26</b>	<b>2026/27</b>
Remark Marking not visible to motorist	£180k		
Routine Marking		£180k	£180k

### **Traffic Signs**

Traffic signs that become illegible are when identified by routine highway inspection. It is expected that new signs will be required annually within the period of the plan.

To enable the amounts of works detailed above to be carried out the annual funding will need to be reviewed in response to an asset survey.



## Drainage

The strategy for managing drainage assets is:

Gullies are cleaned once per year. Some gullies require replacement when they are damaged. A gully with a missing grate is considered a ‘critical’ defect and requiring a 2-hour response.

Rural drainage is managed reactively where highway inspectors identify issues on routine inspections and members of the public report issues to the council. Most work requires the clearing of materials.

The council investigates all highway drainage issues where water ponds on private property and on the road.

The annual work required to maintain the drainage assets is typically:

- 10 - 15 incidents of drainage issues requiring a critical response
- 40,000 – 42,000 gullies are cleaned
- 20 - 30 gullies require replacing
- 1,000 – 1,200 rural drainage assets require reactive clearing

To enable the amounts of works detailed above to be carried out the annual funding shown will be required:

<b>Work Type</b>	<b>Annual Funding Required</b>
Reactive Repair	£20k
Gully Cleansing	£100k
Rural Drain Clearing	£50k
Drainage Asset Replacement	£20k

## Street Furniture Assets

Street furniture assets include pedestrian barriers, vehicle restraint systems, benches, bins

The strategy for managing these assets is reactive with highway inspectors identifying defects as part of their routine inspections. It is expected that there will be a range of repairs required from full replacement to minor repairs.

Typically, between 100 and 150 street furniture assets will require some form of repair every year.

The annual funding which will be required to undertake this work is £50k.

## 10. Risks to the Plan

The risks that could prevent achievement of the standards specified in this plan are:

<b>Plan Assumption</b>	<b>Risk</b>	<b>Action If Risk Occurs</b>
The plan is based upon winters being normal	Adverse weather will create higher levels of detects and deterioration than have been allowed for.	Budgets and predictions will be revised, and this plan updated if abnormally harsh winters occur.
The plan is based upon normal seasonal weather conditions	Adverse weather (storm events) will create higher levels of detects and deterioration than have been allowed for.	Budgets and predictions will be revised, and this plan updated if abnormally adverse weather (e.g. flooding) occur.
Available budgets have been assumed as shown in sections 5 to 9	External pressures mean that the funding available for roads is reduced	Target service standards will be revised to affordable levels
Construction inflation will remain at level like the last 5 years.	Construction inflation will increase the cost of works (particularly oil costs as they affect the cost of road surfacing materials)	Target service standards will be revised to affordable levels.
Levels of defect and deterioration are based on current data which is limited for some assets (e.g. unclassified roads and footways)	Assets deteriorate more rapidly than predicted and the investment required to meet targets is insufficient.	Split between planned and reactive maintenance budgets will be revised.



## **Flintshire County Council:**

### **Highway Maintenance Manual:**

(including Policy for Highway & Car Park  
Inspection and Repair)

## **Document Control**

<b>Version Number</b>	<b>Amendments Made</b>	<b>Date</b>
v1	Nil – Original	September 2024
<b>Next Review Due</b>		September 2026

## **Council Approval**

<b>Version Number</b>	<b>Council Committee</b>	<b>Date</b>
v1	§	October 2024

## **Responsibility for the Manual**

The responsibility for the delivery of and updating of this plan are shown below

<b>Council Officer</b>	<b>Responsible for</b>
Highway Network Manager	Ensuring compliance with the manual and updating of the manual

# 1 Introduction

## Purpose

The purpose of this manual is to document how the council manages highway maintenance. The manual shows how the council aims to meet its duties as the highway authority. It documents the methods used to ensure that the risk to users is appropriately monitored and managed.

Version 1 of the manual details inspection and repair regimes. Future updates of the manual will detail the methods used for other aspects of maintenance.

## Scope

The manual describes how the council maintains the road network under its control. It details the procedures used to plan and execute all works and functions associated with the management, operation and maintenance of the highway asset including how the activities are monitored to ensure compliance with council policies.

## Legal Requirements

As the Highway Authority the council has a duty to meet the requirement of the following legislation:

- **The Highways Act 1980:** This places a duty upon Highway Authorities to maintain highways, adopted as maintainable at public expense, and to keep them safe for public use
- **New Roads and Street Works Act 1991:** This places a duty upon Highway Authorities to co-ordinate all works in the highway for the purposes of ensuring safety, minimising inconvenience to highway users, and protecting the highway and apparatus in it.
- **The Traffic Management Act 2004:** This places a duty on Highway Authorities to ensure the expeditious movement of traffic on their road network and networks of surrounding authorities.

## National Guidance

To assist authorities in meeting their duties the following National Guidance is provided. The methods adopted in this manual are based upon the contents of the following:

- “Well-Managed Highway Infrastructure: A Code of Practice, UK Roads Liaison Group, 2016”
- “Risk Based Approach: Method”, 2019, CSSW, 2019
- CSSW Highway Asset Management Recommended Practices

## Relevant Council Plans and Documents

This manual is part of a suite of documents that support the councils approach to managing the highway asset. These include; Highway Asset Management Plan, Highway Data Improvement Plan and Annual Status Reports.

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## 2 Roles, Responsibilities and Competencies

The roles, responsibilities and competencies required of those involved in managing the council's highway asset are defined below.

### Roles and Responsibilities

Role	Responsibility
Councillors	Approve the use of this document as council policy.
Highway Network Manager	Develop the policy and standards, ensure their effective implementation, monitor the results and undertake an annual risk assessment update.
Operational Area Managers	Responsible for the implementation of the policy in terms of ensuring that Section 58 inspections are carried out; ensures inspections are carried out to the specified standard by suitably accredited staff.
Area Co-ordinators	Carry out inspections as per the inspection regime, recording the appropriate data for input into the AM system.
Service Delivery Highway Teams	Carrying out repairs as per the repair regime and record the required data for input into the AM system.
Contractors	Carry out repairs as instructed as instructed and record the required data for input into the AM system.

### Competencies and Training

CSS Wales manages a competency confirmation schemes covering highway and bridge inspection. Relevant FCC staff will be accredited under these schemes to demonstrate their competency in these tasks.

CSS Wales is currently developing a Capability Building Scheme (2024) to assist authorities to develop their capability in highway management. FCC staff will partake in relevant modules of this scheme.

The council maintains registers of those staff who are accredited under the CSSW competency schemes and those who have completed CSSW HAMP capability scheme training modules.

### **3 Asset Register and Inventory**

The asset register defines the roads that belong to and are maintained by the council. The inventory of the highway assets is based on the asset register and contains the detailed information required to manage the asset. The information includes amount, size, construction material, current condition etc. where such data is available.

#### **Asset Register**

The National Street Gazetteer is the definitive dataset of public roads and streets that highway authorities are responsible for maintaining. The part of the National Street Gazetteer covering Flintshire is included in the Council's Mayrise Asset Management System.

#### **Inventory**

Inventories of the Council's highway assets are held in multiple asset management systems. Information is updated when changes to the assets occur. The assets are held on the following management systems:

- Carriageways and Footways - Mayrise
- Structures - AMX

#### **Data and System Improvement**

The quality of the inventory details held is reviewed annually. A plan for improvements to data and the highway asset management system are recorded in the Highways Asset Data Management Plan.

## 4 Risk Management

The risks associated with maintaining the highway are managed using the methods described below. This includes how the methods comply with the risk based approach required by the Code of Practice.

### Code of Practice

A revised Code of Practice (the code) for Highways “Well Managed Highway Infrastructure” was published in October 2016 providing guidance that authorities are expected to follow and may rely upon when defending themselves against third party claims. The CoP recommends the use of a risk based approach to all aspects of highway maintenance.

CSSW developed a method in response to the code that it recommendeds authorities adopt. The method includes development of Hierarchy, Inspection Regime and Repair Regime for the highway assets, along with recommended minimum standards for inspection and defect repair.

### Use of the CSSW Risk-Based Approach

The CSSW Method has been used to define the inspection and repair regime used in this manual/policy. Documents setting out the CSSW Minimum Standards and the rationale for their adoption are set out in documents supplied with this manual.

A review of hierarchy using the method has not been undertaken as the levels of traffic in Flintshire are not sufficiently different to national averages to provide significant benefit in the review. This may be undertaken at a future date. The details of the asset hierarchy, inspection and repair regimes adopted by the council and where they differ from (exceed) the CSSW recommended standards is detailed later in this document.

### Flintshire County Council Corporate Risk Management

The council manages risk via the ‘Flintshire County Council Risk Management Framework’. An electronic copy of this document can be found at: [Risk Management Framework \(flintshire.gov.uk\)](http://flintshire.gov.uk/Risk-Management-Framework)



## 5 Network Hierarchy

The highway assets have been divided into network hierarchy categories that reflect use and function. This enables the inspection and repair regimes to be related to their associated risk.

### Network Hierarchies

The following network hierarchies have been adopted and are used as the basis for the inspection and repair regimes.

Carriageways		
Category	Classification	Detail
2	Class A – Strategic Route	Routes for fast-moving, long-distance traffic with few frontages or pedestrian traffic.
3(a)	Class B – Main Distributor	Routes between strategic routes and linking urban centres.
3(b)	Class C – Secondary Distributor	Routes carrying mainly local traffic with large numbers of frontages and junctions.
4(a)	Unclassified – Link Road	Routes linking main/secondary distributors and local access roads, many frontages and junctions.
4(b)	Unclassified – Local Access Road	Routes serving properties only with limited access traffic.

Footways		
Category	Definition	Detail
1(a)	Prestige	Very busy main town centre shopping areas
1(b)	Primary	Busy urban shopping and business areas
2	Secondary	Medium usage routes local shopping centres
3	Link footway	Linking local access footways, busy rural footways
4	Local access footway	Low usage estate road footways

Cycleways		
Category	Definition	Detail
A	Integral	Cycle lane forming part of the carriageway
B	Dedicated	A highway route for cyclists not contiguous with the public footway or carriageway

<b>Car Parks</b>		
<b>Category</b>	<b>Definition</b>	<b>Detail</b>
A	Chargeable	Car parks with parking charges
B	Non-chargeable	Car parks without parking charges

<b>Structures</b>	
<b>Category</b>	<b>Description</b>
A	Highway Structures
B	Highway Retaining Walls

### **Update and Review**

The hierarchies are reviewed when significant changes to the asset or changes in use happen (e.g. large changes in traffic volume). As a minimum the hierarchy should be reviewed and confirmed every 2 years. Any resultant recommended changes to the hierarchy are proposed to council and their approval recorded.

## **6 Inspection Regime**

**To monitor the condition and repair needs of the asset the council deploys a regime of inspections of varying types and frequencies.**

### **Types of Inspection**

The council undertakes the following types of inspection:

- 1. Reactive Inspections/Response:** inspections undertaken in response to the notification to the authority of potential defects by other sources (council employees, members of the public, emergency services etc.).
- 2. Planned/Routine Inspections:** A regime of planned inspections the purpose of which is to identify defects that have the potential to cause harm to users and to identify defects that require repair in order to prevent escalation of deterioration and increased (avoidable) maintenance needs.
- 3. Condition Surveys:** A regime of condition surveys that record the condition of components of the asset such that a programme of renewal/replacements can be derived. Condition surveys can be visual or machine based and may include testing where such is appropriate for the asset type.

Planned routine inspections are a combination of:

- **Driven Inspections:** inspections of the carriageway undertaken with a driver and a Highway

Inspector, carried out from a slow-moving vehicle at a speed appropriate to the road conditions.

- **Walked Inspections:** inspections undertaken by a Highway Inspector on foot at a walking pace on the footway, where the footway and carriageway are assessed.

## Inspection Frequencies

### Reactive Inspections

Where a “safety” defect is notified to the council by a third party an inspection of the defect will take place within 2 Hours and action will be taken as per the Council’s repair regime. (see section 14 repair regime for details of safety defect criteria).

Where a “maintenance” defect is notified to the council by a third party an inspection of the defect will take place within 7 Days and action will be taken as per the Council’s repair regime. (see section 14 repair regime for details of maintenance defect criteria).

### Routine Inspection Frequencies

Routine Inspection frequency is based on the Network Hierarchy. It has been determined using the CSSW Highway Asset Risk Review Method and is reviewed every 2 years. The frequency of routine inspections is shown in below along with the CSSW minimum recommended standards.

<b>Carriageway: Routine Inspection Frequencies#</b>				
<b>Category</b>	<b>Classification</b>	<b>Inspection Interval</b>	<b>Inspection Method</b>	<b>CSSW Recommended Minimum</b>
2	Class A – Strategic Route	1 month	Driven	Monthly
3(a)	Class B – Main Distributor	1 month	Driven	Monthly
3(b)	Class C – Secondary Distributor	1 month	Driven	Every 3 Months
4(a)	Unclassified – Link Road	3 months	Driven	Every 6 Months
4(b)	Unclassified – Local Access Road	6 months	Driven	Annually (poor or unknown condition) Every 2 years (good condition)

The carriageway inspections are carried out by Streetscene Area Coordinators from a vehicle, driven as slowly as road conditions will allow. The Area Coordinator will be a passenger in the vehicle, which will be driven by a second member of the Streetscene & Transportation workforce.

<b>Footway Routine Inspection Frequencies#</b>				
<b>Category</b>	<b>Definition</b>	<b>Inspection Frequency</b>	<b>Inspection Method</b>	<b>CSSW Recommended Minimum</b>
1(a)	Prestige	1 week	Walked	Monthly
1(b)	Primary	1 month	Walked	Monthly
2	Secondary	3 months	Walked	Every 3 Months
3	Link footway	6 months	Walked	Every 6 Months
4	Local access footway	6 months	Walked	Annually (poor or unknown condition) Every 2 years (good condition)

<b>Cycleway Routine Inspection Frequencies#</b>			
<b>Category</b>	<b>Definition</b>	<b>Inspection Frequency</b>	<b>Inspection Method</b>
A	Integral	As adjacent carriageway	Driven
B	Dedicated	6 months	Walked

#Where adjacent carriageways and footways are inspected during the same inspection the higher frequency level is applied.

<b>Car Park Routine Inspection Frequencies#</b>			
<b>Category</b>	<b>Definition</b>	<b>Inspection Frequency</b>	<b>Inspection Method</b>
A	Chargeable	6 months	Walked
B	Non-chargeable	Annually	Walked

## Condition Assessments

### Carriageway

The SCANNER and SCRIM assessments are undertaken at the following frequencies

<b>Carriageway Annual Inspection Coverage</b>		
<b>Road Class</b>	<b>SCANNER</b>	<b>SCRIM</b>
A Roads	100% (one direction)	100% (both direction)
B Roads	100% (one direction)	100% (both directions)
C Roads	25% (one direction)	10% (both directions)

Visual condition assessments are undertaken on all roads every 5 years using AI technology

### Footway

Visual condition assessments are undertaken on all roads every 5 years using AI technology

### Structures

Condition assessments are undertaken at the following frequencies.

<b>Inspection Type</b>	<b>Survey Coverage</b>
General Inspection	100 % Every 2 Years
Principal Inspection	100 % Every 6 Years

## Inspection Schedule

Inspection routes in compliance with the regime above are held in the council's asset management system, Mayrise. The Mayrise asset management system contains details of the inspection regimes, the inspections undertaken and the date of the next scheduled inspection. Inspections to be undertaken are provided to the inspectors at the beginning of each week. The use and character of a road will be considered when scheduling inspections, for example to avoid periods with higher numbers of parked vehicles. Best endeavours will be made to ensure that the timing of the inspection enables defects to be identified effectively.

## Inspected Assets

The assets inspected during the routine inspection include (but are not limited to) the following:

- Carriageways
- Footways
- Covers, Gratings & Frames (inc Statutory Undertakers apparatus)
- Kerbs, Edgings and Channels
- Drainage
- Guardrails, Fencing and Restraint Systems
- Verge, Trees and Hedges
- Road Studs and markings
- Signage
- Street Lighting
- Traffic Systems, Controlled Crossings, Illuminated Bollards and Cabinets
- Cleanliness and Weed Growth

## Recording of Inspection Records

Records of the inspection and the resulting observations are recorded in real time on the Mayrise system via mobile devices.

## Condition Assessments

The council undertake the following condition assessments on their highway assets. The frequency of condition assessment is given in Appendix B.

### Carriageways

- i. SCANNER (Surface **Condition Assessment** of the National Network of Roads)  
 SCANNER is a machine condition survey undertaken from a vehicle moving at traffic speeds. The results of the survey are held offsite by WDM and accessed via the WDM / WIP online interface.

The SCANNER survey is undertaken at the following frequencies

<b>Carriageway Annual Survey Coverage</b>	
<b>Road Class</b>	<b>SCANNER</b>
A Roads	100% (one direction)
B Roads	100% (one direction)
C Roads	50% (one direction)

- ii. SCRIM (Sideway-force Coefficient Routine Investigation Machine)

The SCRIM data measuring wet road skidding resistance results are held offsite by WDM and accessed via the WDM / WIP online interface.

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The SCRIM survey is undertaken at the following frequencies

<b>Carriageway Annual SCRIM Coverage</b>	
<b>Road Class</b>	<b>SCRIM</b>
A Roads	100% (both directions)
B Roads	100% (both directions)
C Roads	10% (both direction)

iii. Visual Condition Assessment (using AI)

A visual condition survey of all roads was undertaken in 2022 using video survey technology. The condition of carriageways, footways and road marking has been assessed by AI (artificial intelligence) to produce coarse visual inspection data. The data is held offsite by the supplier and accessed via an online interface. It is proposed to repeat the survey in every 4/5 years.

SCANNER and SCRIM surveys are arranged via a central contract managed by the Welsh Government. The contract covers A, B and C Roads. SCANNER surveys are not undertaken on the unclassified road network.

### **Footways**

Visual Condition Assessment

i. Visual Condition Assessment (using AI)

See details in Carriageway Section

### **Structures**

Visual Condition Assessment

Structures are inspected using two levels of inspection:

- i. General Inspections (GIs); GIs are visual inspections, possibly with some hands-on and basic assessment e.g. hammer tapping and measurements.
- ii. Principal Inspections (PIs); PIs are a more detailed visual inspection, with hands-on assessment of most/all elements plus detailed assessment e.g. hammer tapping, half-cell, chloride measurements etc.

A General Inspection involves recording the extent and severity of observed defects on a form the data from which is subsequently entered into the council's Bridge Management System, AMX.

A Principal Inspection involves the creation of a detailed report along with the data recorded on the form. The results of these inspections are also entered into the council's Bridge Management System, AMX.

## 7 Repair Regime

Repairs identified via inspection or by 3<sup>rd</sup> party notification, are prioritised for repair based upon the risk that they pose to users. The methods used to do this are set out below.

### Defect Categories and Response Times (Carriageways)

The data recorded during inspections is used to determine defect categories. Defect categories prioritise repairs using the defect response times adopted by the council and shown below.

Defect Categories	Description	Response Time
Critical Defect	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, e.g. Collapsed cellar, missing utility cover, fallen tree, unprotected opening, <ul style="list-style-type: none"> <li>➤ Requiring an immediate response to make the site safe</li> </ul>	2 Hours#
Safety Defect	Defects that pose an imminent risk of injury to road users, <ul style="list-style-type: none"> <li>➤ Requiring a response as soon as possible to remove a potential risk of injury to users</li> </ul>	By end of Next Working Day (Hierarchies 2, 3(a), 3(b)) Within 5 Working Days (Hierarchies 4(a), 4(b))
Maintenance Defect	Defects that warrant treatment to prevent them deteriorating into a safety defect prior to the next scheduled inspection, <ul style="list-style-type: none"> <li>➤ Requiring a response to prevent them becoming a safety defect</li> </ul>	1 month (Hierarchies 2, 3(a), 3(b)) 3 months (Hierarchies 4(a), 4(b))
Programmed Repairs	Defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred.	As per the local works programme

# response time for critical defects refers to the time to attend site, make safe or repair will then be asap thereafter

\*\*Defect triggers on CH5 roads are to be considered an **investigatory level**. An investigatory level does not automatically trigger a response. It will be incumbent upon the inspector to assign an appropriate response to each defect based upon its type, size, location and the level of use of the road. CH5 roads are low use roads and defects will frequently present low risk to users and can be responded to accordingly.



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### **Defect Categories and Response Times (Footways)**

The data recorded during inspections is used to determine defect categories. Defect categories prioritise repairs using the defect response times adopted by the council and shown below.

<b>Defect Categories</b>	<b>Description</b>	<b>Response Time</b>
Critical Defect	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, e.g. Collapsed cellar, missing utility cover, fallen tree, unprotected opening, <ul style="list-style-type: none"> <li>➤ Requiring an immediate response to make the site safe</li> </ul>	2 Hours#
Safety Defect	Defects that pose an imminent risk of injury to road users, <ul style="list-style-type: none"> <li>➤ Requiring a response as soon as possible to remove a potential risk of injury to users</li> </ul>	By end of Next Working Day (Hierarchies 1(a), 1(b), 2) Within 15 Working Days (Hierarchies (3, 4))
Maintenance Defect	Defects that warrant treatment to prevent them deteriorating into a safety defect prior to the next scheduled inspection, <ul style="list-style-type: none"> <li>➤ Requiring a response to prevent them becoming a safety defect</li> </ul>	1 month (Hierarchies 1(a), 1(b), 2) No set response time (Hierarchies (3, 4))
Programmed Repairs	Defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred.	As per the local works programme

# response time for critical defects refers to the time to attend site, make safe or repair will then be asap thereafter

### **Defect Types and Intervention Levels**

Details of the defect types identified and the intervention levels that have been prescribed for each defect category are provided in Appendix C.

#### **“24 Hour” Emergency Cover**

The Council operates an emergency service via an out of hours Contact Centre that operates from 5 pm until 8:30 am daily and at other times when the main offices are closed. The Contact Number is 01267 224911. Incidents are reported to the contact centre who forward them to the Duty Officer and emergency response is provided if required.

This service provides where necessary an immediate and co-ordinated response to maintain highway safety at all times. Hazards dealt with include problems such as flooding, ice and snow, unsafe street works,

abandoned vehicles, traffic signal failure, electrical danger at street lighting installations, and clearing of the highway following a road traffic accident.

An incident log is produced by the Contact Centre for every out of hours period. When action can be safely deferred, this log is used to initiate any additional action required in respect of particular incidents on the next working day.

### **Works Ordering**

Works orders are generated automatically using the council's asset management system, Mayrise, following the input of the inspection records.

### **Recording of Repair Records**

On completion of the repair the works representative record details of the type of work undertaken, the materials used and the dimensions of the repair via a tablet into the Mayrise asset management system.

The defect will only be deemed 'fully repaired' once all records have been entered into the asset management system.

## Defect Types and Intervention Levels

The following is a list of defect types and intervention levels used within the authority.

### Critical Defects

Asset Type	Defect	Magnitude	Hierarchy	Road Character	Response Time
All	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, typically include items such as; Carriageway / footway / cycleway collapse with high risk of accidents / loss of control; Critically unstable overhead wires, trees or structures; Exposed live wiring; Isolated standing water with high risk of loss of control; Missing or seriously defective ironwork with high probability of injury to highway users.	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	All	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	2 hours

# the response time for a critical defect is the time until the site is made safe, this may be achieved by closing all or part of the road or coning off the hazard. In some instance a repair may be immediately possible but in many instances the repair will occur later

Safety Defects

Asset Type	Defect Type	Hierarchy	Dimensional Criteria		CSSW National Minimum Standard	
			Depth/Height	Extent	Depth/Hieght	Extent
Carriageways	Pothole	2, 3(a), 3(b)	>50mm	Maximum horizontal dimension greater than 150mm	> 50mm	Maximum horizontal dimension greater than 150mm
	Pothole	4(a), 4(b)	>75mm	Maximum horizontal dimension greater than 150mm	>75mm	Maximum horizontal dimension greater than 150mm
Footways	Pothole	All	>40mm	Maximum horizontal dimension greater than 75mm	> 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All	>40mm	Maximum horizontal dimension greater than 75mm	> 40mm	Maximum horizontal dimension greater than 75mm
	Rocking Slabs	All	>40mm	Maximum horizontal dimension greater than 75mm	> 40mm	Maximum horizontal dimension greater than 75mm

\*\*Defect triggers on CH5 roads are to be considered an investigatory level.

Maintenance Defects

Asset Type	Defect Type	Hierarchy	Dimensional Criteria		CSSW National Minimum Standard	
			Depth/Height	Extent	Depth/Hieght	Extent
Carriageways	Pothole	2, 3(a), 3(b)	>40mm	Maximum horizontal dimension greater than 150mm	> 40mm	Maximum horizontal dimension greater than 150mm
	Pothole	4(a), 4(b)	>50mm	Maximum horizontal dimension greater than 150mm	> 50 mm	Maximum horizontal dimension greater than 150mm
	Crowning / Depression	All	>100mm	< 2M Length	> 100mm	< 2M Length
Footways	Pothole	All	25mm – 40mm	Maximum horizontal dimension greater than 75mm	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Trip	All	25mm – 40mm	Maximum horizontal dimension greater than 75mm	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Rocking Slabs	All	25mm – 40mm	N/A	25mm - 40mm	N/A
	Badly cracked or damaged ironwork	All				

The standards in the preceding tables are a guide only. It is an essential part of the authorities' inspection regimes that inspectors are appropriately trained. In doing so inspectors are able to complement application of the standard with their own assessment of individual defects, which may result in a different response time.

## **Extract from highways Act 1980**

As the highway authority the council is subject to legal requirements that include:

The 1980 Highways Act,

- Section 41; to maintain those roads, footways and cycle tracks that are '*Highways maintainable at public expense*'.
- Section 58 ; states that a statutory defence against third party claims is provided where the Highway Authority can establish that reasonable care has been taken to 'secure that the part of the highway to which the action relates' to a level commensurate with the volume of ordinary traffic such that it 'was not dangerous to traffic'.

### **Section 58 : Special defence in action against a highway authority for damages for non-repair of highway.**

(1) In an action against a highway authority in respect of damage resulting from their failure to maintain a highway maintainable at the public expense it is a defence (without prejudice to any other defence or the application of the law relating to contributory negligence) to prove that the authority had taken such care as in all the circumstances was reasonably required to secure that the part of the highway to which the action relates was not dangerous for traffic.

(2) For the purposes of a defence under subsection (1) above, the court shall in particular have regard to the following matters:—

- a) the character of the highway, and the traffic which was reasonably to be expected to use it;
- b) the standard of maintenance appropriate for a highway of that character and used by such traffic;
- c) the state of repair in which a reasonable person would have expected to find the highway;
- d) whether the highway authority knew, or could reasonably have been expected to know, that the condition of the part of the highway to which the action relates was likely to cause danger to users of the highway;
- e) where the highway authority could not reasonably have been expected to repair that part of the highway before the cause of action arose, what warning notices of its condition had been displayed;

but for the purposes of such a defence it is not relevant to prove that the highway authority had arranged for a competent person to carry out or supervise the maintenance of the part of the highway to which the action relates unless it is also proved that the authority had given him proper instructions with regard to the maintenance of the highway and that he had carried out the instructions.

## **Flintshire County Council**

### **Highway Maintenance Manual**

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The New Roads & Street Works Act 1991 imparts a duty on Statutory Undertakers to maintain their apparatus in the Highway, but it has been established in Case Law that they can rely on the Highway Authority's Safety Inspection regime to some extent when defending Claims.

The Council can avoid being held jointly liable for defective apparatus by issuing a Section 81 Notice - New Roads & Street Works Act 1991 to the Utility Company whenever a defect is identified by the Authority within the Highway.

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# Highway Asset Management Planning: Risk Based Approach: Method Summary



## Document Information

<b>Title</b>	CSSW Highways Asset Management Planning – Risk Based Approach: Method Summary
<b>Author</b>	exp consulting ltd
<b>Description</b>	This document contains a summary of the risk-based approach to highway asset management as recommended by CSSW as part of the HAMP framework.

## Document History

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Author</b>	<b>Changes from Previous Version</b>
1.0	Draft	Oct 19	exp consulting	NA, based on previous request for CSSW approval of the method

## Document Control

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Authorised for Issue by CSSW HAMP Steering Committee</b>
1.0	Final	Oct 19	Approved by CSSW Main Group Meeting September 2019

# 1. Purpose and Context

## Purpose

CSSW commissioned the development of a nationally consistent response to the Code of Practice (2016) to developed under the CSSW HAMP project. This document summarises the results of that work, specifically the method recommended by CSSW.

## Background

A new code of practice for highways was published in October 2016. The code contains 37 recommendations. Some of these are covered by existing CSSW HAMP guidance, others relate to aspects of highway management beyond the scope of the HAMP project.

The most significant change from the previous code is a recommendation that authorities adopt a risk-based approach. The code is explicit in this requirement but silent on the how it may be achieved. The CSSW response focuses on the risk-based approach recommendation.

## Scope

The risk-based approach distils into a need to address the following:

1. Establishing a Network Hierarchy
2. Establishing an Inspection Regime
3. Establishing a Repair Regime
4. Using Risk to influence budget allocation

Most authorities have standards and practices in place for each of these. The method is to review these and to demonstrate that the methods used are explicitly risk-based.

## Adoption and Use

The benefit of adopting a national standard will only be achieved if authorities adopt and use the method. The method has been approved by CSSW at the Main Group meeting in September 2019.

## 2. Current Practices

To inform the development of the method a current practice was undertaken and revealed

### Variation in Existing Practices

Authorities apply a range of standards for inspection regimes and repairs. There is commonality between many authorities but there are variances. If a nationally consistent approach is to be adopted some or all authorities may need to change their standards.

### Use of Risk in Current Practices

Arguably current practices are “risk based” with many using a “risk matrix” approach. However, these rely upon inspectors to assess risk of defects. It is unclear what risks the inspector is supposed to assess and how; the risk of a fatality, of an injury to a user, of damage to property? Each of these has a different probability of occurring and different level of impact. Current methods rely almost solely on an individual’s judgement and are insufficient to demonstrate the application of a risk-based approach.

### Evidence to Support Current Standards

Current standards have evolved over time with little evidence of how they came into being. They are mainly based on reference to the existing code but are the result of judgement rather than rational analysis.

## 3. Alternative Responses to Risk Based Management

### Alternative Approaches

It is acknowledged that there are 2 approaches to a risk-based approach to determine defect categorisation and repair timescales:

- A fact/data-based approach; using high level risk assessment by management to set intervention criteria and target timescales (the approach adopted by this guidance) and
- A dimensionless approach; using a dimensionless system and relying on the judgement of inspectors to determine the category of defect and the required repair timescale based on a risk assessment of the individual defect (an approach adopted in some other areas of the UK)

### Fact/Data Driven Approach

The approach adopted in this guidance utilises high level risk assessment. It uses asset data to determine criteria at which intervention is recommended as a minimum. It is designed to be used in

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conjunction with inspector's judgment. An inspector will always be able to increase the assigned response if they feel an individual defect warrants such action. The risk assessment at a high level treats all defects as being in the worst position. This method is expressly intended to create consistency and to allow risk assessments to be updated over time using the data collected.

The CSSW HAMP Risk-Based Approach method has been consciously constructed to be fact based. It is a deliberate objective of the method to reduce the reliance on individual's judgement and to use asset data as the basis for decision making.

### **Dimensionless Approach**

The dimensionless approach places a higher burden on the inspectors. It requires inspectors to carry out a risk assessment of each observed defect. It requires a higher level of record keeping. It is an option that some authorities may wish to adopt. Should an authority wish to adopt it a higher level of competence for the inspectors will be required. Authorities adopting this approach should make their own provision for recording how inspectors carry out their individual defect risk assessments and how the competence of their inspectors is demonstrated.

### **Hybrid Approach**

There may be options for a hybrid approach where an authority may wish to use the intervention criteria in this guidance as an investigatory level and would carry out an on-site risk assessment of any defect meeting this level. This approach could be applied to all or any of the hierarchy categories. This approach would carry with it the same need for demonstrating inspector competence as the dimensionless approach.

## **4. CSSW Recommended Risk Based Approach**

### **Outline of the Method**

The recommended method of responding to the code is to **carry out a risk review every 2 years**. The risk review collates appropriate data and uses it to inform refinements to hierarchy, inspection and repair regimes. It is expected that after the initial review subsequent reviews would involve refinement to the regimes rather than fundamental changes, as such the subsequent reviews should be able to be carried out with considerably less resource input than the initial review will require. The review comprises of:

### **Network Hierarchy**

A method has been created to enable hierarchies to be established. Applying this method will provide the authority with a documented evidence of how the hierarchy was arrived at.

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A key element of the hierarchy method is reference to use. Traffic volumes are used as the basis for the carriageway hierarchy reflecting the fact that the risk associated with a road carrying 20,000 vehicles a day is different to one carrying 500.

Banding have been chosen that if applied will create consistency nationally. The banding adopted are detailed in the “CSSW HAMP Risk-Based Approach – Method”.

### **Inspection Frequencies**

Based upon the levels of hierarchy recommended an analysis has been undertaken to provide a rationale for a regime of inspections. The analysis is based upon levels of use and the resulting risk exposure. Using the levels of use associated with each level of hierarchy it is possible to compute the inspection interval that would result in the same risk exposure across the network. This provides a basis for the different frequencies of inspection.

It results in roads and footways that are used more requiring more frequent inspection than the lesser used ones. However rather than basing the interval upon perception this method uses data as the basis for creating a recommended regime. The recommended frequencies are as shown the “CSSW HAMP Risk-Based Approach – Method”.

### **Repair Regime**

A similar approach has been taken to create a recommended risk-based repair regime. The regime is predicated upon using an average 24-hour response to a potentially hazardous defect as a starting point and considering the comparative risk exposure of lesser defects.

The ability to carry out this analysis is constrained by the limited amount of detailed data available, however a rationale has been arrived at to create the minimum standard repair regime as shown in the Minimum Standards document

### **Budget Allocation**

Reporting the output from the risk review to the appropriate management forum or committee within the council, along with the relevant annual status and options report, will provide evidence of using risk to influence budget allocation and is considered an appropriate initial step in complying with the code.

### **Data Limitations**

The aspiration of the method is that data will be used as the basis for all risk assessments. There are, however, current limitations on the extent to which this can be applied.

Improvements to the level of traffic data available and the detail recorded for defects will greatly enhance the extent to which future risk assessments can be fact based.

## 5. Resource Produced to Assists Authorities

The following resources have been made available via the CSSW HAMP project to assist authorities to apply the recommended method:

### Tools

To enable practice RP1 to be completed the following resources are available:

1. **RP1 –Highway Asset Risk Review:** A spreadsheet that authorities are recommended to use to record a risk review.
2. **Risk Based Approach: Method:** A document providing a detailed description of the approach to accompany the spreadsheet RP1.
3. **Template Maintenance Manual Content:** A template document that authorities can use to record hierarchy and inspection and repair regimes derived using the risk-based approach and their methods of updating the same.
4. **Highway Inspection Defect Recording Manual:** A manual designed to give guidance to inspectors on what defects to record and what records should be taken about each defect. Intended to be used as the reference document for inspector training.
5. **Committee Paper Template/Report of Outcome of Highway Risk Review**
  - a. A template initial paper that advises the new method, references the CoP and recommends changes to hierarchy, inspection and repair regimes.
  - b. A template report paper for subsequent reviews that focuses on reporting changes to risk and resultant recommended changes to hierarchy, inspection and repair regimes
6. **National Minimum Standards:** A statement of minimum standards recommended by CSSW for intervention level and associated response times for defects.

## 6. Recommendation

CSSW recommends the following actions (as the CSSW HAMP Risk -Based Method) be used to demonstrate initial compliance with the Code of Practice:

1. Complete a risk review and use the output to:
  - a. **Confirm Network Hierarchy;** this will result in a documented hierarchy for each road, footway, structure etc. along with a record of how the hierarchy was arrived at
  - b. **Confirm Inspection Regime;** comparison of the current regime with the recommended national regime, will result in a confirmed risk-based inspection regime that will either comply with the national regime or document where variance from it are to be used. (nb Where the variance is a **lesser** standard it is recommend that the authority documents its

- own risk assessment to detail why they believe this variance is appropriate in their locality/council)
- c. **Confirm Repair Regime:** comparison of the current regime with the recommended national minimum standard will result in a confirmed risk-based repair regime that will either comply with the national regime or document where variance from it are to be used. (nb Where the variance is a **lesser** standard it is recommend that the authority documents its own risk assessment to detail why they believe this variance is appropriate in their locality/council)
  - d. **Report Outcome of Risk Review:** report the outcome of the risk review to the appropriate committee or management forum within the authority along with the annual status report and the options report
  - e. **Confirm Data Improvement Actions:** review data used in the risk review and where necessary identify where improvements are desirable and ensure that use data and defects records will enable fact-based risk assessment to be used in future risk reviews. This is essential if future standards are to be genuinely risk-based rather than just a revised judgement by a different individual.

The method has been explained and presented to attendees at the CSSW HAMP workshops during 2017 and 2018. Every authority has been visited by the project consultants for 2 days. During this visit the risk review activity was explained and initiated. Authority HAMP personnel should already be familiar with the method set out above as a result of this work.



**Cymdeithas  
Syrfewyr Sirol  
Cymru**



**County  
Surveyors' Society  
Wales**

# Highway Asset Management Planning: Risk Based Approach: Method



## Document Information

<b>Title</b>	Risk Based Approach: Method
<b>Author</b>	exp consulting
<b>Description</b>	This document is a detailed description of the method proposed by CSSW for a nationally consistent risk review method in response to the 2016 Code of Practice "Well Managed Highway Infrastructure"

## Document History

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Author</b>	<b>Changes from Previous Version</b>
1	draft	May 19	exp	NA
2	draft	Oct 19	exp	Formatting updated
1	Final	Oct 19	exp	NA.

## Document Control

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Authorised for Issue by CSSW</b>
1	Final	Oct 19	CSSW Main Group Meeting Sept 2019

## 1. Introduction

This document set out CSSW's recommended method of applying a risk-based approach to the management of highway assets. It has been developed under the CSSW highway asset management project and forms part of the HAMP recommended practices. This risk-based approach has been formally approved by CSSW with the expectation that it will be adopted by all Welsh local authorities.

CSSW's HAMP recommended practices have been updated to incorporate a requirement to carry out an annual highway asset risk review as Task 4a. This includes:

- 1) **RP1 –Highway Asset Risk Review:** A spreadsheet that authorities are recommended to use to record a regular risk review (Minimum 2 Yearly).
- 2) **Risk Based Approach: Method:** Document providing a description of the approach to accompany the spreadsheet RP1. (This Document)
- 3) **Risk Based Approach: Summary of Method:** Document providing a summary explanation of the method intended for use by authorities to brief managers and members
- 4) **Template Maintenance Manual/Policy Statement:** Template document that authorities can use to record their hierarchy, inspection and repair regimes
- 5) **Highway Inspection Defect Recording Manual:** A manual on what defects to record and what records should be taken about each. A reference document for inspector training
- 6) **Committee Paper Template/Report of Outcome of Highway Risk Review**
  - a) A template initial paper that advises the new method, references the CoP and recommends changes to hierarchy, inspection and repair regimes.
  - b) A template report paper for subsequent reviews that focuses on reporting changes to risk and resultant recommended changes to hierarchy, inspection and repair regimes
- 7) **National Minimum Standards:** A statement of minimum standards for investigatory level and associated response times for defects.
- 8) **Rationale Behind the Approach:** Sets out the rationale that was adopted in developing that approach.

## 2. Implementation

The method requires asset data to be used increasingly to support the risk assessment process. It will allow authorities to move away from a reliance on officer judgement to a process where decisions can be justified by reference to data. The data required to fully implement the risk assessment process may not be available initially. To accommodate this a staged implementation is proposed.

### Initial Risk Based Regime

The initial regime should be based upon existing data. Upon implementing the initial regime, it is expected that authorities should instigate appropriate data collection procedures to ensure that the data required to implement the risk review using the risk-based method is available for future use. To deliver consistency regionally and nationally it is recommended that initial hierarchy and inspection and repair regimes are reviewed in consultation with neighbouring authorities.

It is recommended that authorities report an initial risk review to council along with any associated changes to current hierarchies and inspection and repair regimes.

### Risk Based Regime (2 Yearly Review)

The method proposed is based upon 2 yearly reviews of risk. It is expected that improving data will enable the regime to be subject to ongoing refinement. Updates of relevant asset data should be used to update risk assessments (at least 2 yearly) and make adjustments to the regime where appropriate. It is recommended that the process of consultation with neighbouring authorities is repeated when any changes are made to the hierarchy category and /or inspection and repair regime applied on roads that cross boundaries.

It is expected that authorities will report the results of their risk review to council annually along with any proposed changes to hierarchies and inspection and repair regimes.

### Data Improvement

A fully developed risk-based approach should be supported by analysis of asset data. This will enable the authority to review the efficacy of its operation and to direct resources to the areas of greatest risk. It is recommended that this data is collected electronically during inspection and repair. This removes manual data entry exercises, which can offset the cost of any new technology required.

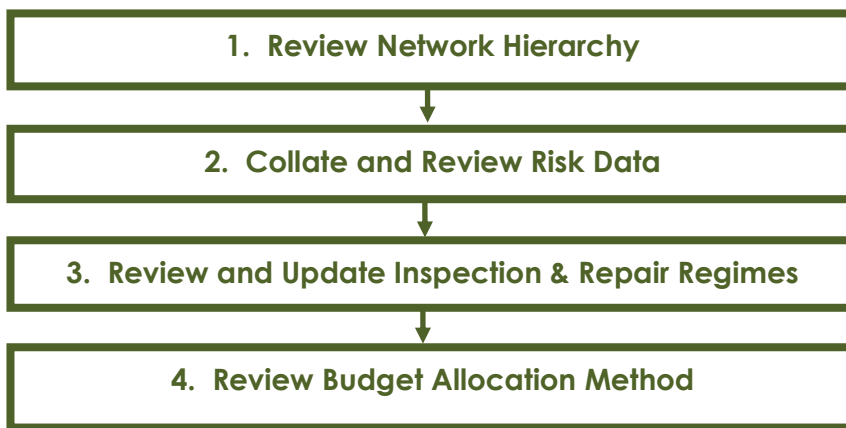
### 3. Method Overview

#### Highway Asset Risk Review (CSSW HAMP; RP1)

It is recommended that authorities a 2-yearly review of the risks associated with managing their highway assets using the method set out in this document. The results of the review should be reported to an appropriate management/member forum within the council. The purpose of the review is to ensure that those tasked with the establishment of standards and with allocation of budgets are able to undertake these tasks with appropriate information available to them about risk.

#### Risk Review Steps

The risk review should include completing the following steps:



#### Recording the Review

A spreadsheet tool “RP1- Highway Asset Risk Review” has been provided to enable authorities to record their risk reviews. The sheet comprises of sections matching the steps above. Within each step are a number of individual sheets that authorities are recommended to complete. Authorities should complete the sheet labelled “risk review record” to provide an audit trail that the review has been completed.

3. Annual Highway Asset Risk Review - Record of Completion				
Step	Activity Name	Date Started	Date Completed	Number of Sub-Items Completed
1	Review Network Hierarchy			
2	Collate and Review Risk Data			
3	Review and Update Inspection & Repair Regimes			
4	Review Budget Allocation Method			

#### Reporting the Results of the Review

It is recommended that the results of the review are reported to the appropriate management/member forum in the council in the form of a committee report. (A template report has been provided).

## Risk Review Method

### Step 1: Review and Update Network Hierarchy

Authorities should review and update their network hierarchy by completing the asset specific hierarchy worksheets provided in RP1

<b>Review Network Hierarchies</b>	<i>The hierarchy should be reviewed and updated when there are changes to the asset (e.g. new or upgraded assets) or changes in its use (e.g. change in traffic volumes)</i>	<b>Hierarchy</b>
		<a href="#">Carriageway</a>
		<a href="#">Footway</a>
		<a href="#">Structures</a>
		<a href="#">Street Lighting</a>
		<a href="#">Traffic Management</a>

The same generic steps are required for all asset groups:

1. Enter Network/Asset Details
2. Assess the use and Refine the Hierarchy (including making any local specific adjustments)
3. Check for Regional Consistency
4. Confirm and Record Final Hierarchy

#### Enter Network/Asset Details to Assign Initial Hierarchy Category

All assets are assigned an initial hierarchy category based upon a specified rule; e.g. initial carriageway hierarchy is based upon road class. This can be done automatically in the spreadsheet using data exported from a relevant asset inventory database.

#### Assess Use to Refine Hierarchy; Local Specific Adjustments

The hierarchy assigned to an asset can be adjusted following an assessment of local specific factors. This exercise should be undertaken in formal consultation with a group of local officers (and if appropriate members) that may include representatives of:

- Head of Service
- Highways Services Manager
- Operations Manager
- Planning division
- Highway Structures
- Street Lighting
- Streetworks Manager
- Network Management
- Asset Management
- Road Safety
- Passenger Transport Unit
- Transport Strategy

A record should be kept of all decisions made by this group that includes the reasons for the decisions/amendments made. This can be done using the spreadsheet and noting the reason for where sections of road have their hierarchy changed from the initial hierarchy as a result of the use assessment.

### **Check for Regional Consistency**

Upon completion of a proposed hierarchy consultation with neighbouring authorities should take place to consider and review regional consistency.

Where there are differences the reason for these should be discussed and if possible, resolved to a standard that is regionally consistent. If this is not possible each authority should record the reason for the adoption of differential standards.

### **Confirm and Record the Hierarchy**

The output from the above should be a record of the hierarchy in the form of a completed spreadsheet using the template provided with this guidance. The resulting hierarchy should be entered into any systems that rely upon it e.g. maintenance management system used for inspections and repairs. The maintenance manual and or data management plan should record where the definitive record of the hierarchy that applies to any highway asset can be found. The initial establishment of the hierarchy and any updates should be confirmed in a report to an appropriate council committee and formal acceptance/approval as council policy.

### **Record the Review and Update**

It is recommended that the hierarchy is reviewed and updated regularly this can be done throughout the year or at a minimum 2 yearly interval. This should involve reporting to the stakeholder group shown above. The report should focus on providing details of:

- any assets that have substantially changed in character and
- any assets where the risk assessments undertaken in support of the inspection and repair regime indicate that the originally allocated hierarchy level may be inappropriate

A formal procedure should be developed and adhered to for recording the review and any changes made to the hierarchy. It should include recording the reasons for the changes made.

**A detailed description of how to use the “RP1 Highway Asset Risk Review” to review and update the asset hierarchies is attached as appendix (i)**

## Step 2: Collate and Review Risk Data

In order to undertake a review of existing inspection and repair regimes it is necessary to first record the existing regimes and to record the performance as a consequence of those regimes. This information can be used to provide context when assessing the appropriateness of the current regimes.

### Compile a Risk Data Summary

For each asset group annually complete a current performance return in relation to:

- Safety – Number of safety defects (Cat 1), No. or % of the asset in a poor condition, No. of Injury Incidents, etc.
- Maintenance – Number of maintenance defects (Cat 2), No. or % of asset to be considered for maintenance works, etc.
- Financial – No. of 3<sup>rd</sup> party claims, number of claims lost and the reason, and value of pay out.

Asset	Category	Data	Year 1	Year 2	Year 3	Year 4	Year 5	Trend	Interpretation
Carriageways	Safety	Number of Cat 1 Defects identified by Routine Inspection							
		Number of Cat 1 Defects identified by Reactive Inspection							
		% Cat 1 Defects repaired / made safe within standard							
		% of A Roads in poor condition (red, scanner)							
		% of B Roads in poor condition (red, scanner)							
		% of C Roads in poor condition (red, scanner)							
		% of U Roads in poor condition (red, scanner) and/or visual							
		KSI (where road condition was a contributory factor)							
		Number of claims received relating to personal injury							
		% of routine inspections completed to standard							
	% of reactive inspections completed within response time								
	Maintenance Liability	Number of Cat 2 defects identified by routine inspections							
		Number of Cat 2 defects identified by reactive inspection							
		Number of Cat 2 defects not repaired (repair backlog)							
		Number of Cat 2 defect that became Cat 1 defects before they were repaired							
		% of roads to be considered for maintenance A roads (red and amber)							
		% of roads to be considered for maintenance B roads (red and amber)							
		% of roads to be considered for maintenance C roads (red and amber)							
		% of roads to be considered for maintenance U roads (red and amber)							
	Financial Loss	% of the asset for which current condition surveys data is held (less than 1 year old)							
Value of payout of 3rd party claims									
Number of claims received relating to property damage									
Number of claims received									
	Number of claims lost due to not adhering to inspection and repair regime								
	Number of claims lost for other reasons								



The risk data input should be reviewed in order to assess where problems are occurring such that the council's targets and standards for the management of the highway asset are not being met. Thus, prompting the adjustment of the management regimes to attempt to correct this.

This could take the form of an increasing level of safety defects leading to a reassessment of inspection regimes, or defect reaction times not being met leading to a reassessment of repair regimes etc.

### Step 3: Review and Update Inspection and Repair Regimes

#### Record the Existing Inspection Regime

For each asset group identify your existing inspection regime.

Asset Type	Category of Inspection	Road Class	Hierarchy	Type of Inspection	Coverage	Frequency	Walked or Driven			
Carriageways	Routine Inspection	Complete relevant column								
		A	Strategic	Routine Inspection	100%	Monthly	Both			
		A	Main Distributor		100%	Monthly	Both			
		B	Secondary Distrib		100%	Monthly	Walked			
		C	Link Roads		100%	3 Monthly	Walked			
		U	Local Access Ro		100%	6 Monthly	Walked			
	Reactive Inspection				Response to 3rd party notification of defect	<b>Criteria</b>	<b>Response Time</b>			
						Emergency Response	2 hours			
						Cat 1	48 hours			
						Cat 2Ha	10 working days			
						Cat 2Hb	30 working days			
	Cat 2L	12 months								
	Condition Survey				SCANNER Machine	50%	Annually			
						50%	Annually			
						25%	Annually			
						0				
					Visual Condition Assessment (CSSW Method)	A				ad hoc
B									ad hoc	
C									ad hoc	
U				100%	ad hoc					

#### Compare Inspection Regime Against CSSW Minimum Standard

For each asset group compare your existing inspection regime against the CSSW recommended minimum standard.

Comparison of Footway Routine Inspection Intervals between Authority and CSSW Minimum								
Hierarchy	Authority Inspection Interval (days)	CSSW Minimum Inspection Interval (days)	Difference (days)	Comparison	Authority REI (k pa)	CSSW Minimum REI (k pa)	Difference in REI (k pa)	Insert reference to authority risk assessment undertaken where standard does not meet CSSW Minimum
FHVHU	30	30	0	Equals CSSW Minimum	465	465	0	
FH1	30	30	0	Equals CSSW Minimum	310	465	155	
FH2	40	90	30	Exceeds CSSW Minimum	305	465	160	
FH3	365	180	-185	Does not Meet CSSW Minimum	366	465	99	A risk assessment was undertaken on the 15 April 2019 using authority data collected over the past 5 years, full details of the RA can be found at .....
FH4 (Condition poor or unknown)	365	365	0	Equals CSSW Minimum	183	465	282	
FH4 (Good Condition)	365	730	365	Exceeds CSSW Minimum	0	465	465	
FH5	365	Reactive	N/A	Exceeds CSSW Minimum	37	465	428	

Identify any differences in the standards and record what they are. Where the authority standard does not meet the CSSW minimum detail the location of the risk assessment undertaken to confirm that the standard is appropriate.

### Compare Repair Regime Against CSSW Minimum Standard

For each asset group identify your existing repair regime and compare this against the CSSW recommended minimum standard.

CSSW National Minimum Standard							Authority Standard in Comparison to National Minimum	Difference from National Minimum Standard Insert Here the differences between the authority regime and the CSSW minimum standard	Reason for lower Standard and location of Authority Risk Assessment undertaken (Where applicable)
Asset/Defect Category	Description	Defect	Dimensional Criteria		Hierarchy	Response Time			
			Depth/height	Extent					
All									
Critical Defect	Defect that poses an immediate or imminent risk of injury to road users, e.g. Collapsed ceiling, missing utility cover, fallen tree, unprotected opening	Examples: Major debris or spillage on the Highway/ Carriageway / Footway / cycleway collapse with high risk of accidents / loss of control; critically unstable overhead wires, trees or structures; Exposed live wiring; Isolated standing water with high risk of loss of control; Missing or seriously defective ironwork with high probability of injury to highway users	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	Any	2 hours#	Adopted National Standard		
Carriageways								Insert Here the differences between the authority regime and the CSSW minimum standard	
Safety Defect	Service requests or defects requiring a response as soon as possible to remove a potential risk of injury to users	Pothole	> 50mm	Maximum horizontal dimension greater than 150mm	CHR, CH1 and CH2	By end of next working day	Adopted National Standard		
			>75mm		CH3, CH4 and CH5*	Within 5 working days	Improved Standard	All hierarchies use the 50mm and next working day intervention criteria	
Maintenance Defects (High)	Other defects that warrant treatment in order to prevent them deteriorating into a safety defect prior to the next scheduled inspection	Pothole	> 40mm	Maximum horizontal dimension greater than 150mm	CHR, CH1 and CH2	1 month	Adopted National Standard		
			> 50mm		CH3, CH4 and CH5*	3 months	Improved Standard	All hierarchies use the 40mm and 1 month intervention criteria	
		Crowning / Depression	> 100mm	< 2M length	Any	3 months	Adopted National Standard		

Identify any differences in the standards and record what they are. Where the authority standard does not meet the CSSW minimum state a reason for this and detail the location of the risk assessment undertaken to confirm that the standard is appropriate.

### Step 4: Update Risk Review Record

After having undertaken each of the above stages the risk review record should be updated to record their completion.

0. Annual Highway Asset Risk Review: Record of Completion							
<p>Complete this sheet to confirm that the review has been undertaken by completing the yellow cells. You can go to the relevant sheets by click on the cells in col. E</p>		<p><b>Authority</b></p> <p>Authority Name</p> <p>Year 2019</p>	<p><b>Completed By</b></p> <p>Name</p> <p>Position</p> <p>Role/Title</p>				
1	Review Network Hierarchies	<p>The hierarchy should be reviewed and updated when there are changes to the asset (e.g. new or upgraded assets) or changes in its use (e.g. change in traffic volumes)</p>	<p><b>Hierarchy</b></p> <p>Carriageway</p>	<p><b>Date Updated</b></p> <p>12/04/2019</p>	<p><b>Comment</b></p>	<p><b>Location of Definitive Hierarchy</b></p> <p>Symology</p> <p>Symology</p> <p>Bridgeman</p> <p>Symology</p> <p>Symology</p>	<p>Where is the Hierarchy stored?</p>
			<p>Footway</p>	<p>12/04/2019</p>			
			<p>Structures</p>	<p>13/04/2019</p>			
			<p>Street Lighting</p>	<p>13/04/2019</p>			
			<p>Traffic Management</p>	<p>13/04/2019</p>			
2	Collate and Review Risk Data	<p>Data relating to risks should be collated and reviewed</p>	<p><b>Risk Data</b></p> <p>Risk Data Summary</p>	<p><b>Date Updated</b></p> <p>12/04/2019</p>	<p><b>Comment</b></p>		
			<p>Existing Inspection Regime</p>	<p>12/04/2019</p>			
			<p>Existing Repair Regime</p>	<p>12/04/2019</p>			
3	Update and Review Risk Assessments	<p>Inspection Regime</p> <p>Repair Regime</p>	<p><b>Risk Assessments</b></p> <p>Curry Inspection Regime</p>	<p><b>Date Updated</b></p> <p>13/04/2019</p>	<p><b>Comment</b></p>	<p><b>Location of records or inspection and repair Regime</b></p> <p>Maintenance Manual</p> <p>Maintenance Manual</p> <p>Maintenance Manual</p> <p>Maintenance Manual</p> <p>Maintenance Manual</p>	<p>Where is the inspection and repair regime recorded?</p>
			<p>Footway Inspection Regime</p>	<p>13/04/2019</p>			
			<p>Structures Inspection Regime</p>	<p>15/04/2019</p>			
			<p>Carriageway Repair Regime</p>	<p>13/04/2019</p>			
			<p>Footway Repair Regime</p>	<p>13/04/2019</p>			
			<p>Confirm the sPR has been updated</p>				
4	Reporting this Review	<p>Report the results of this review to Council</p>	<p><b>Action</b></p> <p>Record the Risk Review Results</p>	<p><b>Date</b></p> <p>15/04/2019</p>	<p><b>Comment</b></p>		
			<p>Report the outcome of the risk review to council using ASRs</p>	<p>25/05/2019</p>			

## Step 5: Report Results of Risk Completed

Following the completion of the risk review the results of the review and any changes made should be reported to the appropriate council body for approval. This can be done within or as an appendix to the Annual Status Report (ASR) or using the template report document provided (Committee Paper Template/Report of Outcome of Highway Risk Review).

## Appendix (i) – Detailed Description of Hierarchy Review using RP1

### Carriageway Hierarchy

#### Use Network/Asset Details to Assign Initial Hierarchy

Import network details (USRN, Road Name, Road Number (A, B, C, U), Section Number and Existing Hierarchy) from the NSG. Enter the data into the spreadsheet provided:

NETWORK/ASSET DETAILS								
a. Enter network data in here from the street gazeteer						b. Identify strategic routes		Initial Proposed Road Hierarchy will populate here based on road class
USRN	Road Name	Road Number (A,B,C,U)	Section Number	Speed Limit (mph)	Existing Hierarchy	Is Road a Strategic Route?	For strategic routes state the reason for considering it strategic	1. Initial Proposed Road Hierarchy
2500123	London Road	A	10	70	Strategic Route	Yes	Route between cities	CHSR
2500124	High Street	A	10	60	Main Distributor	No		CH1
2500125	Main Street	B	10	40	Secondary Distributor	No		CH2
2500126	Broad Avenue	C	10	30	Link Road	No		CH3
2500127	Normal Close	U	10	30	Local Acces Road	No		CH4
2500128	Narrow Lane	U	10	30	Back Lane	No		CH4

All road sections will be assigned an initial category based as follows:

**Identify Strategic Routes (CHSR);** Identify routes that are of a regional importance as a strategic route. It is expected that these will be a small number of roads that provide the primary routes between towns and cities. It is anticipated that this will be a manual exercise undertaken by appropriate officers from within the authority. Appropriate reference should be made to other networks that are already defined for network management/traffic management, winter maintenance, local transport plans and the like.

**Initial Hierarchy:** An initial hierarchy based on road classification (A, B, C or U) will be automatically applied for all non-strategic roads the initial road hierarchy can be matched to the road classification as shown below:

- A roads → CH1
- B roads → CH2
- C roads → CH3
- U roads → CH4

(n.b. Speed limit is included for reference purposes only and does not feed into the initial hierarchy setting criteria)

It may be appropriate to add additional categories below local access roads to account for Minor Roads, Back Lanes, Green Lanes etc. as part of stage 2. The initial allocation is automated in the spreadsheet provided (it reads the road number and allocates an initial hierarchy for all roads except those identified as strategic).

### Use Assessment to Refine Hierarchy: Local Specific Adjustments

It is expected that for many authorities there will be some roads within the network where the matching of road class to a hierarchy level is not appropriate. This may be due to reasons of local importance. Or, more likely, it will be due to the traffic volumes not being commensurate with the banding, invariably this will be able to be evidenced by reference to traffic volumes and/or composition. An arterial road from a town may be a B classification but carries the same level of traffic and local importance as a nearby A road. Such a road may need to be elevated in the hierarchy to the same level as the A road. The converse could equally apply where the use of a road is less than the banding. A fixed method of dealing with these exceptions is not suitable. It is appropriate that local knowledge is brought to bear upon this task but that the output and rationale for the decisions made are recorded.

The use assessment should consider where individual roads (or sections of roads) should be allocated a different hierarchy level based upon factors that may include:

USE ASSESSMENT										
c. Review assumed traffic flow band, does it appear a reasonable assumption?		Insert traffic count figures used. These may be actual or extrapolated or estimated				d. Does this road carry levels of HGV that warrant different inspection and repair?	A recommendation as to whether a review should be undertaken will populate here based on the primary considerations	e. Is this section of road part of a major designated diversion route (e.g. for pre-planned diversion for motorway or trunk road closures) such that it warrants different inspection and repair	A recommendation as to whether a review should be undertaken will populate here based on the secondary considerations	Insert the Road Hierarchy you have decided upon based on your review of secondary considerations
Primary Consideration: Traffic Volumes/Use							Secondary Considerations			
Is the assumed traffic flow within the band indicated below?		AADT (Insert actual where known. ) (Insert extrapolated / estimated where it is not within the assumed traffic flow band)	State the source of Traffic Data quoted in col M (actual count, extrapolated or estimated)	Basis of Estimate	Does the road have a large volume of HGVs?	Consider reviewing the Road Hierarchy?	Is this part of a major "designated" diversion route? (e.g. for pre-planned diversions for motorway or trunk road closures)	Does the Road Hierarchy need reviewing?	2. Reviewed Road Hierarchy	
> 20,000	Yes				No	No	No	No		
10,000 - 20,000	Yes				No	No	No	No		
5,000 - 10,000	No	12000	Traffic Count	N/A	No	Yes	Yes	Yes	CH1	
1,000 - 5,000	Yes				No	No	No	No		
200 - 1000	Yes				No	No	No	No		
200 - 1000	No	100	Estimated	Local Knowledge	No	Yes	No	No	CH5	

It is expected that changes to hierarchy made during the use assessment will be justified by reference to one or all of the considerations below:

**Primary Considerations:**

- **Volume of traffic:** Increased traffic levels are the major contributor to an increased risk level for carriageway use. In order to assess this risk CSSW has adopted the following bandings of expected traffic volumes for each carriageway hierarchy. Where an initial hierarchy has been allotted to a road the amount of traffic using that road on a daily basis should be assessed against these traffic volumes.

Hierarchy Level	Traffic Banding (AADT)
CHSR	>20,000
CH1	10,000 - 20,000
CH2	5,000 - 10,000
CH3	1,000 - 5,000
CH4	200 - 1000
CH5	< 200

It is expected that authorities will make adjustment to the allocated hierarchy level based upon where traffic volumes are known to not be in, or near to, the ranges used above. A road may move between categorisations due to having a higher or lower level of traffic volume than other roads in this category. An initial estimated traffic volume based on officer knowledge may prompt the changing of hierarchy for a particular road, but this should, where possible, be verified using actual traffic count data.

- **Traffic Composition:** the composition of the traffic may also be a driver to moving a road from one category to another. This may include:
  - HGV “routes” - roads with especially large volumes of HGVs, thus more rapid deterioration may also be moved for the same reason.
  - Bus Routes – although not explicitly assessed at this stage where roads that are bus routes experience a more rapid deterioration it may be appropriate to prompt their allocation to a higher hierarchy category to ensure a higher frequency of inspection or enhanced repair regime.

**Secondary Considerations:**

- **Major Designated Diversion Route:** It may be appropriate to adjust the hierarchy if the road is part of a pre-planned diversion for motorway or trunk road closures if that means that it warrants different inspection and repair regimes.

### Tertiary Considerations:

The code of practice lists many factors that authorities may consider when establishing their hierarchy (ref). CSSW has decided that it is appropriate for the tertiary considerations listed below to be discounted from the risk review, for the reasons stated. It is recommended that where authorities have reinstated these considerations as part of a local risk assessment that they document these and explain why they have been reintroduced.

The following items from the CoP are considered to be unnecessary for inclusion in the CSSW recommended hierarchy review process.

- Adjacent Important Facilities: *it may be appropriate to move a road from one hierarchy category to another due to the presence of important adjacent facilities (Hospitals, schools, shopping centres, care homes, public building etc.) WHERE A RISK ASSESSMENT DEMONSTRATES A NEED TO GREATER /HIGHER HIERARCHY*. – This is considered to be something which may drive a higher level of use, and should be considered when estimating usage levels but will not automatically trigger any particular hierarchy level
- Adjacent Pedestrian Use – *roads where adjacent use means that the carriageways are frequently used by pedestrians (This may not result in a hierarchy change but may prompt consideration of making walked inspections in conjunction with footway inspections)*
- Accidents – *routes with greater than normal incidents of accidents. [Again, risk assessment will be required to show that inspection and repair regime adjustment are required rather than a change in hierarchy]*
- Proposed usage – *proposed usage is uncertain, and any forecast will contain many unknowns it has therefore been decided that review of hierarchy should be undertaken following any significant changes to usage rather than before.*
- Routes to important local facilities and to the strategic network – *it is believed that this aspect has been covered in the traffic volume and traffic make-up already considered in Step 2.*
- Designation as a traffic sensitive route – *this is considered to be a network management issue which is unlikely to affect the functional hierarchy of the carriageway.*
- Special characteristic of certain assets, e.g. historic structures – *it is not felt that this will have any bearing on changes to the functional hierarchy as they will already have been picked up by the items above.*
- Potential for use as a diversion route - *it is not considered possible to predict where a temporary diversion may be used as a result of an incident (rta, spillage, etc) and as such adjusting the hierarchy to take into account what may be a very short duration change is not considered appropriate. Where planned maintenance works (or other works) results in the use of a diversion for an extended period consideration will be given to changing the allocated functional hierarchy*

category of the diversion route to take account of its amended usage (i.e. increased traffic volumes and changed composition HGV increase etc.) during this period.

- Ceremonial routes and special events – any changes to the inspection or repair standards for these will be dealt with as a temporary exception and will not affect the ongoing functional hierarchy of the carriageway.

### Consultation with Neighbouring Authorities

REGIONAL CONSISTENCY CHECK		
Is this section of road one that crosses into the neighbouring authority?	Is the hierarchy the same as in the neighbouring authority?	
Does this road cross a regional boundary? i.e. into the neighbouring authority?	Enter the hierarchy on the neighbouring authority road section	3. Reviewed Road Hierarchy
No		
Yes	CH1	CH1
No		
Yes	CH3	CH4
No		

Upon completion of the Use Assessment a consultation should be undertaken with neighbouring authorities. A subset of the hierarchy data should be extracted for the roads that cross into adjacent authorities. Authorities should exchange this data and compare the level of hierarchy assigned to the roads that cross regional boundaries. Where there are differences the reasons for them should be determined. Each authority must then decide if any differences that exist are acceptable.

Where the hierarchy changes when it crosses a regional boundary, this should be noted by both authorities in their records and the rationale for accepting the difference clearly stated.

### Confirm and Record the Hierarchy

Following completion of the consultation exercise the final hierarchy should be recorded. This can be done by formalising a final version of the spreadsheet with the reasons for the adjusted hierarchy clearly stated.

CONFIRMATION OF FINAL HIERARCHY		
Insert the reasons for the Hierarchy you have decided upon following your review/s	The Final Road Hierarchy will populate here based on initial road class and the reviews undertaken	Any additional comments that have a bearing on the Hierarchy or notes to carry through to the setting of inspection regime etc.
Enter in the Yellow cells the reasons for hierarchy chosen	4. Final Road Hierarchy	Comments
Matches with Neighbour no reason to change	CH3R	
Upfied due to high traffic volume	CH1	Increase in traffic volume due to new industrial estate
No change to Hierarchy as traffic volumes change of boundary	CH3	Side road takes a significant proportion of traffic at the boundary
Lowered due to low traffic volumes	CH4	Very quiet back lane
	CH5	

The final hierarchies decided should be council approved. It is likely to be appropriate to do this in conjunction with the formalising of inspection and repair regimes. (Template committee report provided)





## Footway Hierarchy

### Use Network/Asset Details to Assign Initial Hierarchy

Import network details (USRN, road name, section number, existing hierarchy and footway number) from the NSG. Enter the data into the spreadsheet provided:

All footway sections are to be assigned an initial hierarchy category. The category should be established by answering a series of questions in the RP1 spreadsheet that relate to its level of use as illustrated below.

NETWORK/ASSET DETAILS										
Enter network data in here from the street gazetteer, or another suitable database containing detail of all highways					Would the location / use of this footway lead to it having the highest level of inspection / repair	Would the location / use of this footway lead to it having the higher than normal levels of inspection / repair	Would the location / use of this footway lead to it having the a higher level of inspection / repair			Initial Proposed Footway Hierarchy will populate here based on location / use
USRN	Road Name	ESU (Section Number)	Existing Hierarchy	Footway Number	Is the footway in a very busy area of a major city (central business district or main shopping area)	Is the footway in a busy area of town (main shopping area, local authority premises etc.)	Is the footway outside busy public building such as train/bus stations, hospitals, schools and colleges or small parade of shops etc	Does the footway link housing estates and industrial estates to other centres /routes	Is the footway little used rural footway	1. Initial Footway Hierarchy
2500123	London Road	10	N/A	N/A	No	No	No	No	No	FH4
2500124	High Street	10	N/A	N/A	Yes					FH4VHU
2500125	Main Street	10	N/A	N/A	No	Yes				FH1
2500126	Broad Avenue	10	N/A	N/A	No	No	Yes			FH2
2500127	Normal Close	10	N/A	N/A	No	No	No	Yes		FH3
2500128	Narrow Lane	10	N/A	N/A	No	No	No	No		FH4
2500129	Country Road	10	N/A	N/A	No	No	No	No	Yes	FH5

### Use Assessment to Refine Hierarchy: Local Specific Adjustments

The use assessment should consider where individual footways (or sections of footway) should be allocated a different hierarchy level based upon the pedestrian usage:

#### Primary Considerations:

It is expected that most changes to hierarchy made during the use assessment will be justified by reference to the consideration below:

CSSW Footway Hierarchy	Footfall Level (indicative)
FH4VHU	> 10,000 (15,000 used for calculations)
FH1	5,000 - 10,000
FH2	1,000 - 5,000
FH3	500 - 1,000
FH4	< 500

FH5	< 100
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- **Volume of pedestrian traffic:** a footway may move between categorisations due to having a higher or lower level of footfall than other footways in this category. An initial assessment based on officer knowledge may prompt the move, but this should be verified using actual pedestrian count data where possible.

USE ASSESSMENT		
Review assumed pedestrian traffic flow band, does it appear a reasonable assumption?	A recommendation as to whether a review should be undertaken will populate here based on the considerations	Insert the Footway Hierarchy you have decided upon based on your review of the considerations
<b>Primary Consideration</b>	<b>Consider reviewing the Footway Hierarchy?</b>	<b>2. Reviewed Footway Hierarchy</b>
<b>Is the assumed pedestrian daily traffic flow within the band indicated below?</b>		
< 500	Yes	No
> 10,000	Yes	No
5,000 - 10,000	Yes	No
1,000 - 5,000	Yes	No
500 - 1,000	No	Yes
< 500	Yes	No
< 100	Yes	No

### Tertiary Considerations

The code of practice lists many factors that authorities may consider when establishing their hierarchy (ref). CSSW has decided that it is appropriate for the tertiary considerations listed below to be discounted from the risk review, for the reasons stated in the rationale document. It is recommended that where authorities have reinstated these considerations as part of a local risk assessment that they document these and explain why they have been reintroduced.

The following items from the CoP are considered to be unnecessary for inclusion in the CSSW recommended hierarchy review process.

- Pedestrian Composition: the composition of the pedestrian traffic may also be a driver to moving a footway from one category to another. This may include:
  - *Use by the aged or infirm – authority workshop discussions indicate that areas of footway near facilities for the aged or infirm do not experience noticeably higher levels of defect related accidents or claims. As such they do not warrant the application of a different hierarchy to their surround footways. If during analysis of accident or claim data a trend of increased incidents near such a facility is identified, authorities should review the data to establish the significance of any issues and adjust their hierarchy accordingly*
- Current usage and proposed usage – *Current usage is reflected in the Primary and secondary considerations above; Proposed usage is uncertain and any forecast will contain many unknowns it has therefore been decided that review of hierarchy should be undertaken following any significant changes to usage rather than before.*
- Contribution to the quality of public space and streetscene – *this aspect is covered during the initial setting of hierarchy, within the identification of primary footways.*
- Designation as a traffic sensitive pedestrian route – *this is a network management issue which will be primarily based on level of use and is unlikely to affect the functional hierarchy of the footway .*

- Special characteristic of certain assets, e.g. historic structures – this is not considered to be an issue for footway hierarchy
- Accident and other risk assessment - *this item is appropriate for consideration when adjusting inspection and maintenance regimes rather than for setting footway hierarchy.*
- Character and traffic use of adjoining carriageway - *this item is not considered to be appropriate for setting **footway** hierarchy as a high use carriageway adjacent to a low use footway would not warrant increasing the hierarchy level of the footway and a high use footway next to a low use carriageway would have its hierarchy set based on its use.*

### Consultation with Neighbouring Authorities

Upon completion of the use assessment a consultation should be undertaken with neighbouring authorities. A subset of the hierarchy data should be extracted for the footways that cross into adjacent authorities. Authorities should exchange this data and compare the level of hierarchy assigned to the footways that cross regional boundaries. Where there are differences the reasons for them should be determined. Each authority must then decide if the differences that exist are acceptable.

**Where the hierarchy changes when it crosses a regional boundary, this should be noted by both authorities in their records and the rationale for accepting the difference should be clearly stated.**

REGIONAL CONSISTENCY CHECK			CONFIRMATION OF FINAL HIERARCHY		
Is this section of footway one that crosses into the neighbouring authority?	Is the hierarchy the same as in the neighbouring authority	Insert the Footway Hierarchy you have decided upon based on your review of the considerations	Insert the reasons for the hierarchy you have decided upon following your review/s	The Final Footway Hierarchy will populate here based on initial hierarchy and the reviews undertaken	Any additional comments that have a bearing on the hierarchy or notes to carry through to the setting of inspection regime etc.
Does this footway cross a regional boundary? i.e. into the neighbouring authority?	Enter the hierarchy of the neighbouring authority footway section	3. Reviewed Footway Hierarchy	Enter in the Yellow cells the reasons for hierarchy chosen	4. Final Footway Hierarchy	Comments
Yes	FH2	FH4	Pedestrian traffic changes at boundary	FH4	Moves from a built up area to a rural area
No				FHVHU	
No				FH1	
No				FH2	
No			Pedestrian volumes are only slightly lower than the band	FH3	The hierarchy is in keeping with the surrounding area
No				FH4	
No				FH5	

### Confirm and Record the Hierarchy

Following completion of the consultation the final hierarchy should be recorded along with the reasons for the chosen hierarchy. This can be done by formalising a final version of the spreadsheet.

The final agreed hierarchy should be council approved in conjunction with the formalising of inspection and repair regimes.

## Structures Hierarchy

Structures hierarchy bands have been defined as below:

1. **Vital:** a structure that is vital to the network i.e. if restricted or out of service it would cause a very significant adverse effect such as major traffic delays with the potential to affect other important services or community severance
2. **Important:** a structure that is important to the functioning of the network, i.e. if restricted out of service would have an adverse effect on the operation of the network
3. **Standard:** all other structures

## Use Network/Asset Details to Assign Initial Hierarchy

Import Structure Details (Structure Number, Name, Type, Existing Hierarchy [if known]) from the Structures database. Import network details (Road Name, Road Number, Road Hierarchy, Footway Number and Footway Hierarchy) from the NSG or another source. Enter the data into the spreadsheet provided:

All structures will automatically be assigned an initial hierarchy category based on the hierarchy of the road or footway that the structure carries or crosses. The initial structure hierarchy is based on the table below using the highest hierarchy for either carriageway or footway.

Road Bridges, Culverts, Retaining Walls etc	
Carriageway Hierarchy	Initial Structure Hierarchy
CHSR	Important Structure
CH1	
CH2	
CH3	Standard Structure
CH4	
CH5	

## Footbridges

For footbridges and other structures that are solely associated with a footway or footpath the initial structure hierarchy is based on the table below by relating it to the footway hierarchy of the adjacent footway

F-way Hierarchy	Structure Hierarchy
FHVHU	1. Important structures
FH1	
FH2, FH3, FH4, FH5	2. Standard Structure

n.b. At this stage the rating of a **Vital Structure** is not used and is only populated following the assessment of other relevant considerations. (Use Assessment)

STRUCTURE DETAILS			NETWORK DETAILS						
Enter Structure Details Here			Enter network data in here from the street gazetteer, or another suitable database containing detail of all highways			Enter footway network data for those structures that are associated with a footway only		Enter the existing structure hierarchy if known	Initial Proposed Structure Hierarchy will populate here based on road or footway hierarchy
Structure Number	Structure Name	Asset Type	Road Number	Road Name	Road Hierarchy	Footway Number	Footway Hierarchy	Existing Structure Hierarchy (If known)	1. Initial Structure Hierarchy
654	Big Bridge	Road Bridge	2500123	London Road	CHSR				Important Structure
655	Old Bridge	Road Bridge	2500124	High Street	CH1				Important Structure
656	New Bridge	Road Bridge	2500125	Main Street	CH2				Important Structure
657	Small Bridge	Road Bridge	2500126	Broad Avenue	CH3				Standard Structure
658	Old Culvert	Culvert	2500127	Normal Close	CH4				Standard Structure
659	New Culvert	Culvert	2500128	Narrow Lane	CH5				Standard Structure
660	Shopping parade bridge	Footbridge				4400321	FHVHU		Important Structure

It is expected that most authorities will need to adjust the hierarchy of some structures as part of the use assessment to adequately reflect the network importance of individual structures.

It is also probable that individual structures will need to be allocated hierarchies that may not fit the initial “rule” shown above.

### Use Assessment to Refine Hierarchy: Local Specific Adjustments

The use assessment should consider where individual structures should be allocated a different hierarchy level based upon factors that may include:

#### Primary Considerations:

It is expected that most changes to hierarchy made during the use assessment will be justified by reference to the considerations below:

- **Major Traffic Disruption** – would closure or works on the structure be likely to cause major traffic disruption (e.g. city centre bridge)
- **Sole Access** - Is the structure a sole access route to a community or facility that would be cut off if the structure were closed.
- **Major Diversion Route** – would closure or works on the structure require a lengthy diversion route.

- **Other Reasons for Reviewing Hierarchy** – there may be other reasons for reviewing the hierarchy of the structure such as:
  - **Susceptible to Rapid Failure Mode** – could this structure fail in a rapid manner causing a significant safety risk? (based on structure type and material)
  - **Significant adverse social or economic impact** - Would restriction or closure of this structure have a significant adverse social or economic impact? (e.g. structure is on the route to a major industrial facility)
  - **Structure of Local Significance** - Is this structure of local significance? (e.g. an individual iconic local structure, scheduled monument)

Following completion of the use assessment the spreadsheet will prompt a review of the hierarchy and populate a suggested hierarchy based on the ruleset in the following table\*.

Rule	Suggested Hierarchy
Sole Access to community	Vital Structure
Both major traffic disruption <b>and</b> lengthy diversion route	Vital Structure
Either major traffic disruption <b>or</b> lengthy diversion route	Important Structure
Susceptible to rapid failure	Important Structure
Significant social or economic impact	Important Structure
Structure of local significance	Important Structure

\*n.b. As approved by CSSW.

USE ASSESSMENT						
<i>Review if a closure or works on this structure would lead to major traffic disruption</i>	<i>Review if this structure serves as the only access to a community or facility</i>	<i>Review if a lengthy diversion route would be required if this structure were out of service</i>	<i>Is there a reason you would consider reviewing the hierarchy of this structure? (e.g. an individual iconic local structure, closure would have an adverse social or economic impact or the structure could fail without warning)</i>	<i>A recommendation as to whether a review should be undertaken will populate here based on the considerations</i>	<i>A recommendation as to what the hierarchy should be will populate here based on the considerations</i>	<i>Insert the Structure Hierarchy you have decided upon based on your review of the considerations</i>
Primary Considerations				Consider reviewing the Structure Hierarchy?	Suggested Hierarchy	2. Reviewed Structure Hierarchy
Is closure or works likely to cause Major Traffic Disruption (e.g. city centre bridge)	Is the structure a Sole Access to Community	Would closure or works require a Lengthy Diversion Route	Is there a reason you would consider reviewing the hierarchy of this structure?			
Yes	No	Yes		Yes	Vital Structure	Vital Structure
No	Yes	No		Yes	Vital Structure	Vital Structure
No	Yes	Yes		Yes	Vital Structure	Vital Structure
No	No	Yes		Yes	Important Structure	Important Structure
No	No	No		No		
No	No	No		No		
No	No	No		No		

**Tertiary Considerations**

The code of practice lists many factors that authorities may consider when establishing their hierarchy (ref). It is recommended that where some of these have been discounted as not being appropriate that this is recorded. It is expected that this may be appropriate for many of the tertiary considerations listed below, for the reasons stated.

It is recommended that authorities document those items listed in the CoP that have been discounted and explain why they have been discounted: e.g. *The following items from the CoP have been considered but have not resulted in specific adjustment to the structures hierarchy*

- *type of asset, e.g. bridge, tunnel, retaining wall, earth structure, the relative importance of an asset in term of the impact of its potential failure is not a function of asset type*
- *obstacle crossed, bridge span, retained earth height; a bridge crossing another road presents the same risk as one crossing a river*
- *critical asset, historic structure, permanent weight, height, width or swept path restriction;*
- *construction material, e.g. concrete or steel bridge, arch, slab or beam/girder bridge, concrete or stone walls, etc.*

*These factors are important considerations in establishing an inspection frequency but are not relevant in determining the hierarchy*

### **Consultation and Other Considerations**

Upon completion of the use assessment a consultation should be undertaken with neighbouring authorities. A subset of the hierarchy data should be extracted for the structures that are shared with adjacent authorities. Authorities should exchange this data and compare the level of hierarchy assigned to the structure that crosses regional boundaries. Where there are differences the reasons for them should be determined. Each authority must then decide if the differences that exist are acceptable.

Where the hierarchy changes when it crosses a regional boundary, this should be noted by both authorities in their records and the rationale for accepting the difference clearly stated.

Local authority officers may have an additional local reason for adjusting the hierarchy of a structure, where this is the case it should be noted on the sheet and the reason for changing the hierarchy documented.



REGIONAL CONSISTENCY CHECK				STAGE FOUR FINAL HIERARCHY		
is this Structure shared with a the neighbouring authority?	is the hierarchy the same as in the neighbouring authority		Insert the Structure Hierarchy you have decided upon based on your review of the considerations	Insert the reasons for the hierarchy you have decided upon following your review/s	The Final Structure Hierarchy will populate here based on initial hierarchy and the reviews undertaken	Any additional comments that have a bearing on the hierarchy or notes to carry through to the setting of inspection regime etc.
Secondary Considerations						
Does this Structure cross a regional boundary? i.e. into the neighbouring authority?	Enter the hierarchy of the neighbouring authority structure	Are there any other reasons to change the structure hierarchy?	3. Reviewed Structure Hierarchy	Enter in the Yellow cells the reasons for hierarchy chosen	4. Final Structure Hierarchy	Comments
Yes	Vital Structure	No	Vital Structure	As recommended	Vital Structure	
				As recommended	Vital Structure	
				As recommended	Vital Structure	
				As recommended	Important Structure	
					Standard Structure	
					Standard Structure	
Yes	Important Structure	No	Important Structure	As recommended	Important Structure	

### Confirm and Record the Hierarchy

Following completion of regional consistency check the final hierarchy should be recorded along with the reasons for the chosen hierarchy. This can be done by formalising a final version of the spreadsheet. **The final agreed hierarchy should be council approved, in conjunction with the formalising of inspection and repair regimes.**

### Street Lighting Hierarchy

Street lighting hierarchies differentiate between primary and secondary lighting. It is expected that where an authority is adopting a part night lighting and/or dimming regime that such a hierarchy will be introduced as the means of deciding which lights can be turned off or dimmed. A sheet has been provided within RP1 Highway Asset Risk Review, where this information can be inserted. Inspection and repair regime may be dictated by the nature of the defect rather than by hierarchy considerations.

### Traffic Management Systems Hierarchy

#### Use Network/Asset Details to Assign Initial Hierarchy

Import Traffic Management Systems details from the TM database and location details (Road Number, Name and Hierarchy) from the NSG or Carriageway hierarchy spreadsheet. Enter the data into the spreadsheet provided:

All traffic management assets will be assigned an initial category based on the hierarchy of the road where it is located as per the table below. For junctions that serve more than one road hierarchy the highest hierarchy should be used:

Carriageway Hierarchy	Traffic Management Hierarchy (As per highest Carriageway hierarchy)
CHSR	Primary Junction
CH1	
CH2	Secondary Junction
CH3	Local Junction
CH4	

All other traffic management assets (including pedestrian crossings) will initially be assigned the hierarchy of local.

NETWORK/ASSET DETAILS					
Enter asset data in here from the Traffic Management database or other suitable records		Enter network data in here from the street gazetteer, or another suitable database containing detail of all highways			Initial Proposed TM Hierarchy will populate here based on Road / Footway Hierarchy
Junction Number	Junction Name	Road Number	Road Name	Road Hierarchy	1. Initial Traffic Management Hierarchy
25	London Road	2500123	London Road	CHSR	Primary Junction
26	High Street	2500124	High Street	CH1	Primary Junction
27	Main Street	2500125	Main Street	CH1	Primary Junction
28	Broad Avenue	2500126	Broad Avenue	CH3	Local Junction
29	Normal Close	2500127	Normal Close	CH4	Local Junction
30	Narrow Lane	2500128	Narrow Lane	CH5	Local Junction

### Use Assessment to Refine Hierarchy: Local Specific Adjustments

The use assessment should consider where individual traffic management installation should be allocated a different hierarchy level based upon local factors e.g. size of junction, number of legs etc.

USE ASSESSMENT		
Are there any considerations you would take into account that might affect the inspection and or repair regime of the asset and which therefore might affect the hierarchy. If so insert them below.	Insert whether the considerations on the left have prompted a review of the hierarchy	Insert the TM Hierarchy you have decided upon based on your review of the considerations
Primary Considerations	Consider reviewing the Traffic Management Hierarchy?	2. Reviewed Street Traffic Management Hierarchy
N/A		
N/A		
N/A		
Four way junction with access to Station	Yes	Secondary Junction
N/A		
N/A		

## Consultation

Upon completion of the use assessment a consultation should be undertaken with neighbouring authorities. A subset of the hierarchy data should be extracted for the junctions that are shared with adjacent authorities. Authorities should exchange this data and compare the level of hierarchy assigned to the junction that crosses regional boundaries. Where there are differences the reasons for them should be determined. Each authority must then decide if the differences that exist are acceptable.

Where the hierarchy changes when it crosses a regional boundary, this should be noted by both authorities in their records and the rationale for accepting the difference clearly stated.

REGIONAL CONSISTENCY CHECK			CONFIRMATION OF FINAL HIERARCHY		
<i>Is this section of road one that crosses into the neighbouring authority?</i>	<i>Is the hierarchy the same as in the neighbouring authority</i>	<i>Insert the Footway Hierarchy you have decided upon based on your review of the considerations</i>	<i>Insert the reasons for the hierarchy you have decided upon following your review/s</i>	<i>The Final Footway Hierarchy will populate here based on initial hierarchy and the reviews undertaken</i>	<i>Any additional comments that have a bearing on the hierarchy or notes to carry through to the setting of inspection regime etc.</i>
Does this junction form a regional boundary? i.e. into the neighbouring authority?	Enter the hierarchy of the neighboring authority junction	3. Reviewed Traffic Management Hierarchy	Enter in the Yellow cells the reasons for hierarchy chosen	4. Final Traffic Management Hierarchy	Comments
No				Primary Junction	
No				Primary Junction	
No				Primary Junction	
No			Upgrade to secondary junction due to size of junction	Secondary Junction	Access to station car park and 4 legs
No				Local Junction	
No				Local Junction	

## Confirm and Record the Hierarchy

Following completion of regional consistency check the final hierarchy should be recorded along with the reasons for the chosen hierarchy. This can be done by formalising a final version of the spreadsheet.

**The final agreed hierarchy should be council approved, in conjunction with the formalising of inspection and repair regimes.**

## Two Yearly Review of Asset Hierarchies

A review date should be set following the formal approval of the asset hierarchies. The review should examine the risk review data and any changes made to the assets during the years, new assets added or major improvement schemes completed. The review should also take into account new data that has been collected during the year especially traffic or pedestrian count data that may indicate a need to change the level of hierarchy assigned to an asset (or section thereof).

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**Highway Asset Management  
Planning:  
National Minimum Standards:  
Inspection and Repair Regimes 2019**



## Document Information

<b>Title</b>	National Minimum Standards: Inspection and Repair Regimes
<b>Author</b>	exp consulting
<b>Description</b>	This document provides information to supports the completion of Task 4 Performance and Risk Review of the CSSW HAMP Recommended Practices. It provides recommended National Minimum Standards for inspection and repair regimes

## Document History

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Author</b>	<b>Changes from Previous Version</b>
1.0	DRAFT	June 2019	exp	n/a
2.0	draft	Oct 2019	exp	Formatting Updated
1	Final	Oct 2019	exp	NA

## Document Control

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Authorised for Issue by CSSW HAMP Steering Committee</b>
1	Final	Sept 2019	CSSW Main Group Meeting Sept 2019

## Associated Documents

### The following documents are associated with this standard

1. **RP1 –Highway Asset Risk Review:** A spreadsheet that authorities are recommended to use to record a risk review.
  2. **Risk Based Approach: Method:** A document providing a detailed description of the approach to accompany the spreadsheet RP1.
  3. **Risk Based Approach: Method Summary:** A document providing a summary explanation of the method intended for use by authorities to brief managers, members, risk managers etc.
  4. **Template Maintenance Manual Content:** A template document that authorities can use to record hierarchy and inspection and repair regimes derived using the risk-based approach and their methods of updating the same.
  5. **Highway Inspection Defect Recording Manual:** A manual designed to give guidance to inspectors on what defects to record and what records should be taken about each defect. Intended to be used as the reference document for inspector training.
  6. **Committee Paper Template/Report of Outcome of Highway Risk Review**
    - a. A template initial paper that advises the new method, references the CoP and recommends changes to hierarchy, inspection and repair regimes.
    - b. A template report paper for subsequent reviews that focuses on reporting changes to risk and resultant recommended changes to hierarchy, inspection and repair regimes
  7. **National Minimum Standards:** A statement of minimum standards recommended by CSSW for intervention level and associated response times for defects.
  8. **Rationale Behind the Approach:** Sets out the rationale that was adopted in developing that approach.
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# 1. Minimum Standards

## Purpose

To provide national minimum standards for inspection and repair regimes for local authority highways.

## CSSW Recommended Risk-Based Approach

CSSW has developed a recommended risk-based approach in response to the Code of Practice for Highways (2016). The approach is detailed in the document “CSSW Risk-Based Approach Method, 2019”. The method recommends that authorities undertake highway asset risk reviews at least every 2 years. CSSW HAMP Recommended Practices have been updated to include a highway risk review. This document is a reference to be used in that review.

## Scope

The risk review method involves evaluation of risk with specific reference to:

- Network Hierarchy
- Inspection Regime
- Repair Regime

Minimum standards for inspection and repair regimes are included in this document. It is recommended that risk reviews are reported to a management and/or member forum within the council such that decisions about the management of the asset and the funding allocated to maintenance of asset are made with information about the associated risks of such choices in hand.

## Adoption of Minimum Standards

It is expected that all authorities will reference the minimum standards contained within this document when carrying out risk reviews. The reason for the adoption of these standards is given in the document “Rational Behind the Approach<sup>(9)</sup>”. Authorities may choose to exceed the standards in some or all areas. If an authority adopts a standard below the recommended minimum it is recommended that they document their own risk assessment to support their choice.

## Application of National Standard

Adoption of a national standard will provide a consistent standard for users across Wales, allow ongoing review and refinement via annual updating or risk assessments and assist authorities to manage 3<sup>rd</sup> party claims by demonstrating consistency of approach

## Review and Updating

The CSSW HAMP steering committee will review this method regularly and advise any recommended changes to CSSW for approval.



## 2. Inspection Regime

### Minimum Inspection Regime

The following minimum inspection regime is recommended

Carriageway Hierarchy	Minimum Inspection Interval
CHSR	Monthly
CH1	Monthly
CH2	Every 3 months
CH3	Every 6 months
CH4	Annually (poor or unknown condition) Every 2 years (good condition)
CH5	Reactive

Footway Hierarchy	Minimum Inspection Interval
FHVHU	Monthly
FH1	Monthly
FH2	3 months
FH3	6 months
FH4	Annually (poor or unknown condition) Every 2 years (good condition)
FH5	Reactive

It is expected that in future the inspection regime may be refined by reference to elements of the asset that are known to be in good condition and pose low risk. This approach is already embedded into many authorities' approach to structures inspection. It is therefore recommended that authorities implement the CSSW Visual Assessment Methods that were created for use on carriageways and footways.

### Inspection Tolerances

A tolerance should be included to allow for unavoidable incidences such as bad weather, inspector sickness etc. It is recommended that the tolerance applied to each inspection frequency is 50% of the inspection interval or 3 months (whichever is the least).

### 3. Repair Regime

The following minimum standards are recommended for defect categories, response times and investigatory levels.

#### Defect Categories and Response Times (Carriageways)

Defect Categories	Description	Response Time
Critical Defect	A situation where the inspecting officer considers the risk to safety high enough to require immediate action, e.g. collapsed cellar, missing utility cover, fallen tree, unprotected opening,  ➤ Requiring an immediate response to make the site safe	2 Hours#
Safety Defect	Defects that pose an imminent risk of injury to road users,  ➤ Requiring a response as soon as possible to remove a potential risk of injury to users	By End of Next Working Day (CHSR, CH1, CH2)
Safety Defect	Defects that pose an imminent risk of injury to road users,  ➤ Requiring a response as soon as possible to remove a potential risk of injury to users	Within 5 Working Days (CH3, CH4, CH5**)
Maintenance Defect	Defects that warrant treatment to prevent them deteriorating into a safety defect prior to the next scheduled inspection,  ➤ Requiring a response to prevent them becoming a safety defect	1 month (CHSR, CH1, CH2)  3 months (CH3, CH4, CH5**)
Programmed Repairs	Defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred.	As per the local works programme

# response time for critical defects refers to the time to attend site, make safe or repair will then be asap thereafter

\*\*Defect triggers on CH5 roads are to be considered an investigatory level. An investigatory level does not automatically trigger a response. It will be incumbent upon the inspector to assign an appropriate response to each defect based upon its type, size, location and the level of use of the road. CH5 roads are low use roads and defects will frequently present low risk to users and can be responded to accordingly.

## Defect Categories and Response Times (Footways)

Defect Categories	Description	Response Time
Critical Defect	<p>A situation where the inspecting officer considers the risk to safety high enough to require immediate action, e.g. collapsed cellar, missing utility cover, fallen tree, unprotected opening,</p> <ul style="list-style-type: none"> <li>➤ Requiring an immediate response to make the site safe</li> </ul>	2 Hours#
Safety Defect	<p>Defects that pose an imminent risk of injury to road users,</p> <ul style="list-style-type: none"> <li>➤ Requiring a response as soon as possible to remove a potential risk of injury to users</li> </ul>	By End of Next Working Day (FHVHU, FH1, FH2)
Safety Defect	<p>Defects that pose an imminent risk of injury to road users,</p> <ul style="list-style-type: none"> <li>➤ Requiring a response as soon as possible to remove a potential risk of injury to users</li> </ul>	Within 15 Working Days (FH3, FH4, FH5)
Maintenance Defect	<p>Defects that warrant treatment to prevent them deteriorating into a safety defect prior to the next scheduled inspection,</p> <ul style="list-style-type: none"> <li>➤ Requiring a response to prevent them becoming a safety defect</li> </ul>	1 month (FHVHU, FH1, FH2) No set response time (FH3, FH4, FH5)
Programmed Repairs	Defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred.	As per the local works programme

# response time for critical defects refers to the time to attend site, make safe or repair will then be asap thereafter

**Critical Defects**

Asset Type	Defect Type	Hierarchy	Dimensional Criteria	
			Depth/Height	Extent
All	<b>Examples:</b> Major debris or spillage on the highway; Carriageway / footway / cycleway collapse with high risk of accidents / loss of control; Critically unstable overhead wires, trees or structures; Exposed live wiring; Isolated standing water with high risk of loss of control; Missing or seriously defective ironwork with high probability of injury to highway users	All	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size	Not Applicable. Critical defects are defined by their potential to cause immediate injury not by defect size

**Safety Defects**

Asset Type	Defect Type	Hierarchy	Dimensional Criteria	
			Depth/Height	Extent
Carriageways	Pothole	CHSR, CH1 and CH2	> 50mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5**	>75mm	Maximum horizontal dimension greater than 150mm
Footways	Pothole, trip, rocking slab	All	> 40mm	Maximum horizontal dimension greater than 75mm

\*\*Defect triggers on CH5 roads are to be considered an investigatory level.

## Maintenance Defects

	Defect Type	Hierarchy	Dimensional Criteria	
			Depth/Height	Extent
Carriageways	Pothole	CHSR, CH1 and CH2	> 40mm	Maximum horizontal dimension greater than 150mm
	Pothole	CH3, CH4 and CH5**	> 50 mm	Maximum horizontal dimension greater than 150mm
	Crowning / Depression	All	> 100mm	< 2M Length
Footways	Pothole, trip or rocking slab	All	25mm - 40mm	Maximum horizontal dimension greater than 75mm
	Badly cracked or damaged ironwork	Any		N/A

\*\*Defect triggers on CH5 roads are to be considered an investigatory level.

## Programmed Repairs

A national minimum standard has not been prescribed for programmed repairs.

## Standards are a Guide

The standards are a guide only. Reference should be made to CSSW Defect Recording Manual. It is an essential part of all authorities' inspection regimes that inspectors are appropriately trained. In doing so inspectors can complement application of the standard with their own assessment of individual defects.

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# Highway Asset Management Planning:

## Risk Based Approach to Highway

### Management

### Rationale Behind the Approach



## 1. Introduction

CSSW is advocating a nationally consistent approach to the management of local highways. A method has been developed under CSSW’s HAMP project designed to allow all authorities to adopt the risk-based approach recommended by the new code of practice (Code of Practice). This paper sets out the rationale that was adopted in developing that approach.

### Common Needs

The national local road network is varied, ranging from heavily trafficked major routes to barely used rural lanes. There is however commonality between groups of roads and assets. It is appropriate that the travelling public can expect similar standards to apply to roads that are equivalent in their function and level of use nationally. This principle underpins CSSW’s desire to create a nationally consistent response to the Code of Practice.

### Code of Practice Risk-Based Approach

The new Code of Practice recommends that authorities apply a risk-based approach to highway management. In doing so authorities must acknowledge the fact that risk varies across the asset and between asset groups. Managers have always considered risk in their decision making about inspections, repair priorities and works programming. The new code creates a need to formalise such decision making and to ensure that such decisions are, to the extent that such is possible, fact based.

### Current Approach

The current code of practice already advocates the use of risk assessment via the use of a risk matrix as shown. The method is conceptually simple and requires identification of the impact of an event and evaluation of the probability of that event occurring. The difficulty is that the table does not specify to what event it refers. If it

Table 5 – Risk Matrix

Probability ↓ Impact ↓	Very low (1)	Low (2)	Medium (3)	High (4)
Negligible (1)	1	2	3	4
Low (2)	2	4	6	8
Noticeable (3)	3	6	9	12
High (4)	4	8	12	16

Response Category	Category 2(L) response	Category 2(M) response	Category 2(H) response	Category 1 response
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refers to the risk of a fatality, then the impact is very high and the probability low. If it refers to the risk of 3<sup>rd</sup> party property damage the impact is low and the probability considerably higher. Both of these events, and others, are possible as a result of a highway defect. The current method therefore requires highway inspectors to concurrently analyse a range of

potential events and a range of probabilities to arrive at an appropriate response to a defect. This would be a difficult task if data were available. Without data on impacts and probability this becomes an exercise in individual judgement alone.



## Proposed Approach

The proposed approach to CSSW's risk-based method is to use asset data to inform risk assessment. The intent is to allow decisions to be supported by factual data. It is possible to acquire and analyse data on the events that occur at defects, to collect data on the type, size and location of the defects themselves and to use this as a reference when establishing the key elements of a highway management approach; setting a hierarchy, setting inspection and repair regimes and using the records collected from these to influence budget allocation.

## Annual Risk Review

The method proposed by CSSW has been integrated into the CSSW HAMP recommended practices. The updated HAMP practice now recommends completion of a **risk review at least every 2 years**. The risk review assesses all relevant data to assist authorities to refine their hierarchies, inspection and repair regimes based upon analysis of the records generated from their performance records (PIs and operational performance measures).

## Refinement and Improvement

There are many areas where improved data will enable better risk assessment. It is expected that the method will be refined as authorities collect and analyse relevant data and are able to document more refined risk assessments. This process will be managed by CSSW using the national HAMP project.

### CSSW's Risk-Based Method:

- **is based on using asset data to enable a fact-based assessment of risk**
- **uses available asset data**
- **will be refined as better data is collected and analysed**
- **uses regular reviews of risk data to inform refinement of hierarchies and inspection and repair regimes.**

The basis upon which the key steps of the method have been created are explained below.

## 2. Establishing Risk-Based Hierarchies

The requirement to split the asset into hierarchies exists in the current code. It has been retained in the new code but with the onus placed upon authorities to determine how best to apply the risk -principle in determining appropriate hierarchies. The new code states that *“Carriageway hierarchy will not necessarily be determined by the road classification, but by functionality and scale of use.”* and provides a table, an extract from which is shown below.

Secondary Distributor	B and C class roads and some unclassified urban routes carrying bus, HGV and local traffic with frontage access and frequent junctions	In residential and other built up areas these roads have 20 or 30 mph speed limits and very high levels of pedestrian activity with some crossing facilities including zebra crossings. On-street parking is generally unrestricted except for safety reasons. In rural areas these roads link the larger villages, bus routes and HGV generators to the Strategic and Main Distributor Network.
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This is a reference but does not include the most significant factor that affects risk; use. Roads that carry 10,000 vehicles a day have a much greater potential for an adverse event to occur than ones carrying 500

vehicles a day. Simple fact.

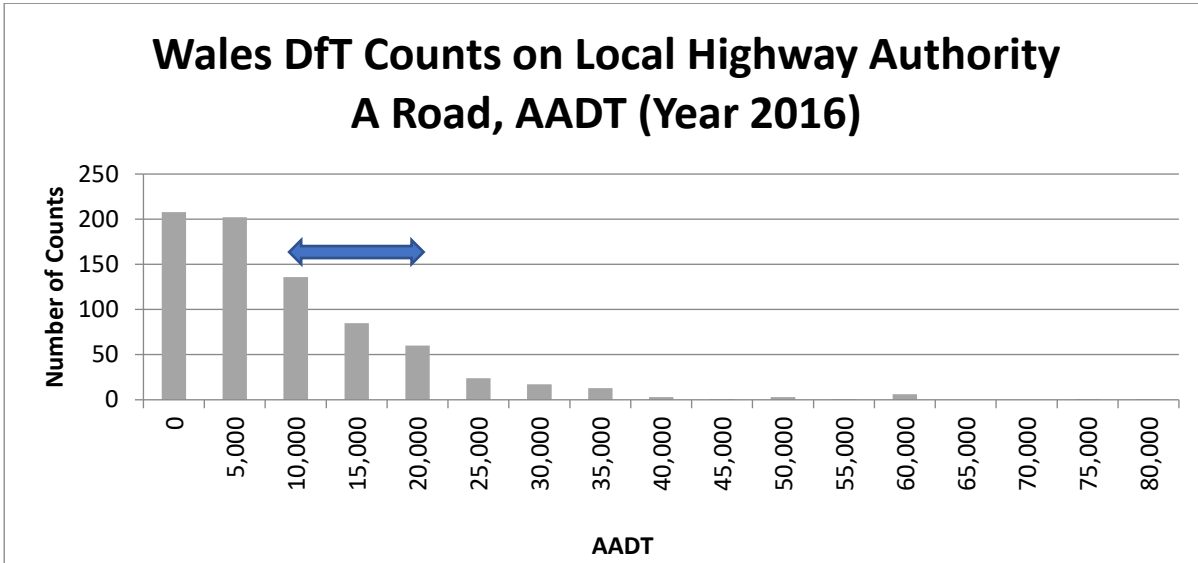
It is possible to estimate use for all roads based upon available traffic count data. CSSW has chosen to recommend that a risk-based hierarchy should be set predominantly based upon use. This does not preclude authorities making necessary adjustment to consider particular local use patterns and issues.

### Other Considerations

Additional consideration may influence the choice of hierarchy level. The principle advocated however is that any adjustment is justified by reference to appropriate data.

### Road Class

All local roads are already ascribed a class; A, B or C if classified or unclassified. Road class has been used by many authorities to date either as their de facto network hierarchy or as the basis for establishing it. Road class is broadly indicative of use and thus risk. However. There are major variations nationally that means the creation of a hierarchy based solely on road class is not appropriate. The traffic count data collected by the Department for Transport includes 761 counts on local authority managed Welsh A roads. The most recent figures for these sites show a range of average annual daily traffic (AADT) from 83,000 to 431. 29% of the counts fall in the range 10,000 to 20,000 vehicles per day. All authorities except Powys and Anglesey have roads in this usage band. The very heavily trafficked roads are predominantly in areas around Cardiff and are atypically high. The results are shown in the graph below



The graph illustrates the range of traffic volume represented in the DfT data. There are many A roads with volumes in the 10,000 to 20,000 range. There are almost double that with volumes below this. The proposed method of establishing hierarchy is recommending that authorities differentiate between road based on their use and as such should for example adopt a different regime of inspection and repair for roads carrying 15,000 vehicles a day to roads carrying 5,000 a day regardless of whether they are designated as an A road.

To establish a means of referencing hierarchy by traffic volume the following table was developed. The range of 10,000 to 20,000 vehicle per day has been adopted as the starting point. This range was taken to represent a type of busy road that exists in most authorities. These have been allocated as “CH1”. CSSW has adopted a nomenclature for hierarchy based on codes as shown below. This is to avoid potential confusion that could be created from the descriptions used in the code, which are only provided as guidance.

Code of Practice Hierarchy Level Names	CSSW Hierarchy Level	Traffic Volume Band (approx.)
Strategic Route	CHSR	Based on local importance rather than traffic flow but often in the range >20,000 [30,000 for calculations]
Main Distributor	CH1	10,000 to 20,000
Secondary Distributor	CH2	5,000 - 10,000
Link Road	CH3	1,000 - 5,000
Local Access Road	CH4	200 – 1000
Minor Road	CH5	< 200

# a figure of 30,000 has been adopted for calculations later in this method. This represents the busiest level of roads nationally. It is accepted that there are a small number of roads that have volumes that exceed this level. The authorities with these roads shall need to specifically assess the risk associated with these roads to warrant if they require inspection and repair regimes that exceed those ascribed to CHSR.

The risk-based method recommends that authorities document their carriageway hierarchies by considering predominantly traffic volume. Secondary/local considerations can also be applied but should be supported with appropriate justification for variances from table above. In reality factors referred to in the Code, such as access to hospitals, would often be a factor of usage level and should be considered when estimating traffic flows.

<b>CSSW's Risk-Based Method: Carriageway Hierarchy:</b>
<ul style="list-style-type: none"> <li>- is based predominantly upon use/traffic volumes</li> <li>- can be adjusted to reflect local conditions</li> <li>- is intended to create national consistency</li> <li>- is to be documented with reasons for any variances from the method</li> </ul>



### Footway Hierarchy

The same principle has been adopted for the establishment of footway hierarchy. There is substantially less data available for footfall. As with carriageways the method uses a benchmark of the most heavily used footways. A "FHVHU" level has been used as the common starting point. It is known that Cardiff, Newport and Swansea may have footway areas in the city centre that fit into this band of use and other authorities may have too. A limited amount of footfall data was available to inform the choice of levels of use. Two footfall counts were available for FH1 level, which is expected to be the smaller towns across Wales e.g. such as Pontypridd (population 33,000), Port Talbot (population 36,000) and Aberdare (population 32,000).

<b>Street</b>	<b>Town</b>	<b>Footfall Count</b>
Canon Street	Aberdare	6376
Taff Street	Pontypridd	9235
Shopping Centre (Main Entrance)	Port Talbot	7250 –(8am - 6pm)

On the assumption that these locations are representative of many towns around Wales a banding of 5,000 to 10,000 footfall has been assumed for FH1 "Town Centre Pedestrian Area".

Other available data has been used to create the table shown below. CSSW has adopted a code-based nomenclature that relates broadly to the categories used in the code of practice as shown below. The names used in the code are for guidance only and this method does not use them in order to be clear that the primary determinant of hierarchy level is its use. (footfall)

Code of Practice Footway Network Hierarchy Category	CSSW Footway Hierarchy	Footfall Level (indicative)
City Centre Pedestrian Area	FHVHU	> 10,000 (15,000 used for calculations)
Town Centre Pedestrian Area	FH1	5,000 - 10,000
Footway Outside Public Facilities	FH2	1,000 - 5,000
Link Footway (between estates / areas)	FH3	500 - 1,000
Housing Estate Footway	FH4	< 500
Little Used Rural Footway	FH5	< 100

It is expected that officer judgement will be used to estimate footfall for different footways in order to apply the method. It is recommended that where estimates are used authorities should undertake sample surveys to validate their assumptions. Reference can also be made to a range of sample count data undertaken by RCT to inform the bandings. This data is available to authorities via CSSW's HAMP khub website.

### Other considerations

The Code of Practice contains a list of a number of criteria that may be relevant to establishing a footway hierarchy including pedestrian composition, proposed usage etc. No evidence was available when developing this guidance to indicate that these factors are habitually associated with increased risk. It has therefore been decided to exclude them from the method unless and until evidence is collected that warrants their inclusion. It is planned to carry out targeted data collection by authorities coordinated by the HAMP project to improve the data available. Such evidence would most likely be in the form of statistical evidence of the increased incidence of adverse events at locations with these features.

#### CSSW's Risk-Based Method: Footway Hierarchy

- is based predominantly upon use/footfall volumes
- can be adjusted to reflect local conditions
- Is intended to create national consistency
- to be documented with reasons for any variances from the method

### Structures Hierarchy

Structures require a slightly different approach to carriageways and footways and the hierarchy should be based more on risks to the functionality of the network. Whilst use is a key consideration it is important to consider the consequences of a structure being out of service or restricted (weight or use restrictions introduced). It is possible for example for there to be 3 bridges over a river in a town each on a different road hierarchy road but each equally important in terms of potential traffic disruption. Closure of any of these structures would cause equally significant traffic disruption. It is important that the structures hierarchy is able to include such considerations and to allocate them as equally important.

Some structures on roads at the lower end of the road hierarchy may be on the only route into a rural community while restricted use of others may involve very long diversion routes or impacts on public transport. Closure of the structure would represent a major disruption albeit to a relatively small number of people, they however require managing with this in mind. Structure hierarchy has been defined as below:

1. **Vital:** a structure that is vital to the network i.e. if restricted or out of service it would cause a very significant adverse effect such as major traffic delays with the potential to affect other important services or community severance
2. **Important:** a structure that is important to the functioning of the network, i.e. if restricted or out of service would have an adverse effect on the operation of the network
3. **Standard:** all other structures

To derive the hierarchy all structures are to be assigned an initial hierarchy category based on the hierarchy of the road or footway that the structure carries or crosses. The initial structure hierarchy should be based on the table below using the highest hierarchy for either carriageway or footway. For footbridges and other structures that are solely associated with a footway or footpath the initial structure hierarchy should be based on relating it to the footway hierarchy of the adjacent footway

Road Bridges, Culverts, Retaining Walls etc	
C-way Hierarchy	Structure Hierarchy
CHSR, CH1, CH2	Important Structure
CH3, CH4, CH5	Standard Structure
F-way Hierarchy	Structure Hierarchy
FHVHU, FH1	Important structures
FH2, FH3, FH4, FH5	Standard Structure

At this stage the rating of a **Vital Structure** is not used and is only populated following the assessment of other relevant considerations as shown below.

Rule	Suggested Hierarchy
Sole Access to community	Vital Structure
Both major traffic disruption <b>and</b> lengthy diversion route	Vital Structure
Either major traffic disruption <b>or</b> lengthy diversion route	Important Structure
Susceptible to rapid failure	Important Structure
Significant social or economic impact	Important Structure
Structure of local significance	Important Structure

## Retaining Walls

The method can be applied to retaining walls. It is however acknowledged that many authorities do not hold a full inventory of their retaining walls and as such this cannot be fully applied until the inventory is captured.

<b>CSSW's Risk-Based Method: Structures Hierarchy</b>
<ul style="list-style-type: none"> <li>- <b>is based initially on the relevant carriageway or footway hierarchy</b></li> <li>- <b>can be adjusted to identify vital structure the restriction of which has been assessed as having the potential to cause major disruption</b></li> </ul>



## Street Lighting

The function of street lighting can be broadly split into two categories:

- Highway Safety Lighting
- Community Lighting

The risks associated with the existence and operation of street lighting are related to the purpose of the lighting. There are however overarching risks that are largely independent of the category and location of the lighting. Safety risks relate predominantly to critical defects, for example where there is potential for electrocution. In theory the risk like the risk of a carriageway defect is a function of the number of people potentially exposed to the hazard. For lighting however, this is not as directly related to flow as it is for carriageways and footways. A light by the side of a heavily trafficked road with no footway is exposed to a large number of vehicles but the risk of them coming into contact with a unit that has become live is small. The unit may even be behind a safety fence, consequently the response to these is not driven by considerations of use. The risk is considered to be at such a level that as immediate a response as possible is considered appropriate regardless of where the asset is on the network. Safety risks apply equally to each category of lighting.

It is noted that a column that has collapsed would be treated as a carriageway and/or footway hazard and thus the inspection and repair regime for carriageways and footways would apply and set the appropriate response.

The risks associated with an individual light that has failed/gone out is considerably less than a safety defect. If an individual unit fails it is invariably part of a collection of lights in a road and will not create absolute darkness as light from adjacent units will provide some lighting albeit at a reduced level.

At this stage the CSSW method does not promote the use of a street lighting hierarchy as the basis for setting inspection and repair regimes. This may be reviewed when risk data is analysed as part of the required annual risk review.

## Hierarchy as the Basis for Part-Night Lighting and Dimming

Where an authority has chosen to adopt a regime of part-night lighting and/or dimming they should have done so after the completion of a risk assessment. This method is consistent with the tenets of the new code of practice and the CSSW's risk-based method. It is recommended that this risk assessment is appropriately referenced in that authority's response to the code and the various sections of the lighting asset, subject to the adopted regime, being identified as the street lighting hierarchy for that purpose.

#### CSSW's Risk-Based Method: Streetlighting Hierarchy

- **is limited to differentiating between assets under different management regimes i.e. part night lighting and/or dimming**
- **will be reviewed as risk data is analysed.**

### Traffic Signals

All traffic management assets are to be assigned an initial category based on the hierarchy of the road where it is located based on the table below. For junctions that serve more than one road hierarchy the highest hierarchy should be used:

Carriageway Hierarchy	Traffic Management Hierarchy (As per highest Carriageway hierarchy)
CHSR	Primary Junction
CH1	
CH2	Secondary Junction
CH3	Local Junction
CH4	

All other traffic management assets (including pedestrian crossings) will initially be assigned the hierarchy of the adjacent road or footway hierarchy (the highest of the two). Further refinement of the hierarchy should be based upon local factors such as the importance of the junction to traffic management of the town/city it is located in.



**Other Highway Assets not covered above e.g. Drainage, Street Furniture**

Drainage and street furniture assets have not had separate hierarchies applied to them. They are mainly items that are inspected during routine inspections and as such the appropriate carriageway or footway hierarchy dictates the frequency of inspection and influence the categorisation and response to defects.

**3. Risk Data Review**

The method is built around a regular reviews of risk data (a minimum of every 2 years is recommended). It is recognised that there is potential for improvement in the data that can be analysed to improve understanding of risk. It is also accepted that risks change over time as the condition and use of the asset changes. The review is therefore the key step of the method from which proposed refinement of hierarchies, inspection frequencies and the repair regime can be made.

The risk review records data that relates to risk categorised as:

- Safety; the risk of user injury
- Maintenance; the risk of escalating maintenance needs (and cost)
- Financial Loss; the risk of incurring avoidable financial loss (e.g. 3<sup>rd</sup> party claim payout)

Risk Data Summary											
Enter Relevant Data								Consider what it may mean	Record Observation on risks		
Enter data items, many of which come from the performance reporting regime								What is trend of the period?	Consider if the data reflects a changing risk profile and thus need to review the inspection regime		
Asset		Data	Year 1	Year 2	Year 3	Year 4	Year 5	Trend	Interpretation	Observations	
Carriageways	Safety	Number of Cat 1 Defects							Increasing number of potential dangerous defects = increasing risk to road users		
		% of A Roads in poor condition (red, scanner)							Roads in poor condition have greater potential for dangerous defects		
		% of B Roads in poor condition (red, scanner)								^*	
		% of C Roads in poor condition (red, scanner)								^*	
		% of U Roads in poor condition (red, scanner) and/or visual								^*	Unknown ? !!
			KSI (where road condition was a contributory factor)								
Carriageways	Maintenance	Number of Cat 2 defects recorded							Escalating levels of minor defects can indicate increasing maintenance needs (now and in the future)		
		Number of Cat 2 defects not repaired (repair backlog)							If increasing numbers of repairs are not being repaired it		
		% of roads to be considered for maintenance A roads (red and amber)								increasing amount of road requiring maintenance .... Will need to be addressed sometime	
		% of roads to be considered for maintenance A roads (red and amber)									
		% of roads to be considered for maintenance A roads (red and amber)									
Carriageways	Financial	Value of payout of 3rd party claims									
		Number of claims received									
		Number of claims lost due to not adhering to inspection regime									
		Number of claims lost for other reasons									

The data collected is based around data that authorities already collect (for example for performance monitoring and reporting) and data that is readily collectable during normal operational activities (during inspections and repairs).

The method requires that the results are reviewed for significant changes and trends in the risk they represent. The data is also an input into risk assessment used to establish inspection and repair regimes.

#### 4. Establishing an Inspection Regime

Risk based establishment of hierarchies is being undertaken predominantly based upon use. This reflects the fact that if a hazard or hazardous feature exists on an asset then the risk is a direct function of the number of users exposed to it. This principle is also applied to the establishment of inspection regimes. To provide a rational basis for establishing an inspection regime the concept of risk exposure has been adopted. Risk exposure is a measure of the exposure of users to a hazard. For carriageways the risk exposure has been calculated based upon the following:

- An individual defect. The exposure is measured based upon the number of people/vehicles exposed to an individual defect. It could have been developed based upon actual historical numbers of defects on different parts of the asset but the data on defects is not reliable enough at present to make this appropriate. Fluctuating numbers of defects would have created a constantly changing exposure making it impossible to derive a regime that could be adopted in practice
- Risk exposure is based upon an assumed response time to a safety defect of 24 hours.
- The inspection frequency for strategic routes (CHSR) have been adopted as the baseline level against which other hierarchy's inspection frequencies are developed from.
- The inspection interval for strategic routes (CHSR) recommended by the previous Code is a monthly regime (hence 30 days). This has been widely accepted as reasonable by Courts as suitable for the highest categories of local authority roads.
- A maximum exposure has been calculated using the maximum time a defect could be present before being repaired and the maximum number of vehicles being exposed to it (the top traffic volume in the band).

#### Baseline Inspection Frequency

As a baseline from which inspection frequencies for other levels of hierarchy can be derived the strategic route level has been chosen. It has been assumed that these roads carry traffic volumes in excess of 30,000 per day and exist in most authorities. A review of current inspection frequencies revealed that most authorities currently inspect these roads on a monthly basis.

The appropriateness of this has been considered by considering the categories of risk in turn as follows:

Safety Risk; is there evidence that current inspection regimes are providing inadequate protection against safety risk for users?

There is little detailed data available to enable detailed analysis of this question. Some broad analysis is possible which has been used as a reference to the choices of existing levels of inspection as a baseline position.

Data is available on safety outcome in the form of records of KSI (killed and seriously injured). These statistics are published annually by the police and used by councils as an input into their road safety programmes. They can be used to provide an overarching reference for the level of safety provided.

In 2016 there were 4,921 injury accidents recorded in Wales by the police<sup>(1)</sup>. Of these contributory factors were recorded 2,257 times. The contributory factors record the attending police officer's opinion of the factors that contributed to the accident. They include driver error, impairment or distraction etc as well as Road Environment. Road environment includes condition as well as other factors such as alignment etc. It is therefore an over estimate of the effect of condition to include all of these for the calculation that has been made. Road environment was quoted as contributory factor 208 times. A prorate calculation therefore estimates 454 accidents where road environment was a potential contributory factor.

Accident Statistics	Source	Police recorded road accidents in Wales, 2016
Total	4921	29
Contributory Factors (total)	2257	June
Road Environment a CF (very likely or likely)	208	201
With Road Environment as a CF	<b>454</b>	<b>approx. injury per year with road environment as a contributory factor</b>
Traffic Volume Statistics	Source	Road Traffic in Wales, 2016
Vehicle Km travelled.	18.2 bn	vehicle km
	1,000,000,000	bn
	<b>18,200,000,000</b>	vehicle kms
1 injury accident in every	40,131,579	km travelled
1 injury accident in every	40	million vehicle km travelled

Traffic volume statistics<sup>(2)</sup> show that an estimated 18.2bn vehicle km were travelled on local roads (excluding trunk roads). This means that there was on average 1 injury accident recorded by the police for which road environment was a contributory factor, for every 40 million vehicle km travelled. This indicates that on the whole local roads are reasonably safe. The accident statistics<sup>(1)</sup> also show there were 95 incidents that resulted in fatalities (representing 1 incident per 2,079million km travelled) and that there were 975 incidents that resulted in killed or serious injury (representing 1 per 203 million km travelled).

These statistics illustrate that overall local roads in Wales have a reasonably good safety record. Furthermore, this evidence does not indicate a large contribution of road condition to the statistics that do exist. As these outcomes are in part a result of the inspection and repair regimes currently employed it is reasonable to assume that current regimes are not fundamentally flawed.

For the purpose of developing a rational differential between different road hierarchies a baseline inspection frequency of monthly inspection on strategic routes (CHSR) has been adopted. This is a frequency which was recommended by the previous Code, is used currently by most authorities for their busier roads and has been generally accepted by Courts as reasonable.

Using the method outlined above the risk exposure has been calculated as shown below. This results in the figure of 930,000 per annum as the Risk Exposure Index (REI). This is the maximum number of vehicles exposed to a safety defect before it would be repaired. Considering the overarching statistics above this has been adopted as a starting point until better data is available.

Hierarchy	AADT	Response Time (days)	Initial Inspection Interval (days)	Initial Exposure Time (days)	Initial REI (k pa)
CHSR	30,000	1	30	31	930.0

The inspection intervals for the other levels of hierarchy are calculated by working out what inspection interval delivers the same level of risk exposure across all levels of the hierarchy. As illustrated below this means that minimum inspection frequencies could be as little as once every 12 years theoretically for minor roads. It is recognised that the condition information required to inform proper asset management of the network will be required much more frequently than this, and for the lower hierarchy roads it is considered that condition inspection requirements should drive the inspection regime. While there is little condition data available for the lower hierarchy roads at present, it is considered reasonable that for roads known to be in good condition a two-year inspection interval would be suitable to provide condition information.

Typical Current Inspection Regime						Routine Inspection Frequency for Safety to provide the same level of risk exposure across all hierarchies					
Asset Information	Use Data	Time Data			REI (k pa)	REI (k pa)	Time Data				
Hierarchy	AADT	Response Time (days)	Initial Inspection Interval (days)	Initial Exposure Time (days)	Initial REI (k pa)	Standard REI (K pa)	Exposure Time (Days)	Inspection Interval (days)	Theoretical Interval to normalise risk exposure (inspections per year)	Safety Inspection Interval for Same Exposure	Comment
CHSR	30,000	1	30	31	930.0	930.0	31	30	12	Monthly	Baseline interval
CH1	20,000	1	30	31	620.0	930.0	46.5	46	8	Every 6 weeks	
CH2	10,000	1	60	61	610.0	930.0	93	92	4	Every 3 months	
CH3	5,000	1	180	181	905.0	930.0	186	185	2	Every 6 months	
CH4	1,000	1	365	366	366.0	930.0	930	929	0.4	Every 2 years	
CH5	200	1	365	366	73.2	930.0	4650	4649	0.08	Every 13 years	

The method is recommending a default minimum inspection regime on roads of CH4 and above of two years where condition data is available to show the assets are in good condition and annually if condition data is not

available or the asset is known to be in a poor condition. This means the recommended minimum inspection intervals are as shown below:

Routine Inspections		
Hierarchy	Theoretical Routine Inspections (CSSW Minm)	Recommended Minimum
CHSR	Monthly	Monthly
CH1	Every 6 weeks	Monthly
CH2	Every 3 months	Every 3 months
CH3	Every 6 months	Every 6 months
CH4	Every 2 years	Every 2 years (good condition), annually poor condition or condition unknown
CH5	Every 13 years	Reactive inspections.

The concept of use has been adopted as the basis for establishing a proposed inspection regime. The regime has focused on what is required to manage basic safety i.e. to discharge the authority's duty of care as the highway authority to maintain a safe highway. In the case of CH5 the theoretical minimum frequency of inspection to provide equivalent risk exposure is so infrequent that it is considered appropriate to only carry out reactive inspections on these roads. This is based on the assumption that this category of road is used predominantly by locals who will report required repair before a regime of inspection would identify them.

There is a logic used to determine an appropriate differential inspection regime based upon use such that an approximately similar level of risk exposure is delivered across the asset.

It is expected that over time in the coming years that data will be increasingly available that will inform refinement of the risk assessment and thus all aspects of this approach can be refined.

Ideally future data will include defect type, size and location and records of resulting adverse outcomes when such occur, for example the accident data references above and other records of adverse safety outcome such as 3rd party claims made for personal injury.

Data that is available indicates that a safety defects are more frequently identified from reactive inspection resulting from a notification by the public or other 3rd party. RCT report 2/3 of their cat 1 defects emanate from reactive inspections, Bridgend report 60% of their Cat 1 (safety) defects are identified from reactive inspection/3rd party notification.

### Footways Inspection Regime

To determine an appropriate method of establishing an inspection regime for footways the same method as that above for carriageway has been adopted. For footways however, there is a research paper that provides some very useful references. TRL Report PPR171 “Development of a Risk Analysis Model for Footways and Cycleway, 2006 has been used as outlined below. Footways are rarely the scene of accidents recorded by the police hence the accident data used for carriageways is not relevant.

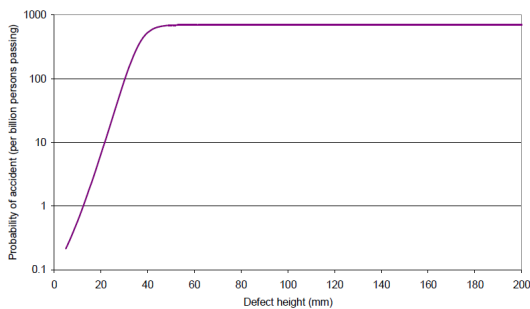


Figure 5 Probability of an accident

PPR171 (3) has however analysed the incidence of accidents based on claims data from a number of local authorities and derived the relationship illustrated below. This output is useful for both the establishment of inspection frequencies and to inform the setting of investigatory levels in the repair regime (see section below).

The graph illustrates that the probability of an accident for a 40mm defect is approximately 1000 per billion persons passing and for a 20mm defect it is approximately 10 per billion. Using these probabilities and the estimated footfall figures for different hierarchies as shown below it is possible to estimate the time between potential accidents on each level of the hierarchy for 20mm and 40mm defects.

Hierarchy	Footfall	Probability of an Accident at 20mm defect	Days between Accidents	Years Between Accidents	Accidents Per Year
FHVHU	15,000	0.00000001	6,667	18	0.055
FH1	10,000	0.00000001	10,000	27	0.037
FH2	5,000	0.00000001	20,000	55	0.018
FH3	1,000	0.00000001	100,000	274	0.004
FH4	500	0.00000001	200,000	548	0.002
FH5	100	0.00000001	1,000,000	2,740	0.000

For a 20mm defect potentially causing an accident the risk that is being managed is equivalent to the probability of 0.05 of accident per year in town centre areas.

Managing 20mm defects is therefore more of an exercise of preventing deterioration to a bigger defect than it is a direct safety management action.

Probability of an Accident Based upon PPR771: 40mm Defect					
Hierarchy	Footfall	Probability of an Accident at 20mm defect	Days between Accidents	Years Between Accidents	Accidents Per Year
FHVHU	15,000	0.000001	67	0	5
FH1	10,000	0.000001	100	0	4
FH2	5,000	0.000001	200	1	2
FH3	1,000	0.000001	1,000	3	0.4
FH4	500	0.000001	2,000	5	0.2
FH5	100	0.000001	10,000	27	0.0

40mm defects are predicted to potentially create 4 accidents per year on FH1 (town centre pedestrian areas) with footfall of 10,000 per day).

Most authorities currently adopt a regime of monthly inspection for these areas, a regime that is 3 times more frequent than the predicted incidence of accidents.

A baseline inspection frequency of monthly inspection on FHVHU (city centre) areas has been adopted based upon the analysis above. This data was considered to be the best available. Using the same method as for carriageways a baseline risk exposure score has been calculated for FHVHU (city centre) footways as shown below.

Asset Information	Use Data	Time Data			REI (k pa)
Hierarchy	Ave Footfall	Response Time (days)	Initial Inspection Interval (days)	Initial Exposure Time (days)	Initial REI (k pa)
FHVHU	15,000	1	30	31	465.0

The baseline REI figure has then been used to derive inspection frequencies that would deliver the same level of exposure across the other levels of the hierarchy as shown below:

CSSW Minimum Standard Routine Inspection for Safety											
Typical Current Inspection Regime					Routine Inspection Frequency for Safety to provide the same level of risk exposure across all hierarchies						
Asset Information	Use Data	Time Data			REI (k pa)	REI (k pa)	Time Data				
Hierarchy	Ave Footfall	Response Time (days)	Initial Inspection Interval (days)	Initial Exposure Time (days)	Initial REI (k pa)	Standard REI (K pa)	Proposed Exposure Time (Days)	Proposed Inspection Interval (days)	Theoretical Interval to normalise risk exposure (inspections per year)	Safety Inspection Interval for Same Exposure	Comment
FHVHU	15,000	1	30	31	465.0	465.0	31	30	12	Monthly	Baseline Interval
FH1	10,000	1	30	31	310.0	465.0	46.5	46	8	6 weekly	
FH2	5,000	1	60	61	305.0	465.0	93	92	4	Every 3 Months	
FH3	1,000	1	180	181	181.0	465.0	465	464	1	Annually	
FH4	500	1	180	181	90.5	465.0	930	929	0.4	Every 2 Years	
FH5	100	1	365	366	36.6	465.0	4650	4649	0.08	Every 13 Years	

As with carriageways this calculation identifies a low level of inspection required on the more lightly used part of the network to manage safety. Following this calculation could mean inspections at intervals of 10 years on minor rural footways and 2 years on housing estate footways. This is considered too infrequent as inspections are required in order to manage maintenance and to plan any renewals required. A minimum inspection frequency is therefore recommended as:

Routine Inspections		
Hierarchy	Theoretical Routine Inspections (CSSW Minm)	Recommended Minimum
FHVHU	Monthly	Monthly
FH1	6 weekly	Monthly
FH2	Every 3 Months	Every 3 Months
FH3	Annually	Every 6 months
FH4	Every 2 Years	Every 2 years (good condition), annually poor condition or condition unknown
FH5	Every 13 Years	Reactive inspections only

### Reactive Inspections

Many authorities rely as much on reactive inspections as they do on their regime of routine inspections. Standards relating to these inspections vary greatly as do the methods by which they are managed. There is insufficient data available to enable analysis of the contribution these inspections currently provide to the management of risk. The limited data that does exist indicates that approximately 2/3 of some authorities' footway safety defects are identified by reactive inspection/3rd party notification. It is proposed that authorities ensure that the same data is recorded for reactive inspections as for routine inspection in future such that the influence of reactive inspection can be analysed and suitable recommendation for applying a risk-based approach subsequently provided.

FH5 footways are very lightly used. So much so that the equivalent inspection regime to meet the risk exposure accepted on other levels of the hierarchy would only require inspection every 13 years. FH5 footways are predominantly used by local residents who will report defects long before a regime of this scale of interval would be able to identify defects. As the risk on these footways is so low it is considered appropriate to specify reactive inspections only as the minimum regime.



## 5. Establishing a Risk-Based Repair Regime

In order to assess the repair regime attempts were made to review repair data held by authorities. This data was found to lack the detail required to rationally assess the effect of the intervention criteria that are currently being applied.

Authorities typically record the data required in order to demonstrate that defects have been identified, categorised and then subsequently repaired. An inspector will usually record an assessment of a defect as a type (cat 1, cat 2 etc) rather than recording the dimensions of the defect.

The risk-based method is recommending that in future dimension data is recorded for all defects. This will in many instances need to be visually estimated. The subsequent analysis and use of this data will need to recognise this but will allow there to be an assessment of the number, type, location and size of defects against the adverse incidents that occurred as a result of or partially because of the defect.

This is not a big change from current practice as inspections currently require inspectors to assess the size of a defect in order to categorise it.

### Current Standards

CSSW's stated wish is to create a nationally consistent approach. To assess how plausible this is a review was undertaken of current standards (defect definitions and response times). The review revealed some variation between authorities but also a high degree of commonality. Many authorities apply the same or similar standards to each other.

### The Effect of Current Standards

To assess how well current standards are delivering safety an attempt was made to examine the results of the application of current standards. This involved a very broad assessment of safety outcomes and claims (injury and property damage) as referenced above in inspection section.

#### Carriageway Safety Outcomes

Accidents that have road environment as contributory factor are statistically rare. 1 injury accident (Slight, serious or fatal) for every 40 million vehicle km travelled.

#### Footway Safety

The estimated probability of an accident resulting from a 40mm defect (many authorities safety defect investigatory level) is 1000 per billion persons passing (or 1 per million persons passing).

Accidents as a result of a highway defect are rare and this outcome is being achieved from the application of current standards. It has therefore been considered a reasonable place to start to reference current standards when addressing a risk-based approach.

As noted in several places above, once better data is available a more detailed rational assessment of risk can be undertaken, and the results used to refine the method. In the meantime, however, it is considered useful to define a national minimum standard.

### **National Minimum Standards**

CSSW has made previous attempts to define national minimum standards for repair. This project has reinvigorated that work and includes a set of minimum standards. As noted above analysis of data from repairs is not currently detailed enough to support assessment of differing intervention criteria. i.e. it is not possible from this data to determine if defects of a certain size are currently resulting in a higher incidence of injury.

The reasoning behind the standards are as follows:

Safety Defects are those that warrant rapid repair/making safe. Dimensions are provided to guide their identification

For carriageways a depth of >50mm has been defined. A defect of 50mm has deteriorated into the layer below the wearing course. Wearing courses are often in the range of 40-45mm. When the wearing course alone is defective the defect will typically deteriorate comparatively slowly. Once the defect extends into the layer below the risk of it deteriorating more rapidly into a much greater depth and thus risk to users is greater. Inspectors can usually see when inspecting a defect if the hole has developed into the lower layer. In some instances, defects of less than 50mm will just be laminated wearing course layers missing. These are maintenance defects but, in most instances, do not pose an immediate safety risk to users.

The minimum standard is set at a level which all defects exceeding the level should be repaired. It assumes that all defects will be encountered by users regardless of their position in the highway. It does not preclude inspectors using their judgement to assign lesser defects to a higher category if they believe, for example that rapid deterioration is likely.

### **Footway Defects**

The report referenced above in the inspection section provides a useful guide on the risk associated with differing levels of footway defects. PRR171 estimates the probability of an accident at a 20mm and 40mm defect to be 10 in a billion and 1 in a million respectively i.e. it is 100 times more likely that an accident will occur at a 40mm defect than at a 20mm one.

Furthermore, the risk of an accident, according to this report does not increase significantly above 40mm. Using 40mm as intervention still only relates to defects that have a very low probability of causing accidents especially on the lower levels of hierarchy.

The analysis indicates that the process of footway management is largely a preventative one. By identifying and repairing defects at an initial level of deterioration they are prevented from deteriorating into safety defects with a much higher risk to users (albeit still a low risk in absolute terms).

The development of this method has highlighted that the predominant activity is the repair of maintenance defects as opposed to safety defects. The accompanying training material that is being developed to train inspectors uses 3 levels of defect definition as follows:

- **A Critical Defect** is one that the inspector consider the risk to safety high enough to require immediate action. Defects that pose an immediate or imminent risk of injury to road users typically include items such as, a collapsed cellar, missing utility cover, fallen tree, unprotected opening etc. Critical defects should be made safe at the time of the inspection if practicable or attended by the inspector until such time as the defect can be made safe. Making safe may constitute displaying warning notices, coning off or fencing off to protect the public from the defect. CSSW's minimum standard for a critical defect is a response time of 2 hours (to attend and make safe as soon as possible thereafter)
- **A Safety Defect** is one that requires prompt attention because it presents an imminent hazard. Safety defects requiring a response as soon as possible to remove a potential risk of injury to users will typically include items such as particular sizes of potholes, trip hazards, dislodged kerbs etc. If practical safety defects should be made safe at the time of the inspection. This may constitute displaying warning notices, coning off or fencing off to protect the public from the defect. If it is not possible to correct or make safe the defect at the time of the inspection, repairs of a permanent or temporary nature should be carried out within the response time specified. CSSW's minimum standard provides dimension data that can be used as a guide to identifying safety defects for different network hierarchies.
- **A Maintenance Defect** is one that is not a safety defect but requires repair at an appropriate time to guard against further deterioration. They do not present an imminent hazard to users. Maintenance defects should be categorised as higher priority; defects that warrant treatment, in order to prevent them deteriorating into a safety defect prior to the next scheduled inspection and lower priority; other defects that warrant treatment, in order to prevent them deteriorating to such an extent that additional works or costs are incurred.

The carriageway repair regime is focused upon the response to defects once they have been identified. Identification is via the inspection regime. This may be from a routine inspection or from reactive inspection. It

is acknowledged that many defects are notified to the council by a 3<sup>rd</sup> party, e.g. a request for repair from a member of the public.

The minimum standards for carriageway repair regime have been based upon the application of the risk-based principle used to establish the hierarchy and the inspection regime.

There was no research information available to indicate the outcomes that are associated with differing sizes of defect. Logic dictates that larger defects pose a great risk to user but there are not available reliable studies that quantify this. Current regimes appear to have been based upon accepted practices that have evolved over time. This is not to discredit these regimes. It is a fact that roads are comparatively safe with low and decreasing incidence of injury accidents. This is enabled by regimes of repair that aim to prevent defects becoming dangerous.

The repair regime acknowledges that from time to time, sometimes as a result of external factors, defects may appear that clearly have the potential to cause harm to users. These defects are of a high risk to users and have been categorised as “critical” defects in the regime. It is expected that the response to these defects will be to make it safe as soon as is practical. It is not appropriate to try to define dimensional criteria for such defects. Trained personnel should be able to identify critical defects based on their nature and location without reference to specific “intervention” criteria.

The remaining regime has been based upon the following assumptions:

- The probability of accident occurring at a carriageway defect increases with the size of the defect (as logic would suggest)
- Defects that only affect the wearing course will typically deteriorate slower than defects that extend into the basecourse/beyond the wearing course
- Prevention of further deterioration is a key consideration in determining the response to defects that are at a level that do not pose an immediate hazard of injury to users
- Where the carriageway is habitually used by pedestrians such as defined or likely crossing points footway standards should apply

### **Determining an Appropriate Threshold**

The major determinant in categorising a carriageway defect that is not immediately dangerous is how rapidly it may deteriorate into that state. The regime is designed to provide preventative repair such that defects that are actually potentially dangerous are minimised in terms of injury to users. There is also a need to repair defects that may cause property damage.

Roads that have been designed will invariably have a discreet layer of wearing course typically of a depth of up to 45mm. It is common for repairs to initiate by a hole appearing in the wearing course. Where the layer

below is intact the defect may remain relatively stable in the short term i.e. deterioration into a much larger defect less probable than for a defect that has already extended into the lower layers. For this reason, a threshold between “small defects” and “larger defects” of 50mm has been chosen. A defect that is 50mm in depth will typically be deteriorating at both the wearing course and the subsequent layer and as such is prone to more rapid deterioration. The regime is based upon differentiating between defects either side of this threshold.

Carriageway Repair Regime: Response Times				
Carriageway Hierarchy	Safety Defect		Maintenance Defect	
CHSR	>50mm	By the end of the next working day	>40mm	1 month
CH1	>50mm		>40mm	
CH2	>50mm		>40mm	
CH3	>75mm	5 days	>50mm	3 months
CH4	>75mm		>50mm	
CH5**	>75mm		>50mm	

\*\* defect triggers on CH5 roads are to be considered an investigatory level [rather than an intervention level as on these very low use roads, the risk to road users may vary considerably depending on the nature and location of the route and the individual defect.](#)

### Defect Size

The defect sizes chosen for each type of defect and hierarchy reflect the fact that carriageway defects deteriorate more rapidly on more heavily trafficked roads as a result of the volume of vehicles running over it. A defect of 50mm depth on CH2 and above will be subjected to repeated trafficking. All these roads carry >5,000 per day and as such a pot hole could deteriorate rapidly into a much bigger and more hazardous hole if not repaired promptly. For this reason, a differential standard of safety defect size has been adopted for the minimum standard shown above.

### Response Times

The proposed response times are also based upon taking into account the different levels of use. The table below shows how risk exposure has been calculated and used to show what response times are required to deliver a consistent level of risk exposure across all levels of the hierarchy.

Safety Defect					
Carriageway Hierarchy	AADT	AADT level for use in calculation	Exposure (vehicles exposed to a defect before it is repaired)	Response time (days) required to normalise exposure	Proposed Minimum Standard
CHSR	30,000	30,000	30,000	1	same day
CH1	10,000 - 20000	20,000	30,000	2	By end of Next Working
CH2	5,000 - 10000	10,000	30,000	3	By end of Next Working
CH3	1,000 - 5000	5,000	30,000	6	5 working days
CH4	200 - 1000	1,000	30,000	30	5 working days
CH5	<200	200	30,000	150	5 working days

Adopting a same day repair response time for busiest roads means that a maximum of 30,000 vehicles would potentially be exposed to the defect before it was made safe or repaired. The response times required to deliver the same level of exposure on the other levels of hierarchy are shown. For example, on CH3 roads a repair response time of 6 days would

deliver the same level of exposure to the defect as for 1 day in CHSR.

The same logic has been applied for maintenance defects. A response time of 1 month (28-days) has been adopted for CHSR. This is a standard in common use currently and in the absence of data to the contrary it has been adopted as a reasonable period to repair non-safety defects to prevent them deteriorating to the extent of becoming a safety defect.

Maintenance Defect					
Carriageway Hierarchy	AADT	AADT level for use in calculation	Exposure (vehicles exposed to a defect before it is repaired)	Response time (month) required to normalise exposure	Proposed Minimum Standard
CHSR	30,000	30,000	840,000	1	1 month
CH1	10,000 - 20000	20,000	840,000	2	1 month
CH2	5,000 - 10000	10,000	840,000	3	1 month
CH3	1,000 - 5000	5,000	840,000	6	3 months
CH4	200 - 1000	1,000	840,000	30	3 months
CH5	<200	200	840,000	150	3 months

## Footway Repair Regime

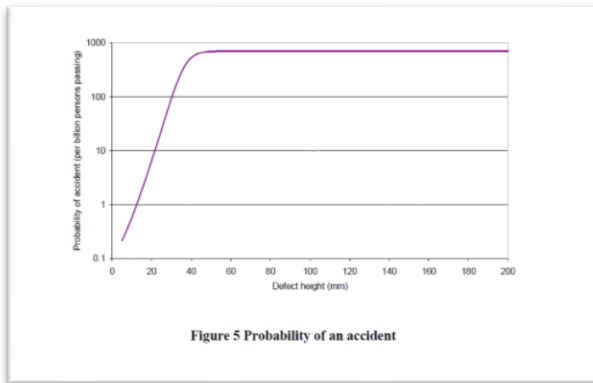
The repair regime is focused upon the response to defects once they have been identified. Identification is via the inspection regime. This may be from a routine inspection or from reactive inspection. It is acknowledged that many defects are notified to the council by a 3rd party, e.g. a request for repair from a member of the public.

The minimum standards for footway repair regime have been based upon the application of the risk-based principle used to establish the hierarchy and the inspection regime. Reference has been made to relevant research, specifically the graph below reproduced from "PPR 171 The Development of a Risk Analysis Model for Footways and Cycletracks". The graph illustrates:

- The probability of accident occurring at a footway defect increases with the size of the defect (as logic would suggest)
- The probability does not increase significantly once that defect is approximately 40mm in depth

- The probability of an accident happening per person passing the defect is less than 1 in a million for a 40mm defect

Unlike carriageway defects footway defects do not typically deteriorate as a function of use. A carriageway defect can deteriorate as a result of vehicles running over it. It would be rare for footfall to be a function of the rate of deterioration of a footway defect {it may be a consideration where the footway is habitually crossed by vehicles or subject to parked vehicles}.



Based upon the graph the probability of an accident for a 40mm footway defect has been estimated at 800 per billion persons passing.

This equates to 1 per 1.25 million persons passing.

The table below uses this probability to estimate how the exposure of users to a defect could be normalised such that the number of people exposed to an individual defect before it is repaired is approximately the same across the network.

Footway Hierarchy	Daily Footfall	Footfall level of calculation	Annual Footfall (daily x 365)	Probability of an accident at a 40mm defect = 1 per :	Years between accidents	Accidents per year	Response time (hours) required to normalise exposure		Normalised Response time (days)	Proposed Minimum Standard
FHVHU	>10,000	15,000	5,475,000	1,250,000	0.2	4	24	15,000	1	same day
FH1	5,000 - 10,000	10,000	3,650,000	1,250,000	0.3	3	36	15,000	1.5	By end of Next Working Day
FH2	1,000 - 5,000	5,000	1,825,000	1,250,000	0.7	1	72	15,000	3	By end of Next Working Day
FH3	500 - 1,000	1,000	365,000	1,250,000	3.4	0	360	15,000	15	15 days
FH4	100 - 500	500	182,500	1,250,000	6.8	0	720	15,000	30	15 days
FH5	<100	100	36,500	1,250,000	34.2	0	3600	15,000	150	15 days

Using the maximum footfall levels used in the hierarchy bands it is possible to calculate the predicted time between accidents by dividing the probability value (1.25m) by the annual footfall. This illustrates the predicted frequency of accidents. For FH1 footways this equates to approximately 3 accidents per year.

The FHVHU (city centre footway) hierarchy level has been chosen as the baseline. City centre footways are the highest use footways on national footway asset. This is an appropriate level to establish a national

minimum standard regime against. A “same day response” has been adopted as appropriate for these footways with the next busiest level adopting a “by the end of the next working day” standard.

Taking the response time for FHVHU as being a day it is possible to normalise the level of exposure by calculating the repair response times for each level of hierarchy that would result in the same level of exposure i.e. to limit the number of people exposed to a defect to the same level as for FHVU i.e. 15,000. This results in response times as shown below.

<b>Safety Defects</b>			
<b>Footway Hierarchy</b>	<b>Footfall daily</b>	<b>Normalised Response time (days)</b>	<b>Proposed Minimum Standard</b>
FHVHU	>10,000	1	By the end of the next working day
FH1	5,000 - 10,000	1.5	
FH2	1,000 - 5,000	3	
FH3	500 -1,000	15	15 days
FH4 #	100 -500	30	
FH5 #	< 100	150	

# It is impractical to use 6 different levels of response. The above regime is based upon averages and estimated volumes and as such it is not considered appropriate to introduce too many different responses.

To create a practical repair regime two minimum standard response times have been adopted next working day and 15 days. The next working day response on town centre footways reflect their higher levels of use. The 15-day response reflects the significantly lower level of use on other categories of footway. In applying a minimum standard like this a workable regime is possible that is at a level of response that is higher (significantly higher for some categories of footway) than is theoretically necessary to manage risk across the footway network equally.



To complete the regime, it is appropriate to consider the risk associated with smaller defects. A value of 25mm has been adopted as the basis for this analysis. PPR 171 illustrates that smaller defects present a much-reduced risk of an accident as logic would dictate.

Using the same graph from PRR171 a probability of accident for a 25mm defect has been estimated as shown below.

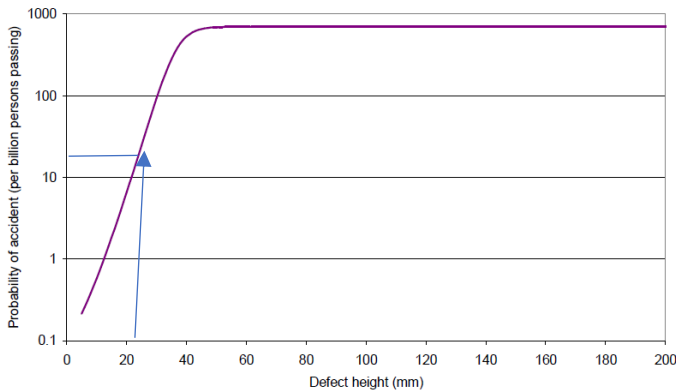


Figure 5 Probability of an accident

Based upon the graph the probability of an accident for a 25mm footway defect has been estimated at 30 per billion persons passing.

This equates to 1 per 33 million persons passing.

To establish a baseline response time for a defect with a lower probability of an accident occurring the probabilities have been contrasted as shown below:

	Probability of an accident 1 per	Response time (days)
40mm defect	1,25 million	1
25mm defect	33.33 million	27

The equivalent response time for a 25mm defect to provide the same predicted probability of an accident to a 1-day response time for a 40mm defect is calculated at 27 days. This is very close to the 28 days used by many authorities already.

It however makes sense to relate the repair regime to the inspection regime and it is therefore recommended that a minimum standard response time for a 25mm defect on a town centre footway is 1 month.

Using the same logic as used for the 40mm defects different response times for different categories of footway can then be derived as shown below.

Footway Hierarchy	Daily Footfall	Footfall level of calculation	Annual Footfall (daily x 365)	Probability of an accident at a 25mm defect = 1 per :	Years between accidents	Accidents per year	Response time (hours) required to normalise exposure	Exposure	Normalised Response time (months)	Proposed Minimum Standard
FHVHU	>15,000	15,000	5,475,000	33,333,333	6	0.164	24	420,000	0.9	1 month
FH1	5,000 - 10,000	10,000	3,650,000	33,333,333	9	0.110	36	420,000	1.3	
FH2	1,000 - 5,000	5,000	1,825,000	33,333,333	18	0.055	72	420,000	2.6	
FH3	500 - 1,000	1,000	365,000	33,333,333	91	0.011	360	420,000	12.9	
FH4	100 - 500	500	182,500	33,333,333	183	0.005	720	420,000	25.7	
FH5	<100	100	36,500	33,333,333	913	0.001	3600	420,000	128.6	

As with the 40mm defect a simplified minimum standard is recommended at intervals that far exceed what is theoretically required to normalise risk. Based upon the analysis above the following minimum repair regime standard is proposed.

The analysis above shows that for a 25mm maintenance defect on FH3 footway the predicted frequency of an accident would be one every 91 years and an even less frequency for FH4 and FH5. For this reason it is not considered appropriate to set a minimum response time for defects of this size on those levels of footway hierarchy. This does not preclude an authority deciding to treat them as programmed repair if they so choose.

Footway Repair Regime: Response Times		
Footway Hierarchy	Safety Defect >40mm	Maintenance Defect >25mm
FHVHU	By end of next working day	1 month
FH1		
FH2		
FH3	15 days	
FH4		
FH5 #		

## 6. Competencies

The Code of Practice requires authorities to demonstrate the competency of both those involved in developing and those implementing the risk-based approach.

### **CSSW Accreditation Role**

CSSW has recognised that the people most able to manage the competencies of those engaged in managing Welsh local highway assets are the authorities themselves. No one else external to this activity could or should have better knowledge of what is required than the authorities themselves. What is needed in order to meet the requirements of the Code is a systematic way of enabling authorities to evaluate their own level of capability and to address any areas that require strengthening via appropriate training.

CSSW represents all 22 Welsh highway authorities and has already adopted an accreditation role for training for visual condition assessment for carriageways, footways and structures. The training and method of managing accreditation was developed under the HAMP project.

CSSW has decided to use the national HAMP project again and the basics of the method used for visual condition assessment to assist with the following activities:

- Developing a documented definition of the competencies required to apply the risk-based method
- Creating training materials for inspector training
- Creating online training material for ongoing inspector refresher training
- Providing training for highway managers via the CSSW HAMP project

## References

1. Police recorded road accidents in Wales, 2016, 29<sup>th</sup> June 2017, Welsh Government, Statistical First Release, Statistics for Wales
2. Road Traffic in Wales, 2016, 8<sup>th</sup> November 2017, Welsh Government, Statistical Bulletin, Statistic for Wales
3. Development of a Risk Analysis Model for Footways and Cycle Tracks, Bird, Sowerby and Atkinson, TRL, Report Number PPR171

## Highway Asset Management Plan (HAMP) Improvement Plan 2024

Asset	Action	Priority	Notes
All Assets	Implement review of Highway & Car Park Inspection Policy and adopt Manintenance Manual in line with CSSW standards	High	
	Procure new asset management system	High	
	Provide training to enable new inspectors to be able to implement the new Highway Inspection Policy	High	
	Provide training to appropriate people on how to use the Maintenance Management System to monitor performance – this should include monitoring defect response compliance and costs. The users should also be able to use the system to identify assets which should be put forward for planned renewal due to large quantities of defects.	High	1
Carriageway	Review the matrix used to prioritise carriageway renewal schemes. Currently this favours the classified roads. Condition data states that classified roads are in very good condition. More investment should be used on unclassified roads.	Low	
	Review Heirarchy of highway classifications and consider review of inspection frequency and response time in line with CSSW standards	Low	
Structures	Provide relevant training to the officer responsible for managing the structures asset. The training needs to ensure the officer can use the Asset Management System and knows appropriate action to take from a management perspective eg. section of bridge is damaged which may require technical expertise which may be from an external source.	High	
	Undertake the first stage of the scour assessment	High	
	Undertake the second stage of the scour assessment on structures which meet the criteria	High	
	Complete review of records to identify if 'structural assessments' have been undertaken. If records can not be found undertake an assessment to identify structures which may require strengthening or a weight limit.	High	
	Identify the level of bridge inspection competence of those who undertake the bridge inspections	Medium	
	The total structures workbank seems very low. Maybe this needs reviewing?	Low	
Street Lighting	Obtain an understanding of the column condition information – currently over 1,000 columns require 'immediate removal'.	High	
	Remove all columns which actually require 'immediate removal'	High	
Traffic Signals	Undertake an exercise to obtain the actual installation date for all traffic signal assets. A possible method is to identify any codes on the components which may be able to be linked to an installation date. TMC may be able to do this during inspections	High	
	Develop and implement a replacement strategy for those components which are over 20 years old	High	
Road Marking	Review Gaist Road Marking Condition data and identify those markings which are assessed as Condition 6 and are located at high risk locations	High	
	Develop a strategy for managing the road marking which ensures that the majority of road marking is visible at all times.	Medium	
SCRIM	Implement the CSSW SCRIM Method. FCC currently have a skid resistance policy which they follow. The CSSW SCRIM Method will reduce the quantity of roads tested and ensure more focus can be applied to the higher risk roads ie. those that are high speed and high use.	Low	
Training	Senior Management	Medium	
	Asset Managers	Medium	
	Inspectors & Supervisors	Medium	1

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**Highway Asset  
Annual Status Report  
Carriageways, 2023**

## Carriageways Status Summary Statement

### 1. Investment:

- At no time in the last 11 years has the level of investment been close to that required to maintain the condition (the steady state value).
- Council investment in the last two years (excluding government grant monies) in planned maintenance of carriageways has been less than half that required to keep the asset in a steady state.
- £128k pa is committed to the completion of reactive repairs.

### 2. Works

- Based on the last 11 years, on average each road gets a new surface every 72 years.
- Based on the last 5 years on average each unclassified road can expect to be resurfaced once every 131years.
- 3,506 repairs were completed in 2022/23, equivalent to 18 repairs per working day.
- Less than 25% of carriageway defects are repaired within the 5 working day target.

### 3. Condition:

- A large and growing level of defects requiring reactive repair are being identified.
- The “measured by survey” condition of classified roads over the last 11 years has improved a small amount. The escalating number of minor repairs requires however indicates ongoing deterioration.
- The condition of A and B roads is comparatively good and reasonably steady due to the direction of available funding towards treatment of these roads.
- Whilst not as good comparatively as A and B class roads, C roads are in a reasonable condition and are improving over time, in terms of survey measured condition.
- Unclassified roads are in a comparatively poor condition and are deteriorating.

### 4. Backlog

- A huge backlog of deferred maintenance exists comprising of:
  - Roads in need of resurfacing £23m
  - Roads in need of surface treatment £10m
  - Areas of road in need of patching £6m
  - Minor defers in need of repair £9m.

### 5. Risk Review

- The risk posed to user from the condition of the asset is increasing.
- The “risk” of transferring the cost of todays use of the asset to a future generation to pay for is not a risk it is a fact. It is occurring now.



## 1. Purpose

This report provides managers and members with an update on the state of council managed roads. It proposes targets for repair, condition and quantities of work (numbers of repairs and lengths of resurfacing and surface treatment) that will be included in a council Highway Asset Management Plan (HAMP).

### Status

The report describes the status of the council's carriageway in terms of:

- condition,
- level of defects

Status is reported as of March 2023.

## The Asset

### Scale

The council manages 1,183km of carriageways,

- Roads range from busy major roads to minor rural lanes and residential streets.
- 58% of roads are unclassified [688km]
- 51% are urban roads and 49% rural.
- 37% are residential streets (urban unclassified [434km])

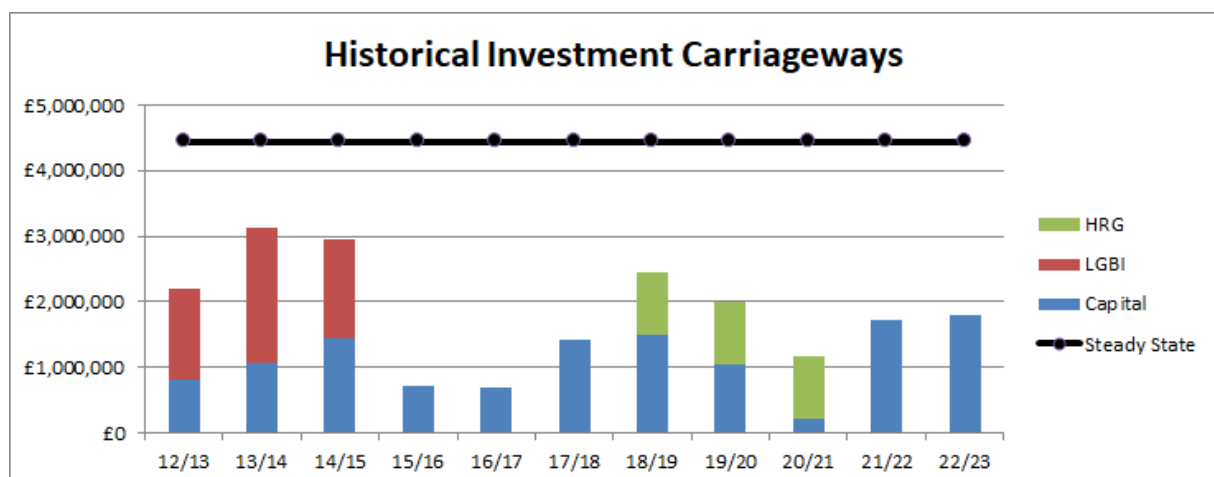
### Value

In 2015-16 the gross replacement value of the carriageway asset was estimated at £1,215 million.

## 2. Investment

### Capital Investment

Historical capital investment in carriageway maintenance has been as shown below:



Additional monies were supplied by Welsh Government, between 2012/13 and 2014/15 and 2017/18 and 2020/21. The table below shows the scale of the additional monies supplied.

<b>Investment / Cost Planned Maintenance (£000's)</b>											
<b>£,000's</b>	<b>12-13</b>	<b>13-14</b>	<b>14-15</b>	<b>15-16</b>	<b>16-17</b>	<b>17-18</b>	<b>18-19</b>	<b>19-20</b>	<b>20-21</b>	<b>21-22</b>	<b>22-23</b>
Capital	£816	£1,065	£1,449	£706	£700	£1,430	£1,492	£1,046	£210	£1,710	£1,799
Additional (LGBI, WG Grant)	£1,370	£2,050	£1,500				£959	£954	£950		
Total	£2,186	£3,115	£2,949	£706	£700	£1,430	£2,451	£2,000	£1,160	£1,710	£1,799

### **Average Investment**

The average investment in planned maintenance between 2012/13 and 2022/23 was £1.8m pa. Without the monies provided by Welsh Government this would have been £1.1m pa. The estimated sum required to maintain a steady state of current condition is £3.9m pa.

### **Annual Depreciation Charge (ADC)**

In 2022/23 the ADC of the carriageway asset was estimated at £3.3m pa. This value is derived from a nationally prescribed method devised by CSSW. ADC represents an estimate of the average investment in replacement of the asset required each year over its lifespan to keep it in service i.e. it is similar but not the same as the steady state. It provides an alternative view of what is required annually.

➤ **At no time in the last 11 years has the level of investment been close to that required to maintain the condition (the steady state value).**

In the last two years the council has invested £1.7m and £1.8m, less than half of the steady state figure.

➤ **Council investment in the last two years (excluding government grant monies) in planned maintenance of carriageways has been less than half that required to keep the asset in a steady state.**

### **Routine Reactive and Cyclic Maintenance Costs**

The annual cost of routine, reactive and cyclic maintenance is approximately £128k. A substantial quantity of reactive repairs are completed each year. This figure includes for the reactive repair of defect on all highway assets (i.e. not just carriageways)

➤ **£128k pa is committed to the completion of reactive repairs.**

### 3. Works Undertaken

#### Planned Maintenance Outputs

The sums invested above have allowed the following amount of works to be undertaken.

Planned Maintenance Works Undertaken by Treatment Type											
	12-13	13-14	14-15	15-16	16-17	17-18	18-19	19-20	20-21	21-22	22-23
Surface Treatment (km)	23.2	17.3	15.3	10.2	11.1	6.0	5.5	10.8	0.0	9.4	6.2
Resurfacing (km)	17.9	19.9	19.3	2.4	2.0	7.0	12.7	7.4	8.2	7.8	7.9
% with a new surface (Return Period)	3.5% (29yrs)	3.1% (32yrs)	2.9% (34yrs)	1.0% (94yrs)	1.1% (90yrs)	1.1% (91yrs)	1.5% (65yrs)	1.5% (65yrs)	0.7% (145yrs)	1.5% (69yrs)	1.2% (84yrs)

**Over the last 11 years, on average each road gets a new surface every 72 years. Road surfaces do not last this long.**

The council uses a risk matrix approach to prioritise resurfacing and surface treatment works. This has meant that work had been focused on classified roads (A, B and C class). The following table provides a breakdown of the works by road class.

Planned Maintenance Works Return Periods (Years) by Road Class						
Road Class	18-19	19-20	20-21	21-22	22-23	Average (last 5 years)
A Road	55	71	66	21	65	46
B Road	16	47	132	53	55	39
C Road	47	35	261	54	49	54
Unclassified Roads	214	53	213	321	145	131

**Based on the last 5 years on average each unclassified road can expect to be resurfaced once every 131 years.**

**Reactive and Routine Maintenance Outputs**

The following amount of reactive maintenance works have been undertaken.

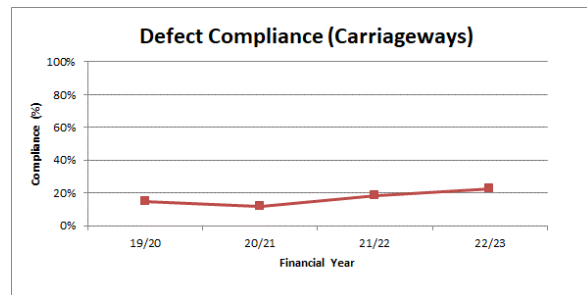
<b>Reactive Maintenance Works Identified and Repaired</b>				
	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>
Total Repairs	1,590	2,767	3,343	3,506

In 2022/23 3,506 carriageway repairs were completed. The level of repairs completed equates to 18 repairs per working day. This is a substantial amount of repair. Public dissatisfaction with roads often relates to these sorts of defects, e.g. pot holes.

➤ **3,506 repairs were completed in 2022/23, equivalent to 18 repairs per working day.**

**Defect Repair Compliance**

Since October 2018, the council standard has required that all defects be repaired within 5 working days of identification. The chart shows that less than 25% of carriageway defects are repaired within this response time.



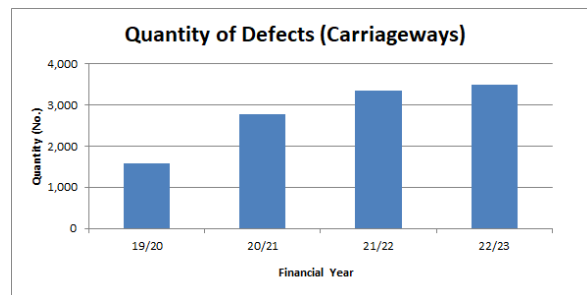
**Less than 25% of carriageway defects are repaired within the 5 working day target.**

**4. Condition**

The condition of roads is reflected by the number of defects requiring repair (recorded during inspections) and the lengths of road that require resurfacing (recorded by condition surveys).

**Defects**

Current standards for defect repair are in the Maintenance Manual. Defects considered potentially hazardous to users are identified for repair. The quantity of defects being identified is large and continuing to increase.



➤ **A large and growing level of defects requiring reactive repair are being identified.**

It should be noted that the defects recorded via inspection are only those that meet the council's standard for assessment and potential repair. Details of the full extent of defects on the network is given later in this report.

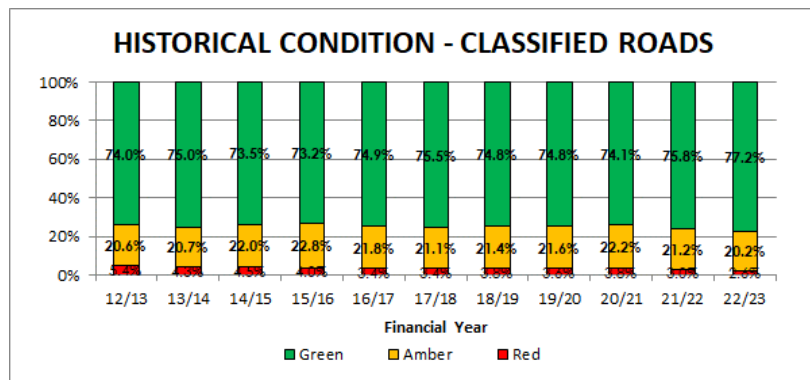
### Measured Condition

Classified road condition is measured annually by machine “scanner” surveying. An AI condition survey of all roads was undertaken in 2021/22 using the Gaist system. This survey included unclassified roads which the council had no previous condition information on. The surveys report condition in relation to:

- Poor Condition (red): sections of road in a state where structural maintenance should be considered are reported as red.
- Deteriorating Condition (amber): sections of road in a state where maintenance should be considered, this may be resurfacing (amber 1) or sections of road in the early stages of deterioration where preventative maintenance should be considered (amber 2)

### Classified Roads (SCANNER)

Classified roads (A, B and C class roads) make up 42% (495km) of the network. The measured condition of these roads as measured by SCANNER is shown.



➤ **The condition of classified roads over the last 11 years has improved a small amount.**

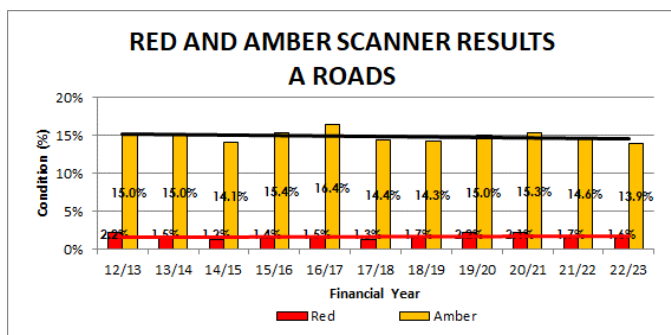
**A Roads** 155km (13% by length). A class roads are in most cases the council's busiest roads.

Based on % in poor condition current condition is:

- 1.6% (2.5km) in a deteriorated red condition
- Within the HAMP target of 2%
- Ranked 1<sup>st</sup> nationally (2021/22)
- Ranked 1<sup>st</sup> out of 10 of semi-rural Welsh authorities (2021/22)

In addition to road in red condition a further 13.9% (21.5km) is in a deteriorating amber condition

### Trend in Condition



Poor Condition: ■  
 - Decreasing (improving)

Deteriorating Condition: ■  
 - Decreasing (improving)

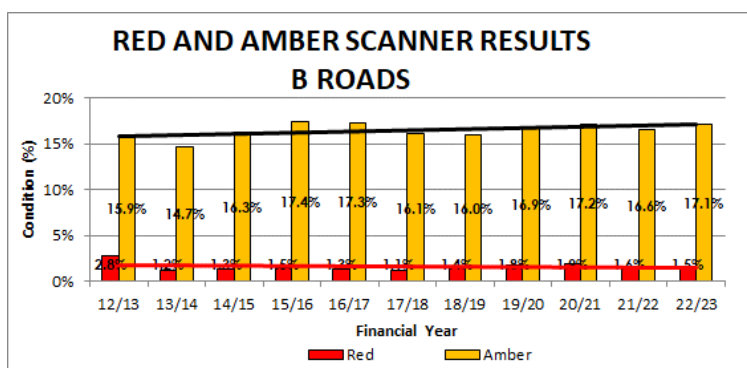
**B Roads:** 78km (7% of the network by length).

Based on % in poor condition current condition is:

- 1.5% (1.2km) in a deteriorated red condition
- Within the HAMP target of 3%
- Ranked 1<sup>st</sup> nationally (2021/22)
- Ranked 1<sup>st</sup> out of 10 of semi-rural Welsh authorities (2021/22)

In addition to road in red condition a further 17.1% (13.4km) is in a deteriorating amber condition

**Trend in Condition**



Poor Condition: ■  
 - Decreasing (improving)

Deteriorating Condition: ■  
 - Increasing (getting worse)

➤ **The condition of A and B roads is comparatively good and reasonably steady due to the direction of available funding towards treatment of these roads.**

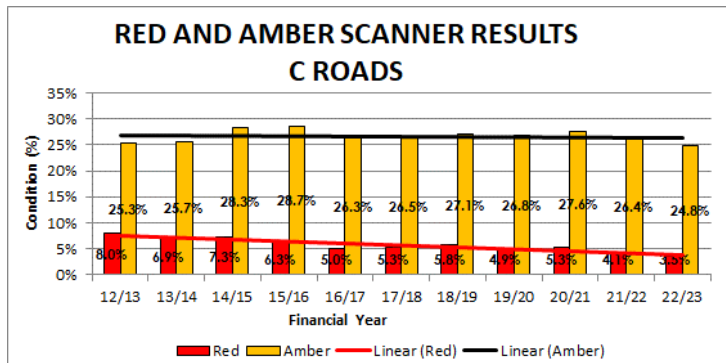
**C Roads:** 262km (22% of the network by length)

Based on % in poor condition current condition is:

- 3.5% (9.2km) in a deteriorated red condition
- Within the HAMP target of 7%
- Ranked 4<sup>th</sup> nationally (2021/22)
- Ranked 4<sup>th</sup> out of 10 of semi-rural Welsh authorities (2021/22)

In addition to road in red condition a further 24.8% (65.1km) is in a deteriorating amber condition

**Trend in Condition**

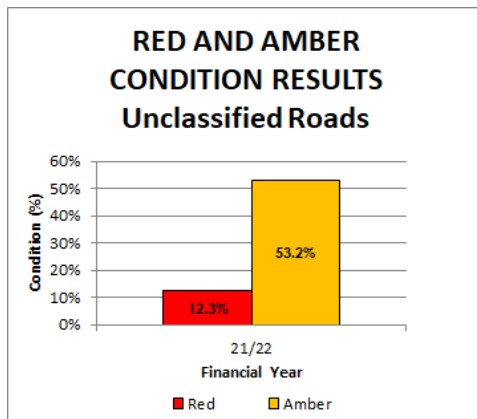


Poor Condition: ■  
 - Decreasing (improving)

Deteriorating Condition: ■  
 - Steady  
 (approximately the same)

➤ Whilst not as good comparatively as A and B class roads, C roads are in a reasonable condition and are improving over time.

**Unclassified Roads:** 688km (58% by length).



Gaist condition survey of Unclassified Roads in 2021/22 report condition as:

- 12% (76km) in a deteriorated red condition
- 53% (330km) in a deteriorating amber condition

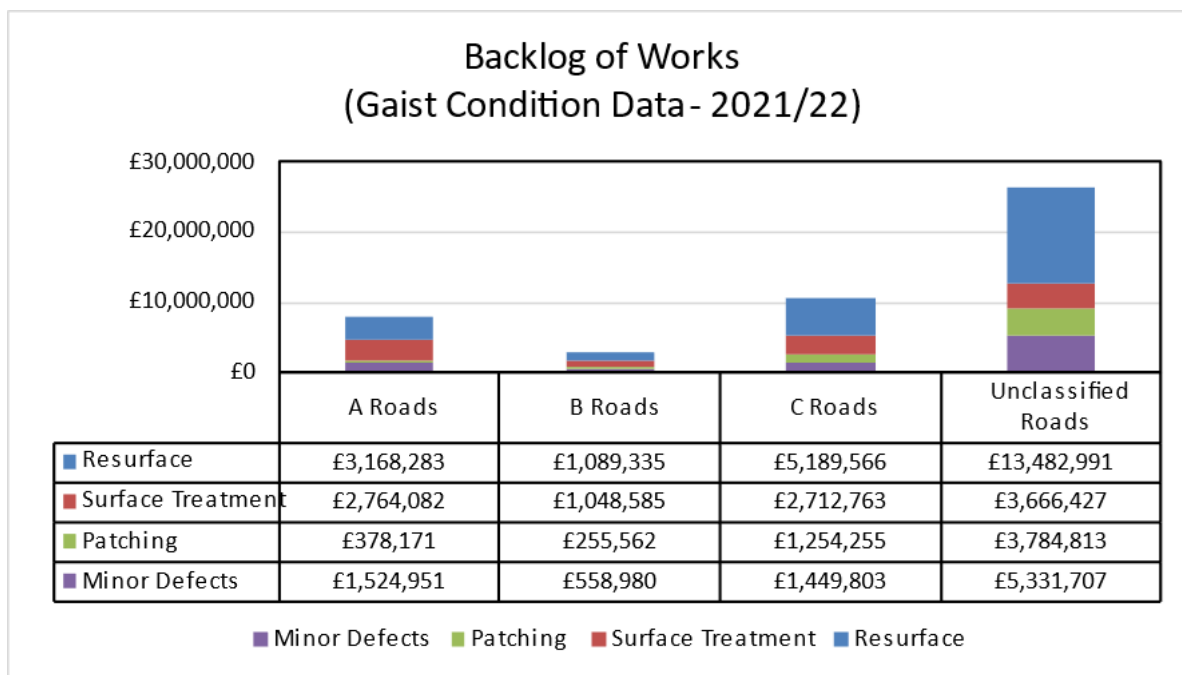
This is the first survey of unclassified roads. There is no data available to show if these roads are deteriorating. The level of replacement is however so low that deterioration will be happening.

➤ Unclassified roads are in a comparatively poor condition and are deteriorating.

## Backlog

Previous reporting of backlog has been based on SCANNER survey results for the classified roads. This approach reports on the need for resurfacing or surface treatment. The data collected by the GAIST survey provides the ability to report maintenance needs more fully. The following chart shows a backlog of works for each road class and the following work types:

- **Resurface** – Sections of poor condition greater than 100m.
- **Surface Treatment** – Sections of deteriorating road greater than 100m
- **Patching** – Sections of poor condition less than 100m
- **Minor Defects** – All other defects (except fretting, chip loss and vegetation)



➤ **The total backlog using the above method is £48m.**

This data illustrates that in addition to desirable resurfacing and surface treatment schemes there is a currently unmet need for patching (of small badly deteriorated sections of road not long enough to form a resurfacing scheme). There are also a myriad of minor repairs. At the time of this survey 29,000 minor defect locations (that are not on sites of potential schemes or patching) were identified. Approximately 4,000 defects per year are currently being repaired.

**A huge backlog of deferred maintenance exists comprising of:**

- **Roads in need of resurfacing £23m**
- **Roads in need of surface treatment £10m**
- **Areas of road in need of patching £6m**
- **Minor defers in need of repair £9m.**

## 5. Risk Review

The risk posed to user from the condition of the asset is increasing.

The “risk” of transferring the cost of today’s use of the asset to a future generation to pay for is not a risk it is a fact. It is occurring now.





**Highway Asset  
Annual Status Report  
Footways, 2023**

## Footway Status Summary Statement

### 1. Investment:

- At no time in the last 10 years has the level of investment been close to that required to maintain the condition (the steady state value).

### 2. Works

- Based on the last 10 years, on average each road gets a new surface every 336 years.
- 382 repairs were completed in 2022/23, equivalent to 1 repair for every 2,500m
- Less than 10% of footway defects were repaired within the 5 working day target in 2022/23

### 3. Condition:

- A large and growing level of defects requiring reactive repair are being identified
- 0.07% (630m) of footways have been identified as being in poor condition

### 4. Backlog

- There is a backlog of £3.1m which would treat all footways in poor or deteriorating condition

### 5. Risk Review

- The risk posed to user from the condition of the asset is increasing.
- The “risk” of transferring the cost of today’s use of the asset to a future generation to pay for is not a risk it is a fact. It is occurring now.

# 1. Purpose

The purpose of this report is to provide managers and elected members with information to enable standards to be set and included in the Highway Asset Management Plan (HAMP).

## Status

The report describes the status of the council's footway in terms of

- condition,
- level of defects
- the outputs that are delivered and
- the standards that are being achieved

Status is reported as of April 2023.

# The Asset

## Scale

The council manages 938km of footways, ranging from predominantly in the urban areas (towns and villages) with a small length of rural footway.

- 99% are bituminous

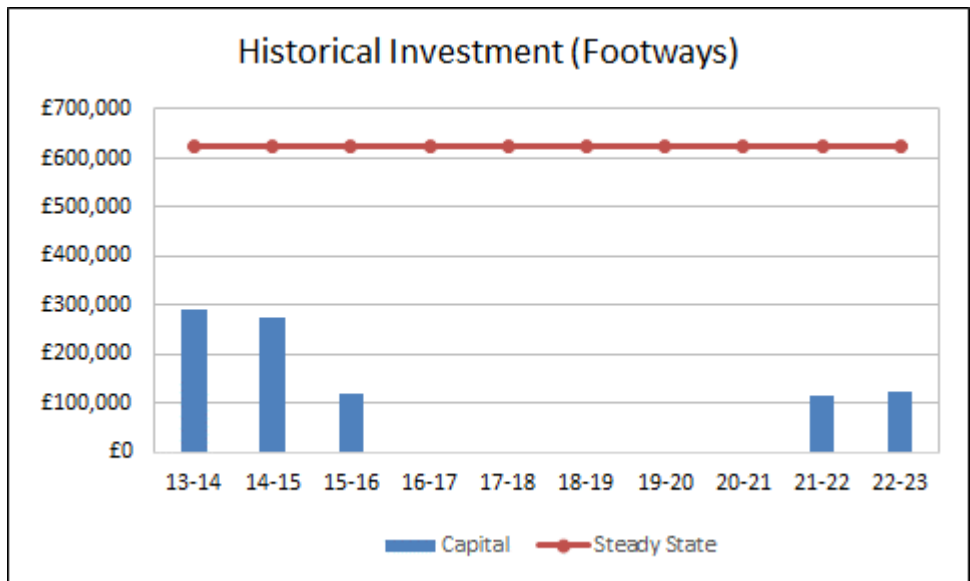
## Value

In 2014/15 the total replacement value of the footway asset was estimated at £57 million.

# 2. Investment

## Capital Investment

Historical capital investment in footway maintenance has been as shown below:



Investment / Cost Planned Maintenance (£000's)										
£,000's	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Capital	£291	£277	£121	£0	£0	£0	£0	£0	£115	£122

### Average Investment

The average investment in planned maintenance between 2013/14 and 2022/23 was £93k pa. The estimated level of investment required to maintain a steady state of measured condition is £626k pa.

### Annual Depreciation Charge (ADC)

In April 2014 the ADC of the footway asset was estimated at £941k. This value is derived from a nationally prescribed method devised by CSSW to produce a realistic estimate of the average investment in replacement of the asset required each year over its lifespan to keep it in service. The ADC and steady state cost both provide an indication of the annual cost required to maintain the footway asset.

➤ At no time in the last 10 years has the level of investment been close to that required to maintain the condition (the steady state value).

### Routine Reactive and Cyclic Maintenance Costs

The cost of reactive and routine maintenance are reported in the Annual Status Report for Carriageways.

## 3. Works Undertaken

### Planned Maintenance Outputs

The sums invested above have allowed the following amount of works to be undertaken.

Planned Maintenance Works Undertaken by Treatment Type										
	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23
Surface Treatment (km)	0	0	10.4	0	0	0	0	0	0	8.8
Resurfacing (km)	3.8	3.5	0	0	0	0	0	0	1.3	0.1
% with a new surface (Return Period)	0.41% (247yrs)	0.37% (268yrs)	1.11% (90yrs)	0.00% (N/A)	0.00% (N/A)	0.00% (N/A)	0.00% (N/A)	0.00% (N/A)	0.14% (722 yrs)	0.95% (105 yrs)

The average return period over the last 10 years is 336 years. This means that if this level were continued each footway would have a new surface on average every 336 years. This is not considered to be a sustainable level ....

**Reactive and Routine Maintenance Outputs**

The following amount of reactive maintenance works have been undertaken.

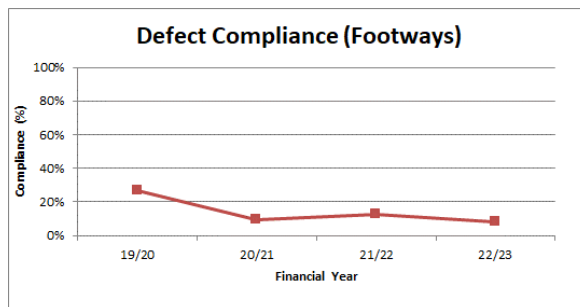
<b>Reactive Maintenance Works Identified and Repaired</b>				
	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2022-23</b>
Total Repairs	174	292	352	382

In 2022/23 382 footway repairs were completed. The level of repairs completed equates to 1 repair for every 2,500m.

➤ **382 repairs were completed in 2022/23, equivalent to 1 repair for every 2,500m**

**Defect Repair Compliance**

Since October 2018 the council standard has required that all defects are repaired within 5 working days of identification. The chart shows that less than 10% of footway defects were repaired within this response time in 2022/23.



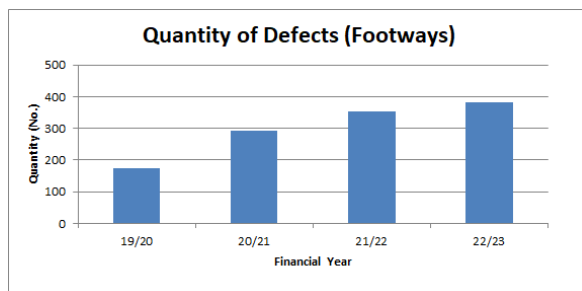
**Less than 10% of footway defects were repaired within the 5 working day target in 2022/23**

## 4. Condition

The condition of roads is reflected by the number of defects requiring repair (recorded during inspections) and the lengths of road that require resurfacing (recorded by condition surveys).

### Defects

Current standards for defect repair are in the Maintenance Manual. Defects considered potentially hazardous to users are identified for repair. The quantity of defects being identified is large and continuing to increase



➤ **A large and growing level of defects requiring reactive repair are being identified.**

It should be noted that the defects recorded via inspection are only those that meet the council's standard for assessment and potential repair. Details of the full extent of defects on the network is given later in this report.

### Measured Condition

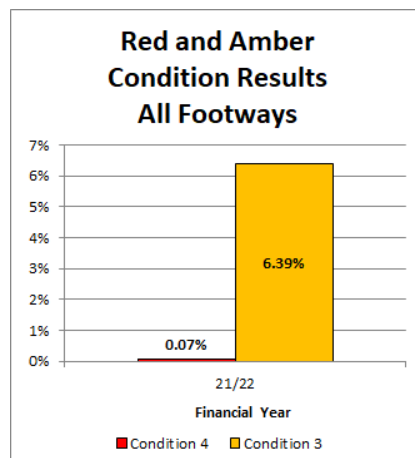
In 2021/22 a condition survey of all footways in Wrexham was undertaken by Gaist. Gaist uses Artificial Intelligence (AI) to identify defects on the footway which are then processed to provide an overall condition indicator. The survey reports condition in relation to:

- **Poor Condition (red):** sections of footway in the worst state are reported as red. Most 'poor' footways are very small in area. The most cost-efficient treatment is to patch the defective areas.
- **Deteriorating Condition (amber):** sections of footway in a state where maintenance should be considered are reported as amber. The majority of defects on amber footways occur on the surface which can be treated with a resurfacing or relaying of the existing materials including slabs and blocks.

### Condition – All Footways

The results of the footway survey are shown in the chart. The results show that 0.07% (0.63km) of the footway require some patching to be completed.

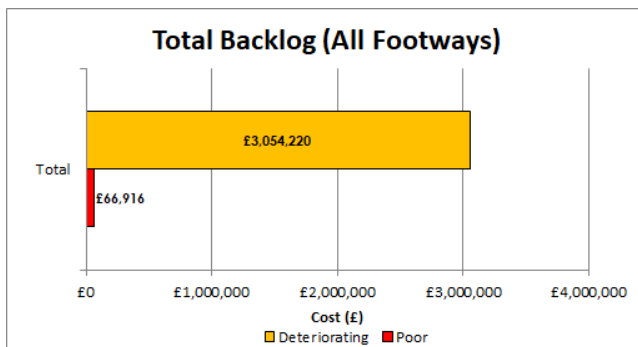
6.51% (61.02km) of the footway requires a new surface. This would include resurfacing of bituminous footways and replacing or relaying materials on slab or block footways.



**0.07% (630m) of footways have been identified as being in poor condition**

## Backlog

The total cost of repairing all the lengths of footway identified as in poor or deteriorating condition is £3.1m.



**There is a backlog of £3.1m which would treat all footways in poor or deteriorating condition.**

## 5. Risk Review

The risk posed to user from the condition of the asset is increasing.

The “risk” of transferring the cost of today’s use of the asset to a future generation to pay for is not a risk it is a fact. It is occurring now.

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**Highway Asset  
Annual Status Report  
Structures, 2023**

## Summary

This report presents the status of the council's structure in terms of condition and investment as of March 2024. The report states:

### Investment

- Funds are committed to the 10-year Maintenance Plan for Flintshire Bridge approved in 2021/22.
- The routine budget of £31k in 2023/24 is approximately 20% of the estimated need.
- The average investment in planned maintenance between 2014/13 and 2023/24 is £171k pa. This is less than 1/3<sup>rd</sup> of the estimated annual depreciation (the average amount required over time to keep the asset in service)

### Works

- 24 structures (out of a stock of 390) received works funded by capital investment in 2023/24

### Condition

- Condition (inspection results): 7 are currently rated to be in a very poor condition and a further 45 in a poor condition.
- Scour: it is unknown currently if there are structures that are susceptible to scour that may benefit from protection works
- Strengthening: it is unknown if there are structures that are inherently weak on the network.

### Backlog

- The estimated cost of repairing all the defects in the structures "workbank" is £2m.
- The estimated cost of refurbishment of structures in a "very poor" or "poor" condition is £655k

### Risk

- **The risk of a bridge being damaged by Scour is unknown.** An investigation of this is planned. It may be necessary to update the HAMP if a need for scour protection works is identified.
- **The risk of a bridge being inherently weak is unknown.** An investigation of this is planned. It may be necessary to update the HAMP if the investigation identifies structures that need strengthening.

## 1. Purpose

This report provides managers and elected members with information to enable standards to be set and included in the Highway Asset Management Plan (HAMP) for highway structures

## 2. Scope

### Status

The report describes the status of the council's highway structures in terms of condition and investment as of March 2024.

## 3. The Asset

### Scale

The council manages 390 Highway Structures, ranging from busy road bridges to small culverts

Structure Type	Number
Road Bridges	73
Footbridges	142
Retaining Walls	25
Culverts	149
Subways	1
<b>Total</b>	<b>390</b>

The Flintshire Bridge is a cable-stayed bridge which has its own specific maintenance plan. The bridge is managed in accordance with a 10 year maintenance plan with the budget approved in 2021/22.

### Value

In 2015 the total replacement value (gross replacement cost, GRC) of the highway structures asset was estimated at £238m.

## 4. Condition

### Condition of Stock

Structures condition is reported using a bridge stock condition indicator (BSCI). The figures reported are at a stock level i.e. the average for all structures and are:

- BSCI<sub>ave</sub>: the average condition of the stock based upon the rating given to all components of the structures and
- BSCI<sub>crit</sub>: the condition based upon ratings of components of structures that are considered critical to the load carrying capacity of the structure i.e. "critical components" only.

Currently  $BSCI_{ave}$  and  $BSCI_{crit}$  are not available. The following tables show the quantities of individual structures in each of the BCI Condition Ranges for both  $BSCI_{ave}$  and  $BSCI_{crit}$ .

<b><math>BSCI_{ave}</math> Results as of 31 March 2024</b>						
<b>Type</b>	<b>Quantity</b>	<b>BCI Condition Range</b>				
		<b>Very Good</b>	<b>Good</b>	<b>Fair</b>	<b>Poor</b>	<b>Very Poor</b>
Road Bridges	73	22	34	17	0	0
Footbridges	142	57	61	24	0	0
Retaining Walls	25	25	0	0	0	0
Culvert	149	55	78	16	0	0
Subway	1	0	1	0	0	0
<b>Totals</b>	<b>390</b>	<b>159</b>	<b>174</b>	<b>57</b>	<b>0</b>	<b>0</b>

<b><math>BSCI_{crit}</math> Results as of 31 March 2024</b>						
<b>Type</b>	<b>Quantity</b>	<b>BCI Condition Range</b>				
		<b>Very Good</b>	<b>Good</b>	<b>Fair</b>	<b>Poor</b>	<b>Very Poor</b>
Road Bridges	73	29	0	33	10	1
Footbridges	142	46	1	77	15	3
Retaining Walls	25	25	0	0	0	0
Culvert	149	74	0	52	20	3
Subway	1	1	0	0	0	0
<b>Totals</b>	<b>390</b>	<b>175</b>	<b>1</b>	<b>162</b>	<b>45</b>	<b>7</b>

Historical condition information is not currently available so it is not possible to comment on whether the structures stock is improving or deteriorating.

General Inspections are completed on each structure every 2 years. 104 structures require a Principal Inspections which are completed every 6 years.

### **Strengthening Need**

A structure in need of strengthening has typically had a structural assessment completed on it and been identified as being weak. Management of these structures can include monitoring, the use of weight or other use restrictions. It is unknown if assessments have been carried out. A plan to investigate the need for strengthening is appropriate and will enable the risk of structural failure to be better understood and managed.

**Refurbishment Need**

Stock level indicators are based on figures that include the numbers of structures in a very poor or poor condition. Structures deteriorate slowly over time. Timely routine maintenance can greatly assist to ensure that structures require the minimal amount of the more expensive major refurbishment works but there will come a time in most structures lives when refurbishment is required. Refurbishment usually includes works to several components and will restore it to a good condition.

**Structures in Very Poor Condition** (based on their  $BCI_{crit}$  values)

Structures with a  $BCI_{crit}$  value of less than 40 are deemed to be in a very poor condition.

➤ **7 structures are in a “very poor” condition (including 1 road bridges)**

**Structures in a Poor Condition**

In addition to the very poor condition structures a further 45 structures are deemed to be in a poor condition with  $BCI_{crit}$  values between 40 and 65.

➤ **45 structures are in a “poor” condition (including 10 road bridges)**

**Parapet Upgrading**

Parapets provide protection for users to limit the risk of falling from the structures (as a pedestrian or more likely in a vehicle). The parapets on many structures do not meet modern design standards. The risk associated with these parapets is a function of their use, some pose a higher risk than others. There are currently no records available which indicate any of the structures require parapet upgrading.

**Scour Protection**

it is unknown currently if there are structures that are susceptible to scour that may benefit from protection works. An investigation of this is planned. It may be necessary to update the HAMP if a need for scour protection works is identified

**Flintshire Bridge**

The Flintshire Bridge is a cable-stayed bridge spanning the Dee Estuary in Flintshire. A 10-year maintenance plan was approved in 2021/22 to ensure the bridge remains in good condition. The cost of the plan is £1.8m over the 10 years. The annual costs vary depending on the programmed inspections or works.

**Reactive Maintenance Needs**

In addition to the specific deficiencies noted above there is an ongoing need to carry out reactive maintenance, for example where vehicle impact requires repair and routine maintenance. Reactive maintenance needs are unpredictable. They are best predicted by reference to historical costs.

- **Historically reactive maintenance needs have been met from a budget of c£16k**

### **Routine Maintenance Needs**

Routine maintenance works are “good housekeeping”, work is small in scale and cost but necessary to prevent more costly repairs being required in the future. Typical works include vegetation removal, drainage cleansing, minor repointing, minor concrete repairs etc. CSSWales\* has created an initial model that has been developed to estimate a range of budget levels appropriate for routine maintenance needs. Applying this method of estimating to Flintshire’s stock gives an indicative routine maintenance budget need range of £135k to £180k pa.

- **Estimated Total Routine Maintenance needs is in the range of £135k to £180k pa**

(\*CSSW = County Surveyors Society of Wales representing the 22 Welsh highway authorities. Under their ongoing national highway asset management project CSSW has created estimating methods for forecasting a broad assessment of routine maintenance needs for structures)

## **Backlog**

### **Major Refurbishment**

7 structures are in a “very poor” condition. The initial estimated cost of refurbishment of these structures is £80.0k.

A further 45 structures are in a “poor” condition. The initial estimated cost of refurbishment of these structures is £575k.

### **Structures Maintenance Backlog**

A structures maintenance backlog has been defined as the cost of addressing identified strengthening# works plus the cost of addressing the refurbishment of structures in a very poor or poor condition

- **Current Structures Maintenance Backlog = £655k**

### **Workbank**

When structures are inspected the bridge inspector records a budget estimate of the remedial works required to address the defects recorded. These are very broad estimates. The sum of the total of these works is known as the structures “workbank” and give an indication of the scale of works that would be required to repair all the recorded defects on the stock. The current “workbank” is £2m.

### **Summary:**

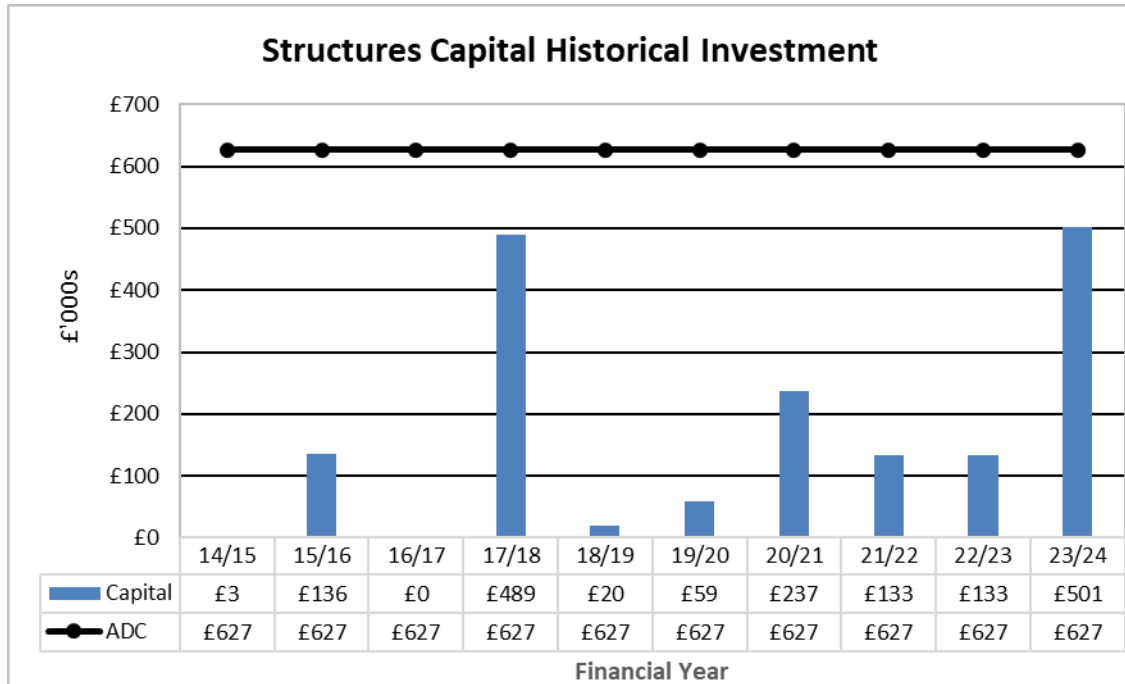
- A maintenance backlog of £655k has been calculated.

## 5. Historical Investment

The results above have been achieved from investment over the period reported. The levels of investment made to deliver the standards that have been achieved are reported below.

### Capital Investment

Historical capital investment in structures has been as shown below



	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Capital	£3k	£136k	£0k	£489k	£20k	£59k	£237k	£133k	£153k	£153k

### Average Investment

The average investment in planned maintenance between 2014/13 and 2023/24 is £171k pa.

### Annual Depreciation Charge (ADC)

In 2015 the ADC of the structures asset was estimated at £627k. The ADC represents the average investment in replacement of the asset required each year over its lifespan to keep it in service. It is theoretically additional to the investment required to address the maintenance backlog.

### Over the last 11 years investment in planned maintenance has been 27% of the ADC

This level of funding suggests that there may be a need to substantially increase investment in the future to keep the asset in service.

### Investment/Cost of Routine, Reactive and Cyclic Maintenance

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24
Reactive	Unknown							£12k	£15k	£22k
Routine and Cyclic	£51k	£51k	£53k	£53k	£53k	£53k	£53k	£41k	£38k	£31k
Other	£35k	£35k	£35k	£35k	£35k	£35k	£35k	£35k	£35k	£35k

Costs										
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Other costs include licence fees, bridge monitoring, principal inspections, surveys and developer approvals.

The average revenue between 2014/15 and 2023/24 was £87k pa.

The routine budget of £31k in 2023/24 was approximately 20% of the estimated need. Failure to complete routine maintenance may lead to increases in some defect types.

**Summary:**

- There has been very little spent on routine maintenance
- Over the last 10 years investment in planned maintenance has been 27% of the ADC

## 6. Works Undertaken

### Planned Maintenance Outputs

The sums invested above have allowed works to be undertaken on the following number of structures:

Number of Structures with works funded by Capital	
Financial Year	Number of Structures
2022/23	6
2023/24	24

### Reactive and Routine Maintenance Outputs

There are no records available to enable quantities of reactive and routine maintenance to be reported.

**Summary:**

- 24 structures received works funded by Capital investment in 2023/24





## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	New Brighton – Adoption of a Welsh Name
<b>Cabinet Member</b>	Cabinet Member for Education, Welsh Language, and Culture
<b>Report Author</b>	Chief Officer (Education and Youth)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

The Welsh Language Commissioner (WLC) is responsible for providing advice on Welsh place-names to individuals and organisations and has established a panel of experts, the Place-names Standardisation Panel, to advise on standard forms of Welsh place-names. Local authorities are ultimately responsible for deciding on the forms they use for local place names.

The local Ward Member for New Brighton, following consultation with residents, has approached the Council to request a Welsh form of New Brighton, “Pentre Cythraul”. The WLC supports the adoption of a Welsh form of New Brighton but recommends “Pentre Cythrel” as the standard name.

Adopting a Welsh form of New Brighton will support the Council’s Welsh Language Promotion Strategy by increasing the visibility and normalising the use of Welsh.

### RECOMMENDATIONS

1	Cabinet consider and approve adopting “Pentre Cythrel” as the recognised Welsh form of New Brighton and asking the Welsh Language Commissioner to include this in the standardised list of Welsh place-names.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE WELSH PLACE NAME FOR NEW BRIGHTON</b>
1.01	The Welsh Language Commissioner (WLC) is responsible for providing advice on Welsh place-names to individuals and organisations and has established a panel of experts, the Place-names Standardisation Panel (the Panel), to advise on standard forms to be used.
1.02	The Panel follows specific guidelines and gives due regard to the meaning, history and etymology of place-names as well as current usage when forming its recommendations. However, local authorities are ultimately responsible for deciding on the forms they use for local place-names.
1.03	The Place-names Standardisation Panel aims to: <ul style="list-style-type: none"> <li>• ensure consistency in the spelling of place- nationwide, which supports effective and accurate maps, signage and on-line search engines;</li> <li>• avoid multiplying forms i.e. having more than one form of a place-name; and</li> <li>• respect the principles of standard modern Welsh language orthography.</li> </ul>
1.04	Following the WLC’s publication of the list of standardised place names in 2018, the Place- names Standardisation Panel was contacted by members of the public and organisations requesting they consider “Pentre Cythraul” as the Welsh form of New Brighton. The Panel says this is a matter for the local authority.
1.05	The local Member for New Brighton ward approached Flintshire County Council to request “Pentre Cythraul” be adopted as the Welsh form of New Brighton.  The Member consulted with local residents in New Brighton village on their views of a Welsh form of New Brighton. Of the 38 respondents to the consultation, 33 agreed to the adoption of “Pentre Cythraul” as the Welsh form of New Brighton. Five respondents objected on the basis of the negative meaning of “Cythraul” – devil/demon and difficulties pronouncing Welsh words.  At their meeting in September 2021, the Community Council agreed to use “Pentre Cythraul” in signage for the recreational area.
1.06	“Pentre Cythraul”, has been recognised and used locally as the Welsh form of New Brighton for many years. It is recognised by the Driver and Vehicle Licensing Agency (DVLA), as it is included on driving licences, is

	used by Royal Mail, and is already included in local signage. For example, New Brighton Community Centre.
1.07	<p>The name “Pentre Cythraul” stems from the village’s association with the landowning Catherall family.</p> <p>A more detailed history of the Welsh form of New Brighton has been provided by the WLC and is included as Appendix 1.</p>
1.08	<p>The WLC has indicated support for the use of an official Welsh form of New Brighton, but prefers “Pentre Cythrel” (rather than “Pentre Cythraul”), <i>“as the name is an oral development of ‘Catherall’ and reflects how the name is pronounced locally; using ‘cythraul’ would be a further step away from the original colloquial name”</i>.</p> <p>Local residents who use the Welsh name “Pentre Cythraul” are supportive of the Panel’s suggestion of “Pentre Cythrel”.</p>
1.09	The Welsh name “Pentre Cythrel” will also address the objections raised in the consultation and the negative association of “Pentre Cythraul” (Devil’s Village).
1.10	Formally recognising a Welsh form of New Brighton will support the Council’s Welsh Language Promotion Strategy by raising the visibility of the language. It also ensures Welsh is treated equal to English.
1.11	<p>Adopting a Welsh name would not incur any additional costs as signage can be changed as and when it is renewed.</p> <p>The Local Land and Property Gazetteer (LLPG) would need to be updated to reflect the change. The LLPG informs all the statutory necessary bodies, including Ordnance Survey and Royal Mail.</p>
1.12	If supported by Cabinet, the WLC will need to be informed of the decision to ensure the Welsh name for New Brighton is included in the official published standardised list of place names.
1.13	Once approved there will need to be communication with the local community to inform them of the standard Welsh name for New Brighton and to explain the rationale for the decision.
1.14	<p>The Panel has also raised some queries on other Welsh place-names in Flintshire, such as spellings, use/lack of hyphens in some place names and is asking the Council to consider these.</p> <p>A working group comprising key officers is being established to look at these issues and will engage with relevant Town and Community Councils.</p>

	Further reports will be presented to Cabinet at a later date on recommendations to accept or reject the suggestions.
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<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	There are no resource implications, as signage is renewed it will be replaced with bilingual signage to include the new Welsh name.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>	
3.01	A Welsh Language impact assessment has been undertaken. A Welsh name for New Brighton will have a positive impact by raising the visibility of the Welsh language and ensure the Welsh language is treated equal to the English language.	
3.02	<b>Ways of Working (Sustainable Development) Principles Impact</b>	
	Long-term	Positive - safeguarding the Welsh language for future generations through raising the visibility of Welsh through bilingual signage.
	Prevention	Positive – through normalising and formalising the use of Welsh place-names.
	Integration	No change
	Collaboration	No change
	Involvement	The local Member for New Brighton Ward has consulted with the residents. The WLC has shared views on an appropriate Welsh name for New Brighton.
3.03	<b>Well-being Goals Impact</b>	
	Prosperous Wales	No impact
	Resilient Wales	No impact
	Healthier Wales	No impact

	More equal Wales	Positive - through ensuring that the Welsh language is treated no less favourably than the English language.
	Cohesive Wales	No impact
	Vibrant Wales	Positive - through promoting the Welsh language
	Globally responsible Wales	No impact

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	The local Member for New Brighton Ward consulted with residents, of the 38 respondents 33 were in favour of a Welsh name for New Brighton.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1 – WLC's notes on a Welsh name for New Brighton.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	<a href="#">Welsh Language Commissioner Standardised Welsh place-names</a>
6.02	<p>Integrated Impact Assessment</p>  <p>Summary IIA Pentre Cythrel.docx</p>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<p><b>Contact Officer:</b> Fiona Mocko, Strategic Policy Advisor  <b>Telephone:</b> English 01352 702122 Welsh 01267 224923  <b>E-mail:</b> <a href="mailto:Fiona.mocko@flintshire.gov.uk">Fiona.mocko@flintshire.gov.uk</a></p>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<b>Local Land and Property Gazetteer (LLPG)</b> - is the central corporate database for all addressing used in an authority and is recognised by central government and emergency service. The local database is

	combined at a national level to form a national database. A key identifier in the database is the Unique Property Reference Number (UPRN) which is a unique identifier for every addressable location in Great Britain.
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## Appendix 1 Welsh Name for New Brighton Notes for Flintshire's local authority

Please note that the latest academic information on Flintshire place-names along with more historical forms can be found in Hywel Wyn Owen and Ken Lloyd Gruffydd, *Place-names of Flintshire* (University of Wales Press, 2017).

### **New Brighton**

New Brighton was named after New Brighton, Wirral (named after Brighton, Sussex), probably as a result of immigration. But before that, another name was in colloquial use, namely *Pentre Catherall*, after Josiah Catherall who built a row of houses there for his workers in the 19<sup>th</sup> century. [The Welsh Academy English-Welsh Dictionary Online](#) (under the entry 'new') gives 'Pentre Catheral, Argoed' as the Welsh name for New Brighton.

*Pentre Cythrel* was a variation on that Welsh name. Both names are believed to be spoken names as Blue Bell was the only name noted on the 1840 map. The tradition continued in the early 20<sup>th</sup> century: 'New Brighton but known colloquially as Pentre'r Gŵr Drwg' (*translation from original Welsh*) (1913), local evidence that may suggest that *Pentre Catherall/Cythrel* as such did not survive into the 20<sup>th</sup> century, although it can be argued that the 1913 transcriber was trying to avoid writing the word *cythraul*, which would have been widely regarded as blasphemous and an offensive Welsh name for the devil. Having said that, there is an entry in the [Baner ac Amserau Cymru](#) newspaper from 1906 titled 'Telegram Pentre Catherall' where that name is used throughout the short article and reference is made to how 'some call it Pentre C-th-r-l' (*translation from original Welsh*). Again, the lines (-) are used to avoid blasphemy.

Certainly, as the linguistic profile of the area changed and as the mining heritage disappeared, the forms *Pentre Catherall* and *Pentre Cythrel* also gradually disappeared. This name was discussed by the Welsh Language Board's Placenames Standardisation Team in 2010 and as there was no evidence at that time that *Pentre Catherall/Cythrel* was used locally, the Team decided to recommend *New Brighton* as a single standard form. This was consistent with the principle set out in the [Guidelines for Standardising Place-names in Wales](#) that antiquarian forms that are no longer in use should not be revived. We have no record of Flintshire County Council wishing to discuss this recommendation further at the time.

Responsibility for standardising place-names was transferred from the Welsh Language Board to the Commissioner in 2012. In 2018, the Commissioner published the [List of Standardised Welsh Place-names](#) on our website so that the public could search and view the standard forms of Welsh place-names and we have since received several enquiries asking about the status of the Welsh form *Pentre Cythraul* with some referring to *Pentre Cythrel* as the spoken form. A comment was received shortly after the publication of the List by a member of staff of Menter Fflint a Wrecsam, for example:

## Appendix 1 Welsh Name for New Brighton Notes for Flintshire's local authority

'We were very disappointed to see that the list recommended using the English name only. The Welsh name, 'Pentre Cythraul', is in regular use among Flintshire residents.' (*Translation from original Welsh*)

They referred to the Urdd office's practice of using *Pentre Cythraul* in their address ([Fflint a Wrecsam | Urdd Gobaith Cymru](#)) and noted that the Menter also uses it. An article published on the [BBC Wales Fyw](#) website on 8 October 2019 claims that the Royal Mail and DVLA recognise the name *Pentre Cythraul*. The enquirer also referred to an unsuccessful attempt to submit a petition to the UK Government in 2013 calling on Flintshire County Council to officially adopt the Welsh name. The petition was rejected, however, as it was not a matter for the UK Government: [New Brighton / Pentre Cythraul - Petitions \(parliament.uk\)](#). They also mentioned how 'some older people refer to it as 'Pentre'r Gŵr Drwg' (because they do not want to blaspheme!) but Pentre Cythraul is the most well-known Welsh form here'.

The Commissioner received a copy of Flintshire County Council's gazetteer in 2018 where *Pentre Cythraul* had been recorded along with a handful of other names in a separate column without explanation of the status of those names. It therefore appears that this form was recorded by the local authority and that the local authority was aware of it, but it was not officially recorded as the Welsh form for *New Brighton*.

The subsequent enquiries and comments that we've received all refer to the form *Pentre Cythraul* (or *Pentre Cythrel* orally). It should be noted that none have asked us to consider the form *Pentre Catherall* (or *Pentre Catheral*) as the Welsh form. One enquirer noted that 'all local Welsh speakers' used the name *Pentre Cythraul*. Another enquirer contacted us as a group of local people had raised money to erect a new sign for a leisure area and noted that they were not allowed to use *Pentre Cythraul* on the sign as a Council officer had said that the Commissioner had not approved that form.

Several people have contacted us about the name claiming that the Welsh name is used increasingly by local Welsh speakers, and there is evidence in *Place-names of Flintshire* that residents referred to the place as 'the Pentre' up to the 1950s. Our Place-names Standardisation Panel therefore supports the use of an official Welsh form and favours the form *Pentre Cythrel* (rather than *Pentre Cythraul*) as the name is an oral development of 'Catherall' and reflects how the name is pronounced locally; using 'cythraul' would be a further step away from the original colloquial name.

**If Flintshire County Council wishes to adopt *Pentre Cythrel* as a Welsh form and is prepared to mainstream the name into all council work and systems, the Commissioner would then reflect that in the List of Standardised Welsh Place-names and recommend that form as the standard Welsh name to be used alongside *New Brighton*.**





## CABINET

<b>Date of Meeting</b>	Tuesday 15th October, 2024
<b>Report Subject</b>	Revenue Budget Monitoring Report 2024/25 (Month 5)
<b>Cabinet Member</b>	Cabinet Member for Finance and Social Value
<b>Report Author</b>	Corporate Finance Manager
<b>Type of Report</b>	Operational

### **EXECUTIVE SUMMARY**

This monthly report provides the latest detailed overview of the budget monitoring position for the 2024/25 financial year for the Council Fund and Housing Revenue Account and presents the position, based on actual income and expenditure as at Month 5.

The projected year end position is as follows:

#### **Council Fund**

- An operating deficit of £5.962m (this reduces to £2.962m with the utilisation of the budget risk reserve of £3m agreed when setting the budget) which is an adverse movement of £0.208m from the deficit figure reported at Month 4.
- A projected contingency reserve balance as at 31 March 2025 of £0.337m (after taking account of previously approved allocations including those approved as part of the 2024/25 Budget and a contribution of £0.167m from Earmarked Reserves).

This significant projected overspend (and impact on our available reserves) continues to be of major concern and needs to be addressed urgently in an attempt to bring expenditure back in line with the approved budget. Based on current projections the council only has a very small amount of contingency reserve which it uses to deal with any significant in-year unforeseen events. It should also be noted that there are also still a number of risks identified in the report that could further worsen the Council's financial position.

Therefore, as required by Financial Procedure Rules - Action Plans are being compiled by Social Services, Streetscene and Transportation and Housing and Communities which will detail the reasons for the potential overspends and the

measures being put in place to improve the position by the end of the financial year.

Our ability to mitigate pressures and risks during the financial year will again predominantly centre on review and challenge of non-essential spend and maximising income streams and grant funding. The moratorium on non-contractually committed spend and vacancy management process put in place during 2023/24 continues throughout 2024/25 and is being applied with rigour. Appendix 2 details the split of the moratorium savings to date.

In addition to the above an initial review of our Earmarked Reserves has been undertaken to identify any un-committed areas that can be released to improve our overall position (para 1.22 Refers). Further work is ongoing and the outcome will be reported in the month 6 report.

### **Housing Revenue Account**

- Net in-year revenue expenditure is forecast to be £0.111m lower than budget.
- A projected closing balance as at 31 March, 2025 of £4.563m

## **RECOMMENDATIONS**

1.00	To note 1) the report and the estimated financial impact on the 2024/25 budget and 2) the measures being put in place to improve the financial position by the end of the financial year.
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## **REPORT DETAILS**

<b>1.00</b>	<b>EXPLAINING THE REVENUE BUDGET MONITORING 2024/25</b>
1.01	<p>This monthly report provides the latest detailed overview of the budget monitoring position for the 2024/25 financial year for the Council Fund and Housing Revenue Account and presents the position, based on actual income and expenditure as at Month 5.</p> <p>The projected year end position is as follows:</p> <p><b>Council Fund</b></p> <ul style="list-style-type: none"> <li>• An operating deficit of £5.962m this reduces to £2.962m with the utilisation of the budget risk reserve of £3m agreed when setting the budget) which is an adverse movement of £0.208m from the deficit figure reported at Month 4.</li> <li>• A projected contingency reserve balance as at 31 March 2025 of £0.337m (after taking account of previously approved allocations including those approved as part of the 2024/25 Budget and a contribution of £0.167m from Earmarked Reserves).</li> </ul>

	<p><b>Housing Revenue Account</b></p> <ul style="list-style-type: none"> <li>• Net in-year revenue expenditure is forecast to be £0.111m lower than budget.</li> <li>• A projected closing balance as at 31 March, 2025 of £4.563m</li> </ul>																																																																			
1.02	<p><b>Table 1. Projected Position by Portfolio</b></p> <p>The table below shows the projected position by portfolio:</p> <table border="1"> <thead> <tr> <th rowspan="2">Portfolio/Service Area</th> <th>Approved Budget</th> <th>Projected Outturn</th> <th>In-Year Over / (Under) spend</th> </tr> <tr> <th>£m</th> <th>£m</th> <th>£m</th> </tr> </thead> <tbody> <tr> <td>Social Services</td> <td>92.047</td> <td>94.749</td> <td>2.702</td> </tr> <tr> <td>Out of County Placements</td> <td>19.299</td> <td>20.671</td> <td>1.372</td> </tr> <tr> <td>Education &amp; Youth (Non Schools)</td> <td>10.148</td> <td>10.285</td> <td>0.137</td> </tr> <tr> <td>Schools</td> <td>117.302</td> <td>117.120</td> <td>(0.182)</td> </tr> <tr> <td>Streetscene &amp; Transportation</td> <td>42.695</td> <td>44.719</td> <td>2.024</td> </tr> <tr> <td>Planning Env &amp; Economy</td> <td>7.682</td> <td>7.722</td> <td>0.040</td> </tr> <tr> <td>People &amp; Resources</td> <td>4.290</td> <td>4.190</td> <td>(0.100)</td> </tr> <tr> <td>Governance</td> <td>12.066</td> <td>11.747</td> <td>(0.319)</td> </tr> <tr> <td>Assets</td> <td>11.403</td> <td>11.402</td> <td>(0.001)</td> </tr> <tr> <td>Housing &amp; Communities</td> <td>18.161</td> <td>20.723</td> <td>2.562</td> </tr> <tr> <td>Chief Executive</td> <td>1.641</td> <td>1.625</td> <td>(0.016)</td> </tr> <tr> <td>Central &amp; Corporate Finance</td> <td>31.372</td> <td>29.115</td> <td>(2.257)</td> </tr> <tr> <td><b>Total</b></td> <td><b>368.106</b></td> <td><b>374.068</b></td> <td><b>5.962</b></td> </tr> <tr> <td colspan="3">Utilisation of Budget Risk Reserve</td> <td><b>(3.000)</b></td> </tr> <tr> <td colspan="3"><b>Total – Revised Overspend</b></td> <td><b>2.962</b></td> </tr> </tbody> </table>	Portfolio/Service Area	Approved Budget	Projected Outturn	In-Year Over / (Under) spend	£m	£m	£m	Social Services	92.047	94.749	2.702	Out of County Placements	19.299	20.671	1.372	Education & Youth (Non Schools)	10.148	10.285	0.137	Schools	117.302	117.120	(0.182)	Streetscene & Transportation	42.695	44.719	2.024	Planning Env & Economy	7.682	7.722	0.040	People & Resources	4.290	4.190	(0.100)	Governance	12.066	11.747	(0.319)	Assets	11.403	11.402	(0.001)	Housing & Communities	18.161	20.723	2.562	Chief Executive	1.641	1.625	(0.016)	Central & Corporate Finance	31.372	29.115	(2.257)	<b>Total</b>	<b>368.106</b>	<b>374.068</b>	<b>5.962</b>	Utilisation of Budget Risk Reserve			<b>(3.000)</b>	<b>Total – Revised Overspend</b>			<b>2.962</b>
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1.05	<p><b>Out of County Placements £0.277m</b></p> <ul style="list-style-type: none"> <li>Children’s Services £0.372m - Additional residential/ Unaccompanied Asylum-Seeking Children (UASC) placements added to placement caseload.</li> <li>Education &amp; Youth (£0.095m) - Projected expenditure adjusted to ensure invoices paid prior to the financial year end are correctly accounted for in 2025/26. Current placement caseload remains.</li> </ul>
1.06	<p><b>Planning, Environment and the Economy (£0.127m)</b></p> <p>A review of commitments around vacancy savings due to delays in the recruitment process resulting in a positive movement within the Portfolio.</p>
1.07	<p><b>Housing and Communities – (£0.177m)</b></p> <p>Housing Solutions - A positive movement of (£0.177m) as a result of a reduction in the number of temporary accommodation placements in August.</p>

1.08	<p><b>Central and Corporate Finance (£0.101m)</b></p> <p>The projection on the Central Loans and Investment Account (CLIA) for the 2024/25 indicates a further underspend of (£0.120m) as the trend from previous years continues with reduced short-term borrowing costs and income from investments in line with current bank interest rates. This however has been mitigated in part due to increasing Bank Charges following the revised contract prices from Worldpay.</p>
1.09	<p>Cumulative minor variances across the Council of (£0.211m) account for the remainder of the total monthly movement.</p>
1.10	<p><b>Tracking of In-Year Risks and Emerging Issues</b></p> <p>Members were made aware when setting the budget that there were a number of open risks that would need to be kept under close review. An update on these is provided below.</p>
1.11	<p><b>Council Tax Income</b></p> <p>Council Tax collections, at the end of August, were 47.24%, compared to 47.41% in the previous financial year. Recovery processes continue to be deployed to collect unpaid council tax, and where possible, to enter into realistic payment agreements with residents. The Revenues service also provide advice and support to those who struggle to maintain payments.</p>
1.12	<p><b>Pay Awards (Teacher and Non-Teacher)</b></p> <p><u>Teachers Pay</u></p> <p>The 2024/25 budget provides additional funding for a 5% pay award from September 2024. The Independent Wales Pay Review Body (IWPRB) had recommended a 4.3% increase, but Welsh Government increased this to 5.5% due to the “no detriment” principle, which means that teacher pay rises in Wales keep pace with those in England. In September 2024, the First Minister accepted the recommendations of the Independent Pay Review bodies for 2024-25.</p> <p>It is anticipated that additional funding will be received from Welsh Government to meet the in-year shortfall but this is yet to be confirmed.</p> <p>Confirmation is still awaited on funding for additional Teacher Pay employer pension costs and negotiations are ongoing between UK Government and Welsh Government – no provision was included in the budget. There is a risk that the costs may not be met in full.</p> <p><u>NJC (Green Book)</u></p>

	<p>The latest pay offer for NJC (Green Book) employees for the current year (2024/25) is currently in negotiation. The offer made with effect from 1 April 2024 is an increase of £1,290 (pro rata for part-time employees) to be paid as a consolidated, permanent addition on all NJC pay points 2 to 43 inclusive. Together with, an increase of 2.5% on all pay points above the maximum of the pay spine but graded below deputy chief officer.</p> <p>If agreed at this level, there would be an in-year benefit to the budget of over £0.800m. However, if not agreed at this level, any final award in excess of the budgeted amount will need to be met from reserves in the current financial year and would also have the impact of increasing the budget requirement for 2025/26.</p> <p><u>Pay Modelling</u></p> <p>No figures are currently included for any impact of the pay modelling review which is intended to help address the problems being encountered by the Council in the recruitment and retention of staff.</p>
1.13	<p><b>Out of County Placements</b></p> <p>As in previous years there is potential for significant numbers of new placements. The service areas within this pooled budget continue to do everything possible to manage these risks and additional investment has already been made to further develop in-house provision to help to mitigate against such financial pressures.</p>
1.14	<p><b>Waste Recycling Infraction Charge</b></p> <p>The Council did not meet the statutory minimum target, (64%) in 2021/22, for the percentage of municipal waste which must be recycled, prepared for re-use and composted, as specified in Section 3 of the Waste (Wales) Measure 2010. Welsh Government (WG) can therefore take steps to impose a penalty on the Council by way of an infraction fine. A potential penalty of up to £0.663m has previously been confirmed.</p> <p>The statutory recycling targets were also not achieved in 2022/23 and 2023/24, which means that further infraction fines of £0.356m and £0.184m respectively could be levied. Therefore, the financial risk across all 3 financial years currently totals £1.203m.</p> <p>WG officials are collating their advice for the minister on the 2021/22 Infraction Charges. We are hopeful we will know the outcome of this in the coming weeks. However, they are yet to start considering the 2022/23 or 2023/24 Infraction Charges so further updates will be provided as further details become available.</p>
1.15	<p><b>Homelessness</b></p> <p>There is a significant and growing demand within the Homelessness service. The Council has a statutory duty to provide suitable temporary accommodation for Homeless persons and families who meet the Welsh Government eligibility criteria which are less stringent than in England.</p>

	<p>The growth in demand commenced in the second half of 2022/23 and has accelerated markedly since the start of 2023.</p> <p>The Council will continue to lobby Welsh Government via the WLGA in conjunction with other Welsh LA's who are experiencing these pressures to seek additional financial support.</p> <p>WG are currently providing support via the No One Left Out grant for which the 2024/25 allocation is currently £0.423m. One favourable impact of the increase in costs and demand is the ability to recover additional Housing Benefit income over and above the amount budgeted which is currently helping to offset the projected overspend by £0.659m.</p>
1.16	<p><b>Other Tracked Risks</b></p> <p>In addition, there are a number of risks being tracked which may be subject to change and these are summarised below.</p>
1.17	<p><b>Medium Term Financial Strategy (MTFS) Impact</b></p> <p>Cabinet considered the latest projection for the MTFS in September which showed a revised budget requirement of £38.420m.</p> <p>Options for solutions to meet the budget requirement are currently being considered and further updates will be provided in Overview and Scrutiny Committees later in October and November.</p> <p>All Portfolios consider their financial position, the risks within their service and the impacts on the Medium Term on a monthly basis as part of their Portfolio Management Team meetings.</p>
1.18	<p><b>Benefits</b></p> <p>Council Tax Reduction Scheme (CTRS) – Based on current demand, costs are currently projected to be £0.723m over budget, although this will be monitored closely throughout the year due to the potential for growth. There is continued high demand across the whole of the Benefits service which is expected to remain the case for the foreseeable future.</p> <p>Other pressures within the service such as meeting income targets for recovery of overpayments and related bad debt provision increases are also expected to remain. The £0.723m can be fully mitigated by use of the Reserve previously set aside.</p>
1.19	<p><b>Harpur Trust vs Brazel Case</b></p> <p>The potential financial impacts are still being determined in response to the Employment Appeal Tribunal (EAT) decision in the case of Harpur Trust v Brazel. The Supreme Court upheld the EAT judgment in the Brazel case in July 2022 which impacts on the calculation of holiday pay entitlements for staff who work for part of the year (i.e., term time). An approved carry forward from 2022/23 for £0.254m has provided some funding towards these costs. There are currently 319 live employment</p>

	tribunal claims in respect of this. The next preliminary hearing is scheduled for 18th October 2024. It is hopeful that we will get to a position where we could seek to settle on 'without prejudice basis'.										
1.20	<p><b>Achievement of Planned In-Year Efficiencies</b></p> <p>The 2024/25 budget contains £14.921m of specific efficiencies which are tracked and monitored throughout the year. The Council aims to achieve a 95% rate in 2024/25 as reflected in the MTFS KPI's and fully achieved all efficiencies in the previous financial year.</p> <p>It is projected that 96% of efficiencies will be achieved in 2024/25 and further details can be seen in Appendix 3.</p>										
1.21	<p><b>Unearmarked Reserves</b></p> <p>The final level of Council Fund Contingency Reserve brought forward into 2024/25 was £2.972m as detailed in the 2023/24 outturn report (subject to audit) elsewhere on this agenda.</p> <p>The Base Level Reserves have been increased to £8.985m by using the remaining balance of £3.216m of the COVID-19 Hardship Fund Reserve from 2023/24.</p> <p>At Month 5 the Contingency Reserve balance was improved with the receipt of a £0.200m reimbursement from Aura Leisure and Libraries for previous income loss funding provided to them by the Council, due to the fact that they have now received alternative funding for this income loss.</p> <p>Taking the current projected final outturn and Earmarked Reserves review into account, the contingency reserve available is £0.337m.</p> <p>As required by Financial Procedure Rules all Portfolios will be expected to identify solutions in-year to mitigate the risks and potential overspends identified in the report.</p>										
1.22	<p><b>Earmarked Reserves</b></p> <p>An review of earmarked reserves has been undertaken at Month 5 and an amount of £0.167m has initially been identified for release to the Contingency Reserve. Further work is ongoing, including a detailed review of service balances and the outcome will be included in the month 6 report.</p> <p>The table below provides a summary of earmarked reserves as at 1 April 2024 and an estimate of projected balances as at the end of the current financial year.</p> <table border="1"> <thead> <tr> <th>Reserve Type</th> <th>Balance as at 01/04/24</th> <th>Balance as at Month 5</th> <th>Release to General Reserve</th> <th>Estimated Balance as at 31/03/25</th> </tr> </thead> <tbody> <tr> <td>Service Balances</td> <td>3,326,381</td> <td>3,116,381</td> <td>0</td> <td>1,118,229</td> </tr> </tbody> </table>	Reserve Type	Balance as at 01/04/24	Balance as at Month 5	Release to General Reserve	Estimated Balance as at 31/03/25	Service Balances	3,326,381	3,116,381	0	1,118,229
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Workforce Costs	843,190	580,218	0	455,046
Investment in Organisational Change	972,142	972,142	0	571,086
County Elections	374,693	374,693	0	0
Warm Homes Admin Fee	294,835	294,835	0	192,156
Design Fees	238,684	238,684	0	238,684
Severe Weather	250,000	250,000	0	0
Car Parking	88,059	88,059	0	0
Insurance Reserves	2,382,509	2,382,509	0	2,575,000
School HWB ICT Replacement	789,670	789,670	0	1,052,893
Flintshire Trainees	321,614	321,614	0	41,548
Rent Income Shortfall	131,118	131,118	0	131,118
Plas Derwen Wave 4	5,339	5,339	0	7,119
Customer Service Strategy	7,468	7,468	0	0
Supervision Fees	48,798	48,798	0	48,798
IT COVID Enquiry	142,301	142,301	0	140,000
IT Infrastructure HWB	139,442	139,442	0	0
Schools Intervention Reserve	51,251	45,008	0	212,490
Organisational Change/ADM	600,560	810,560	0	360,000
NWEAB	690,685	690,685	0	0
Solar Farms	180,192	180,192	0	180,192
Employment Claims	109,846	109,846	0	0
Community Benefit Fund - NWRWTP	913,925	913,925	0	863,925
<b>Total Balances</b>	<b>9,576,321</b>	<b>9,517,106</b>	<b>0</b>	<b>7,070,055</b>
Schools Balances	3,336,011	3,336,011	0	-2,052,149
Grants & Contributions	6,768,522	3,951,636	166,714	1,751,480
<b>TOTAL</b>	<b>23,007,236</b>	<b>19,921,134</b>	<b>166,714</b>	<b>7,887,615</b>

Based on latest information school balances are projected to move into an overall net deficit position. However, this will be subject to change and dependent on a number of factors in the remainder of the year.

1.23

### Summary and Conclusion

This significant projected overspend (and impact on our available reserves) continues to be of major concern and needs to be addressed urgently in an attempt to bring expenditure back in line with the approved budget. Based on current projections the Council only has a very small contingency reserve of £0.337m available to deal with any significant in-year unforeseen events. It should also be noted that there are also still a number of risks identified in the report that could further worsen the Council's financial position.

Therefore, as required by Financial Procedure Rules - Action Plans are being compiled by Social Services, Streetscene and Transportation and Housing and Communities which will detail the reasons for the potential overspends and the measures being put in place to improve the position by the end of the financial year.

	Our ability to mitigate pressures and risks during the financial year will again predominantly centre on review and challenge of non-essential spend and maximising income streams and grant funding. The moratorium on non-contractually committed spend and vacancy management process put in place during 2023/24 will continue throughout 2024/25 and needs to be applied with rigour.
1.24	<b>Housing Revenue Account (HRA)</b>  The 2023/24 Outturn Report to Cabinet on 23rd July 2024 showed an un-earmarked closing balance at the end of 2023/24 of £3.512m and a closing balance of earmarked reserves of £2.471m.
1.25	The 2024/25 budget for the HRA is £42.166m which includes a movement of (£0.193m) from reserves.
1.26	The projected outturn for the HRA shows an in-year revenue expenditure (£0.111m) lower than budget with a closing un-earmarked balance as at 31 <sup>st</sup> March, 2025 of £4.563m, which at 10.94% of total expenditure satisfies the prudent approach of ensuring a minimum level of 3% - see Appendix 5.
1.27	The budget contribution towards capital expenditure (CERA) is £14.467m.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	As set out within the report.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	The financial impacts of the emergency as set out in the report are a combination of actual costs and losses to date and estimates of costs and losses for the future. There is the possibility that the estimates will change over time. The budget will be monitored closely, and mitigation actions taken wherever possible.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	None specific.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1: Council Fund – Movement in Variances from Month 4 Appendix 2: Council Fund – Budget Variances Appendix 3: Council Fund – Programme of Efficiencies

	Appendix 4: Council Fund – Movement on Un-earmarked Reserves Appendix 5: Housing Revenue Account Variances
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<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	Various budget records.

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<p><b>Contact Officer:</b> Dave Ledsham Strategic Finance Manager</p> <p><b>Telephone:</b> 01352 704503</p> <p><b>E-mail:</b> <a href="mailto:dave.ledsham@flintshire.gov.uk">dave.ledsham@flintshire.gov.uk</a></p>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<p><b>Budget:</b> a statement expressing the Council’s policies and service levels in financial terms for a particular financial year. In its broadest sense it includes both the revenue budget and capital programme and any authorised amendments to them.</p> <p><b>Council Fund:</b> the fund to which all the Council’s revenue expenditure is charged.</p> <p><b>Financial Year:</b> the period of twelve months commencing on 1 April.</p> <p><b>Housing Revenue Account:</b> The Housing Revenue Account (HRA) is a local authority account showing current income and expenditure on housing services related to its own housing stock. The account is separate from the Council Fund and trading accounts and is funded primarily from rents and government subsidy.</p> <p><b>Projected Outturn:</b> projection of the expenditure to the end of the financial year, made on the basis of actual expenditure incurred to date.</p> <p><b>Regional Integration Fund (RIF):</b> Funding provided by Welsh Government to encourage integrated working between local authorities, health and housing.</p> <p><b>Reserves:</b> these are balances in hand that have accumulated over previous years and are held for defined (earmarked reserves) and general (general reserves) purposes. Councils are required to regularly review the level and purpose of their reserves and to take account of the advice of the Chief Finance Officer.</p> <p><b>Revenue:</b> a term used to describe the day-to-day costs of running Council services and income deriving from those services. It also includes charges</p>

for the repayment of debt, including interest, and may include direct financing of capital expenditure.

**Variance:** difference between latest budget and actual income or expenditure. Can be to date if reflecting the current or most up to date position or projected, for example projected to the end of the month or financial year.

**Virement:** the transfer of budget provision from one budget head to another. Virement decisions apply to both revenue and capital expenditure heads, and between expenditure and income, and may include transfers from contingency provisions. Virements may not however be approved between capital and revenue budget heads.

## Council Fund Variances

MONTH 5 - SUMMARY  
2024/25

Service	Movement between Periods (£m)	Narrative for Movement between Periods greater than £0.025m
<b>Social Services</b>		
<b>Older People</b>		
Localities	0.395	Demands on older peoples care services are leading to increased costs. This includes pressures from ensuring safe hospital discharges, this pressure will likely increase during winter. The residential care service cost has increased by £0.196m and the domiciliary service increased by £0.190m. Minor variances account for the balance.
Minor Variances	0.009	
<b>Adults of Working Age</b>		
Resources & Regulated Services	-0.350	Costs increased through changes in needs and resulting care package alterations by £0.681m. A change to the policy to reduce the level of balances which are held in Direct Payment accounts has reduced the projected spend by £1.031m.
Children to Adult Transition Services	-0.086	Reduction to projected care package costs.
Residential Placements	0.070	Increased care package costs.
Minor Variances	-0.018	
<b>Children's Services</b>		
Residential Placements	0.216	Costs have increased due to a regrading of care staff posts and increased staffing to meet the necessary care needs.
Professional Support	0.296	Successful recruitment has led to additional projected costs of £0.160m for staff. Some additional agency staff were required and the cost impact of these is estimated at £0.115m. There is also an increase to Direct Payments of £0.043m, but a reduction to the Leaving Care budget of £0.029m. There is £0.007m in minor variances.
Minor Variances	0.014	
<b>Safeguarding &amp; Commissioning</b>		
Minor Variances	0.004	
<b>Total Social Services (excl Out of County)</b>	<b>0.552</b>	
<b>Out of County Placements</b>		
Children's Services	0.372	Numerous residential/UASC placements added to placement caseload
Education & Youth	-0.095	Projected expenditure adjusted to ensure invoices paid prior to the financial year end are correctly accounted for in 2025/26. Current placement caseload remains.
<b>Total Out of County Placements</b>	<b>0.277</b>	
<b>Education &amp; Youth (Non-Schools)</b>		
Inclusion & Progression	-0.048	Movement due to offsetting a further £0.050m from the LAEG ALN Provision Grant (Local Authority Education Grant - Additional Learning Needs) against the Creative In Excellence costs for pupils who have been permanently excluded or not attending mainstream school due to medical reasons.
Minor Variances	-0.048	
<b>Total Education &amp; Youth (Non-Schools)</b>	<b>-0.096</b>	
<b>Schools</b>	<b>0.001</b>	
<b>Streetscene &amp; Transportation</b>		
Service Delivery	0.141	The achievable income from Non-Household Waste has further reduced following Member recommendations and a change to the original proposal.
Highways Network	0.027	Impact of Street lighting Energy Costs Increasing.
Transportation	-0.127	Maximising 20mph scheme grant funding income by recharging Officer Time and Staff Costs.
Regulatory Services	-0.052	Mix of Vacancy savings and Staff costs Recharges.
<b>Total Streetscene &amp; Transportation</b>	<b>-0.012</b>	
<b>Planning, Environment &amp; Economy</b>		
Business	-0.028	Delays in the recruitment process means that projected expenditure has reduced
Management & Strategy	-0.091	Review of commitments for Staff Costs and vacancy savings part year
Minor Variances	-0.008	
<b>Total Planning &amp; Environment</b>	<b>-0.127</b>	
<b>People &amp; Resources</b>		
HR & OD	0.008	
Corporate Finance	-0.058	Vacancy savings following staff movements across the Service
<b>Total People &amp; Resources</b>	<b>-0.050</b>	
<b>Governance</b>		
Legal Services	-0.042	Reduction in the estimated cost of Locum Services projected to March, 2025.
ICT	0.040	Revised commitments for software and licensing costs projected to March, 2025
Minor Variances	-0.023	
<b>Total Governance</b>	<b>-0.024</b>	
<b>Assets</b>		
Minor Variances	-0.042	
<b>Total Assets</b>	<b>-0.042</b>	
<b>Housing and Communities</b>		
Housing Solutions	-0.177	A positive movement as a result of a reduction in the number of temporary accommodation placements in August
<b>Total Housing and Communities</b>	<b>-0.177</b>	
<b>Chief Executive's</b>	<b>0.007</b>	
<b>Central &amp; Corporate Finance</b>	<b>-0.101</b>	At Month 5 a further £0.120m favourable movement in the Central Loans & Investment Account (CLIA) has been identified following a further review. This is mitigated in part due to increasing bank charges following the revised Contract with Worldpay.
<b>Grand Total</b>	<b>0.208</b>	

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## Budget Monitoring Report 2024/25 - Month 5

Service	Approved Budget (£m)	Projected Outturn (£m)	Annual Variance (£m)	Last Month Variance (£m)	Moratorium related Savings (£m)	Cause of Major Variances greater than £0.050m	Action Required
<b>Social Services</b>							
<b>Older People</b>							
Localities	24.534	25.591	1.057	0.662		Residential care costs for older people are projecting an overspend of £0.603m due to demands for this service. This amount is net of client income from property recharges and reimbursements for deputyships and assets held in trust. Homecare is £0.391m overspent. Localities workforce and professional support budgets are overspent by £0.038m and day care is overspending by £0.015m. There is a real risk that cost will escalate as pressure to minimise stays in hospitals continues. This risk will increase as we enter the winter period.	To mitigate expected escalating costs and number policies are being reviewed and amended to maximise financial benefit and reduce costs
Resources & Regulated Services	10.010	9.900	-0.110	-0.118		In-house residential care is projecting an overspend by £0.328m due to employee and running costs. Homecare is predicted to underspend by £0.435m, although demand is high it cannot be met due to recruitment challenges. The Extra Care budget is expected to overspend by £0.108m due to employee costs and day care will underspend by £0.111m.	
Minor Variances	1.511	1.513	0.002	0.002			
<b>Adults of Working Age</b>							
Resources & Regulated Services	36.195	36.300	0.105	0.454		The PDSI (physical disability and sensory impaired) budget is reporting a £0.106m underspend due to costs of care packages. The in-house supported living service is £0.348m overspent due to care hours and agency costs. The care package costs for independently provided care for learning disability services is £0.042m underspent. The learning disability day and work provision service is £0.096m underspent.	Any requests for increases to care packages are reviewed by a panel. Current care packages are being reviewed to ensure the right level of care is provided
Children to Adult Transition Services	0.848	1.021	0.173	0.259		This is the costs of care packages for young adults transferring from Childrens Services to Adult Social Care services. Care packages are usually new within the financial year and initial estimates are made for the costs. When the care packages are agreed there can be variances against the initial estimate. This year some confirmed care packages have already been confirmed as higher than the initial estimate.	
Professional and Administrative Support	0.458	0.369	-0.089	-0.082	-0.089	This underspend is due to staff vacancies.	
Transition & Disability Services Team	0.984	0.932	-0.052	-0.053		Additional funding has been recieved	
Supporting People	-0.386	-0.487	-0.101	-0.101	-0.100	Additional Supporting People funding is expected this year	
Residential Placements	2.729	2.801	0.072	0.001		This is due to care placements and packages for people with mental ill health	
Minor Variances	3.299	3.257	-0.042	-0.031			
<b>Children's Services</b>							
Integrated Working	0.200	0.252	0.053	0.058		There are increased costs this year, mostly for advocacy costs	
Family Support	0.412	0.462	0.050	0.043		This is a demand led service which is currently high	
Legal & Third Party	0.283	0.755	0.471	0.461		Legal costs are overspent by £0.209m due to the number of cases going through the courts and some use of external professionals. Client support and Section 17 costs are overspent by £0.163m and Direct Payments are overspent by £0.099m.	
Residential Placements	1.856	1.699	-0.157	-0.374		The Childrens Services in-house residential care provision continues to expand and is in receipt of a Welsh Government grant which is offsetting costs.	

## Budget Monitoring Report 2024/25 - Month 5

Service	Approved Budget (£m)	Projected Outturn (£m)	Annual Variance (£m)	Last Month Variance (£m)	Moratorium related Savings (£m)	Cause of Major Variances greater than £0.050m	Action Required
Professional Support	6.228	7.483	1.255	0.960		To support adequate levels of child protection the established structure needs to be at a sufficient level to meet mandatory safeguarding standards. Vacancies are to be minimised where possible and temporary posts are sometimes required to be able to continue meeting the challenges and demands of Childrens Services. Two managed agency teams were contracted to support the service, one of these teams has ceased and the other is planned to finish later this year. The associated costs are £0.934m. This is being partially mitigated from underspends mostly from vacancies of £0.264m. The Leaving Care budget which supports young people who are Looked After Children, is overspending by £0.400m due to increased care leavers which includes unaccompanied asylum seeking children (UASC). The costs of some external contracts are £0.074m overpent due to inflationary pressures. Costs of Direct Payments to provide suport to children with disabilities are £0.111m overspent due to demand.	Alternative accomodation for UASC is being explored and cheaper rates have been negotiated with a current accomodation provider
Minor Variances	3.665	3.655	-0.010	-0.013			
<b>Safeguarding &amp; Commissioning</b>							
Charging Policy income	-3.505	-3.595	-0.090	-0.090		This is income from service users who are charged a contribution to their care.	
Minor Variances	2.726	2.842	0.116	0.112			
<b>Total Social Services (excl Out of County)</b>	<b>92.047</b>	<b>94.749</b>	<b>2.702</b>	<b>2.150</b>	<b>-0.189</b>		
<b>Out of County Placements</b>							
Children's Services	13.795	15.065	1.270	0.898		Detailed projections show a significant overspend within the Out of County pooled budget as a result of the following:- an increase in the number of new placements agreed in-year and fees incurred to external providers. The overspend includes no further contingency and is projected based on current caseload only.	
Education & Youth	5.504	5.605	0.101	0.196		Detailed projections show a significant overspend within the Out of County pooled budget as a result of the following:- an increase in the number of new placements agreed in-year and fees incurred to external providers. The overspend includes no further contingency and is projected based on current caseload only.	
<b>Total Out of County Placements</b>	<b>19.299</b>	<b>20.671</b>	<b>1.372</b>	<b>1.094</b>	<b>0.000</b>		
<b>Education &amp; Youth (Non-Schools)</b>							
Inclusion & Progression	5.650	5.910	0.260	0.313		Previous in year pressure of £0.247m against Creative In Excellence costs, has now been reduced by £0.100m by maximising the Additional Learning Needs grant. The balance of the pressure relates to Canolfan Enfys of £0.117m. This is due to an increase in staff due to increased pupil numbers. There has also been a reliance on agency staff due to long term sickness.	
Integrated Youth Provision	0.918	0.864	-0.053	-0.035	-0.050	Recruitment delays, enabling grant utilisation against trainee costs. Income generation increases on room hire.	
School Planning & Provision	0.625	0.565	-0.060	-0.040	-0.060	Reduction in expenditure from transition budget due to delayed Capital Projects and reduction in the number of mobile classrooms	
Minor Variances	2.956	2.946	-0.010	-0.005	-0.010		
<b>Total Education &amp; Youth (Non-Schools)</b>	<b>10.148</b>	<b>10.285</b>	<b>0.137</b>	<b>0.233</b>	<b>-0.120</b>		
<b>Schools</b>	<b>117.302</b>	<b>117.120</b>	<b>-0.182</b>	<b>-0.183</b>		The variance primarily relates to the following:- Free School Meals (FSM) budget - (£0.114m) underspend, due to meal take up and levels of eligible FSM children. The Unallocated budget containing Added Years and Copyright Licenses indicates a (£0.124m) underspend. The above underspends are offset by a number of insignificant adverse variances within Primary and Secondary non-delegated, totalling £0.055m.	
<b>Streetscene &amp; Transportation</b>							



## Budget Monitoring Report 2024/25 - Month 5

Service	Approved Budget (£m)	Projected Outturn (£m)	Annual Variance (£m)	Last Month Variance (£m)	Moratorium related Savings (£m)	Cause of Major Variances greater than £0.050m	Action Required
Service Delivery	8.567	9.567	1.000	0.859		Significant variance of £0.400m in highways maintenance costs, £0.200m Alltami depot running costs increased. Method Statements have been submitted for both budget pressures above. Budget efficiency pressure of £0.400m in total related to HRCs (charging and trade waste) implementation date later than initially planned. Income from Workplace Recycling Regulations legislative changes is lower than anticipated.	
Highways Network	11.674	12.141	0.467	0.440		Winter Maintenance costs of £0.300m are forecast to escalate for the provision of equipment, labour and salt usage, which have seen significant year-on-year inflation, plus fleet hire costs have increased compared to the previous contract arrangement. A report is to be presented to Cabinet to consider the delivery of efficiencies relating to decision making on marginal weather forecasts. Street-lighting energy cost increases of £0.100m.	We continue to investigate options to reduce Winter Maintenance procurement costs and ensure appropriate income/funding in preparation for the start of the 2024/25 winter season.
Transportation	11.023	11.183	0.161	0.287	-0.120	School Transport significant variances due to transport contractor costs increasing driven by inflation and cost of living (fuel, energy, insurance, wages). Additional routes for increased demand for SEN/ALN transport is also having an impact. Social Services Transport costs increased due to recent procurement and additional adult social services requests for transport. Bereavement Services reporting an income pressure of £0.057m, compared to increased income targets. Public transport subsidies also increased following re-procurement. Variance reduced at Month 5 due to Maximising 20mph scheme grant funding income by recharging Officer Time and Staff Costs.	
Regulatory Services	11.432	11.828	0.396	0.448	-0.052	The overspend variance is mainly due to increasing volumes of residual waste being collected along with gate fee indexation inflation, increased tipping and gate fees for some recyclable waste, together with the reduction in income levels for both recyclable materials and electricity generation from gas and solar at the former landfill sites. Variance reduced at Month 5 due to vacancy savings and Staff cost Recharges.	
Other Minor Variances	0.000	0.000	0.000	0.000			
<b>Total Streetscene &amp; Transportation</b>	<b>42.695</b>	<b>44.719</b>	<b>2.024</b>	<b>2.035</b>	<b>-0.172</b>		
<b>Planning, Environment &amp; Economy</b>							
Business	2.327	2.156	-0.171	-0.144	-0.171	Part year vacancy savings, the recruitment process has commenced	
Development	-0.200	0.009	0.209	0.207		Fee income estimated shortfall in Building Control, Land Charges and Planning	
Access	1.591	1.718	0.127	0.126		Commitment for the cost Ash Die Back tree works £0.120m projected to March, 2025	
Regeneration	0.711	0.650	-0.061	-0.053		Part year savings from Grant Maximisation in reallocating staff costs to numerous Grant schemes	
Management & Strategy	1.897	1.801	-0.096	-0.005	-0.096	Part year vacancy savings which with delays in the recruitment process have manifested reduced expenditure	
Minor Variances	1.355	1.388	0.033	0.036			
<b>Total Planning &amp; Environment</b>	<b>7.682</b>	<b>7.722</b>	<b>0.040</b>	<b>0.168</b>	<b>-0.267</b>		
<b>People &amp; Resources</b>							
HR & OD	2.211	2.265	0.054	0.046		Historic Business Efficiency for DBS Checks unrealised	
Corporate Finance	2.080	1.925	-0.154	-0.096	-0.104	Part year vacancy savings	
<b>Total People &amp; Resources</b>	<b>4.290</b>	<b>4.190</b>	<b>-0.100</b>	<b>-0.050</b>	<b>-0.104</b>		
<b>Governance</b>							
Customer Services	0.985	0.869	-0.116	-0.113		Part year vacancy savings and fee income over recovery in Registrars	
Revenues	0.371	0.212	-0.159	-0.138		Potential Surplus on the Council Tax Collection Fund	
Minor Variances	10.710	10.666	-0.045	-0.044	-0.040		
<b>Total Governance</b>	<b>12.066</b>	<b>11.747</b>	<b>-0.319</b>	<b>-0.295</b>	<b>-0.040</b>		
<b>Assets</b>							

## Budget Monitoring Report 2024/25 - Month 5

Service	Approved Budget (£m)	Projected Outturn (£m)	Annual Variance (£m)	Last Month Variance (£m)	Moratorium related Savings (£m)	Cause of Major Variances greater than £0.050m	Action Required
Minor Variances	11.403	11.402	-0.001	0.041			
<b>Total Assets</b>	<b>11.403</b>	<b>11.402</b>	<b>-0.001</b>	<b>0.041</b>	<b>0.000</b>		
<b>Housing and Communities</b>							
Housing Solutions	4.309	6.872	2.563	2.741		Anticipated £2.563m overspend for the service. Temporary accommodation costs anticipated to be £3.538m overspent, offset with an increase in the HB Income collected (£0.635m) and NOLO Grant of (£0.423m). £0.075m overspend on the Homeless Hub	
Minor Variances	13.852	13.851	-0.002	-0.002			
<b>Total Housing and Communities</b>	<b>18.161</b>	<b>20.723</b>	<b>2.562</b>	<b>2.739</b>	<b>0.000</b>		
<b>Chief Executive's</b>							
	1.641	1.625	-0.016	-0.023	-0.016		
<b>Central &amp; Corporate Finance</b>							
	31.372	29.115	-2.257	-2.156		The initial projection on the Central Loans and Investment Account (CLIA) for the 2024/25 indicates an underspend of (£0.250m) as the trend from previous years continues with reduced short term borrowing costs and income from investments in line with current bank interest rates. This is mitigated by potential shortfalls in Corporate windfall income targets based on actual receipts to date. As a result of the refinancing of Enfinium Group Ltd into Enfinium Parc Adfer Ltd, there is a gainshare benefit to all partner authorities within the North Wales Residual Waste Partnership. Flintshire's estimated gainshare from this undertaking is £2.108m, net of fees. A commitment has been included to fund the on-going clean-up from the impact of fly tipping at land adjacent to the Riverside Site, Queensferry at a current cost of £0.091m that includes the machine hire, transport and manpower related to the necessary works. At Month 5 following a review on the CLIA a further £0.120m favourable variance has been identified.	
<b>Grand Total</b>	<b>368.106</b>	<b>374.068</b>	<b>5.962</b>	<b>5.754</b>	<b>-0.908</b>		

2024/25 Efficiencies Outturn Tracker - Month 5

Efficiency Description	Accountable Officer	Efficiency Target	Projected Efficiency	(Under)/Over Achievement	Efficiency Open/Closed (O/C)	Confidence in Achievement of Efficiency - Based on (see below) R = High Assumption A = Medium Assumption G = Figures Confirmed	Reason for variation	Mitigating Action if Amber or Red
		2024/25 £m	2024/25 £m	2024/25 £m				
<b>Portfolio</b>						R		
<b>Corporate</b>						A		
Actuarial Review	Portfolio budget reductions	Gary Ferguson	4.000	4.000	0.000	C	G	
Central Loans and Investment Account	Increased income/reduced borrowing	Chris Taylor	1.000	1.000	0.000	C	G	
Additional Income from Fastrack Project	Portfolios	Debbie Griffiths	0.018	0.018	0.000	O	G	
<b>Total Corporate Services</b>			<b>5.018</b>	<b>5.018</b>	<b>0.000</b>			
<b>Assets</b>								
Strategic Funding		Damian Hughes	0.028	0.028	0.000	O	G	
Rent Review - Commercial Assets		Damian Hughes	0.021	0.021	0.000	O	G	
Valuation & Estates	Restructure	Damian Hughes	0.010	0.010	0.000	O	G	
<b>Assets - ADMs</b>			<b>0.059</b>	<b>0.059</b>	<b>0.000</b>			
ADM Budget	Reduction in ADM Budget	Rachael Corbelli	0.065	0.065	0.000	O	G	
Review of External Partners		Rachael Corbelli	0.087	0.087	0.000	O	G	
<b>Total Assets - ADMs</b>			<b>0.152</b>	<b>0.152</b>	<b>0.000</b>			
<b>Chief Executives</b>								
Executive Office	Reduction in Promotions Budget	Joanne Pierce	0.010	0.010	0.000	C	G	Budget Removed
IT - Mobile Phone contract	Chief Executive's element	Joanne Pierce	0.001	0.001	0.000	C	G	Budget Removed
<b>Total Chief Executives</b>			<b>0.011</b>	<b>0.011</b>	<b>0.000</b>			
<b>People &amp; Resources</b>								
Corporate Finance	Reduction in Staffing	Gary Ferguson	0.104	0.104	0.000	C	G	Budget Removed
Feasibility Study budget	Reduction in Budget	Gary Ferguson	0.050	0.050	0.000	C	G	Budget Removed
HR & OD	Reduction in TU facilities budget	Sharon Carney	0.030	0.030	0.000	C	G	Budget Removed
Flintshire Trainees	Recruitment Freeze 2024/25	Sharon Carney	0.138	0.138	0.000	C	G	Budget Removed
<b>Total People &amp; Resources</b>			<b>0.322</b>	<b>0.322</b>	<b>0.000</b>			
<b>Governance</b>								
RSA Tags	Governance element	Gareth Owen	0.003	0.003	0.000	C	G	Budget Removed
Fees & Charges Review 2023 - Registration Services	Increased income from 2023 Review	Gareth Owen	0.002	0.002	0.000	C	G	Fee Income expected to meet target
Discretionary Rate Relief		Gareth Owen	0.004	0.004	0.000	C	G	Budget Removed
Internal Audit	Removal of Vacant Posts	Gareth Owen	0.104	0.104	0.000	C	G	Budget Removed
IT - Equipment reduction in requirements		Gareth Owen	0.018	0.018	0.000	C	G	Budget Removed
IT - Mobile Phone contract	Governance element	Gareth Owen	0.015	0.015	0.000	C	G	Budget Removed
Contact Centre	Reduction in budget	Gareth Owen	0.010	0.010	0.000	C	G	Budget Removed
Single Person Discount Review 24/25		Gareth Owen	0.250	0.250	0.000	C	G	Achieved
Procurement	Reduction in contribution	Gareth Owen	0.009	0.009	0.000	C	G	Budget Removed
HRA Recharging	Management Costs Apportionment	Gareth Owen	0.027	0.027	0.000	C	G	Recharge at increased rate agreed with HRA
Granicus	GovDelivery	Gareth Owen	0.025	0.025	0.000	C	G	Budget Removed
Registration Services		Gareth Owen	0.040	0.040	0.000	C	G	Fee Income expected to meet target
Graphic Design		Gareth Owen	0.039	0.039	0.000	C	G	Removal of posts Sept 2024
<b>Total Governance</b>			<b>0.546</b>	<b>0.546</b>	<b>0.000</b>			
<b>Planning, Environment &amp; Economy</b>								
Fees & Charges Review 2023	Increased income from 2023 Review	Andrew Farrow	0.050	0.050	0.000	O	A	Dependant on actual fee income levels received in year
Fees & Charges Review 2024	Increased income from 2024 Review	Andrew Farrow	0.017	0.017	0.000	O	A	Dependant on actual fee income levels received in year
IT - Mobile Phone contract	PE&E element	Andrew Farrow	0.008	0.008	0.000	C	G	Budget Removed
Planning Fee Income	Fee Income Target Increase	Andrew Farrow	0.295	0.295	0.000	O	A	Dependant on actual fee income levels received in year
Ambition North Wales Contribution	Budget Saving	Andrew Farrow	0.035	0.035	0.000	C	G	Budget Removed
Wales Rally GB	Budget Saving	Andrew Farrow	0.030	0.030	0.000	C	G	Budget Removed
<b>Total Planning, Environment &amp; Economy</b>			<b>0.435</b>	<b>0.435</b>	<b>0.000</b>			
<b>Streetscene &amp; Transportation</b>								
Cash in Transit - reduced costs	Part of transition to Card and App payments at car parks	Katie Wilby	0.012	0.012	0.000	O	G	Efficiency originated by Revenues but operated by S&T
Fees & Charges Review 2023 - Green Waste	Increased income from 2023 Review	Katie Wilby	0.099	0.099	0.000	O	G	
Fees & Charges Review 2023 - Car Parking	Increased income from 2023 Review	Katie Wilby	0.063	0.063	0.000	O	G	
Fees & Charges Review 2023 - Bersavement Services	Increased income from 2023 Review	Katie Wilby	0.033	0.033	0.000	O	G	
Fees & Charges Review 2024 - Bersavement Services	Increased income from 2024 Review	Katie Wilby	0.012	0.012	0.000	O	G	
IT - Mobile Phone contract	S&T element	Katie Wilby	0.011	0.011	0.000	C	G	
Part time opening of HWRC's		Katie Wilby	0.250	0.225	(0.025)	O	A	HWRC sites open over part of the week rather than the full 7 days e.g. Friday to Monday. Savings would come from labour. Security of sites could become an issue when they are closed, which could incur additional costs. Fly tipping could increase as a result of the part-time closure (as happened during the pandemic) and there may be an impact on residual waste tonnages as residents seek to divert the waste to other collection methods. Started on 6th May hence £25k shortfall of Efficiency pressure.
Review/reduce service standards	Grass cutting etc.	Katie Wilby	0.025	0.025	0.000	O	G	Range of grass cutting and grounds maintenance operations in place, which vary from external contracted services on highway verges, roundabouts and central reservations, weed spraying, tenant gardens and school grounds to our own in-house service delivery for amenity areas and public open spaces, such as car parks, cemeteries, leisure centres, libraries, Council offices and housing estates, town centres, sheltered housing, bus stops and play areas and playing fields, nature conservation areas. This proposal would see all grass cutting operations externalised through a contract.

Efficiency Description		Accountable Officer	Efficiency Target	Projected Efficiency	(Under)/Over Achievement	Efficiency Open/Closed (O/C)	Confidence in Achievement of Efficiency - Based on (see below) High Assumption A = Medium Assumption G = Figures Confirmed	Reason for variation	Mitigating Action if Amber or Red
			2024/25 £m	2024/25 £m	2024/25 £m		R A		
<b>Portfolio</b>									
Review/reduce service standards	Cemetery maintenance	Katie Wilby	0.025	0.025	0.000	O	G	Discretionary service - savings would come from reduction in labour, plant and materials. Likely to generate complaints from members of the public. Previously considered transferring responsibility to Town/Community Councils, but no appetite or capacity to take this on.	
Introduce Night Working		Katie Wilby	0.025	0.025	0.000	O	G	Streetscene introduced an evening shift in 2012. A small number of people work through the night (365 days a year) dealing with emergencies and small amounts of planned works. The proposal will see this level of work increase with operations such as gully emptying, town centre sweeping etc. carried out during the evening and overnight period. The saving will be generated by a reduction in plant and equipment. Impact on communities due to evening and night working. Workforce/Trade Union support will be required. There was a lack of appetite to continue when previously introduced and unable to recruit or maintain staff on a night time shift, due to the unsocial hours	
Reduce cleansing standards and enforce zero balance for littering		Katie Wilby	0.030	0.030	0.000	O	G	Potential consequential impact on littering and fly tipping, which would require additional resources for enforcement.	
In-house services e.g. weed spraying, traffic management		Katie Wilby	0.035	0.035	0.000	O	G	Cost-benefit assessment to be undertaken to assess whether in-house provision would be more cost efficient than a contracted service	
Full cost recovery for supporting community events		Katie Wilby	0.010	0.010	0.000	O	G	Introduce a charge for providing support for community events for road closures, such as fairs, festivals, street parties etc. Currently, costs are approx. £25k per annum. The charge would help to mitigate the cost.	
Reduce non essential services on Bank Holidays (x5)		Katie Wilby	0.077	0.077	0.000	O	G	Stand 85% of Grounds, Highways, Streetlighting, Cleansing on 5 Bank Holidays per year. Currently, operations for these services continue on public holidays. Savings would come from the reduction in overtime.	
Charging for DIY Waste streams at HWRC's		Katie Wilby	0.300	0.075	(0.225)	O	A	A number of local authorities charge for DIY waste streams, such as soil, rubble, plasterboard and waste wood, as these waste streams are costly to treat and dispose, which is no longer sustainable or affordable. Charging would ensure cost recovery of these non-household waste streams.	August Implementation Date - Further delayed
Remove vacancies for Schools Crossing Patrols		Katie Wilby	0.084	0.084	0.000	O	G	The portfolio currently has vacancies for crossing patrol officers within the road safety team, which could be given up.	
Remove Officer vacancies across the Portfolio		Katie Wilby	0.294	0.294	0.000	O	G	2 x Transport Strategy Officers; 1 x Road Safety Officer; 1 x Business Manager; 1 x Support Services Officer; 1 x Enforcement Officer; 1 x Waste Disposal Manager.	
Charge for Trade Waste at one HRC site		Katie Wilby	0.200	0.050	(0.150)	O	A	A number of local authorities currently provide a facility for commercial traders and businesses to dispose of their waste through a chargeable service. There is the potential to designate one of the Council's HRC sites for trade waste only for the receipt of other chargeable recyclable materials (wood, soil, rubble, green waste etc) from businesses.	August Implementation Date - Further delayed
Increase fees for Bulky Waste		Katie Wilby	0.010	0.010	0.000	O	G	Currently charge for bulky waste collections. The fee could be increased in line with inflation (by £5 per collection).	
Reduce SmartClient for Technical Support		Katie Wilby	0.025	0.025	0.000	O	G	ground surveys. Reduce budget available.	
Winter Maintenance Review of Weather Stations for 2024/25		Katie Wilby	0.025	0.025	0.000	O	G	Review is already underway for the use of route-based forecasting or domain-based forecasting instead of the current approach	
<b>Total Streetscene &amp; Transportation</b>			<b>1.644</b>	<b>1.244</b>	<b>(0.400)</b>				
<b>Social Services</b>									
Fees & Charges Review 2023	Increased income from 2023 Review	Craig Macleod	0.063	0.063	0.000	O	G		
Fees & Charges Review 2024	Increased income from 2024 Review	Craig Macleod	0.021	0.021	0.000	O	G		
RSA Tags	Social Services element	Craig Macleod	0.002	0.002	0.000	O	G		
IT - Mobile Phone contract	Social Services element	Craig Macleod	0.046	0.011	(0.035)	O	A		
	Reduction to contract with Newydd	Craig Macleod	0.100	0.050	(0.050)	O	A	The efficiency is a high proportion of the total cost of mobile units in 2023/24 and unlikely it will be achieved in full. Negotiations are ongoing with Newydd and the reduction has not yet been agreed. As we are several months into the financial year the full amount will not be achieved in 2024/25.	
Newydd Cleaning Contracts									
Reduce Regional Contribution	Reduction to in-year contribution to Regional Team	Craig Macleod	0.025	0.025	0.000	O	G		
Extra BCUHB contribution to Marleyfield	Additional income from BCUHB for hospital discharge beds	Craig Macleod	0.040	0.040	0.000	O	G		
Service Review	Reduction in posts		0.075	0.035	(0.040)	O	A	This is dependent on natural wastage of posts which can then be deleted. This will occur within the financial year and so the efficiency will not likely be achieved in full this financial year.	
Vacancy Management	In-year vacancy savings	Craig Macleod	0.100	0.100	0.000	O	G		
Increase to Income budget	Older People Commissioning	Craig Macleod	0.050	0.050	0.000	O	G		
Disability Day Service	Reduced budget	Craig Macleod	0.040	0.040	0.000	O	G		
Appointeeship service charging	Increased income	Craig Macleod	0.050	0.025	(0.025)	O	A	There will be a requirement for a consultation with stakeholders meaning the efficiency will be unable to be implemented at the start of the financial year and will likely be towards the midway point.	
Additional Contributions for residential care from BCUHB	Additional income from BCUHB for hospital discharge beds	Craig Macleod	0.010	0.010	0.000	O	G		
Efficiencies to Planned Contracts with Third Sector	Reduced expenditure	Craig Macleod	0.020	0.020	0.000	O	G		
Grant Maximisation		Craig Macleod	0.100	0.100	0.000	O	G		
Reduced NEWCES contribution	Reduced expenditure	Craig Macleod	0.010	0.010	0.000	O	G		
Grant funding for Adult Social Services	2024/25 only	Craig Macleod	0.100	0.100	0.000	O	G		
Disability services	Charging for college placements pending financial assessments	Craig Macleod	0.020	0.020	0.000	O	G		
<b>Total Social Services</b>			<b>0.872</b>	<b>0.722</b>	<b>(0.150)</b>				
<b>Housing &amp; Communities</b>									
RSA Tags	Housing & Communities element	Vicky Clark	0.001	0.001	0.000	O	G		

Efficiency Description	Accountable Officer	Efficiency Target	Projected Efficiency	(Under)/Over Achievement	Efficiency Open/Closed (O/C)	Confidence in Achievement of Efficiency - Based on (see below) R = High Assumption A = Medium Assumption G = Figures Confirmed	Reason for variation	Mitigating Action if Amber or Red
<b>Portfolio</b>		<b>2024/25</b>	<b>2024/25</b>	<b>2024/25</b>		<b>R</b>		
		<b>£m</b>	<b>£m</b>	<b>£m</b>		<b>A</b>		
IT - Mobile Phone contract	Housing & Communities element	Vicky Clark	0.009	0.009	0.000	C	G	Use of the Reserve in 2024/25 instead of base budget pressure
CTRS Reduction	Budget Reduction	Vicky Clark	0.254	0.254	0.000	O	G	
<b>Total Housing &amp; Communities</b>			<b>0.264</b>	<b>0.264</b>	<b>0.000</b>			
<b>Education &amp; Youth</b>								
Fees & Charges Review 2023 - Integrated Youth Service	Increased income from 2023 Review	Claire Homard	0.001	0.001	0.000	O	G	
Fees & Charges Review 2024 - Integrated Youth Service	Increased income from 2024 Review	Claire Homard	0.001	0.001	0.000	O	G	
RSA Tags	Education & Youth element	Claire Homard	0.007	0.007	0.000	O	G	
IT - Mobile Phone contract	Education & Youth element	Claire Homard	0.005	0.005	0.000	C	G	
GWE - Reduction in Contribution		Claire Homard	0.099	0.099	0.000	O	G	
Early Entitlement	Reduced numbers accessing Early Entitlement	Claire Homard	0.075	0.075	0.000	O	G	
Adult Community Learning	Income generation	Claire Homard	0.010	0.010	0.000	O	G	
Youth Services	Buildings Asset transfer of some buildings	Claire Homard	0.032	0.032	0.000	O	G	
Business Support Review		Claire Homard	0.032	0.032	0.000	O	G	
School Planning & Provision	Mobile Classrooms	Claire Homard	0.010	0.010	0.000	O	G	
School Planning & Provision	Transition Funding	Claire Homard	0.010	0.010	0.000	O	G	
Inclusion & Progression	Contribution towards PEP Caseworker	Claire Homard	0.020	0.020	0.000	O	G	
<b>Total Education &amp; Youth</b>			<b>0.302</b>	<b>0.302</b>	<b>0.000</b>			
<b>Schools</b>								
Utility Costs		Claire Homard	0.600	0.600	0.000	O	G	
School Demography		Claire Homard	0.675	0.675	0.000	O	G	
3% Reduction in Delegated Funding		Claire Homard	3.273	3.273	0.000	O	G	
Remove Schools Deficit Subsidy for 1 year		Claire Homard	0.750	0.750	0.000	C	G	
<b>Total Schools</b>			<b>5.298</b>	<b>5.298</b>	<b>0.000</b>			
<b>Total 2024/25 Budget Efficiencies</b>			<b>14.921</b>	<b>14.372</b>	<b>(0.550)</b>			

	%	£
<b>Total 2024/25 Budget Efficiencies</b>	<b>100</b>	<b>14.921</b>
<b>Total Projected 2024/25 Budget Efficiencies Underachieved</b>	<b>-4</b>	<b>(0.550)</b>
<b>Total Projected 2024/25 Budget Efficiencies Achieved</b>	<b>96</b>	<b>14.372</b>
<b>Total 2024/25 Budget Efficiencies (Less Previously agreed Decisions)</b>	<b>100</b>	<b>0.000</b>
<b>Total Projected 2024/25 Budget Efficiencies Underachieved</b>	<b>0</b>	<b>0.000</b>
<b>Total Projected 2024/25 Budget Efficiencies Achieved</b>	<b>0</b>	<b>0.000</b>

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**Movements on Council Fund Unearmarked Reserves**

	£m	£m
Total Reserves as at 1 April 2024	15.271	
Less - Base Level	(8.985)	
<b>Total Reserves above base level available for delegation to Cabinet</b>		6.286
Less - Children's Services Legal Costs		(0.142)
Less - Approved "Budget Risk" Reserve 2024/25		(3.000)
Less - Approved Time Limited Pressures 2024/25		(0.172)
Add - Transfer to Reserve Budget 2024/25		0.437
Add - Reimbursement from Aura Leisure and Libraries		0.200
Less - Cambrian Aquatics approved funding		(0.200)
Less - Provision of Free School Meals payment to eligible children during the summer school holidays		(0.277)
Less - estimated impact of the pay award		0.000
Add- Review of Earmarked Reserves at Month 5		0.167
Less - Month 5 projected outturn		(2.962)
<b>Total Contingency Reserve available for use</b>		<b>0.337</b>

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**Budget Monitoring Report**  
**Housing Revenue Account Variances**

**MONTH 5 - SUMMARY**

Service	Revised Budget (£m)	Projected Outturn (£m)	Variance (£m)	Last Month Variance (£m)	Cause of Major Variance	Action Required
<b>Housing Revenue Account</b>						
Income	(42.166)	(42.010)	0.155	0.207	There is a net pressure relating to void properties of £0.170m. This relates to costs such as void rent loss, council tax charges and service charges and is net of additional income relating to new build properties and voids moving to target rent. We are anticipating a variance of approximately (£0.002m) on garage rents. Other minor variances of (£0.013m).	
Capital Financing - Loan Charges	6.845	6.845	0.000	(0.000)		
Estate Management	3.206	3.064	(0.141)	(0.208)	Projected vacancy savings of approximately (£0.168m) which is being offset by agency costs of £0.135m. Additional allocation of Housing Support Grant (£0.120m). Other minor variances of (£0.012m).	
Landlord Service Costs	1.798	1.832	0.035	0.035	Projected vacancy savings of approximately (£0.142m) which is being offset by agency costs of £0.110m. Material increased costs of £0.052. Other minor variances of £0.015m.	
Repairs & Maintenance	12.741	12.736	(0.006)	0.022	Minor variances	
Management & Support Services	2.787	2.632	(0.155)	(0.155)	Projected vacancy savings of approximately (£0.068m). Reduction in Support Recharge -(£.068m). Other minor variances of (£0.019)	
Capital Expenditure From Revenue (CERA)	14.467	14.467	0.000	(0.000)		
HRA Projects	0.130	0.130	0.000	(0.000)		
Contribution To / (From) Reserves	0.193	0.193	0.000	(0.000)		
<b>Total Housing Revenue Account</b>	<b>0.000</b>	<b>(0.111)</b>	<b>(0.111)</b>	<b>(0.098)</b>		

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Strategic Equality Plan Annual Report 2023/24
<b>Cabinet Member</b>	Cabinet Member for Corporate Services
<b>Report Author</b>	Corporate Manager – Capital Programme and Assets
<b>Type of Report</b>	Strategic

### EXECUTIVE SUMMARY

The Council published its equality objectives and four-year Strategic Equality Plan (SEP) in April 2020, fulfilling the requirements of the Public Sector Equality Duties (PSED), as set out in the Equality Act 2010.

The aim of equality objectives is to address the most significant issues and areas of inequality that face people with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

The Equality Act 2010 places specific duties on public sector organisations in Wales. These include the requirement to publish an annual report by 31<sup>st</sup> March each year, which must outline progress on meeting the PSED and achieving the equality objectives. The attached annual report highlights the progress the Council has made in implementing its SEP and meeting its equality objectives during 2023/2024.

This is the final annual report for the SEP 2020-24. A new SEP for the period 2024-28 is now in place.

### RECOMMENDATIONS

- |    |   |
|----|---|
| 1. | Cabinet endorse the content of the Strategic Equality Plan Annual Report 2023/24 and subsequent publication on the Council's website. |
|----|---|

## REPORT DETAILS

1.00	<b>EXPLAINING THE STRATEGIC EQUALITY PLAN ANNUAL REPORT 2023/24</b>
1.01	<p>The Council published its equality objectives and four-year Strategic Equality Plan (SEP) in April 2020, fulfilling the requirements of the Public Sector Equality Duties (PSED), as set out in the Equality Act 2010 (“The Act”).</p> <p>The purpose of equality objectives is to address the most significant issues and areas of inequality that face people with protected characteristics. For example, disabled people, women, older people.</p>
1.02	<p>The Act requires that an annual report is produced which specifically outlines progress towards fulfilling each of the Council’s equality objectives and includes specified employment information, including information on training and pay (unless this has already been published). The report must be published by 31<sup>st</sup> March each year.</p>
1.03	<p>The Council’s Strategic Equality Plan Annual Report for 2023/24 is provided at <b>Appendix 1</b>.</p> <p>This is the final annual report for the SEP 2020-24 and highlights the Council’s progress in meeting its equality objectives during 2023/2024.</p> <p>This report does not include the full data required for employment and pay statutory reporting. These reports are published separately and are the responsibility of HR.</p> <p>This is the final report for the Strategic Equality Plan 2020-24. A new Plan for the period 2024-28 is now in place.</p>
1.04	<p>Areas of achievement in meeting the equality duties during 2023/24 are summarised below:</p> <ul style="list-style-type: none"> <li>• Students from our secondary schools decided to work with the Youth Service to organise their own Pride event to raise awareness of issues facing Lesbian, Gay, Bisexual and Transgender (LGBT) people and to celebrate being different. Approximately 250 students attended this event.</li> <li>• Several employees in Streetscene have volunteered to become Mental Health Champions, providing support to their colleagues and developing initiatives to promote awareness of mental health issues. The Champions meet quarterly where any emerging trends and concerns are discussed. Their work helps address the unequal mental health outcomes experienced by men, as reported by Mental Health UK.</li> <li>• Social Services formed a partnership with HfT and Deeside Business Forum to support individuals with mental health issues,</li> </ul>

	neurodiversity and learning disabilities, to secure paid employment in their local community.
1.05	<p>Whilst the Council can demonstrate progress in achieving its equality objectives there are still areas for improvement, a summary of those areas is provided below.</p> <p><b>The collection and publication of equality data:</b> Equality data provides a profile of Council customers and employees. This information is important in making sure services are accessible to everyone who needs them and monitoring progress in meeting the equality objectives. Collecting equality data has also been identified as an area of improvement in the Corporate Self-assessment and is a requirement of the PSED.</p> <p><b>Impact assessments:</b> A new approach on Integrated Impact Assessments (IIA) has been developed with the University of Manchester which will need to be embedded across the organisation to improve the quality of IIAs and ensure they are undertaken consistently.</p>
1.06	<p>To address the above, two subgroups of the Corporate Equality Board have been established:</p> <ul style="list-style-type: none"> <li>• A Data Group to develop and improve employee and customer data collection and analysis across the Council.</li> <li>• An IIA Quality Assurance Group to ensure the quality of Equality and socio-economic Impact Assessments (EIAs)/IIAs to support service improvement and ensure they meet statutory guidance and regulations.</li> </ul> <p>The outcomes of the work of these Groups will be included in the annual reports for the new Strategic Equality Plan 2024-28.</p>
1.07	<p><b>Further Information</b></p> <p>The production and publication of the annual Workforce Information Report and the Equal Pay Audit reports contribute to the Council's SEP Annual Report. This is because they form part of the reporting requirements of the PSED and will need to be published before, or simultaneously to, the SEP Annual Report 2023/24.</p> <p>The Workforce Information Report and Equal pay Audit are produced by HR and have yet to be published.</p>

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	There are no resource implications associated with this report.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>																												
3.01	<p><b>Integrated Impact Assessments (IIAs)</b></p> <p>An integrated impact assessment is not required as this is a report on progress in meeting the Council's equality objectives, which aim to have a positive impact on people with protected characteristics. A full impact assessment was completed on the Strategic Equality Plan 2020-24.</p> <p>Under the five ways of working principles of the Well-being of Future Generations (Wales) Act 2015, this report will have the following impact:</p> <table border="1"> <thead> <tr> <th>Ways of Working</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>Long-term</td> <td>No change</td> </tr> <tr> <td>Prevention</td> <td>Positive impact through promoting equal access to services and information</td> </tr> <tr> <td>Integration</td> <td>No change</td> </tr> <tr> <td>Collaboration</td> <td>No change</td> </tr> <tr> <td>Involvement</td> <td>No change</td> </tr> </tbody> </table> <p><b>Well-being Goals Impact</b></p> <table border="1"> <thead> <tr> <th>Well-being Goal</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td>Prosperous Wales</td> <td>No change</td> </tr> <tr> <td>Resilient Wales</td> <td>No change</td> </tr> <tr> <td>Healthier Wales</td> <td>Positive impact through reducing health inequalities</td> </tr> <tr> <td>More equal Wales</td> <td>Positive impact through increasing access to services and information for people with protected characteristics</td> </tr> <tr> <td>Cohesive Wales</td> <td>Positive impact through addressing hate crime and fostering good relations between people from different protected groups</td> </tr> <tr> <td>Vibrant Wales</td> <td>No change</td> </tr> <tr> <td>Globally responsible Wales</td> <td>No change</td> </tr> </tbody> </table>	Ways of Working	Impact	Long-term	No change	Prevention	Positive impact through promoting equal access to services and information	Integration	No change	Collaboration	No change	Involvement	No change	Well-being Goal	Impact	Prosperous Wales	No change	Resilient Wales	No change	Healthier Wales	Positive impact through reducing health inequalities	More equal Wales	Positive impact through increasing access to services and information for people with protected characteristics	Cohesive Wales	Positive impact through addressing hate crime and fostering good relations between people from different protected groups	Vibrant Wales	No change	Globally responsible Wales	No change
Ways of Working	Impact																												
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Vibrant Wales	No change																												
Globally responsible Wales	No change																												

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Relevant officers, including the Corporate Equalities Board, were consulted to produce the Annual Report.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1: Strategic Equality Plan Annual Report 2023/24

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	<a href="#">Strategic Equality Plan 2020-24</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Fiona Mocko, Strategic Policy Advisor <b>Telephone:</b> Cymraeg 01267 224923 English 01352 702122 <b>E-mail:</b> <a href="mailto:fiona.mocko@flintshire.gov.uk">fiona.mocko@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<p><b>Data collection:</b> is the collection and analysis of information on the profile of customers and employees. For example, people’s age range, disability, gender reassignment, ethnic group, religion or belief, sex, and sexual orientation to identify actual or potential inequalities.</p> <p><b>Equal Pay Audit:</b> an equal pay audit compares the pay of men and women and employees with other protected characteristics who are doing equal work. The aim is to identify any differences in pay, investigate the causes of any differences and take action to eliminate unequal pay that cannot be justified.</p> <p><b>Protected characteristics:</b> these are the groups protected under the Equality Act 2010. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.</p> <p><b>PSED:</b> Public Sector Equality Duty, which places a General Duty and Specific Duty on public bodies. The General Duty requires public bodies to show due regard to the need to: eliminate unlawful discrimination, advance equality of opportunity between people who share a protected characteristic and foster good relations. The Specific Duty in Wales requires public bodies to develop equality objectives and publish Strategic Equality Plans. It also includes the requirement to train employees, assess impact of decisions and undertake equality monitoring.</p> <p><b>Workforce Information Report:</b> as part of the Public Sector Equality Duty the Council is required to collect and publish a range of information on the diversity profile of its workforce and key HR processes. This includes reports broken down by protected characteristic on recruitment and selection, those who leave the authority and employees who are subject to disciplinary and grievance procedures. The purpose is to analyse the data</p>

	to identify areas where there may be potential or actual discrimination and to take action to address this.
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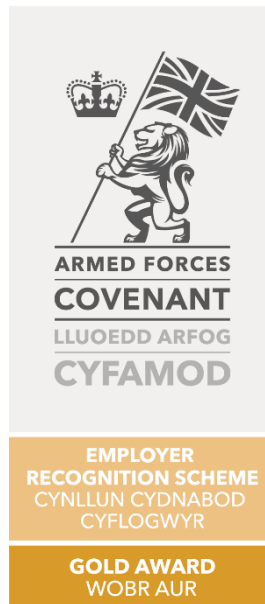
# Strategic Equality Plan Annual Report 2023/24

*Mae'r ddogfen yma ar gael yn Gymraeg.  
This document is also available in Welsh*

We can provide this information in alternative formats or in your own language.

Corporate Services  
County Hall  
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# Strategic Equality Plan

## Annual Report 2023/2024

### Contents

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2. Profile of the workforce	
3. Profile of services users- Adult Social Services	
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## **Executive Summary**

Welcome to the fourth and final annual report for Flintshire County Council's Strategic Equality Plan 2020-2024 which sets out the progress we made to achieve our seven equality objectives during 2023/24. The purpose of the Strategic Equality Plan is to reduce inequalities experienced by people with protected characteristics.

During 2023/24, we maintained our status as a Disability Confident Employer, a scheme designed to encourage employers to recruit and retain disabled people and those with health conditions.

Our commitment to equality is also reflected in our schools. We were delighted when students from our schools decided to work with the Youth Service to organise their own Pride event to raise awareness of issues facing Lesbian, Gay, Bisexual and Transgender (LGBT) people and to celebrate being different.

We continued to work with the University of Manchester, piloting a new tool for impact assessments. Implementing a new approach to impact assessments will be a priority for 2024/25.

Going forward we will focus on implementing our new Strategic Equality Plan 2024-2028, which incorporates actions from Welsh Government Anti-racist Wales Action Plan and the LGBTQ+ Action Plan. We will also work towards achieving the Trust Mark for Victim Support's Hate Crime Charter.

Neal Cockerton  
Chief Executive

Councillor Linda Thomas  
Cabinet Member for Corporate Services

# Strategic Equality Plan Annual Report 2023/2024

## 1. Introduction

1.1 This annual report for the Council's [Strategic Equality Plan](#) (SEP) 2020-2024 covers the period April 2023 to March 2024. The report sets out progress to meet our [equality objectives](#) and provides a summary of achievements during this time.

1.2 The Equality Act 2010 introduces a public sector duty to

- a) eliminate discrimination, harassment, and victimisation;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.3 The protected characteristics as defined by the Equality Act 2010 are:

Age	Disability
Gender Reassignment	Marriage and Civil Partnership
Pregnancy and Maternity	Race
Religion and Belief	Sex
Sexual Orientation	

Our commitment to the Welsh language and treating English and Welsh languages on the basis of equality are set out in the [Welsh Language Compliance Notice](#). The action we have taken to meet our statutory responsibilities for Welsh language are covered in a separate [report](#).

The specific equality duties also require public bodies to: -

- publish objectives to address pay differences;
- publish a statement setting out the steps it has taken or intends to take to meet the objectives and how long it expects to take to meet each objective;
- produce an annual report by 31<sup>st</sup> March each year, which will include specified employment information, including information on training and pay;
- engage with people from protected groups;
- assess impact of new and revised policies on people from protected groups; and
- publish and use equality information.

The purpose of the equality objectives is to reduce specific areas of inequality which were identified using both qualitative and quantitative evidence. We have also worked with the other public bodies across North Wales to identify regional equality objectives.








1.4 Alongside the [SEP](#) our work on equality is supported by a [Diversity and Equality Policy](#), and Plain Language Guide and delivered as part of various Council documents such as the Council Plan and Customer Strategy.

## 2. Progress

2.1 Our [equality objectives](#) and [Strategic Equality Plan 2020-24](#) were published in March 2020. The action plan to meet the SEP is provided in Appendix 1; this also highlights the progress made to meet each action.

2.2 The following table sets out our performance towards achieving the actions we set ourselves. For each objective, we have assessed ourselves using the following criteria:

- R** **Limited Progress** - delay in scheduled activity; not on track
- A** **Satisfactory Progress** - some delay in scheduled activity, but broadly on track
- G** **Good Progress** - activities completed on schedule, on track

Equality Objective	Progress
Improve health, well-being and social care outcomes including outcomes for older people and disabled people.	
Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being	
Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place	
Improve personal safety for all protected groups	
Increasing access to services and decision making for all protected groups	
Improve living standards of people with different protected characteristics	
Develop our knowledge of the socio-economic duty to protect people from poverty	

### 3. Meeting our Equality Objectives 2023/24

3.1 This section sets out our key achievements to meeting our seven equality objectives during 2023/24.

**Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.**

#### During 2023/24:

- Managing Anxiety courses were offered to employees to support them to manage their mental health.
- A Mental Health First Aid course was available for employees, which aimed to promote understanding of mental health issues and to provide the skills to respond appropriately to others, who may need support.
- Through Carers Wales, “Me Time”, on-line support sessions were offered to carers.
- We participated in [Time to Talk Day](#) encouraging employees to talk about mental health.
- A Catch, Challenge and Change your Negative Thinking course was offered to employees. This looked at how thinking impacts stress and anxiety and explored the unhelpful thinking styles that can become habit forming and the negative thoughts that can impact daily lives.
- Managing Stress at Work courses were provided to employees, in addition to Well-being, Resilience and Mindfulness workshops. These provided an opportunity to learn about and experience mindfulness skills to help employees notice and become more self-aware of unhelpful patterns of thinking; developing the ability to self-regulate response to stress.
- During the Christmas period, information on support available to employees who felt unable to cope or who were lonely was promoted to the workforce.
- Alongside Jobcentre Plus we organised a successful Health and Well-being event which brought together local health care providers from a wide range of service providers to support individuals in Flintshire who live with a health condition, or who care for someone with a health condition. It gave local people the opportunity to meet these services face to face and access advice about what is available to assist with an existing health condition.
- A Team of Mental Health Champions has now been established within the Streetscene and Transportation Portfolio. The role of the Champions is to be the “Go – To” people who can listen to employees concerns and signpost to effective support.

## Making a difference

### Introducing mental health champions

The majority of employees in Streetscene are male and initiatives have been introduced to support their mental health. [Mental Health UK](#) report that mental health outcomes for men and women are not equal - 75% of deaths by suicide are males.

Employees have volunteered to become Mental Health Champions in our Streetscene and Transportation Portfolio. They meet quarterly and include as a standing agenda item "Word on the Streetscene" allowing any emerging trends to be discussed during the meeting. Mental Health Champions received training on Vicarious Trauma to provide support and resilience to our public facing workers who respond to emergency and critical incidents.

The Champions have developed a calendar to promote mental health initiatives, this includes providing a "Blue Monday", where Streetscene employees can talk over tea and bacon sandwiches.

The outcomes of the initiatives to promote mental health in Streetscene include:

- Employees feel listened to.
- Proactive rather than a reactive response
- Greater visibility of mental health.
- Awareness of where to get help.

## Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being

### During 2023/24:

- Three additional schools participated in [Show Racism the Red Card's](#) "Leaders of Now" project. The aims of the programme are to:
  - Empower young people to be actively anti-racist in their own communities.
  - Create a self-sustaining network of anti-racism activists.
  - Enable ongoing longer-term conversations about racism and anti-racism.
  - Enable young people to feel confident in challenging racism within their own spaces.
  - Gather intelligence on what young people want/need from us and be pupil-led.



- Give pupils a voice that is heard by senior school leaders.
- The Inspire Pride Lesbian, Gay, Bisexual and Transgender (LGBT) youth group continued to run and face to face meetings are now being held.
- There has been a comprehensive offer of support to Refugee families moving into Flintshire. This has included support to access and engage with education along with wrap around services to support the whole family to integrate successfully with the wider community.
- A pre-school pathway working group has been established to create seamless pathways through childcare to education, and to ensure children with needs are supported on this journey.

## Making a difference

### **Celebrating Being Me!!**

School students worked with our Youth Service to organise a Pride event, “Celebrating Being Me” for all secondary schools in the county. This event involved workshops on hate crime, digital resilience, self-esteem and body image. The “Celebrating Being Me” event took place as part of Pride Month (June). It was attended by approximately 250 pupils from secondary schools across the county supported by staff from 25 different charities and organisations with an affinity to the LGBTQ+ community.



### **Objective 3: Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place**

#### **During the past 12 months:**

- We have started to review our pay model to ensure it continues to be fair.
- We have maintained [Disability Confident](#) employment status, this is a UK Government scheme for employers to take action to improve how they recruit, retain and develop disabled people.
- We have continued to work with Hft to support people with learning disabilities or autism to find paid employment. Hft are contracted by the Council to deliver and develop Day and Work opportunities across the county for adults with a learning disability.
- 10 people from Ukraine completed the Clean Slate course during 2023/24. Clean Slate supports people find employment in the construction industry.
- We have continued to offer flexible working patterns to support our employees maintain a work life balance.

#### **Making a difference**

##### **Supporting disabled people into work**

We have formed a partnership with HfT and Deeside Business Forum to support individuals with mental health issues, neurodiversity and learning disabilities, to secure paid employment in their local community.

In February 2024, a reverse jobs fair was held at Coleg Cambria, with support from Next Steps and HfT. The event was well attended by over 50 individuals and organisations. Following on from the event, one individual has been approached regarding paid employment, and another individual is setting up their own business with support from Big Ideas Wales.

The 'EmployAbility Hub' has also been launched on the Deeside Business Forum website, which lists all the supported individuals who are seeking paid employment.

Next Steps provides support and guidance for people to enter education, training, voluntary work and employment.



## Objective 4: Improve personal safety for all protected groups

### During 2023/24:

- A part of our commitment to Victim Support’s Hate Crime Charter, Victim Support offered on-line and face to face hate crime awareness training enabling more employees to recognise hate crime, understand the impact of hate crime and know how to make a report. Courses included:
  - On-line hate crime
  - Migrant Rights
  - Hate crime Awareness.
- The Regional Community Cohesion Team also provided a course “Hate Crime and Vulnerability in North Wales” which looked at how employees could support people who had been victims of hate crime.
- There were 193 reports of hate incidents in Flintshire during 2023/24.

Type of incident	2019/20	2020/21	2021/22	2022/23	2023/24
Racially motivated	99	92	126	151	111
Homophobic	40	39	61	58	35
Disability Related	20	38	65	39	22
Transphobic	4	7	7	10	11
Religious	5	7	6	13	14
Total	168	183	265	271	193

There was a decrease in reporting of hate crime during 2023/24 compared to the previous year. North Wales Police report that figures for Flintshire are consistent with the regional and national picture.

- Members of North Wales Public Sector Equality Network (NWPSSEN) worked together to encourage reporting of hate crime during Hate Crime Awareness week in October. We also published messages on social media alongside other public bodies to encourage people to report hate crime.

- 1,067 employees completed the e-learning module on Hate Crime Awareness.
- Victim Support continued to provide Hate Crime training, which our employees attended.
- We raised the Trans Flag on 20th November to commemorate the Transgender Day of Remembrance in memory of all Trans people who have lost their lives to Transphobic violence.
- We raised the Rainbow flag during LGBT History month to highlight our commitment to equality. The Rainbow flag is a symbol recognised as the celebration of the LGBTQ+ community.
- We supported the White Ribbon Campaign for an end to violence against women.
- 1,013 employees completed the Modern Slavery e-learning training.

## **Making a difference**

### **Victim Support's Hate Crime Charter**

We signed up to Victim Support's Hate Crime Charter during 2022/23 and have been working towards gaining the Trust Mark for demonstrating delivery on the pledges in the Charter.

The Charter sets out the rights of victims, and the commitments of organisations. These include tackling hate crime, providing support and information for victims, and raising employees' awareness of hate crime.

We have been working with Victim Support to raise awareness of hate crime and support employees to recognise hate crime and take action to support victims.

Our next steps are to review relevant policies to ensure they explicitly reference hate crime and support available to the victims, so that we can achieve the Trust Mark.



## Objective 5: Increasing access to services and decision making for all protected groups

### During 2023/24:

- We launched an innovative service for residents of Flintshire where volunteers from across the organisation, [the Digital Support Squad](#), provide face to face support to give people confidence to use digital technology free of charge.
- The Recycling service has produced a number of informative recycling and environmental documents in multiple languages so that essential information is readily available and accessible to residents who do not speak English or Welsh. As part of the 2024 Resource and Waste Strategy review, we have committed to continuing this practice.
- Vision Support reviewed the Council website to ensure accessibility for people with visual impairments.
- North East Wales Community Cohesion Team funded, facilitated and co-produced nine creative projects for North East Wales (N.E.W.) Futures. This is an initiative to hear the voices of diverse communities in Wrexham, Flintshire and Denbighshire. The projects included supporting self-advocacy through developing a short film about the discrimination experienced by people with a learning disability.



## Making a difference

### Pride of Flintshire

Pride of Flintshire took place in June 2023. This event celebrates the achievements of our children looked after, including an award ceremony hosted by the young people themselves, and a range of fun activities for children of all ages.

The event is organised and hosted by Flintshire Young Voices Speak Out participation group. The group offers children looked after in Flintshire the chance to have their voices heard, to contribute to developments of the service, give their feedback on policies and procedures within the local authority and attend the Children's Services Forum.

The group welcomes guest speakers including the Police, Looked After Children's Nurses and Housing.



## Objective 6: Improve living standards of people with different protected characteristics

### During 2023/24:

- Campaigns to promote support with maintaining housing tenancy, managing money, keeping homes safe and accessing benefits were promoted to the workforce and members of the public. These campaigns included information on self-referral to the Housing Support Grant Team.
- We successfully brought a [prosecution](#) against a landlord for not meeting his House in Multiple Occupation (HMO) license conditions, which put the residents, including families and young children, at risk. Residents had complained to the Council about conditions, which we investigated and took action against the landlord.
- 1050 adaptations were made to support disabled people to continue living at home.
- 327 households received energy efficiency improvements.
- We have continued to support Refugees from Syria and Afghanistan and people from Ukraine.

### Making a difference

#### **Short-term Emergency Accommodation for young people with learning disabilities**

Social Services now has four properties available to support people who find themselves homeless, or in need of accommodation urgently. The most recent addition is a bedsit which has been used to accommodate a young person with autism who was at risk of homelessness.

The Progression Service have supported this young person to engage in the community locally and visit another supported living establishment to build natural friendships. As a result, the young person feels they can live independent of a formal package of support and are being supported to find long term accommodation in the area as they wish to continue building on the networks and friendships they have made.

## Objective 7 Develop our knowledge of the socioeconomic duty to protect people from poverty

We continued to support people living in poverty during 2023/24.

### During 2023/24:

- We implemented a pilot project “Parents into Employment”, this is aimed at parents who were ready to begin their transition from benefits into the world of work, the programme identified barriers preventing them looking for employment before supporting them to address these issues .
- UK Energy discounts were promoted to the workforce and members of the public to encourage people to claim extra financial support towards energy costs.
- The process for claiming a School Essentials Grant (formerly Uniform Grant) was improved and simplified, reducing the need for form-filling, and speeding up the process of issuing the payments.
- A Financial Well-being course was offered to employees, to help employees strengthen their financial wellbeing by enabling them to make informed decisions when it comes to their financial planning. The course looks at four key areas to support overall financial wellbeing:
  - Understand income and plan spending.
  - Review and keep track of borrowing.
  - Plan financial goals and prepare for those unexpected costs.
  - Start to plan for life beyond work whenever that may be.
- A Pre-Retirement Seminar was offered to employees considering retirement and those who have just started to think about retirement plans, covering lifestyle changes, income and pension.
- 2,103 young people aged 8-18 were able to order sanitary products of their choice from a selection available, up to three months’ supply in one delivery with discrete packaging.
- 484 primary and secondary age children took part in the Food and Fun Scheme during the Summer holidays. Over the 12 days of the programme, the children participated in a broad range of engaging activities focused on health, happiness, and wellbeing. Children attending enjoyed a healthy breakfast, snack and a hot lunch. The scheme helps parents with meeting childcare costs and offers paid employment to local people.



## Making a difference

### **Food and Fun Programme,**

Children attending Food and Fun during the summer holidays enjoyed a healthy breakfast, snack and a hot lunch provided by NEWydd Catering and Cleaning. Children also took home recipe cards and ingredients to feed a family of four.

Food and Fun has a keen focus on nutrition education, with children encouraged to try new foods and take part in practical food activities each week. Aura Leisure delivered a wide variety of sporting activities and interactive games alongside a broad offer of enrichment activities coordinated by each school. The children have enjoyed dancing, circus skills and drumming.

The Food and Fun programme benefit pupils long after it ends. School staff build on the relationships they have made with providers and the skills that they have gained from the training undertaken. An example of this can be seen in two schools who have invited the Betsi Cadwaladr University Health Board (BCUHB) dieticians to work with parents on 'Come and Cook' sessions.



## **4. Collating information and engagement**

4.1 Systems have been developed within portfolios and services to capture and monitor the profile of our customers by protected characteristic. However, all the services are different and not all protected characteristics are captured on each system. There is insufficient data available for detailed analysis for most services. It is an ongoing action to improve data capture across services.

4.2 Categories used to collate diversity data are taken from the [Census 2021](#).

4.3 Despite the challenges in collating data, improvements have been made to our processes, we are now:

- Recording the ethnic details of Social Service users. This is now a mandatory field on the Social Services client database.
- Monitoring the profile of tenants, homelessness applicants and people on the housing waiting lists.
- Recording the profile of school pupils and school attainment levels.
- Recording and monitoring diversity data to ensure there is no disproportionate representation of service users of the Youth Justice Team.

4.4 Research has been undertaken by Cyngor Gwynedd for the North Wales Public Sector Equality Network (NWPSSEN), a network of all North Wales public bodies' Equality Officers, to help identify the inequalities experienced by protected groups. This information is available for use by services.

4.5 NWPSSEN has developed an exemplar equality monitoring form with a Top Ten Tips Guidance Note. This helps ensure consistency amongst the equality monitoring categories used by public bodies across North Wales and will contribute to more effective benchmarking.

4.6 Qualitative data is collated through other means such as surveys and focus groups and through engagement with local groups such as:

- Flintshire Disability Forum
- Flintshire Youth Forum
- Faith contacts
- Older People's Forum
- North Wales Regional Equality Network
- School's Councils
- Stonewall Cymru
- Travelling Ahead who work with Gypsies and Travellers
- Unique transgender group
- 50 plus Action Group

4.7 We have continued to collaborate with the Regional Community Cohesion Team to strengthen engagement. During 2023/24 the Community Cohesion Team provided financial support to Menter Iaith Fflint a Wrecsam to promote Saint David's Day to people who did not speak English or Welsh and encourage them to participate in the celebrations. The Regional Community Cohesion Team continued to facilitate an interfaith forum and a multi-cultural hub. The Team engaged with different communities on different themes to help identify potential equality objectives. They also facilitated a workshop with people from ethnic minorities on barriers to employment with public sector bodies.

**Using information to meet the general duty.**

4.8 The profile of customers/service users is compared against the profile of the community to identify areas of over/under representation or under achievement which enables services to set targets for improvement. An example of this is the work being undertaken by the Youth Offending Team. Analysis of data of referrals to the Team are regularly analysed to identify disproportionality. This work is also supported by surveys of the young people who have been referred to ensure there has been fair treatment.

4.9 Using data in this way helps services to identify potential and actual areas of discrimination and advance equality of opportunity, through setting improvement targets which will be incorporated into the [SEP](#). This information has also been used to identify the [Council's local equality objectives](#).

4.9 Comparisons of satisfaction levels and complaints and information from focus groups is also used to identify any areas of potential and actual discrimination and areas of community tensions which in turn contribute to identifying opportunities for advancing equality and for fostering good relations.

### Employment Information

4.10 A full diversity profile of the workforce is published separately and includes information required by the specific duties of the Equality Act 2010. This can be found on our website. **A profile of the workforce can be found at Appendix 2.**

As can be seen from the following tables, during the past four years, there has been a small reduction in the number and percentage of employees who did not complete the employee diversity audit or who have selected the “Prefer not to say” option. An action to improve the equality data of the workforce is included within the new Strategic Equality Plan 2024-28.

### Comparison of the number and percentage of employees who did not complete the diversity audit in 2019 and 2024.

Year	2019		2024	
	Not stated		Not stated	
Protected characteristic	No. of employees	% of workforce	No. of employees	% of workforce
Ethnicity	2031	33.14	1977	32.26
Disabled	2083	33.99	1980	32.31
Sexual orientation	3378	55.12	2815	45.93
Religion and /or belief	2867	46.78	2495	40.71
Marital status	2446	39.91	2379	38.82

**Comparison of the number and percentage of employees who selected the “Prefer not to say” option of the diversity audit in 2019 and 2024.**

Protected characteristic	2019		2024	
	Prefer Not to say		Prefer Not to say	
	No. of employees	% of workforce	No. of employees	% of workforce
Ethnicity	73	1.19	74	1.2
Disabled	160	2.61	147	2.4
Sexual orientation	160	2.61	148	2.4
Religion and /or belief	158	2.58	147	2.4
Marital status	39	0.64	28	0.46

4.11 Qualitative information is gained through feedback from Trade Union representatives at the Joint Trade Union Consultative Committee.

4.12 Qualitative and quantitative information is used to inform equality impact assessments on HR policies and practices and to identify areas of potential/actual inequalities which require further investigation.

## **5.0 Equal Pay**

5.1 Equal pay is the equal payment of men and women for doing equal work as defined by the Equality Act 2010.

There are three kinds of equal work:

- Like work is the same or broadly similar. It involves similar tasks which require similar knowledge and skills, and any differences in the work are not of practical importance.
- Work rated as equivalent has been rated under a valid job evaluation scheme as being of equal value in terms of how demanding it is.
- Work of equal value is not similar and has not been rated as equivalent but is of equal value in terms of demands such as effort, skill and decision-making.

5.2 A detailed analysis of the annual Equal Pay Audit by gender, disability, ethnicity and religion as at 31<sup>st</sup> March 2024, is published separately on our website. A summary of the gender pay gap since the Strategic Equality Plan 2020 - 24 was published is set out in the following table.

Gender Pay Gap	March 31 <sup>st</sup> 2020	March 31 <sup>st</sup> 2021	March 31 <sup>st</sup> 2022	March 31 <sup>st</sup> 2023
<b>Overall</b>	13.11%	13.75%	13.71%	12.76%
<b>NJC/ Green Book</b>	15.00%	15.37%	15.47%	13.99%

## 6.0 Equality Impact Assessments (EIAs)

6.1 Equality Impact Assessments (EIA) are one of the methods being used to mainstream equality and to support services identify specific equality targets.

6.2 A regional EIA template has been developed by NWPSSEN which includes equality, Welsh language, and socio-economic impacts. This was shared with both the Equality and Human Rights Commission and Welsh Language Commissioner to seek their feedback before being adopted by NWPSSEN members. This has now been incorporated within our Integrated Impact Assessment (IIA) developed to capture the relevant information required for a range of impact assessments- including environment, health, poverty, and Welsh language. Guidance notes are available for each protected characteristic to support IIA authors.

6.3 We are working with the University of Manchester piloting a new tool for IIAs, the Carbon and Co-benefits Decision Making Support Tool. The university is now at the evaluation stage, interviewing IIA authors and decision makers to understand how this influences and improves decision making. IIAs must be included within all our strategic committee reports to ensure decision makers understand the impacts of their decisions.

6.4 Periodic reviews of committee reports are undertaken to sample impact assessments to:

- Ensure they are being completed by report authors for relevant reports.
- Sample the quality of the content.
- Ensure they are available for decision makers.

The outcome of the review is reported to the Council's Chief Officer Team with recommendations for improvements.

6.5 Bespoke impact assessment training is available for teams in addition to an e-learning programme.

## 7.0 Training

7.1 Details of how we promote understanding and knowledge about equality is set out in the [SEP](#). There are two mandatory e-learning packages specifically on equality:

- Equality Act 2010 – completed by 710 employees.
- Equality in the Workplace – completed by 630 employees.

7.2 These are supported by e-learning packages on:

- Modern slavery – completed by 766 employees.
- Hate crime – completed by 1,067 employees.

7.3 Diversity and equality is also included in:

- Institute of Leadership and Management (ILM) programme at all levels.
- E-learning modules for new managers.
- Corporate induction

7.4 During 2023/24, in addition e-learning programmes and workshops were provided on: -

- Vision Impairment Awareness course delivered by Vision Support.
- Hate Crime awareness training was delivered by Victim Support.
- Unconscious Bias training -attended by 31 employees.
- Autism Awareness (online completed by 72 employees and 39 employees attended in person workshops).
- Menopause Awareness attended by 29 employees.
- Violence Against Women e-learning module completed by 722 employees.
- Neurodiversity at work as part of Neurodiversity week 2024.

As part of Intentional Women’s Day 2024, Confidence Skills for Women and Influencing Skills for Women courses were made available to employees.

## 8.0 Procurement

8.1 Details of how equality is embedded into the procurement process is set out in the [SEP](#). Equality questions are included within our pre-qualification questionnaire (PQQ) for all tenders. In addition, Modern Slavery has been included as an element of the PQQ, this looks at actions potential contractors are taking to eliminate modern day slavery within their workforce and supply chains. Furthermore, social value clauses are included within contracts over £1 million; contracts of £10,000 include an element of social value in the scoring methods.

8.2 We have signed up to Welsh Government’s (WG) Code of Practice: Ethical Employment in Supply Chains. We have committed to a set of actions to tackle illegal and unfair employment practices. We publish an annual [Modern Slavery statement](#), this sets out the actions we will take to ensure there is no modern slavery within our supply chains.

## 9.0 Conclusion


9.1 This report outlines the progress we are making to meet both the general and specific public sector equality duties. It is however clear that collating some data to monitor progress has been challenging. Our priorities are to:

- Establish a Data Group to develop and improve employee and customer data collection and analysis across the Council.
- Improving the quality and number of IIAs that are completed and establish a new Quality Assurance Group to oversee this.
- Implement our new SEP 2024-28 which incorporates actions from Welsh Government's Anti-racist Wales and LGTQ+ Action Plan within the new Strategic Equality Plan 2024-28.



**Thank you for reading our Strategic Equality Plan Annual Report  
2023/24.**



## Appendix 1 Strategic Equality Plan Action Plan 2020- 2024


### 2023/24 Progress


Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
Setting up a registered Children’s Home to help avoid the need for residential placements outside Flintshire	Senior Manager Children’s Services	Flintshire’s commitment to developing a programme of Children’s homes to help avoid the need for residential placements outside of the county is ongoing. Over the last 12 months, we have been successful in registering four of our five new Childrens’ Residential Homes with Care Inspectorate Wales (CIW). We continue to work with CIW around the registration process for the last of the fifth home.  
Continue to develop services to support the reduction of the number of children looked after by the Local Authority through the recommissioning of current services.	Senior Manager Children’s Services	The development of an in-house, Special Guardian Order service, now has two dedicated members of staff who support to develop Special Guardianship Order options.






Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		<p>Recommissioning is due to commence for Families First Services to begin in April 2025.</p> <p></p>
Continuing to grow our in-house fostering service to support more looked after children, measured by the increase in new foster carer approvals in the year	Senior Manager Children’s Services	<p>The Foster Bear campaign was launched in January 2023 in collaboration with Primary Schools across Flintshire to raise awareness of local authority fostering and outline the urgency to recruit more foster carers in the county.</p> <p>So far, thirteen primary schools have welcomed Foster Bear into their classrooms, and children are given an activity pack that contains a Foster Bear teddy and activity book to take home.</p> <p></p>
Plan to provide additional placements for ‘discharge to recover and assess’ in the in-house provision	Senior Manager Adults Services / Commissioning Manager	The final design plans for Tŷ Croes Atti have been approved and construction work is well underway on the site which previously housed the Flint Cottage Hospital. This will increase capacity for step down care within our in-house provision, 12




Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		<p>step-down Discharge to Recover and Assess (D2RA) beds have been agreed at Tŷ Croes Atti, which will increase the provision across Flintshire from its current level of 16 to a total of 28. We anticipate that this facility will be completed and operational by April 2025</p> <p></p>
Continuing to grow the Microcare market, measured by the increase in Microcare providers. Baseline data from 2021/22 is 24 with the target by 2023 to be 34.	Commissioning Manager	<p>There have been an additional 14 Micro-Care enterprises setup during this financial year. This has grown the number of active Micro-Carers to 50 with a further 16 potentially in the pipeline. We are now also able to commission support from Micro-Carers</p> <p></p>
Continuing to grow our in-house homecare service to support more people to live at home, measured by the rate of increasing the rate of those people over 65 who are helped to live at home from 33 in 1,000 to 34 in 1,000.	Senior Manager Adults Services / Commissioning Manager	<p>Flintshire continues to utilise a rolling scheme of recruitment to grow our in-house homecare service to support more people to live well at home. However, recruitment across social care continues to be a challenge. To rise to this challenge, the homecare service has a designated task team</p>




Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		looking at new and innovative ways to attract applicants to the service, and a recruitment event was held in March 2024. This work is ongoing and will support the service to grow and expand the offering to people living in our communities. 
Developing an Early Years Strategy to ensure that all our children ages 0-7 have the best possible start in life and can reach their full potential.	Senior Manager Children's Services	A draft Early Years Strategy has been completed. However, as WG notified closure of the Early Years Pathfinder funding late December, 12 months earlier than anticipated, a decision is to be made by the Flintshire Early Years Board (June 2024) and Regional Partnership (April 2024) on the way forward. This will include the prioritisation of exiting projects.
Work to the action plan to further improve compliance with the National Autism Code of Practice.	Commissioning Manager	We have developed a local Implementation Plan which aims to ensure compliance with the Autism Code of Practice. This Plan is currently being evaluated as part of WG's national evaluation of compliance with the Code of Practice.

Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		<p>WG have evaluated the Plan and work continues to ensure compliance in all actions.</p> <p></p>
Continue to develop carers services through partnership with Third Sector providers	Commissioning Manager	<p>North East Wales Carers’ Information Services (NEWCIS) has several Winter Warm boxes available for carers to support them with heating costs. The boxes include radiator reflectors, window film, items of warm clothing and fleece blankets. NEWCIS has also gained funding to buy some electric throws which again helps to keep the heating turned down low.</p> <p>Courses are being arranged with Scottish Power and Citizen’s Advice Bureau (CAB) which will support carers with high energy costs. The courses will look at energy saving methods and financial help that is available to carers.</p> <p>Work is in progress to review our currently commissioned services to understand what is working and where there may be gaps that we</p>

Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		<p>need to fill to support our carers. We are working to ensure that what will be commissioned is co-produced with carers themselves ensuring that they have input into the services available.</p> <p></p>
Establish a Dementia Strategy Implementation Group, to include representation from people with lived experience.	Commissioning Manager / Senior Manager Adults Services	<p>A Dementia Strategy Project Board was established in 2022 to implement the key actions identified in the Flintshire Dementia Strategy. The actions align with the implementation of the All-Wales Dementia Care Pathway of Standards.</p> <p>The Project Board meets every two months and receives input and feedback from citizens by linking to the Dementia Friendly Community Chairs Group.</p> <p>The Board's current focus is on supporting the implementation of the new North Wales Dementia Friendly Community Recognition Scheme and the priorities identified by people with</p>



Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		lived experience during the recent Dementia Listening Campaign. 
To promote the creative use of direct payments with individuals and carers to meet their outcomes.	Senior Manager Adults Services	The Direct Payments Support Service continue to encourage both citizens and social care practitioners to focus on and develop bespoke, outcomes focused solutions to meeting assessed social care needs and to help people to achieve agreed well-being outcomes. Carers reported that the Direct Payment Scheme contributed positively towards their wellbeing and that of the cared for. Carers felt that they were able to be sustained in their caring role and maintain supporting their cared for living at home.  
Further development of Young Carers Service and the Young Carers ID Card	Senior Manager Children's Services	Our Young Carer ID card has been launched successfully and engagement and uptake has been increasing. We now have more than 400 Young Carers across Flintshire




Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		registered with the scheme. Work is ongoing establishing links with local businesses to encourage them to offer discounts and benefits for young people carrying the Young Carers ID Card. This acts as a thank you for the work they do as a Young Carer. 
Work in partnership with Aura and Street Games to deliver free on-line fitness session for LGBT young people	Information and Involvement Officer	The sessions were offered face to face to high schools across the County. One secondary school made a video to showcase their work. This project has now ended. 
Develop and implement an action plan in response to the research we have commissioned into the health needs of Travellers.	Gypsy and Traveller Liaison Officer	The report has been published and the recommendations will be considered and included in the new SEP 2024 – 28, where applicable, going forward. 
Develop a transit site for Travellers to reduce the number of unauthorised encampments at unsafe and unhealthy locations and improve access to health services.	Gypsy and Traveller Liaison Officer	Location of a transit site has been agreed, waiting on approval to progress planning application.


Strategic Equality Plan – Action Plan		
Objective 1: Improve health, well-being and social care outcomes including outcomes for older people and disabled people.		
Action	Who	Progress
		Reporting to seek approval has started. 
Work with Community Midwife Team and Vaccination Team to increase take up of Traveller children receiving MMR (Measles, Mumps and Rubella) vaccine	Gypsy and Traveller Liaison Officer	Offer of MMR has been made to all families in Flintshire. A video message has been shared by leaders from the Travelling community to encourage take-up. 
Implement a Health and Well- being strategy for our employees and introduce initiatives to improve our employees' mental health	Senior manager HR and OD	Additional annual leave was introduced in October 2022. 


Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
Implement an electronic system to record and report on identity-based bullying in schools	Learning Advisor, Health, Well-being and Safeguarding	A Challenging Bullying Online Reporting platform for schools to notify the Council of incidents is in place. Between April 2023 and March 2024 there were 28 incidents reported by schools. 17 reports were completed by 10 primary schools.11








Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		reports were completed by 3 secondary schools. 
Monitor Estyn Inspection Reports and identify any equalities issues in schools to target support to school	Senior Manager School Improvement	Progress against recommendations is monitored by GwE and the Local Authority. Only one recommendation (in one school) has identified any equality issues –improving diversity in the curriculum. 
Monitor compliance by all schools on the Wales Government Respecting Others (statutory guidance)	Learning Advisor, Health, Well-being and Safeguarding	As part of schools safeguarding reporting to the local authority, they are asked to disclose whether they have in place up to date relevant policies, including Respecting Others. This exercise is now annual and by monitoring schools in this way, they can be followed up should they not have an active policy / require additional support. Schools' engagement with the online Respecting Others reporting platform is also a means of monitoring schools' compliance with the guidance.


Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		
Monitor school exclusion rates by protected groups to target support to schools.	Senior Learning Advisor Engagement	On-going. Education and Youth Overview and Scrutiny committee has recognised the progress being made with this target.  
Monitor persistent school absenteeism by protected characteristic	Senior Learning Advisor Engagement	Regular data reviews were undertaken half termly to identify vulnerable individuals. The Inclusion Welfare Team visited any children identified as vulnerable. Inclusion Welfare Officers (IWO) have been trained to profile attendance trends within secondary school bases. A new information technology system was implemented in January 2024, and this has resulted in some technical issues regarding profiling absenteeism.  
Ensure all schools access modern slavery training.	Learning Advisor, Health, Well-being and Safeguarding	The Home Office offers 2 free e-learning courses on modern slavery:  <b>First responder training.</b> This course provides guidance on:


Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		<ul style="list-style-type: none"> <li>• how to identify indicators of modern slavery</li> <li>• how to refer people to the National Referral Mechanism</li> </ul> <p><b>Child victims of modern slavery.</b> This course covers:</p> <ul style="list-style-type: none"> <li>• child-specific indicators of modern slavery</li> <li>• the safeguarding process</li> <li>• best practice for referring children to the National Referral Mechanism</li> </ul> <p>Courses are 45 minutes duration each and Designated Safeguarding leads and deputy leads in schools are being encouraged to undertake both courses.</p> 
Reduce the gap and educational attainment level for those eligible for/receiving free school meals.	Senior Manager School Improvement	WG restarted the reporting of key stage 4 outcomes at a school level using the approach adopted prior to the pandemic. All benchmarking, comparisons with other establishments, and the placing of schools and local authorities in rank




Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		<p>order is no longer acceptable or possible. The only comparative data available to local authorities in these key stages are the national averages. WG's expectation is that performance information is used to support schools and local authorities to understand their own context and improve their own offer. It should not be used in isolation to judge performance or compare schools. At key stage 4 2022/23, Flintshire pupils not entitled to free school meals scored higher in the Capped 9 indicator (interim measures version) with 375.5 points than pupils eligible for free school meals with 287.4 points. The gap was slightly smaller at 88.1 points compared to the national gap of 88.8 points.</p> <p></p>
Continue to grow/expand LGBT Youth Group	Information and Involvement Officer	The LGBT+ group continues to run during term time delivered by Theatre Clwyd in Mold and Youth Service promote the group via social media

Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		and sign post young people to the group. 
To develop a partnership with Viva to offer an additional LGBT+ group which will meet in the evenings	Information and Involvement Officer	Youth Service are working in partnership with Viva and Pride Cymru to deliver a LGBT+ youth club twice a month during term time. The sessions are promoted via Youth Service's social media and the Information and Involvement officer drop-in sessions. 
Monitor Black, Asian and Minority Ethnic people entering youth justice system	Youth Justice Manager	Ongoing monitoring through the services' Disproportionality Action Plan and reports to the Youth Justice Service Management Board 
Monitor the impact of the Pupil Development Grant (PDG) delegated to schools to close the attainment gap for pupils receiving free school meals.	Senior Manager School Improvement Systems	At key stage 4 2022/23, Flintshire pupils not entitled to free school meals scored higher in the Capped 9 indicator (interim measures version) with 375.5 points than pupils eligible for free school meals with 287.4 points. The gap was slightly smaller





Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		at 88.1 points compared to the national gap of 88.8 points. 
Raise profile of STEM subjects to pupils from a Black and minority ethnic background	Senior Manager School Improvement	Work to further promote STEM subjects is included where relevant in the support plans for individual schools. 
Provide revised Trans policy guidance and resources to schools	Learning Advisor, Health, Well-being and Safeguarding	Local Trans Guidance for schools remains on hold pending WG Guidance. A WG consultation is expected on their guidance in 2024. Publication will take place thereafter. This will inform how the local policy will be revised to ensure they align.  Schools have been attending Relationships and Sexuality Education (RSE) training opportunities throughout the year including the establishment of RSE clusters with primary and secondary schools working together to meet the requirements of the RSE Code. The mandatory RSE Code supports schools to design their RSE. The


Strategic Equality Plan – Action Plan		
Objective 2: Reduce gaps in educational attainment between protected groups and implement strategies to improve well-being		
Action	Who	Progress
		<p>content is set within the context of broad and interlinked learning strands, namely: relationships and identity; sexual health and well-being; empowerment, safety and respect. Clusters have been provided funding to access training and resources to support the learning strands.</p> <p></p>




Strategic Equality Plan – Action Plan		
Objective 3 Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place		
Action	Who	Progress
Undertake an annual equal pay audit and develop an action to reduce the pay difference between men and women and other protected groups.	HR Policy and Reward Officer	<p>Report for 2022/23 published in March 2024, in line with statutory reporting timeframes. Report for 2023/24 has not yet been published.</p> <p></p>
Support people with learning disabilities to gain paid employment through Project Search.	Planning and Development Team	<p>The last 12 months have been an exciting time for the local Project SEARCH programme in terms of innovation and development of the local service. Within Flintshire, the programme expanded to offer two</p>





Strategic Equality Plan – Action Plan		
Objective 3 Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place		
Action	Who	Progress
		distinct programmes and became the first Project SEARCH scheme in the UK to offer a dedicated programme for adults aged over 25. The expansion offering two schemes has proven to be a real success. Two graduation ceremonies have been held for students to celebrate completing their internships with their family and friends. 
Achieve Level 3 Disability Confident Leader – DWP Disability Confident Employer	HR Policy and Reward Officer	We have maintained level 2 status of the Scheme. 
Continue to work with the “Clean Slate Cymru” project, an initiative funded by the Construction Industry Training Board (CITB) to support refugees and Travellers secure employment.	Gypsy and Traveller Liaison Officer	Additional course was facilitated by Careers Wales which was attended by refugees at Mold. 
Continue to collate diversity data from employees to increase response rate	HR Business Information Officer	Diversity data continues to be collated and increases year on year. Non-school data is captured at recruitment stage. However, there are still gaps in school data. ICT are progressing two factor authentication to enable roll out of Employee Self






Strategic Equality Plan – Action Plan		
Objective 3 Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place		
Action	Who	Progress
		Service to school employees which will enable recording of diversity data. 
Undertake annual workforce equality monitoring and develop an action plan to address and reduce any inequalities.	HR Business Information Officer	Report has been completed for 2023/24 but not yet been published. 
Identify opportunities to use positive action to reduce inequalities.	HR Business Information Officer	Analysis to take place following publication of report. 
Develop a strategic and consistent approach to embedding social value in the procurement process to increase apprenticeship opportunities to disabled people, people from a Black and minority ethnic background and women.	Social Value Development Officer	Contracts over £25k are assessed to identify whether social value can be added. It is mandatory for contracts over £1M. Recruitment of disabled people and people from a Black and ethnic minority background is included as a social value option for contractors. 
Increase the number of employees who complete the equality e-learning modules.	Strategic Policy Advisor	The e-learning modules for equality are mandatory and process is now in



Strategic Equality Plan – Action Plan		
Objective 3 Ensure equal pay within the workplace by having in place fair, open and transparent grading and salary strategies in place		
Action	Who	Progress
		place advising managers of who has not completed the modules. This means that there is now an increase in completion rates. Over 65% employees have completed this training module. 



Strategic Equality Plan – Action Plan		
Objective 4: Improve personal safety for all protected groups		
Action	Who	Progress
Continue training employees in key teams to recognise and report a hate motivated incident and hate crime.	Regional Community Cohesion Officer	Regular Hate crime training is provided through the Victim Support 
Raise awareness of hate incidents and hate crime in schools through the Welsh Government, Community Cohesion Grant	Strategic Policy Advisor /Regional Community Cohesion Officer	Training was delivered across schools in Flintshire. 
Develop initiatives to promote community cohesion through the Regional Community Cohesion Grant	Strategic Policy Advisor /Regional Community Cohesion Officer	A range of activities were undertaken by the Regional Community Cohesion Team including the Diverse Together project, bringing people from different backgrounds together virtually. 

<b>Strategic Equality Plan – Action Plan</b>		
<b>Objective 4: Improve personal safety for all protected groups</b>		
<b>Action</b>	<b>Who</b>	<b>Progress</b>
Participate in LGBT History month.	Strategic Policy Advisor	A virtual celebration was held through raising the Rainbow flag and promoting through social media and a press release. 
Participate in the annual hate crime awareness week to increase reports across all protected characteristics.	Strategic Policy Advisor	We worked with the North Wales Public Sector Equality Officer Network promoting information through social media. 
Increase the number of employees who complete the Welsh Government's Domestic Violence against women e-learning modules.	HR Business Information Officer	Over 83% employees have now completed the training. 
Increase the number of employees who attend Modern Slavery training.	Strategic Policy Advisor	Over 64% employees completed the Modern Slavery e-learning training. 



<b>Strategic Equality Plan – Action plan</b>		
<b>Objective 5: Increasing access to services and decision making for all protected groups</b>		
<b>Action</b>	<b>Who</b>	<b>Progress</b>
Put in place equality monitoring processes in key services to identify potential barriers to access	Strategic Policy Advisor	This action is being included as part of the Anti-racist Wales action plan and being taken forward.



Strategic Equality Plan – Action plan		
Objective 5: Increasing access to services and decision making for all protected groups		
Action	Who	Progress
		
Complete review of website to ensure it meets accessibility standards	Digital Solutions Architect	Weekly checks are being completed to check compliance. A Council wide Web Group has been established to ensure the website meets the accessibility standards. 
Review opportunities to improve access to public transport for disabled and older people	Transport Manager	Fflecsi service has been introduced in Holwell to great success. Local travel arrangements are currently being reviewed following procurement exercise. All Active Travel Schemes for 2023/24 have been completed as well as a package of crossing facilities at historic School, Crossing Patrol sites. Safer Routes in Communities schemes are progressing following recent successful award of funding from WG. 
Develop an activity plan for the new model of Archive Services which positively targets the engagement of protected groups.	Principal Archivist	Submission for Heritage Lottery funding, which included a draft Activity Plan, has been successful. The Activity Plan is currently in the process of development.

Strategic Equality Plan – Action plan		
Objective 5: Increasing access to services and decision making for all protected groups		
Action	Who	Progress
		
Secure Welsh Government funding enable WiFi on Traveller sites including the transit site.	Gypsy Traveller Liaison Officer	Application has been submitted to WG. Awaiting outcome from WG. 
Work with Aura (leisure services) and Street Games to provide organised sports activities on our own Traveller sites	Gypsy Traveller Liaison Officer	An application has been made to the Serious Violence Fund to support this activity. Two youth engagement officers have been employed to work with Gypsy, Roma, Travellers and refugee children for twelve months

Strategic Equality Plan – Action Plan		
Objective 6: Improve living standards of people with different protected characteristics		
Action	Who	Progress
Develop plan for a transit site for Travellers.	Gypsy and Traveller Liaison Officer	Location of transit site has been agreed, waiting for formal approval to proceed with planning application. 
Become a resettlement area for Asylum Seekers and Refugees		We are now supporting ten families in Flintshire who are residing in Dispersed Accommodation. The Home Office target for 2024/2025 is 377 bed spaces in Flintshire. 

Strategic Equality Plan – Action Plan		
Objective 7 Develop our knowledge of the socio-economic duty to protect people from poverty		
Action	Who	Progress
<p>Ensuring access to period products, free of charge and accessible in the most practical and dignified way possible to:</p> <ul style="list-style-type: none"> <li>• all learners in all schools;</li> <li>• those who menstruate; and</li> <li>• prioritising those from low-income households.</li> </ul>	<p>Learning Advisor – Health, Well-being &amp; Safeguarding</p>	<p>All female pupils in Flintshire schools (x78) have access to a selection of sanitary products in school. Period products are being distributed through each Foodbank in the county. All youth groups have been provided with a selection of period products. Aura Leisure Officers carry period product first aid kits with them and products are promoted across toilet facilities in leisure centres and libraries. Products are also distributed through 15 adult community learning venues. Education staff and community staff have had period product training to support having effective conversations with those who menstruate and understanding more about the products available. Community events held online for parents/carers of young people to raise awareness on period products and menstrual health. Reusable period products online ordering programme for young people aged 8 – 18 years old ran throughout March 2024.</p>



Strategic Equality Plan – Action Plan		
Objective 7 Develop our knowledge of the socio-economic duty to protect people from poverty		
Action	Who	Progress
		
Maximise the numbers attending the Food and Fun programme (previously known as School Holiday Enrichment Programme) in the school summer holidays.	Learning Advisor – Health, Well-being & Safeguarding	484 children benefitted from Food and Fun at 13 schools during the Summer of 2023 including two special schools. Children attending enjoyed a healthy breakfast, snack and a hot lunch. Food and Fun has a keen focus on nutrition education and physical activity, with children encouraged to try new foods different physical activities each week. 496 ‘Bag Bwyd’ (pantry ingredients) to feed a family of four, were provided to the parents of children attending  
Continue to raise awareness of Council Tax Reduction Scheme (CTRS) and ensure that all low-income households are aware of what they are entitled to and how they can make a claim.	Team Manager – Benefits Assessment	Take Up actions have included: <ul style="list-style-type: none"> <li>Updated correspondence issued to all applicants for Disabled Facilities Grants, Free School Meals and School Essential Grants to advise they may also be eligible for CTRS.</li> </ul>

Strategic Equality Plan – Action Plan		
Objective 7 Develop our knowledge of the socio-economic duty to protect people from poverty		
Action	Who	Progress
		<ul style="list-style-type: none"> <li>Created Cost of Living Hub to allow customers to easily access information in relation to all Benefits and Grants including CTRS.</li> <li>Contacting customers who are claiming Housing Benefit only to see if they wish claim CTRS.</li> <li>Promoted to all Council Tax paying households as part of annual billing.</li> <li>Promotion at local hubs/network events.</li> </ul> <p></p>
Continue to raise awareness of the Welfare Reform Team who can support any customers impacted by Welfare Reform changes or who are simply struggling financially.	Welfare Reform Team Manager	<p>Referrals continue to be received due to the continuation of the impacts of the cost of living. It is envisaged that figures will continue to rise with the increased costs of energy bills and general cost of living expenditure.</p> <p></p>
Continue to raise awareness to ensure all low-income households are aware they may be eligible to receive Free School Meals and a uniform Grant.	Team Manager – Grants and Performance	<p>Take Up actions have included:</p> <ul style="list-style-type: none"> <li>Contacting all eligible Free School Meals (FSM) customers who had not claimed the School Essential Grant to advise of their eligibility</li> </ul>



**Strategic Equality Plan – Action Plan**

**Objective 7 Develop our knowledge of the socio-economic duty to protect people from poverty**

Action	Who	Progress
		and where necessary provide help to complete the application form. <ul style="list-style-type: none"> <li>• Promoting via website and schools.</li> <li>• Promotion at local hubs/network events.</li> </ul> 
Provide holistic and financial support to those customers who find themselves in financial difficulty before they fall into poverty.	Welfare Reform Team Manager	Ongoing advice and support forms part of the Discretionary Housing Payments (DHP) application process even if a DHP is unsuccessful. Support is promoted at local hubs/network events. 

Appendix 2 Profile of the workforce (including school employees) as at 31<sup>st</sup> March 2024

**Profile of employees by Ethnic Origin**

2024		
Ethnic Origin	Total employees	% employees
BME	54	0.88%
White	4024	65.66%
Not Stated	1977	32.26%
Prefer Not to Say	74	1.20%
<b>Totals</b>	<b>6129</b>	<b>100.00%</b>

**Profile of employees who classify themselves as disabled.**

2024		
Disabled employees	Total employees	% employees
No	3818	62.29%
Not Stated	1980	32.31%
Yes	184	3.00%
Prefer Not to Say	147	2.40%
<b>Total</b>	<b>6129</b>	<b>100.00%</b>

**Profile of employees by Sexual Orientation**

2024		
Sexual Orientation	Total employees	% employees
Bi-Sexual	33	0.54%
Gay Man	19	0.31%
Gay Woman/Lesbian	27	0.44%
Heterosexual / Straight	3072	50.12%
Not Stated	2815	45.93%
Other	15	0.24%
Prefer Not to Say	148	2.41%
<b>Total</b>	<b>6129</b>	<b>100.00%</b>

**Profile of employees by Religion and Belief**

Religion or Belief	2024	
	Total employees	% employees
Buddhist	7	0.11%
Christian	1955	32.06%
Hindu	1	0.02%
Jewish	2	0.03%
Muslim	5	0.08%
None	1435	23.41%
Not Stated	2495	40.71%
Other	71	1.16%
Prefer Not to Say	147	2.40%
Sikh	1	0.02%
<b>Total</b>	<b>6129</b>	<b>100.00%</b>

**Profile of employees by Marital Status**

Marital Status	2024	
	Total employees	% employees
Divorced or in a Dissolved Civil Partnership	200	3.26%
Married or in a Civil Partnership	2115	34.51%
Not Married or in a Civil Partnership	1311	21.39%
Not Stated	2379	38.82%
Widowed or Surviving Civil Partner	96	1.57%
Prefer Not to Say	28	0.46%
<b>Total</b>	<b>6129</b>	<b>100.00</b>

### Profile of employees by Sex

Sex	2024	
	Total employees	% employees
Female	4630	75.54%
Male	1499	24.46%
Not stated	0	0.00%
<b>Total</b>	<b>6129</b>	<b>100.00%</b>

### Profile of employees by Age

Age Range	2024	
	Total employees	% employees
16 – 24	224	3.65%
25 – 34	1051	17.15%
35 – 44	1423	23.22%
45 – 49	766	12.50%
50 – 54	908	14.81%
55 – 59	877	14.31%
60 – 64	598	9.76%
65 – 69	215	3.51%
70 – 74	49	0.80%
75 and over	18	0.29%
<b>Totals</b>	<b>6129</b>	<b>100.00%</b>

### Appendix 3 Profile of Adult Social Services users by protected characteristic 2023/24.

Data taken from annual data collection 2023/24: all individuals aged 18 plus who were provided with advice and assistance during the year.

#### Profile of Adult Social Service users by sex and age

Age	Female		Male		Non-Binary		Grand Total	
	No.	% of all Adult Social Service users	No.	% of all Adult Social Service users	No.	% of all Adult Social Service users	No.	% of all Adult Social Service users
18-64	996	19.45%	767	14.98%	13	0.25%	1776	34.68%
65-74	367	7.17%	265	5.17%	0	0	632	12.34%
75-84	792	15.47%	510	9.96%	0	0	1302	25.42%
85+	871	17.01%	540	10.54%	0	0	1411	27.55%
<b>Grand Total</b>	<b>3026</b>	<b>59.09%</b>	<b>2082</b>	<b>40.66%</b>	<b>11</b>	<b>0.25%</b>	<b>5121</b>	<b>100%</b>

#### Profile of Adult Social Service users by ethnic background

Ethnic background	No.	%
Black and Minority Ethnic background	39	0.76%
White British	2544	49.68%
Not obtained	2538	49.56%
<b>Grand Total</b>	<b>5121</b>	<b>100%</b>

#### Profile of Adult Social Service users by language

Language	No.	% of all adult service users
Bengali	1	0.02%
Bulgarian	1	0.02%
English	5093	99.45%
German	1	0.02%
Hungarian	1	0.02%
Italian	1	0.02%
Lithuanian	1	0.02%
Other	2	0.04%

Pashto/Pakhto	1	0.02%
Polish	5	0.10%
Portuguese	1	0.02%
Romanian	1	0.02%
Ukrainian	1	0.02%
Welsh	11	0.21%
<b>Grand Total</b>	<b>5121</b>	<b>100%</b>

### Profile of Adult Social Service users by religion

Religion	No.	%
Atheist	5	0.10
Buddhist	1	0.02
Christian	661	12.91
Jehovah Witness	9	0.18
Muslim	2	0.04
No Religion	110	2.15
Other	51	1.00
Pagan/Druid	1	0.02
Unknown	4281	83.60
<b>Grand Total</b>	<b>5121</b>	<b>100.00</b>

## Appendix 4

### Profile of school pupils by protected characteristic

#### Profile of school pupils by sex

Sex	Primary		Secondary	
	Total no. of all school pupils	% of all school pupils	Total no. of all school pupils	% of all school pupils
Male	6983	50.80%	5126	50.28%
Female	6762	49.20%	5069	49.72%
<b>Total</b>	<b>13745</b>	<b>100.00%</b>	<b>10195</b>	<b>100.00%</b>

#### Profile of school pupils who receive Free School Meals (FSM) by sex.

Sex	Primary			Secondary		
	Total no. of all school pupils	No. eligible for FSM.	% FSM recipients	Total no. of all school pupils	No. eligible for FSM	% FSM recipients
Male	6983	1228	50.56%	5126	891	51.89%
Female	6762	1201	49.44%	5069	826	48.11%
<b>Total</b>	<b>13745</b>	<b>2429</b>	<b>100%</b>	<b>10195</b>	<b>1717</b>	<b>100%</b>

#### Profile of school pupils by ethnic background and those receiving FSM

Ethnic background	Total no. of all school pupils	% of all school pupils	No. eligible for FSM.	% FSM recipients
Black and ethnic minority background	1781	7.44%	154	3.71%
White British	20741	86.24%	3757	90.62%
Other	156	0.65%	7	0.17%
Unknown	1262	5.27%	228	5.50%
<b>Total</b>	<b>23940</b>	<b>100%</b>	<b>4146</b>	<b>100%</b>

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Update on the Bus Network Grant and Local Bus Services in Flintshire
<b>Cabinet Member</b>	Cabinet Member for Streetscene and Transportation
<b>Report Author</b>	Chief Officer (Streetscene and Transportation)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

A report was taken to the Environment & Economy Overview & Scrutiny Committee in March 2024 to update committee members on the Welsh Government Bus Network Grant (BNG), which was introduced in April 2024. The BNG allows local authorities to procure commercially non-viable bus routes following the removal of the Bus Emergency Scheme (BES) and the Bus Transition Fund (BTF), which were put in place following the pandemic to help keep bus companies afloat and ensure that vital bus services continued to operate. A copy of the previous report has been enclosed for reference (see Appendix 1).

Six months on, the purpose of this report is to further update Cabinet members on the revenue pressures associated with the local bus service discretionary budget for the 2025/2026 financial year, whilst also informing of an in-year shortfall in BNG funding along with proposals to mitigate these pressures.

The report highlights the proposals to address the £270k shortfall for the revenue budget for local bus services, as well as a further £47k to address the regional shortfall of BNG.

### RECOMMENDATIONS

1	For Cabinet to recognise and support the proposals within the report.
2	For Cabinet to be aware that any delays incurred will represent budget pressures for Streetscene & Transportation and the authority in 2025/2026.
3	For Cabinet to note the requirement to allow 56 days' notice to the Traffic Commission (78 days for services into England) for any changes and/or termination of bus services.

## **REPORT DETAILS**

1.00	<b>EXPLAINING THE BACKGROUND TO THE REPORT</b>
1.01	<p>A report was taken to the Environment &amp; Economy Overview &amp; Scrutiny Committee in March 2024 to update Members on the Welsh Government Bus Network Grant (BNG), which was introduced in April 2024.</p> <p>The BNG allows local authorities to procure commercially non-viable bus routes following the removal of the Bus Emergency Scheme (BES) and the Bus Transition Fund (BTF), which were put in place following the pandemic to help keep bus companies afloat and ensure that vital bus services continued to operate. A copy of the previous report has been enclosed for reference (see <b>Appendix 1</b>).</p>
1.02	<p><b>Bus Network Grant (BNG)</b></p> <p>The Bus Network Grant (BNG) was introduced in April 2024 to run alongside the existing discretionary Bus Service Support Grant (BSSG) scheme, which is funded by Welsh Government (WG), with funding of £25m allocated for the whole of Wales for the financial year 2024-2025. Flintshire is the host authority through which both grants are distributed to the region on behalf of WG. The allocation of BNG for north Wales is £5.6m and the allocation for BSSG across north Wales is £6.1m.</p>
1.03	<p>Whilst it had been anticipated previously that there were expected to be significant changes to the commercial bus network in Wales from April 2024 due to reduced funding, only minor service changes are now required.</p>
1.04	<p>Although the north Wales region has an allocation of £5.6m for this financial year to procure the commercially non-viable services, there is currently a shortfall of £187k across the region. WG has stipulated that there will be no additional BNG available for 2024/2025, and that local authorities will need to remain within budget and, as such, Flintshire is required to make savings of £47k this financial year to cover its proportion of the shortfall.</p>
1.05	<p>At the time of presenting this report to the Scrutiny Committee, it was expected that significant changes were going to have to be made to the X4 bus service that operates between Mold and Chester Bus Park and the f10 and f11 bus services between Rhyl, Connah's Quay and Chester in order to mitigate against the shortfall. However, in the intervening time, the bus operator has come forward and indicated that the cost savings required for the BNG can be accommodated without making any service changes. This is an amendment to what was originally reported through the Scrutiny Committee cycle earlier this month.</p>
1.06	<p><b>Local Bus Service Revenue Budget</b></p> <p>In March 2024, the Integrated Transport Unit (ITU) reprocured all subsidised local bus services, which saw an increase in contractor costs and resulted in a subsequent in-year budget pressure of £270k. The effects of the Covid pandemic, the global impact on fuel, energy, and other operator costs (insurance, drivers' wages etc.) and limited competition within the bus industry has resulted in a sharp rise in contract prices nationally, and in Flintshire.</p>

	<p>Consequently, WG has permitted all local authorities in Wales to continue utilising the funding available from the BNG this financial year to assist with this immediate pressure. However, local authorities need to be mindful that, whilst the BNG can be utilised to mitigate local bus contract price increases, utilisation of this funding to mitigate overspends will limit the funding available to support the overall network.</p>
1.07	<p>Whilst the £270k annual pressure has been mitigated for the 2024/2025 financial year (via the use of BNG), it is essential that this recurring annual pressure is addressed more sustainably for future years. In order to do this, a review of local bus services has been undertaken and a proposal to mitigate this overspend for the 2025/2026 financial year and beyond is presented below.</p>
1.08	<p><b>Terminate the Service 5 at the DIP</b></p> <p>The Service 5, which operates from Mold to Ellesmere Port via the Deeside Industrial Park (DIP) and forms part of the approved core bus network in Flintshire (see <b>Appendix 2</b>), although the extension to Ellesmere Port is not part of the core network. This service was re-procured in March 2024 along with all other subsidised services, but the cost of the contract has increased to £360,000 per annum (which equates to a £9k per month increase). The cost is also high value for the number of passengers utilising the service in terms of cost per passenger (see data enclosed within <b>Appendix 3</b> of this report).</p> <p>Although this service forms part of the core bus network, there were aspirations for this service to terminate at Hooton Train Station for onward travel opportunities into Liverpool; however, due to funding constraints, this did not happen.</p> <p>The current recharge to Cheshire West &amp; Chester (CWaC) Council for its contribution to the mileage within Cheshire is minimal and initial discussions with CWaC have indicated that an increase in contribution is unlikely to be deemed to be cost effective given the limited passenger numbers travelling within Cheshire and availability of other services for residents in Cheshire.</p> <p>It is therefore proposed that the Service 5 is terminated at the Deeside Industrial Park for the reasons outlined below:</p> <ul style="list-style-type: none"> <li>• Passenger numbers indicate a minimal loss of service for Flintshire residents into Cheshire.</li> <li>• Recharges are minimal and CWaC is unlikely to increase its contribution due to low passenger numbers.</li> <li>• Potential for a decrease in contract costs following the re-procurement of the reduced revised service.</li> <li>• Potential to increase service frequency to every 30 minutes or hourly (75mins currently) because of reduced journey length - this would meet the needs of employees working shifts on the DIP.</li> <li>• Additional potential to improve access into the DIP (Zone 1 and 2) to offer better access from the Mold and Buckley areas – this will need to be balanced against any frequency improvements.</li> <li>• Possible access to additional funding from Transport for Wales/Welsh Government as a result of improving employment opportunities.</li> <li>• Encourages use of bus travel and would go towards the Council's aims to reduce the carbon emissions.</li> </ul>

	Whilst it would only be possible to determine accurate savings via a retendering exercise, it is estimated that the savings generated would be sufficient to mitigate the annual pressure indicated.
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<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	The review, amendment and implementation of amended services will be undertaken by the Council's in-house Integrated Transport Unit (ITU).
2.02	Should the proposals not be taken forward, the existing revenue budget will not be sufficient to run the services in its current form, which would result in an annual overspend. This is a significant risk to the authority given the current financial situation.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	Buses play a vital role and are hugely important if we are to make our air cleaner and meet net zero ambitions. They enable people to shop, visit friends and family, get to work and access vital services, and for many people are a lifeline as they face the current cost of living crisis. However, passenger numbers have not returned to those seen before the pandemic and, without continued financial support, some routes will no longer be viable and will have to be reduced. This is likely to have an impact on people who rely on these services to get to work, visit family and access essential services, including doctors and affordable food shopping.
3.02	This is an operational report and therefore a full integrated impact assessment is not required; however, subject to approval, any amendments that are made to the bus services are intended to have the lowest impact in terms of passenger numbers affected.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Cabinet Member for Streetscene and Transportation
4.02	Consultation with passengers affected by any changes or reductions to bus services.
4.03	Consultation with transport operators following the outcome of the procurement exercise.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1 - Update on the Bus Emergency Scheme (BES) – Scrutiny Report March 2024.

5.02	Appendix 2 – Map of the approved core bus network
5.03	Appendix 3 - Service 5 passenger data

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	None.

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
	<p><b>Contact Officer:</b> Anthony Stanford, Transportation Service Manager  <b>Telephone:</b> 07966 430212  <b>E-mail:</b> <a href="mailto:anthony.stanford@flintshire.gov.uk">anthony.stanford@flintshire.gov.uk</a></p> <p><b>Contact Officer:</b> Helen Telford, Integrated Transport Unit Manager  <b>Telephone:</b> 01352 704531  <b>E-mail:</b> <a href="mailto:helen.telford@flintshire.gov.uk">helen.telford@flintshire.gov.uk</a></p>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<p><b>Bus Emergency Scheme (BES)</b> – Emergency funding provided by Welsh Government to help sustain commercial bus Operators in order to ensure that vital commercial bus services were retained during and immediately following the Covid19 pandemic.</p> <p><b>Bus Transition Fund (BTF)</b> – Grant provided by Welsh Government to replace BES, which commenced in June 2023 and ended in March 2024.</p> <p><b>Bus Network Grant (BNG)</b> – Grant provided by Welsh Government to allow local authorities to procure commercially non-viable bus services from April 2024 and effectively replaced BTF.</p> <p><b>Bus Service Support Grant (BSSG)</b> – Grant provided by Welsh Government to deliver transport objectives set out in the Welsh Transport Strategy and the National Transport Finance Plan.</p> <p><b>Commercial Bus Services</b> – Bus services that operate without any public subsidy. Bus companies are free to decide how, where and when they will run commercial services that will provide a financial return. This includes the route, stops, timetables and fares.</p> <p><b>Transport for Wales (TfW)</b> - the body established by Welsh Government to deliver transport priorities in Wales.</p> <p><b>Integrated Transport Unit (ITU)</b> – The Council’s in-house transport team.</p>

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## ENVIRONMENT AND ECONOMY OVERVIEW AND SCRUTINY

<b>Date of Meeting</b>	Tuesday, 5 <sup>TH</sup> March 2024
<b>Report Subject</b>	Update on Bus Emergency Scheme
<b>Cabinet Member</b>	Deputy Leader of the Council and Cabinet Member for Streetscene and Regional Transport Strategy
<b>Report Author</b>	Chief Officer (Streetscene and Transportation)
<b>Type of Report</b>	Operational

### **EXECUTIVE SUMMARY**

During the Covid Pandemic Governments across the UK stepped in to provide support to bus companies when passenger numbers on commercial services collapsed. In Wales, the Bus Emergency Scheme (BES) was created to help keep bus companies afloat to ensure that vital commercial bus services were retained throughout the pandemic. The BES was terminated in June 2023 and was replaced by the Bus Transition Funding (BTF) which is scheduled to terminate in March 2024,

The purpose of this report is to provide an update in relation to the funding of commercial services post BTF, whilst also detailing the scope of Welsh Government Bus Network Fund (BNG) which will be introduced in April 2024.

### **RECOMMENDATIONS**

1	That Scrutiny note how public bus services have been funded during the pandemic, the impact on service levels / passenger numbers / bus companies themselves and future proposals.
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### **REPORT DETAILS**

<b>1.00</b>	<b>EXPLAINING THE BACKGROUND TO THE BUS EMERGENCY SCHEME</b>
1.01	During the Covid Pandemic, Governments across the UK stepped in to provide support to bus companies when passenger numbers on commercial services collapsed. In Wales, the Bus Emergency Scheme (BES) was created to help keep bus companies afloat to ensure that vital commercial bus services kept running throughout the pandemic.
1.02	In February 2023, Welsh Government (WG) confirmed that the BES funding was to be removed and whilst this was originally scheduled to end in March 2023, a further extension was provided until June 2023. The

	three month extension provided by WG was intended to give the industry the short-term stability required while plans for reviewing and developing the bus network continued to better suit the new travel patterns seen since the end of the pandemic. This also ensured that there was no disruption to school transport journeys on public transport services by extending to the end of the school year.
1.03	Regional Planning Teams (bus services) supported by Transport for Wales (TfW) were then established to understand the impact of the removal of BES on commercial services and to resolve the network issues that were likely to arise from the change in funding regime, thus helping to optimise the network and to maintain as much reach and access as possible.
1.04	BES was then replaced by The Bus Transition Fund (BTF) on 24 July 2023; this was developed collaboratively with Local Authorities, Welsh Government, Transport for Wales and the bus industry. The purpose of BTF was to provide immediate financial support to bus operators in Wales so that those vital commercial services could continue.
1.05	In order to understand what funding was required to maintain the current commercial network across North Wales, operator costs were obtained and submitted to Welsh Government and on the 24 <sup>th</sup> September 2023, 'minor changes' to some services were introduced with very minor impact on passengers – mainly being efficiencies through good housekeeping.
1.06	Given BTF is due to end March 2024, Operators were asked to inform the council of those commercial services that will no longer be financially viable (without BTF support). Those services that were highlighted as not being commercially viable are in the process of being procured by local authorities.
1.07	That said, following meetings with operators in November 2023, it was clear that North Wales would not have the capacity or time available to procure the post BTF services in time to start 1 <sup>st</sup> April 2024.
1.08	It was therefore suggested that to 'buy time', approval was given for North Wales Authorities to instigate emergency contracts with operators which would allow the continuation of those non-viable commercial services until such time as the procurement exercise had been completed. The process of procurement is currently underway in Flintshire where it is anticipated that costs for those services will be obtained at the end of March this year.
1.09	With regards to the future regional allocation of funding, WG have announced that a new discretionary grant (to replace the existing BTF) is to be introduced from April 2024. The name of the new funding stream is called The Bus Network Grant (BNG).
1.10	This new scheme, unlike BTF, will provide Local Authorities with funding to tender for bus services that will not operate commercially when BTF comes to an end. The new scheme will run alongside the existing discretionary Bus Service Support Grant (BSSG) scheme with funding allocated of £25m for the whole of Wales for financial year 2024-2025. WG will distribute both BSSG (previously £6m for North Wales) and now



	BNG to the region. Although it has yet to be confirmed officially, it is understood that the allocation of BNG for North Wales is £5.6m.
1.11	The estimated £5.6m will not necessarily be distributed evenly amongst North Wales Authorities, but rather, each region will be required to meet to agree how the funding will be distributed according to individual local authority need. This will depend on the number of former commercial services requiring procurement by each authority, the costs of these routes and the priority of the route in question.
1.12	Given it is highly unlikely that North Wales will be able to afford to continue to fund every element of the current network, a prioritisation (RAG) exercise will need to be undertaken independently by TfW, who will be analysing information received from operators and will rank services based on patronage levels and impact on passengers.
1.13	<p>Despite the financial support detailed above, recent experience has demonstrated that bus operators are finding it increasingly difficult to maintain the commercial viability of some bus services. Passenger numbers on public transport have declined significantly over the last three years, which is impacting on the sustainability of bus services across Wales.</p> <p>As such, we have observed a reduction in the number of bus operators over recent years, which is an issue across Wales. As a result, the current competition in the bus industry is extremely limited which has the potential to increase contract prices.</p>
1.14	We continue to face challenges ahead with the consumer price index for transport services in the UK indicating that, since January 2015, prices in the transport sector have increased by over 27%. Governments and Local Authorities are keen to address the decline in bus use that has been experienced over the years and making bus services more attractive is key to achieving this.
1.15	WG recognise the need for an effective public transport network to ensure economic recovery and that communities are connected, car dependency and congestion is reduced, active travel is promoted, as well as ensuring that carbon emissions and climate change, air quality and health, social inequalities are tackled.
1.16	<p>That said, despite WG's commendable aspirations for an improved public transport network, the potential for inadequate funding, as a result of the BNG prioritisation exercise, is likely to result in significant changes to the bus network in Wales from April 2024.</p> <p>Should any non-viable commercial services not continue because of the procurement / prioritisation exercise, alternative transport would need to be provided for eligible pupils for the duration of their school attendance. This may have an impact on the School Transport Budget given alternative transport arrangements may be more expensive than a current bus pass utilised on commercial services.</p>

1.17	Operators have also raised concern with regards to increased journey times because of the recently implemented 20mph legislation change. As such, WG are working with operators to understand the cause of potential disruption and how this can be overcome.
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<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
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2.01	The procurement of the non-viable commercial services will be undertaken by the Council's in house Integrated Transport Unit (ITU).
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2.02	Should any non-viable commercial services not continue because of the procurement / prioritisation exercise, alternative transport would need to be provided for eligible pupils for the duration of their school attendance. This may have an impact on the School Transport Budget given alternative transport arrangements may be more expensive than a current bus pass utilised on commercial services.
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<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
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3.01	Whilst it is anticipated that there will be a negative impact on bus services because of market price rises and a reduced regional budget, it is not possible to complete the necessary Impact Assessment at this moment in time until funding for Flintshire has been confirmed and once the required procurement and prioritisation exercise has been undertaken.
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<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
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4.01	Deputy Leader of the Council and Cabinet Member for Streetscene and Regional Transport Strategy
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4.02	Consultation with Transport for Wales and regional Authorities during the evaluation, prioritisation and allocation of funding.
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4.03	Consultation with passengers affected by any reductions in services.
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4.04	Consultation with transport operators following the outcome of the procurement / prioritisation exercise.
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<b>5.00</b>	<b>APPENDICES</b>
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5.01	None
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<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
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6.01	None
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<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<p><b>Contact Officer:</b> Katie Wilby, Chief Officer (Streetscene &amp; Transportation)  <b>Telephone:</b> 01352 704530  <b>E-mail:</b> <a href="mailto:katie.wilby@flintshire.gov.uk">katie.wilby@flintshire.gov.uk</a></p> <p><b>Contact Officer:</b> Helen Telford, Integrated Transport Unit Manager  <b>Telephone:</b> 01352 704531  <b>E-mail:</b> <a href="mailto:helen.telford@flintshire.gov.uk">helen.telford@flintshire.gov.uk</a></p>

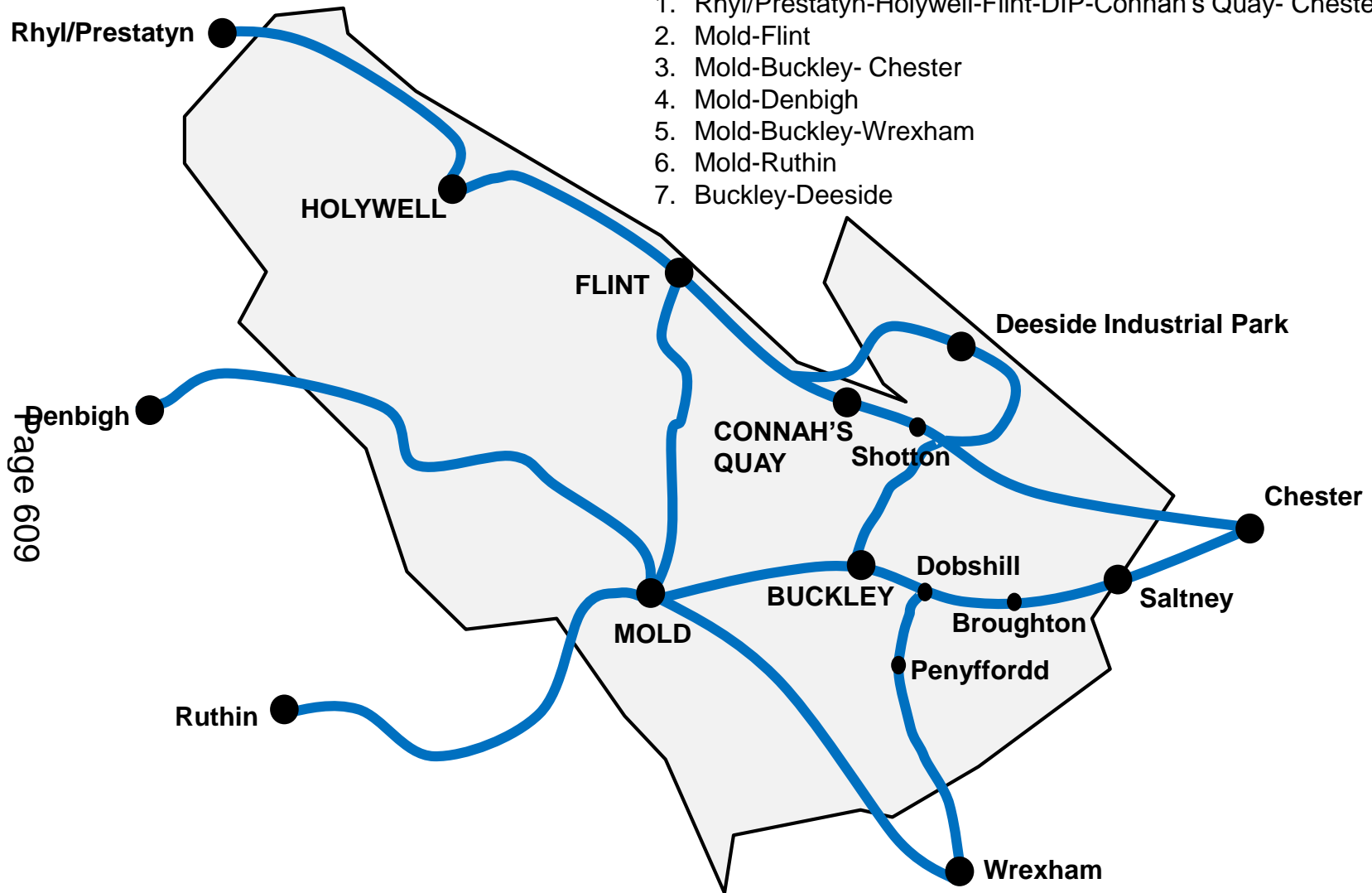
<b>8.00</b>	<b>GLOSSARY OF TERMS</b> <b>These are provided corporately on the Infonet (link) and maintained by the Executive Office</b>
	<ol style="list-style-type: none"> <li>(1) Bus Emergency Scheme (BES) – Emergency funding provided by Welsh Government to help sustain commercial bus Operators in order to ensure that vital commercial bus services were retained during the Covid 19 pandemic.</li> <li>(2) Bus Transition Fund (BTF) – Grant provided by Welsh Government to replace Bus Emergency Scheme (BES) which commenced in June 2023 and is scheduled to terminate in March 2024.</li> <li>(3) Bus Network Grant (BNG) – Grant provided by Welsh Government to allow local authorities to procure commercially non-viable bus services which will be introduced in April 2024.</li> <li>(4) Bus Service Support Grant (BSSG) – Grant provided by Welsh Government to deliver transport objectives set out in the Welsh Transport Strategy and the National Transport Finance Plan.</li> <li>(5) Commercial Bus Services - motor vehicle designed for carrying more than nine passengers and used for the transportation of persons for compensation.</li> <li>(6) Transport for Wales (TfW) - the body established by Welsh Government to deliver transport priorities in Wales.</li> <li>(7) Integrated Transport Unit (ITU) – The Councils in house transport team.</li> </ol>

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## Appendix 2 – Flintshire's core bus network

Core bus routes:

1. Rhyl/Prestatyn-Holywell-Flint-DIP-Connah's Quay- Chester
2. Mold-Flint
3. Mold-Buckley- Chester
4. Mold-Denbigh
5. Mold-Buckley-Wrexham
6. Mold-Ruthin
7. Buckley-Deeside



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**Passenger Numbers f5 Mold to Ellesmere Port**

Looking at one year’s worth of data and considering known boarding and alighting, here is a split of various passenger movements expressed as percentages:

		Percentage	
A	Internally within Flintshire	62%	
B	Internally within Cheshire	17%	
C	Boarding Flintshire to Cheshire	17%	17 + 4 = 21% crossing boundary
D	Boarding Cheshire to Flintshire	4%	

Note that there is understandably a high proportion of boarders who tap on only (network tickets, concessionary travel passes) and therefore whose destination is unknown. It is highly likely that these passengers follow the same pattern. However, you may be interested in these data, for boarding only:

		Percentage
E	Boarding in Cheshire (all destinations incl unknown)	21%
F	Boarding Flintshire (all destinations incl unknown)	78%

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Response to the Audit Wales Review “ <i>Urgent and Emergency Care: Flow out of Hospital – North Wales Region</i> ”
<b>Cabinet Member</b>	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
<b>Report Author</b>	Chief Officer (Social Services)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

The Auditor General has undertaken work to examine whole system issues affecting urgent and emergency care services across Wales and the associated demand management. This work included the discharge of patients from hospital, and examined whether health boards and local authorities have effective arrangements in place to ensure the timely discharge of patients out of hospital.

The Auditor General has produced a review report on findings for North Wales. The report concludes that, whilst partners demonstrated an understanding and commitment to improving patient flow out of hospital, performance remains extremely challenging with adverse effects for patient experience. Specifically, the overall finding is that “Partners must continue to work individually and collaboratively to set and implement clear guidance, mitigate the challenges posed by reduced capacity and increased complexity of care, and ensure the impact of activities is continually monitored, challenged, and maximised.”

The review considered the period April 2023 to February 2024, concluding with a set of 16 recommendations for action. Audit Wales will present their report and findings to Governance and Audit Committee on 25 November 2024.

### RECOMMENDATIONS

1	That Members consider the Wales Audit report and the measures being taken regionally and locally to implement the recommendations made.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE RESPONSE TO THE AUDIT WALES REVIEW “URGENT AND EMERGENCY CARE: FLOW OUT OF HOSPITAL – NORTH WALES REGION”</b>
1.01	The report found that the extent of hospital discharge delays in North Wales has grown significantly in recent years and between April 2023 and February 2024. Each month there were on average 334 medically fit patients across the region whose discharge was delayed, with completion of assessments the main cause for delay.
1.02	For the year to date, up to and including February 2024, the total number of bed days that had been lost to delayed discharges across North Wales was 71,871 with a full-year cost equivalent of £39.202 million. Difficulties with discharge are also impacting on the ability of partner organisations to meet some patients' needs effectively, especially in the West of the region where a significant proportion of patients are placed in temporary accommodation post hospital discharge.
1.03	Several factors are contributing to delayed discharges. Many patients, especially elderly people with mental health problems, have complex needs that are not easily met by the services that are available. There are also workforce challenges within the social care sector, particularly in the areas of Conwy, Denbighshire, and Gwynedd.
1.04	Work is also needed to address an absence of jointly agreed training and guidance on discharge planning for health and social care staff, and to overcome difficulties in communicating and sharing information across organisational boundaries.
1.05	Improving patient flow is a key feature of plans across the partners which align to the Welsh Government's six goals for urgent and emergency care. Partners are working together, both strategically and operationally, to improve patient flow, however, pressures on the system are creating an unhelpful blame culture. Financial resources are being applied to improve discharge planning, although financial constraints in partner bodies is leading to the continual roll forward of schemes and ultimately leaves little space for new ideas.
1.06	Partners also need to maximise the use of the Regional Integration Fund (RIF), improve oversight and impact of the initiatives that are being undertaken to support timely and effective discharge, and ensure learning from events is embedded into routine practice.
1.07	Taken together, the above demonstrates that despite hard work and good intentions on the part of organisations within the region, there is still much to do to improve discharge planning and processes. Continued action is needed across a range of areas to secure the improvements which are necessary for patients, their families, and the wider urgent and emergency care system.

1.08	The report identifies gaps and areas for improvement in supporting patient flow but acknowledges the financial constraints in which social care and health agencies are working.
1.09	Sixteen recommendations are made to improve joint working, setting out better ways of working with an expectation that these recommendations are addressed. Recommendations set out expectations for BCUHB and North Wales local authorities, with particular reference to the role of the Regional Partnership Board.
1.10	A key recommendation is that guidance should be agreed between the Health Board and local authorities in North Wales, providing clarity on how discharge planning should work across the region. In response, a guidance summary is being prepared regionally to provide support and guidance to help health and social care colleagues work together better. Within Flintshire Social Services, the document will be shared with all staff involved in supporting discharge planning across Flintshire and will be embedded in training and supervision.
1.11	The report recommends that social care and staff should have consistent access to up to date information about community services. In Flintshire, our Single Point of Access for adult services includes a number of FLVC third sector advisers who have access to a wide range of community resources, and there is also access to the national DEWIS database of community services.
1.12	The report recommends that BCUHB and local authorities should develop information sharing, including wider access to organisational systems. Flintshire Social Services has for some time provided access to our electronic information system to discharge leads within the Home First Bureau to enable access to key information to support discharge planning. Daily meetings are held in each of the hospitals which service Flintshire, where health and social services colleagues share information and make plans for safe discharges.
1.13	The Regional Partnership Board has prepared an action plan to address all the Audit Wales recommendations in a timely way. The report will influence and inform policy and procedure to improve hospital discharges over the coming months.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	<p><b>Revenue:</b> there are no implications for the approved revenue budget for this service for either the current financial year or for future financial years. The recommendations made can be addressed by working more effectively within existing resources and structures.</p> <p><b>Capital:</b> there are no implications for the approved capital programme for either the current financial year or for future financial years.</p> <p><b>Human Resources:</b> there are no implications for additional capacity or for any change to current workforce structures or roles.</p>

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	An impact assessment is not required as this is a report on progress and provides an overview of the requirements and recommendations set out in the Audit Wales report.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	None required in this case.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Audit Wales – Urgent and Emergency Care: Flow out of Hospital – North Wales Region Report.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	None.

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	Contact Officer: Christopher Phillips, Service Manager, Older People Telephone: 01352 702540 E-mail: <a href="mailto:Christopher.phillips@flintshire.gov.uk">Christopher.phillips@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<p><b>Wales Audit Office:</b> works to support the Auditor General as the public sector watchdog for Wales. They aim to ensure that the people of Wales know whether public money is being managed wisely and that public bodies in Wales understand how to improve outcomes.</p> <p><b>Regional Integration Fund (RIF):</b> A five-year Welsh Government programme from April 2022 to 2027 to help integrate health and care services.</p> <p><b>North Wales Regional Partnership Board:</b> Regional Partnership Boards manage and develop services to secure strategic planning and partnership working between local authorities and Local Health Boards and to ensure effective services, care and support are in place to best meet the needs of their respective populations.</p>

<p><b>FLVC:</b> Flintshire Local Voluntary Council supports, promotes and develops the voluntary and community sector in Flintshire.</p>
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<p><b>Home First Bureau:</b> A BCUHB team covering Wrexham and Flintshire to support discharge planning and co-ordinate discharge activity.</p>
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## Urgent and Emergency Care: Flow out of Hospital – North Wales Region

Date issued: February 2024

Document reference: 4081A2024

The Auditor General has a wide range of audit and related functions, including auditing the accounts of Welsh NHS bodies, and reporting to the Senedd on the economy, efficiency, and effectiveness with which those organisations have used their resources. The Auditor General undertakes his work using staff and other resources provided by the Wales Audit Office, which is a statutory board established for that purpose and to monitor and advise the Auditor General.

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# Summary report

## About this report

- 1 Once a patient is considered medically or clinically well enough to leave hospital (also referred to as medically fit or clinically optimised) the timely discharge of that patient to the right setting for their ongoing needs is vital. Timely, effective, and efficient moving of patients out of an acute hospital setting holds important benefits for patient care and experience as well as for the use of NHS resources.
- 2 When the discharge process takes longer than it should there can be significant implications for the patient in terms of their recovery, rehabilitation, and independence. Delayed discharges will also have implications for other patients coming into the urgent and emergency care system<sup>1</sup> who need a hospital bed. Poor patient “flow” creates bottlenecks in the system that contribute to well documented problems such as over-crowded emergency departments and an inability to secure timely handover of patients from ambulance crews.
- 3 The Auditor General had originally included work in his 2021 local audit plans to examine whole system issues affecting urgent and emergency care services, including the discharge of patients from hospital. The COVID-19 pandemic resulted in this work being postponed and brought back on stream in 2023. Our work has sought to examine whether health boards and local authorities have effective arrangements in place to ensure the timely discharge of patients out of hospital. The approach we adopted to deliver our work is set out in **Appendix 1**.
- 4 This work is part of a broader programme of work the Auditor General is currently undertaking in respect of urgent and emergency care services in Wales. We are also examining the arrangements in place to help manage urgent and emergency care demand, and to direct patients to the care setting that is most appropriate to their needs. The findings from that work will be reported separately in 2024.
- 5 The Auditor General’s work on urgent and emergency care is designed to help discharge his statutory duties. Specifically, this work is designed to satisfy the Auditor General that NHS bodies and local authorities have proper arrangements in place to secure the efficient, effective, and economical use of resources, as required by sections 17 and 61 of the Public Audit Wales Act 2004.
- 6 This report sets out the findings from the Auditor General’s review of the arrangements to support effective flow out of hospital in the North Wales region (the region). The region encompasses:
  - Betsi Cadwaladr University Health Board (the Health Board);
  - Conwy County Borough Council;

<sup>1</sup> Urgent and emergency care describes any unplanned, urgent, and emergency care provided by health and social care services. The unscheduled care system is complex with numerous organisations involved in providing services and it deals with acutely unwell, vulnerable, and distressed people in need of urgent assistance.

- Denbighshire County Council;
  - Flintshire County Council;
  - Cyngor Gwynedd;
  - Isle of Anglesey Council; and
  - Wrexham County Borough Council.
- 7 In undertaking this work, we have also considered progress made by the Health Board against previous recommendations made in our [2017 report on discharge planning](#). Our findings from this work are set out in a separate report to the Health Board.

## Key messages

- 8 Overall, we found that **while partners understand and show a commitment to improving patient flow out of hospital, performance remains extremely challenging with adverse effects for patient experience and care. Partners must continue to work individually and collaboratively to set and implement clear guidance, mitigate the challenges posed by reduced capacity and increased complexity of care, and ensure the impact of activities is continually monitored, challenged, and maximised.**
- 9 The extent of discharge delays in North Wales has grown significantly in recent years and between April 2023 and February 2024, each month there were on average 334 medically fit patients whose discharge was delayed, with completion of assessments the main cause for delay. For the year to date, up to and including February 2024, the total number of bed days that had been lost to delayed discharges was 71,871 with a full-year cost equivalent of £39.202 million. The consequent impact on patient flow within hospitals and the urgent and emergency care system is significant, with waiting times in emergency departments and ambulance handovers falling well short of national targets. In February 2024, there were over 8,000 lost ambulance hours because of handover delays, and the average wait within the Health Board's emergency departments was around 8.5 hours. Difficulties with discharge are also impacting on the ability of partner organisations to meet some patients needs effectively, especially in the west of the region where a significant proportion of patients are placed in temporary accommodation post hospital discharge.
- 10 Several factors are contributing to delayed discharges. Many patients, especially elderly people with mental health problems, have complex needs that are not easily met by the services that are available. There are also workforce challenges within the social care sector, particularly in the areas of Conwy, Denbighshire, and Gwynedd. Our work identified numerous weaknesses in the practice and documentation of discharge planning and a need to implement the Discharge to Recover and Assess (D2RA) model as intended. Work is also needed to address an absence of jointly agreed training and guidance on discharge planning for

health and social care staff, and to overcome difficulties in communicating and sharing information across organisational boundaries.

- 11 Improving patient flow is a key feature of plans across the partners which align to the Welsh Government's six goals for urgent and emergency care<sup>2</sup>. Partners are working together, both strategically and operationally, to improve patient flow, however, pressures on the system are creating an unhelpful blame culture. Financial resources are being applied to improve discharge planning, although financial constraints in partner bodies is leading to the continual roll forward of schemes and ultimately leaves little space for new ideas. Whilst there is regular monitoring of the position within individual organisations, partners lack arrangements to oversee patient flow across the whole health and care system. This limits opportunities to examine whole system solutions, embed learning and to focus on the impact of activity within performance and progress reports.
- 12 Partners also need to maximise the use of the Regional Integration Fund (RIF), improve oversight and impact of the initiatives that are being undertaken to support timely and effective discharge, and ensure learning from events is embedded into routine practice.
- 13 Taken together, the above demonstrates that despite hard work and good intentions on the part of organisations within the region, there is still much to do to improve discharge planning and processes. Continued action is needed across a range of areas to secure the improvements which are necessary for patients, their families, and the wider urgent and emergency care system.

## Recommendations

- 14 Recommendations arising from this audit are detailed in **Exhibit 1**. The combined organisational response by the statutory bodies included in this review to these recommendations will be summarised in **Appendix 4** once considered by the relevant committees.

### Exhibit 1: recommendations

Recommendations	
<b>Improving training and guidance</b>	
R1	The Health Board, working with local authorities, should develop jointly agreed guidance to provide clarity to all staff on how the discharge planning

<sup>2</sup> Further information on the Welsh Government six goals for urgent and emergency care can be found via <https://www.gov.wales/written-statement-six-goals-urgent-and-emergency-care-programme-update>

## Recommendations

process should work across the region. This should be based on the national guidance issued in December 2023 and should set out clearly defined roles and responsibilities, and expectations, including when referrals for ongoing care should be made.

- R2 The Health Board and local authorities should ensure processes are in place to communicate discharge planning guidance to all relevant health and social services staff, including those working on a temporary basis, supported by an ongoing programme of refresher training and induction training for new staff.

### Improving compliance with policies and guidance

- R3 The Health Board should embed a regular cycle of audit to assess the effectiveness and consistency of the application of discharge policies and guidance, including the application of D2RA.
- R4 The Health Board should establish controls to prevent staff adding patients to multiple waiting lists, such as for reablement, home care packages and residential care to facilitate a speedy discharge, regardless of need. This will ensure that only those who need the services are on the relevant waiting lists.

### Ensuring patient safety while awaiting care packages

- R5 The Health Board should ensure processes are in place to notify social services before patients are discharged home, where those patients require ongoing support in their own home, and where such support is not in place at the time of discharge.
- R6 The Health Board and local authorities should ensure mechanisms are in place to regularly monitor patients who are discharged home without arranged ongoing social care and to escalate issues to the appropriate service where necessary.

### Improving the quality and sharing of information

- R7 The Health Board and local authorities should ensure that all relevant staff across each organisation has consistent access to up-to-date information on services available in the community that support hospital discharge. This will ensure that opportunities to discharge earlier with support from services beyond social care are not missed.
- R8 The Health Board should improve record keeping by:
- 8.1. ensuring all staff involved in discharge planning fully understand the importance of documenting comprehensive information in patient case-notes to support effective discharge planning.

## Recommendations

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8.2. establishing a programme of case-note audits focused on the quality of record keeping.

- R9 The Health Board and local authorities should implement ways in which information can be shared more effectively, including opportunities to provide wider access to organisational systems and ultimately joint IT solutions.
- 

### Addressing key gaps in capacity

- R10 The Health Board and local authorities need to work together to develop joint solutions to address key gaps in service capacity, in particular, domiciliary care and reablement services which would enable timelier discharge of patients to their own home.
- 

### Maximising the use of the Regional Integration Fund

- R11 The Health Board and local authorities, through the Regional Partnership Board (RPB), should demonstrate how it is working to increasingly mainstream long-standing schemes funded through RIF which are considered core services.
- R12 The Health Board and local authorities, through the Regional Partnership Board, should agree a process for utilising any future RIF slippage monies, ensuring that appropriate value and benefit is obtained from such spending.
- R13 To help inform decision-making and discussions, the Health Board and local authorities should:
- 13.1. ensure that the Regional Partnership Board has routine access to key performance indicators relevant to effective and timely flow out of hospital, including urgent and emergency care performance within the Health Board and waiting lists for social services and care packages; and
  - 13.2. use the Regional Partnership Board working arrangement to develop a regional risk register which pulls together the risks associated with delayed discharges.
- 

### Improving oversight and impact

- R14 The Health Board and local authorities should ensure that information setting out progress with significant activities and initiatives being undertaken to support effective and timely discharge is routinely available at a corporate and partnership level. This should include activities and initiatives undertaken individually and jointly, both within and outside of the RPB structure, their

## Recommendations

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impact and how they collectively contribute to addressing the challenges. This will help to provide assurance that resources are being invested to best effect.

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### **Embedding learning from actions taken to address delayed discharges**

- R15 The Health Board and local authorities should ensure that mechanisms are in place to implement learning from actions taken to address delayed discharges, such as the Multi Agency Discharge Events (MADE), and to maintain regular oversight to ensure the learning is being implemented.
- R16 The Health Board should strengthen escalation arrangements for reporting adverse incidents or concerns relating to discharge by:
- 16.1. addressing any outstanding adverse incidents or concerns, communicating clearly with the relevant local authority; and
  - 16.2. ensuring a consistent approach to reporting adverse incidents and concerns relating to discharge is in place across the Health Board.

Exhibit source: Audit Wales

# Detailed report

## What is the scale of the challenge?

- 15 This section sets out the scale of the challenge that the region is facing in respect of delayed discharges and the subsequent impact on patient flow and the patient experience.
- 16 We found that **there are significant numbers of delayed discharges across the region which are reducing patient flow through the hospitals with consequential impact on urgent and emergency care services and the ability to meet patients' needs.**

### Delayed discharges

- 17 We found that **significant numbers of patients are not leaving hospital in a timely way once they are considered medically well enough to do so, with completion of assessments, social care worker allocations and waits for home care packages the main causes for delay.**
- 18 Delays discharging patients from hospital has been a longstanding issue for bodies in Wales and other parts of the UK. The available data shows that this issue has become significantly worse in recent years.
- 19 **Exhibit 2** sets out the number of delayed discharges experienced by the Health Board between April 2023 and February 2024, compared with other Health Boards across Wales. These relate to patients who are considered medically fit but remain in a hospital bed 48 hours after the decision was made that they were well enough to leave hospital. The rate of delayed discharges across the region is broadly in line with the average for Wales.



**Exhibit 2: number of delayed discharges per 100,000 head of population (April 2023 – February 2024)**

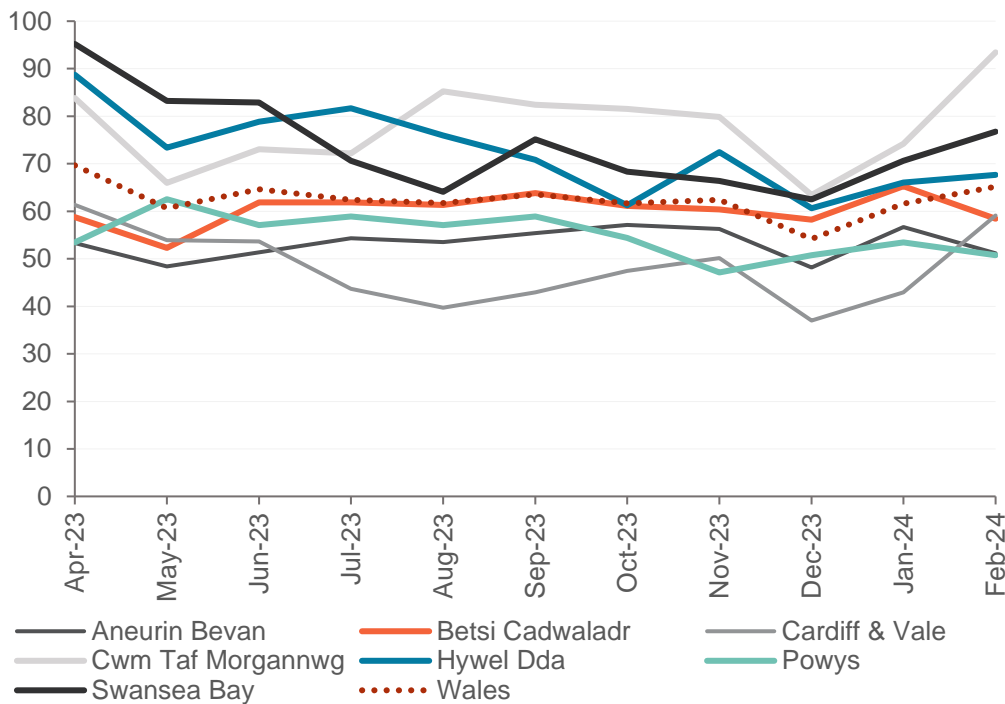


Exhibit source: Welsh Government

- 20 Since the pandemic, the way in which delayed discharges are measured has changed. No data on delayed discharges was formally reported between the period March 2020 and March 2023. Prior to the pandemic, delayed discharges were reported as ‘delayed transfers of care’ which were defined as those who continue to occupy a bed after the date in which the patient is declared to be ready to move on to the next stage of their care. This compares with the current method for counting delays which focuses on those who remain in a hospital bed 48 hours after being identified as ‘medically fit’.
- 21 Although not a direct comparison, in February 2020 the Health Board reported 81 delayed transfers of care. The position at the end of February 2024 of 324 delayed discharges equates to 16.1% of the Health Board’s total bed capacity<sup>3</sup>. However, this is below the all-Wales average of 17.9% (ranging between 13.7% and 31.3%) and the second lowest in Wales.

<sup>3</sup> Based on general and acute bed availability data in July 2023, StatsWales website (<https://statswales.gov.wales/Catalogue/Health-and-Social-Care/NHS-Hospital-Activity/NHS-Beds/nhsbeds-by-organisation-site>)

- 22 The top five reasons for delays at the Health Board compared to the all-Wales position is set out in **Exhibit 3**, with the most common reasons being awaiting a joint assessment (between health and social care) and awaiting a social worker allocation. A full list of reasons for delay in the Health Board are set out in **Appendix 2**, and by local authority.

**Exhibit 3: top five reasons for delayed discharge (February 2024)**

Reason for delay	Percentage delayed	All-Wales average
Awaiting joint assessment	15.7	9.0
Awaiting social worker allocation	15.1	8.5
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	13.3	10.3
Awaiting start of new home care package	10.5	8.0
Awaiting completion of assessment by social care	5.6	15.7

Exhibit source: Welsh Government

- 23 When broken down by local authority, the rate of delayed discharges per 100,000 head of population is generally higher than the all-Wales position except for Flintshire. Awaiting joint assessment is the highest cause of delay in the west of the region, and in Denbighshire. Awaiting social worker allocation is the highest cause of delay in the east of the region. Awaiting clinical assessments is the highest cause of delay in Conwy, accounting for a quarter of all delays.
- 24 Based on data reported in February 2024, the total number of patients accounted for 6,524 bed days. Based on a typical cost per bed day<sup>4</sup>, this equates to costs in the region of £3.262 million, and a full year effect of £39.202 million.
- 25 Our hospital patient case note review relating to a sample of medical emergency patients identified that the length of time patients remained in a hospital bed after 48 hours of being declared medically fit varied across the Health Board’s main hospital sites, with the average number of days patients remained in a hospital bed the longest at Ysbyty Maelor (**Exhibit 4**).

<sup>4</sup> Based on £500 per bed-day as set out in the NHS Confederation [briefing for the statement by the Minister for Finance and Local Government on the 2023-24 financial position](#)

**Exhibit 4: average length of time after 48 hours of being declared medically fit  
(based on a sample of patients with a length of stay greater than 21 days)**

Hospital site	Average number of days
Ysbyty Glan Clwyd	16
Ysbyty Gwynedd	20
Ysbyty Maelor	43

Source: Audit Wales

### Impact on patient flow

- 26 We found that **delayed discharges are having a significant impact on patient flow with worrying knock-on effects elsewhere in the urgent and emergency care system.**
- 27 Delays in discharging patients from hospital have consequences for patient flow and in particular, the ability of patients to access services when they need them. Beds being used by patients who no longer need them means that they are not available for those who do, resulting, for example, in longer waits in emergency departments. This in turn impacts on the ability for ambulance crews to handover patients and respond to 999 calls in the community.
- 28 **Appendix 3** sets out the region's performance across a range of urgent and emergency care performance indicators in comparison to the position across Wales since April 2022. In summary:
- the percentage of ambulance red calls responded within 8 minutes has broadly been in line with the all-Wales position at around 50%, but below the national target of 65% (**Exhibit 20**);
  - the median amber response time has been significantly above the target of 20 minutes at around 3.5 hours, falling to around an hour over the summer of 2023, but rising again in recent months (**Exhibit 21**);
  - the percentage of ambulance handovers within 15 minutes at the Health Board's major emergency departments is generally below the all-Wales average and some of the lowest in Wales, particularly at Ysbyty Glan Clwyd and Ysbyty Maelor, and significantly below the national target (**Exhibit 22**);
  - the percentage of ambulance handovers taking over one hour has broadly been above the all-Wales average fluctuating between 38.5% and 55%, compared to a national target of zero (**Exhibit 23**);
  - the total number of hours lost following notification to handover over 15 minutes is well above the all-Wales average, fluctuating between 6,000 and 10,000 hours per month over recent months (**Exhibit 24**);

- once the patient is in the emergency department, the median time from arrival to triage has reduced and is now just below the all-Wales position at 21 minutes (**Exhibit 25**);
- the median time from arrival to being assessed by a senior clinical decision maker has been significantly higher than all other health boards, at around five and a half hours, but since March 2023 has reduced to around two hours which remains above the all-Wales average (**Exhibit 26**);
- the percentage of patients seen within 4 hours in a major emergency department is some of the lowest in Wales. Performance varies across the three hospital sites, with performance better in Ysbyty Maelor (**Exhibit 27**);
- the percentage of patients spending less than 12 hours in an emergency department is also some of the lowest in Wales, with performance worse at Ysbyty Glan Clwyd and Ysbyty Gwynedd (**Exhibit 28**); and
- the proportion of bed days accrued by patients with a length of stay over 21 days has been better than the all-Wales average (**Exhibit 29**).

- 29 Based on our analysis of Health Board data relating to all emergency medicine patients discharged in October 2022, we found the average total length of stay for patients staying over 21 days in the acute sites was 51 days (compared to 56 days across Wales). This varied across the three acute sites, with the average total length of stay increasing to 64 days at Ysbyty Maelor. The average total length of stay at Ysbyty Glan Clwyd and Ysbyty Gwynedd was 39 and 50 days, respectively.
- 30 The Health Board's total bed capacity has fluctuated over recent years, with 2,123 total beds available in 2022-23, with just under half allocated to acute medicine (975). Bed occupancy in the acute medicine beds has been at 88.3%, compared with an optimal level of 85%. The Health Board is one of four health boards to have community hospital beds managed by GPs. These beds provide step-down facilities for patients who no longer need acute care. However, the number of these beds available in the Health Board has reduced from 109 in 2019-20 to 88 in 2022-23, and occupancy levels have been running high at 97.2%. Most of these beds are in Denbighshire and Gwynedd.
- 31 Pressure on available beds because of delayed discharges means that health boards are not always able to ensure that patients are placed on the best wards for their clinical needs. For example, health boards will usually hold vacant beds on stroke units to ensure that stroke patients have fast and direct access, enabling them to access stroke specialists and equipment.
- 32 Health boards have increasingly experienced difficulties in admitting stroke patients to a stroke ward as problems with patient flow and bed availability mean that these beds have been needed for non-stroke patients. Over the last 12 months, only a quarter of stroke patients admitted to the Health Board have had direct admission to a stroke unit within four hours. Performance, however, is marginally better than the all-Wales position.

33 The impact of poor patient flow is also often felt within scheduled (or planned) care, as patients with their booked procedures are increasingly having their treatments cancelled due to the lack of available beds. During 2022-23, 641 planned care admissions were cancelled due to the lack of an available ward bed in the Health Board, with over half of those during December 2022 and January 2023. For the period, 2023-24 up to and including February 2024, 1,036 planned care admissions were cancelled. This level of cancellation represents poor patient experience and risks the conditions of planned care patients further deteriorating while they wait for their treatment to be rescheduled.

### Meeting patients' needs

- 34 We found that **delayed discharges are impacting on the ability of organisations to meet some patients needs effectively with a significant proportion of patients in the west of the region being discharged into temporary accommodation.**
- 35 The pressure to discharge patients and the lack of available care options can lead to patients being discharged to settings that are not always the most appropriate ones for their needs including:
- being discharged home before a proper care package is in place;
  - being discharged to a residential care home when they could have gone home with a support package;
  - being discharged to a temporary residential care home to await availability of longer-term placement;
  - being discharged to a community hospital bed to await availability of a package of care; and
  - being discharged to a setting which is far away from family and friends.
- 36 Patients who are delayed within hospital can become deconditioned, are at higher risk of experiencing an injury from a fall or contracting a hospital acquired infection which can exacerbate their care needs, lengthening their hospital stay and making them more vulnerable to re-admission after they have been discharged.
- 37 Within the region, the impact of delays on patient experience and outcomes is something we found that both health and social care staff are very aware of and working hard to avoid. However, patient choice and experience are increasingly being compromised to secure a timelier patient discharge, and staff we spoke to often cited the increased need to manage patient and family expectations. With limited options for ongoing care, we found that staff are often left looking at alternative options to enable patients to be discharged. We heard examples of staff adding patients to multiple waiting lists, such as for reablement<sup>5</sup>, home care

<sup>5</sup> Reablement describes services for people with poor physical or mental health to help them accommodate their illness by learning or re-learning the skills necessary for daily living.

packages and residential care, to facilitate a timelier discharge regardless of patients' specific needs.

38 We also heard of examples where patients were discharged home without support to await a package of care to become available. Partners work to minimise such cases as much as possible, adopting a risk-based approach and exploring various options to bridge gaps in the provision of formal support such as by requesting the patients' families or friends provide short-term support. While some councils, including Conwy, Gwynedd, and Wrexham, have arrangements in place to monitor the wellbeing of patients awaiting a package of care, some do not. We also heard of rare but concerning situations where patients are discharged home to await a package of care without social service teams being notified.

39 **Exhibit 5** sets out the extent to which unplanned short-term care home accommodation is used across the region. Since July 2023, the region has had some of the highest number of adults per 100,000 population placed in unplanned short term care home accommodation. This is particularly the case in the west of the region. The proportion of adults in unplanned placements longer than 6 months in Gwynedd is the highest in Wales, with the proportion of adults staying in temporary placements between 3 and 6 months on the Isle of Anglesey the second highest in Wales.

**Exhibit 5: number of adults per 100,000 head of population waiting in a care home with no planned end date, regardless of the reason they are waiting (+3 months) July 2023 – February 2024**

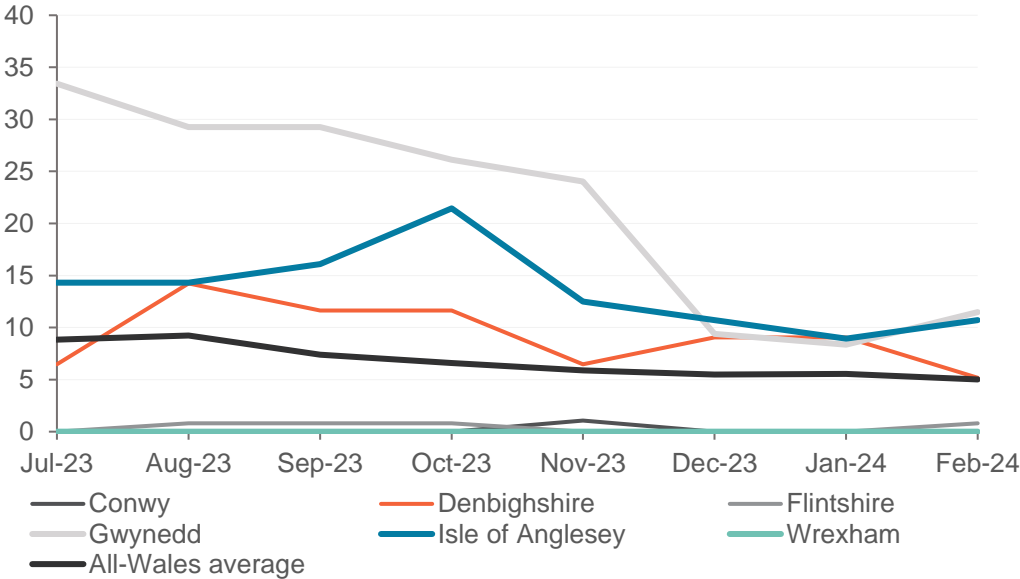


Exhibit source: Welsh Government

\* Note – no data submitted for Wrexham for the period.

## What is impacting effective and timely flow of patients out of hospital?

- 40 This section sets out the issues impacting on effective discharge planning and the timely flow of patients out of hospital across the region.
- 41 We found that **while complexity of demand is increasing, health and social care capacity has reduced leaving limited options for ongoing care and these challenges are exacerbated by a lack of information sharing and beginning discharge planning too late in a patient's journey.**

### Volume and complexity of demand

- 42 We found that **there have been increases in the complexity of demand and the number of elderly patients with mental health problems.**
- 43 In North Wales people over the age of 65 accounted for 20% of the population in 2020, but that figure is expected to increase to 29% by 2040<sup>6</sup>. As people live for longer, there is a correlating increase in the numbers of people who live with multiple long-term conditions and complex health needs and who will therefore need to rely on health and care services for support.
- 44 Those we spoke to during this review spoke of significant increases they see in demand, particularly in terms of more complex, higher acuity demand. We were often told that patients come in with one problem, but routine tests can quickly uncover several other conditions that need to be treated and managed, which will typically require more complex discharge planning.
- 45 COVID-19 exacerbated this increase in complex demand. During the pandemic, demand for emergency departments declined rapidly as people followed national advice to protect core frontline services. In addition, families provided additional care and support to avoid their loved ones being admitted to hospital or long-term care out of fear of contracting COVID-19. We were told that as the pandemic eased, demand began presenting through the emergency departments which was much more complex than before as people's conditions had deteriorated at home.
- 46 Care homes have also seen increasing complexity amongst their patients. Elderly mental health was often raised as a significant pressure, with greater numbers of elderly patients presenting at hospital with mental health conditions which care homes find increasingly difficult or impossible to accommodate post discharge.

<sup>6</sup> Population projection data sourced from the Older People's Commissioner for Wales <https://olderpeople.wales/wp-content/uploads/2023/01/221222-Understanding-Wales-ageing-population-24-November.pdf>

## Workforce capacity

- 47 We found that **there are workforce capacity challenges, particularly within the Health Board and in Gwynedd and Wrexham adult social services, with waits for social care assessments in some councils amongst the highest in Wales.**
- 48 Increasingly staff involved in discharge planning are finding their capacity stretched due to factors such as high vacancy rates and unplanned absence rates. Reduced numbers of staff leads either to a reliance on agency staff or to fewer permanent staff attempting to manage increasingly complex patients and organise the ongoing care they need for discharge. High usage of agency staff has inevitable impacts on continuity within the workforce.
- 49 As of January 2024, the Health Board was reporting 9.0% vacancies as a percentage of its total establishment, with nursing and midwifery vacancies at 11.7%, and medical vacancies at 6.2%. Vacancy rates were highest in the centre of the region. The unplanned absence rate was at 6.7% for nursing and midwifery staff, but much lower at 2.2% for medical staff. Bank and agency use accounted for 8.9% of nursing and midwifery posts, with the greatest use of bank and agency also in the centre of the region.
- 50 In June 2023, the North Wales councils were reporting between 0%-45% vacancies in adult social services, with the highest rate of vacancies in Wrexham and the lowest in Flintshire<sup>7</sup>. In February 2024, the unplanned absence rate in adult social services ranged between 6%-10%, as shown in **Exhibit 6**.

### Exhibit 6: percentage of unplanned absence in adult social services (February 2024)

Local authority	Unplanned absence
Conwy	7
Denbighshire	10
Flintshire	6
Gwynedd	10
Isle of Anglesey	8
Wrexham	8
<b>All-Wales average</b>	<b>7.9</b>

Exhibit source: Welsh Government

<sup>7</sup> Flintshire 0%, Isle of Anglesey 5%, Conwy 6%, Denbighshire 6%, Gwynedd 9%, and Wrexham 45%. No data has been made available since June 2023.



- 51 Both Gwynedd and Wrexham have experienced higher rates of unplanned absence and vacancies compared with the all-Wales position, with Wrexham council carrying a significant level of vacancies for several months. The use of agency staff across the six authorities is generally low (ranging between 1%-3%), compared with the all-Wales position of 2%. The highest rate was reported in Conwy at 3%. For the previous six months, the agency rate in Gwynedd had been significantly higher, ranging between 11%-21% per month, reflecting the vacancy and unplanned absence rates that the council has been experiencing.
- 52 Workforce capacity constraints can adversely affect the discharge planning process. For example, pressure on ward nursing numbers means that time for proper discharge planning is constrained which may be exacerbated using agency staff who are less familiar with discharge processes, or social workers may not be able to complete assessments for a patient in a timely way. As highlighted in **Exhibit 3**, delays in joint assessments between health and social care staff and clinical assessments by hospital staff are some of the main reasons for delayed discharges across the region, accounting for 28% of all delays. Delays awaiting social care worker allocation and social care assessments account for a further 20.7% of all delays as of February 2024. **Exhibit 7** sets out the extent to which adult social services across the six local authorities can meet demand for assessment. The number of patients waiting for a social care assessment in hospital account for a small proportion of the total number of people waiting for assessment.

**Exhibit 7: number of social care assessments completed and awaiting to be completed per 100,000 head of population per month (February 2024)**

Local authority	Social care assessments completed	Adults waiting for a social care assessment	% of those waiting for a social care assessment that are in hospital
Conwy	252	48	4.3%
Denbighshire	263	178	0.7%
Flintshire	195	136	1.8%
Gwynedd	148	153	1.3%
Isle of Anglesey	298	226	3.1%
Wrexham	152	-	-
<b>All-Wales average</b>	<b>250</b>	<b>125</b>	<b>8.7%</b>

Exhibit source: Welsh Government

\* Note - no data submitted by Wrexham for adults waiting.

- 53 Waiting lists for social care assessments are higher than the all-Wales average in Denbighshire, Flintshire, Gwynedd, and Isle of Anglesey, and some of the highest in Wales. The waiting list in Gwynedd is similar or higher than the number of assessments completed suggesting that it is struggling to keep on top of demand for social care assessments.
- 54 Conversely, although Wrexham has experienced a significant number of vacancies, the number of social care assessments completed during the summer of 2023 were some of the highest in Wales (at around 470 per month), dropping below the all-Wales average to be between 100 and 150 each month. To address staff shortfalls, Wrexham council has made use of micro enterprises to support its provision of social services, and complete social care assessments.

### Care sector capacity

- 55 We found that **there is stretched capacity across the social care sector, particularly with respect to domiciliary care provision.**
- 56 Availability of home (domiciliary) care packages and long-term residential care home accommodation can be key causes of discharge delay across Wales. Within the region, during our interviews we repeatedly heard about the impact of shortages of domiciliary care staff across North Wales with delays starting new home care packages accounting for 10.5% of all delays in February 2024. Awaiting residential home availability accounted for a further 8.6% of all delays. **Exhibit 8** sets out the number of adults receiving care sector support and the extent to which there are waits for provision. **Appendix 4** sets out waiting list performance for social care assessments and care packages since November 2022.

#### Exhibit 8: number of adults receiving (and waiting for) care packages and placements per 100,000 head of population per month (February 2024)

Local authority	Domiciliary care <sup>8</sup> in receipt (waits)	Reablement <sup>9</sup> in receipt (waits)	Long-term care home accommodation <sup>10</sup> in receipt (waits)
Conwy	896 (39)	56 (4)	677 (5)
Denbighshire	534 (66)	17 (0)	625 (9)
Flintshire	615 (42)	34 (18)	494 (-)
Gwynedd	796 (123)	73 (-)	752 (27)
Isle of Anglesey	585 (42)	18 (7)	536 (19)

<sup>8</sup> Includes domiciliary care both provided and commissioned by local authorities.

<sup>9</sup> Includes reablement provided by local authorities.

<sup>10</sup> Includes long-term care home accommodation commissioned by local authorities.

Local authority	Domiciliary care <sup>8</sup> in receipt (waits)	Reablement <sup>9</sup> in receipt (waits)	Long-term care home accommodation <sup>10</sup> in receipt (waits)
Wrexham	388 (21)	28 (21)	497 (-)
<b>All-Wales average</b>	<b>665 (34)</b>	<b>46 (9)</b>	<b>536 (11)</b>

Exhibit source: Welsh Government

- 57 The exhibit shows difficulties matching demand and capacity for domiciliary care and/or reablement services across most local authorities in North Wales, with the number of people waiting for care above the all-Wales position for some of these services. Conversely, the number of adults in receipt of domiciliary services in the Conwy and Denbighshire council and Cyngor Gwynedd areas, and reablement services in Conwy is higher than the all-Wales average, suggesting the availability of domiciliary care and reablement is greater in these areas than in other parts of Wales. The provision of long-term care home is also greater in the Conwy, Denbighshire, Gwynedd, and Isle of Anglesey council areas.
- 58 **Exhibit 9** indicates the extent to which there are domiciliary care hours unfilled, and the average number of hours provided per adult.

**Exhibit 9: unfilled domiciliary hours and average hours of domiciliary care provided per adult, per 100,000 head of population (February 2024)**

Local authority	Domiciliary care hours waiting to be filled	Average hours per adult in receipt of domiciliary care
Conwy	525	11.2
Denbighshire	875	9.5
Flintshire	481	12.7
Gwynedd	1001	10.9
Isle of Anglesey	356	12.7
Wrexham	165	15.3
<b>All-Wales average</b>	<b>353</b>	<b>13.2</b>

Exhibit source: Welsh Government

- 59 The data suggests a very mixed picture across the region with Wrexham reporting a low level of domiciliary care hours waiting to be filled, whilst the number of unfilled domiciliary care hours in Conwy, Denbighshire, Gwynedd, and Isle of Anglesey are amongst the highest in Wales. Interestingly the average number of domiciliary care hours provided per adult in some council areas is less than the all-

Wales average. Whilst this may reflect the care that people need, it could also be indicative of problems with the supply of domiciliary care with councils potentially trying to spread a limited resource thinly to ensure that as many people are being supported with domiciliary care but not necessarily at the level that they need.

## Discharge process

- 60 We found that **there are weaknesses in the practice and documentation of discharge planning which are exacerbated by an overcautious approach and an absence of jointly agreed training and guidance.**
- 61 Good discharge planning is reliant on good communication and co-ordination across different professional groups, with consideration of discharge as soon as a patient is presented to services. Good discharge planning is also facilitated by having clearly documented processes which are shared with all staff involved to promote understanding and awareness of the different roles in the discharge process.
- 62 Our hospital patient case note review suggested that discharge planning is not considered early enough in the patient journey and is not well-documented. We found variable quality and completeness of discharge documentation between clinicians, wards, and sites. Referral information between specialties, as well as 'What Matters to Me'<sup>11</sup> forms were largely incomplete or absent in the notes we reviewed. Physiotherapy and occupational therapy notes were generally comprehensive and thorough, and we saw some notes had been completed by social workers.
- 63 However, further documentation that we expected to see, for example, Single Point of Access referrals or nursing assessments, were rare. None of the case notes we reviewed had a completed section within the Emergency Department form which gave an indication of a predicted date of discharge. Though we recognise it may not always be possible to provide this indication at such an early stage, it is good practice for discharge to be considered as soon as a patient encounters hospital services, and particularly at the point in which admission is deemed appropriate.
- 64 Largely, references to discharge planning within case notes occurred only once the patient was deemed medically fit for discharge, and often they simply referred to 'discharge planning' with lack of detail of what was required for ongoing care (if any) or what the patients and their families wishes were. While case notes showed some limited evidence of discussion with patients and families, insufficient use of 'What Matters to Me' conversations are hindering discharge planning as decisions for ongoing care are made without direct knowledge from the patient or their family of their capabilities, limitations, and usual home environment. Fewer than half the

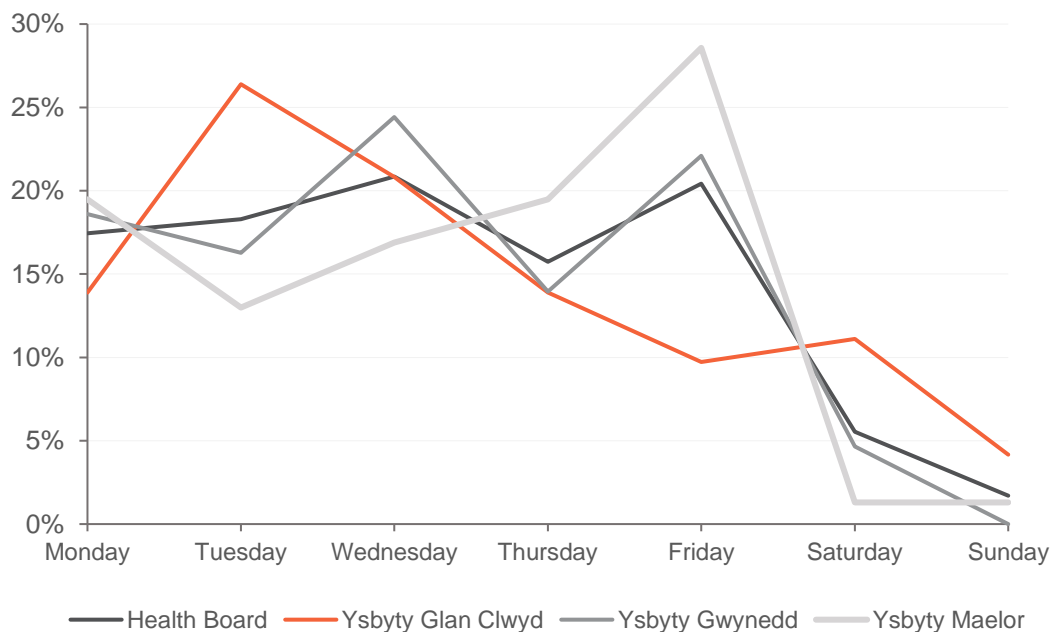
<sup>11</sup> What Matters to me refers to conversations' hospital staff are expected to undertake with patients. The conversations are structured around what the patient can do for themselves and what they will require ongoing support with.

case notes reviewed showed the family was kept informed of the patient's care plan.

- 65 Delays to discharges were not well described within case notes, often limited to references to 'awaiting packages of care' or 'awaiting best interest meetings'<sup>12</sup> without describing what was causing the delay and when next steps were anticipated to take place. The results of best interest meetings were not formally recorded in the case notes we reviewed. Once discharges were progressing, logistical arrangements were rarely described i.e., whether the patient required transport or whether their medications had been prepared. In some cases, it was unclear where the patient had been discharged to (i.e., lack of care transfer form or notes on form).
- 66 We also noted that discharging patients from hospital remains an activity which largely takes place on weekdays, with very few (and mostly simple) discharges occurring on weekends due to staff working patterns in both health and social care. A review of data relating to all patients discharged from the Health Board's acute sites in October 2022, indicated that only 7.2% of patients were discharged at the weekend (**Exhibit 10**). This is due to working patterns of staff within social services and within hospital settings, as well as the fact that most providers will not accept admissions over the weekend. During the week, discharges peak on a Friday across all the acute sites, with the greatest proportion of Friday discharges taking place at Ysbyty Maelor. Discharging on a Friday poses risks that necessary support services at home may not available over the weekend period.

<sup>12</sup> A Best Interest Meeting is a multidisciplinary meeting that is arranged for a specific decision around a patient's care / treatment, when a person is deemed to lack the mental capacity to make that decision for themselves.

**Exhibit 10: day of discharge of all patients discharged from acute hospital sites in October 2022, as a percentage of total discharges<sup>13</sup>**



Source: Audit Wales

- 67 When we spoke to those involved in the discharge process from both a health and social care perspective, we found differences in perception about how the discharge process should work. Of primary concern were differences in opinion on when referrals should occur as part of discharge planning with concerns from social workers that they were either notified too early or too late to facilitate effective and timely flow out of hospital. These different perspectives are causing further delays in patient discharges as well as some tensions in the working relationships between health and social care workers.
- 68 Ward staff also spoke of a culture of risk aversion, whereby staff, particularly junior doctors, are reluctant to declare a patient medically fit and discharge them because they fear the patient may not cope as well at home. Whilst staff may be acting out of kindness, they may not be acting in a patient’s best interest. Keeping patients in hospital for longer than they medically need has a negative impact on patient experience and outcome as well as broader patient flow within the hospital. While many we spoke to recognise the negative impact that delayed discharging has on the independence and wellbeing of patients, there is a continued reluctance to take

<sup>13</sup> Excludes patients who died.

measured risks and to recognise the significant knock-on impact delayed discharges have on patient flow and the wider system.

- 69 Across North Wales, we found differences in arrangements between hospital sites and between local authorities in relation to discharging patients, including how referrals are made and to whom. High agency and bank staff usage in the Health Board adds to the challenge of maintaining a consistent and clear approach. Although training and guidance could address inconsistencies, during our fieldwork staff reported that they had not received discharge planning training. The Health Board recently introduced Criteria Led Discharge training, but awareness and completion rates vary across sites. A draft discharge standard operating procedure exists, specifying responsibilities and standards, but it appears unfinished, and many Health Board staff were unaware of its existence.
- 70 In 2018, the Welsh Government introduced the Discharge to Recover then Assess (D2RA) model, which is designed to support people to recover at home before being assessed for any ongoing need, thereby reducing length of stay in hospital. Implementation of the model was accelerated during the pandemic, and the Welsh Government has subsequently supported regions with additional monies to embed D2RA further.
- 71 National data submitted to Welsh Government in early 2023 indicates the Health Board has difficulty in discharging patients to an appropriate setting for their assessment, as is advocated by D2RA. Data for the Health Board showed it had high proportions of patients waiting to transfer to D2RA pathways. Many of these patients were waiting to be discharged to their own homes, which indicates delays due to factors such as awaiting social care assessments, packages of care or housing adaptations. Other patients are waiting to be discharged to step-down beds but are unable to leave hospital due to the lack of availability of such beds in the community.
- 72 The Health Board has been awaiting updated national guidance on D2RA before developing its own guidance which should support it to further embed the policy. However, given some of the disparities in understanding between health and social care about how the discharge process should work, jointly agreed guidance and training would help establish and clarify shared expectations to be used in practice by all staff involved in the discharge planning process. The national guidance was issued in December 2023.

## Information sharing

- 73 We found that **difficulties in communicating and sharing information across organisational boundaries is adding to delays.**
- 74 Professionals within and across organisations will typically be required to share information about the patient to facilitate appropriate discharge arrangements and ongoing care, especially where the patient has more complex needs. During our fieldwork, we found that while arrangements for sharing information between staff

within hospitals are improving, sharing of information between organisations appears to be a significant barrier.

- 75 For patients who are likely to require ongoing social care support, the sharing of information from the hospitals to social services is not starting early enough following admission. In most cases, social workers will not become aware of a patient until the point the patient is considered medically well enough to leave hospital. Given the social care capacity constraints described in **Exhibit 6**, and the delays in social care assessments (**Exhibit 7**), it is important that referrals are made as early as possible in the patients' admission to enable effective planning and assessment. Once a referral has been made, ward and social services staff reported difficulty in contacting one another to discuss the patient's case, which can also cause delays. The Health Board has implemented a Home First Hub to help co-ordinate referrals, but this is not yet fully embedded and consistently used.
- 76 Systems holding patient information have not been connected or viewable to all staff involved in the care of individual patients as various IT systems have not been accessible across organisations. While four of the local authorities have implemented the Welsh Community Care Information System<sup>14</sup>, Denbighshire and Flintshire council have not and although the Health Board has committed to using the system and undertaken a small pilot in the community nursing and therapy teams, it has not yet implemented the system across the Health Board. While we saw the positive impact of the STREAM<sup>15</sup> system in place within some hospital wards, this useful patient information was not able to be shared more broadly across the organisation or with key partners, such as social services. Since the time of our review, we have heard that the Home First teams have begun to have direct access to local authority client systems to enable better information sharing.
- 77 Services run by the voluntary sector along with community-based services are fundamental to supporting discharge for many patients. It is therefore best practice to involve these services in the discharge planning process. Understanding of the landscape of services outside of hospital however was patchy, meaning opportunities to discharge earlier with support from services beyond social care were missed. We found that access to information on community and voluntary services was often variable and there was an absence of training to provide information to relevant staff.

## What action is being taken?

<sup>14</sup> The Welsh Community Care Information System (WCCIS) is a single system and a shared electronic record for use across a wide range of adult and children's services. The idea being that all 22 local authorities and seven health boards should implement it, with the initial intended implementation date of the end of 2018.

<sup>15</sup> STREAM is a clinical discharge planning tool that supports patient flow in an acute setting.



78 This section considers the actions being taken by the statutory organisations, including through the RPB to improve the flow of patients out of hospital.

## Strategic and operational plans

79 We found that **improving patient flow is a key feature of plans across the partners which align to the Welsh Government's six goals for urgent and emergency care.**

80 We reviewed relevant health board and local authority plans in relation to discharge planning and unscheduled and social care more generally. We found that plans in the region reflect a good understanding of the challenges affecting the flow of patients out of hospital. Plans also reflect the commitment of partners to resolve some of the key challenges related to flow such as workforce gaps and limited care home availability. Plans are informed by data and demand projections, particularly from the North Wales Population Needs Assessment, developed by the RPB. Importantly, plans reflect key Welsh Government planning requirements, such as the six goals for urgent and emergency care, as well as the Welsh Government 1,000 bed challenge<sup>16</sup>.

81 Introduced in 2021, the six goals for urgent and emergency care programme contains two goals that are linked to improving discharge: 'goal five - optimal hospital care and discharge practice from the point of admission', and 'goal six: home first approach and reduce risk of readmission'. The Health Board's existing urgent and emergency care programme was reframed in 2022 to align to the six goals programme. The Health Board's plan contains a variety of schemes aligned to the six goals. For example, a commitment to maximising use of the discharge lounge, including developing a seven-day discharge lounge. The Health Board is also prioritising implementation of the STREAM system across each ward to consistently capture actions in patient care to facilitate discharge, as well as implementing the Optimal Flow Framework, including embedding SAFER<sup>17</sup> patient flow principles across the Health Board.

82 The North Wales regional plan 2023-28 sets out high level principles, outcomes, and priorities for regional working across health and social care in North Wales, based on the Population Needs Assessment. While the plan does not discuss issues in relation to flow out of hospital directly, among its key priorities are working together to support people at home, as well as addressing the impact of wider social care workforce recruitment and retention on unpaid carers. It identifies that partners are committed to address these challenges through the RPB structure.

<sup>16</sup> In July 2022 the Health and Social Care Minister set a challenge for Health Boards and Local Authorities to establish an additional 1,000 bed spaces or their equivalents to support timely discharge <https://www.gov.wales/written-statement-six-goals-urgent-and-emergency-care-programme-update>

<sup>17</sup> Further information on the SAFER model can be found via <https://www.adss.cymru/en/blog/view/patient-flow/fileAttachment>

- 83 In our fieldwork, we examined the Health Board's winter plan for 2022-23, aligning with its urgent and emergency care and urgent and emergency care programme. However, some plan components aimed at enhancing routine practices rather than addressing surge demand. Examples include internal professional standards and a standard operating procedure for medically fit patients. The plan was approved by partners through the RPB in December 2022, potentially limiting its impact on managing demand for the winter. Local authorities' winter plans mirrored the Health Board's activities, emphasising capacity increase and providing alternatives for patients ready to leave the hospital. All plans acknowledged the need to boost staff capacity to handle demand.
- 84 Challenges in terms of recruitment and retention were recognised by partners as having a direct impact on service provision, particularly in relation to availability of domiciliary care and care home placements. The North Wales Social Care and Community Health Workforce Strategy 2018-21 aimed to develop a joined-up approach to the workforce challenges and opportunities. At the time of our fieldwork, the RPB's Workforce Board was working to refresh the strategy. Workforce challenges were referenced in most plans, strategies and reports we reviewed and was the focus of much activity including projects funded by the Regional Integration Fund (RIF) (such as Step into Work<sup>18</sup>) and activity commissioned by several groups and boards across the region.

## Partnership working

- 85 We found that **partners are working together, both strategically and operationally, to improve patient flow, however pressures on the system create an unhelpful blame culture between the different parties involved in discharge planning.**
- 86 The structure and governance of the North Wales RPB is complicated due to the high number of groups locally and sub-regionally. However, feedback from members suggests that it has been successful in facilitating joint working on specific workstreams and partnership working more generally. More recently changes to membership following turnover of senior leadership, particularly within the Health Board, has presented a challenge in clarifying accountabilities and building relationships.
- 87 Minutes from the RPB, and the Leadership Group which reports to the RPB, reflect regular discussions around urgent and emergency care pressures and discharge planning, including regular updates surrounding the 1,000-bed challenge during late 2022. The Welsh Government requirement was for North Wales to supply 243

<sup>18</sup> Step into Work is a collaborative project between Health and Social Care to provide training and placements for individuals that are interested in pursuing a career in care with the aim that they can secure employment and become part of the care workforce. <https://www.northwalescollaborative.wales/step-into-work/>

of the 1,000-beds by October 2022. In November 2022, the region reported that it had identified 203 beds. These beds remain in place for 2023-24.

- 88 We found evidence that partners are investing their time heavily in facilitating timely flow, particularly within hospitals. Our observations of the discharge process at the Health Board's acute hospitals showed significant attention and resource being deployed to manage flow across the site. We observed a multitude of operational meetings including site manager meetings and ward rounds which take place several times a day and include a wide range of professionals. There are also various meetings between the Health Board and local authorities either daily or several times a week to escalate and manage delayed discharges in each of the areas.
- 89 Operationally, relationships between health and social care staff appeared to vary. Due to the high volume of complex discharges which require input from various professionals, health and social care staff are in very regular contact, and many told us they had positive working relationships. However, it was clear from our fieldwork that as problems with discharge delays have become more acute, there is increased tension in working relationships. Staff spoke of the pressure they face to get patients out of hospital, and how that can lead to a blame culture between health and social care wherein another professional or their organisation is seen as the cause of the delay. This blame culture, in turn creates a defensiveness which can have a negative impact on how staff interact with each other during the discharge process.

## Use of funding

- 90 We found that **financial resources are being applied to improve discharge planning, however, there are some challenges with RIF funded schemes and an overall need to report more clearly on whether the funded initiatives have had the desired impact.**
- 91 The region makes use of the Health and Social Care Regional Integration Fund (RIF) to support schemes aimed to improve discharge planning. The RIF is a Welsh Government 5-year fund to deliver a programme of change from April 2022 to March 2027. The aim of the fund is to establish and mainstream at least six new national models of integrated care to provide a seamless and effective service for the people of Wales. Two contain a clear link to improving flow out of hospital for patients, namely: Home from Hospital Services; and Accommodation Based Solutions. There is a clear expectation within the RIF guidance that partners 'match fund' projects up to 50% by the end of year 5, with Welsh Government funding for each project tapering each year to allow for successful projects to become business as usual.
- 92 For 2022-23, the region received £32.5 million of RIF funding in total, some of which was ringfenced at a national level to support specific services including dementia. The RPB approved its regional 2022-23 RIF programme with allocations to each of the six models of care. The 2022-23 programme included 40 regional

schemes aligned to the six models of care. Five schemes related to Home from Hospital Services which received over £5.6 million in investment (including £261,650 match funded money) and four schemes related to Accommodation Based Solutions with over £1 million in investment (including £40,739 match-funded money). A small number of projects also continued previous Right-sizing Communities<sup>19</sup> work aimed at rebalancing care provision to meet demand. According to the RIF end of year report for 2022-23, partners contributed £13 million in total to schemes by way of match funding.

- 93 Although approved by the RPB, we found some limitations to the schemes that used RIF funding in 2022-23. For example, some schemes could be considered core services rather than new innovative projects, such as step-up beds, community resource teams and single point of access teams. We also found examples of schemes funded in 2022-23 which had previously been funded by the predecessor Integrated Care Fund in 2017-18. The continuous roll forward of schemes limits the potential to introduce new, innovative schemes to better manage demand. Those we spoke to explained that the requirement to match fund projects can create a reluctance to commit to new projects that will require match-funding in future years. In the context of the ongoing financial difficulties facing the partners in the region, they are finding it increasingly difficult to commit to future spending via new RIF projects.
- 94 The region submits financial information on how it is managing the RIF to Welsh Government each quarter and reports the latest position to its RPB meetings. At quarter three of 2022-23, the region was reporting slippage of £4.4 million. During our fieldwork we heard that it often takes longer to establish a project once it has been approved, including time to recruit, which can cause delays. We also heard that partners do not have an agreed process for utilising slippage, which is not covered by the national guidance. Some seek slippage to support community capacity in general, while others wish for slippage to be reallocated to existing successful projects for them to be expanded. Lack of an agreed process can be a cause of tension within the region and the risk that monies are not being used for their intended purposes.
- 95 The RIF Annual Report presents performance data for schemes, including the positive impact from two Home from Hospital schemes on 215 individuals<sup>20</sup>. Although the region has collected over 70 case studies highlighting the positive impact of funded schemes on individuals, these are not included in public reports submitted to the RPB or partner bodies. Incorporating these case studies would enhance transparency. Additionally, collaborative efforts between the Health Board

<sup>19</sup> Right-sizing communities refers to work to ensure that services are in line with true demand. It aims to ensure people are assessed in the most appropriate settings, that assessments are timely and are outcome focussed to maximise individual outcomes and patient flow.

<sup>20</sup> One scheme positively supported 146 individuals, and one scheme positively supported 69 individuals.

and local authorities outside the RPB structure focus on joint solutions for capacity, such as NHS-funded care homes and an integrated workforce. However, progress and impact of these initiatives are minimally reported within partner bodies.

## Scrutiny and assurance

- 96 We found that **while there is regular monitoring within individual organisations, partners lack arrangements to oversee patient flow across the whole health and care system, embed learning and papers lack focus on the impact of activity.**
- 97 We reviewed the level of information that partners' committees, Board and Cabinet receive in relation to flow out of hospital and found a mixed picture. The Health Board monitors several indicators relating to urgent and emergency care and patient flow via the Board and, more specifically, the Performance, Finance, and Information Governance Committee, including:
- % of emergency ambulance responses to calls categorised as 'red' arriving within (up to and including) eight minutes;
  - median time from a patient's arrival at an emergency department to triage by a clinician;
  - % of patients who spend less than four hours in emergency units from arrival until admission, transfer, or discharge;
  - number of patients who spent 12 hours or more in emergency units from arrival to admission, transfer, or discharge; and
  - number of ambulance handovers over one hour.
- 98 Commentary within performance reports to the Committee provides additional information, such as numbers of medically fit patients remaining in a hospital bed. However, reports rarely discuss the differences between hospital sites. Reports do describe the actions that are in place across pathways to try and improve patient flow. The Committee also receives updates on Urgent and Emergency Care which include actions under the six goals programme. The Health Board's Partnerships, People and Population Health Committee routinely received updates relating to the work of the Regional Partnership Board during 2022. However, following the resignation of all the Health Board's previous Independent Members in February 2023, the committee was suspended, meaning that regular reporting of RPB activities to the Health Board was not received from March 2023. A new Planning, Population Health and Partnerships Committee has since been established and met for the first time in January.
- 99 Papers received by committees and Cabinets within the six local authorities contain many references to challenges related to social care aspects of patient flow. Performance reports contain indicators including the numbers of adults either accessing services or waiting to access services. More generally, papers often reference challenges in relation to lack of domiciliary care and care home provision. We found some instances of discussion within local authority papers of

the broader impact that lack of provision within social care and care homes has on patient flow. For example, Wrexham County Council's July and September 2023 meetings included updates on the challenges faced by Ysbyty Maelor Emergency Department and the activity underway to mitigate those challenges, including joint work between the Council and the Health Board.

- 100 Generally, however, partners' focus is on metrics and activity within their remit, rather than on the broader whole system picture. In addition, while we found evidence within some local authorities that they operationally monitor expenditure in relation to the RIF, we found little evidence of reporting of RIF schemes and their impact within the Board, Cabinet or committees of local authorities or the Health Board.
- 101 The RPB receives regular updates on RIF progress and periodic papers on key priority areas but does not receive regular operational performance reports. Consideration of performance reports would be valuable in understanding the impact of RIF activities on addressing long-standing performance challenges.
- 102 While partners generally have mechanisms to record key risks relating to delayed discharges, these again were very separate. Risks in relation to poor patient flow are documented within the Health Board with four tier one risks noted on the Corporate Risk Register, which includes a risk relating to the fragility of the independent sector, where activity taken with partners through the RPB is listed. There are also two strategic risks on the Health Board's Board Assurance Framework relating to the impact of poor flow on quality of care, safety, and patient experience. Challenges relating to aspects such as the fragility of the care home market and difficulty recruiting domiciliary care are documented on most local authority corporate risk registers. There is currently no mechanism for partners to agree and monitor shared risks in relation to delayed discharges. This is a weakness as it drives partners to focus on mitigating their own risks without consideration of how mitigation could impact on partners.
- 103 In line with the six goals for urgent and emergency care programme, the Health Board has established the Urgent and Emergency Care Board, chaired by the Executive Director of Operations<sup>21</sup>. This Board oversees the planning and delivery of the six goals programme, aiming to ensure collaborative planning and ownership among system-wide stakeholders. It replaces the previous six goals programme group which was in place prior to our fieldwork. Despite several requests to the Health Board, we were unable to observe the Board nor receive any relating documentation and as such, we were not able to review its effectiveness.
- 104 Various mechanisms exist within and between partners for monitoring and escalating issues related to discharge planning, but their effectiveness varies. Social services, in particular, use 'Adverse Discharge' forms to highlight poorly managed discharges. However, at Ysbyty Glan Clwyd, there was a lack of response to these forms, raising concerns about the accountability for discharge

<sup>21</sup> Previously the Executive Director of Clinical Services



planning at a corporate level for this hospital. The Health Board did not respond to our requests to clarify the arrangements for processing these complaints or the accountability for discharge planning at a corporate level for this hospital.

105 The region took part in several Multi Agency Discharge Events (MADE) in 2022, which aimed to improve patient flow by providing protected time for partners to jointly recognise and agree to address challenges collaboratively. Those we spoke to as part of our fieldwork indicated that MADE discussions provide valuable opportunities for partners to work together and focus their resources on ensuring effective discharges take place. However, we found that areas for improvement that are identified through these events are not consistently actioned, with service pressures seemingly causing partners to continue with existing behaviours and practices. This was demonstrated through reports from the November 2022 MADE which reiterated several key issues that had been raised in September 2022 but not actioned, such as needing to use a multi-agency discharge approach and to continually monitor performance.

## What more can be done?

106 Whilst there is a clear recognition by regional partners of the problems associated with discharge, a desire to sort them out, the right focus within strategies and plans, and the use of funding targeted schemes, none of these have driven any significant or sustainable improvement in the overall position. Our work has found that there are several further actions that could be taken which would help improve timely and effective flow out of hospital across the region and reduce some of the challenges currently being experienced by the health and social care system. These actions are explored in the following exhibit and align with the recommendations that are set out earlier in the report.

### Exhibit 11: further actions for partners to help tackle the challenges for patient flow out of hospital

<b>Improving training and guidance</b>	Having access to <b>jointly agreed guidance</b> which clearly sets out roles and responsibilities, and expectations around when and how staff should share information, including referrals, is vital to ensuring consistency between wards, hospitals, professions, and organisations.
	Offering a <b>comprehensive training programme</b> for everyone involved in patient flow, including bank and agency staff as well as new starters, also ensures guidance is embedded.

**Improving compliance with policies and guidance**

Having a **regular cycle of audit** to assess the effectiveness and consistency of the application of discharge policies and guidance, including the application of D2RA.

**Minimising multiple referrals** and ensuring only those people who need the service are on waiting lists for reablement, home care packages and residential care, minimises inefficiencies resulting from inappropriate referrals and provides better outcomes for patients.

**Ensuring patient safety while awaiting care packages**

Having **clear communication processes** in place to notify social services staff when patients are discharged to minimise the risks that patients are discharged without services in the community being notified.

Maintaining **regular communication with patients** awaiting packages of care once discharged home ensures that patients are safe whilst waiting and provides better outcomes.

**Improving the quality and sharing of information**

Having an improved **understanding of the range of community services** that could support effective and timely discharge and how these can be accessed, enables staff to make more informed decisions when planning for discharge.

Having **clear and comprehensive information** within patient case-notes which sets out the actions being taken to support discharge, enables a clearer understanding of what is happening with a patient and supports effective discharge planning by all professionals involved in the care of patients whilst in hospital.

Having **joined-up systems** that are accessible by all staff (regardless of organisation) involved in the care of individual patients enables effective and efficient methods of communication between organisations and supports effective flow out of hospital.

**Addressing key gaps in capacity**

Looking at joint solutions across sectors to **address key gaps** such as domiciliary care and reablement services would enable timelier discharge of patients' home.



**Maximising the use of the Regional Integration Fund**

The additional regional money provides opportunities to develop **innovative and transformational schemes** that can support effective and timely discharge. These opportunities are lost when the fund is used to support core services which should be mainstreamed.

Having clear processes in place to **manage slippage RIF money** enables streamlined decision-making which is supported by all partners.

Regularly considering **operational performance and capturing risks** at a regional level, enables more effective decision making across partners when considering how best to use the regional funding.

**Improving oversight and impact**

Ensuring that all initiatives being undertaken to support timely and effective flow out of hospital (both within and outside the Regional Partnership Board) and their associated impacts are **collated and reported openly**, minimises the risk of duplication and provides transparency.

**Embedding learning from actions taken to address delayed discharges**

**Building in time after learning events** such as the MADE to embed learning into day-to-day practice minimises the risk of repeatedly facing the same challenges and improves patient experience and outcomes.

**Adverse incidents or concerns** provide an opportunity to learn from when things go wrong with respect to discharge planning. Having clear processes to ensure consistent reporting of adverse incidents and concerns, along with timely responses enables lessons to be learnt.

# Appendix 1

## Audit methods

**Exhibit 12** sets out the methods we used to deliver this work. Our evidence is limited to the information drawn from these methods.

### Exhibit 12: audit methods

Element of audit methods	Description
Documents	<p>We reviewed a range of documents, including:</p> <ul style="list-style-type: none"><li>• Board, Cabinet, and committee papers</li><li>• Updates on the six goals programme and urgent and emergency care to committees</li><li>• Operational and strategic plans relating to urgent and emergency care</li><li>• RPB papers, including case studies</li><li>• Standard Operating Procedure for discharge planning</li><li>• Corporate risk registers</li><li>• MADE reports</li></ul>
Interviews	<p>We interviewed the following:</p> <ul style="list-style-type: none"><li>• Hospital Directors, East and Central</li><li>• Interim Director of Regional Delivery</li><li>• Programme Director for Urgent and emergency care</li><li>• Clinical Lead for Urgent and emergency care</li><li>• Deputy Executive Medical Director</li><li>• Business Planning and Improvement Manager</li><li>• Health Board lead for Ysbyty Glan Clwyd improvement work.</li><li>• Health Board lead on care homes</li><li>• Operational Leads for Emergency Department, Ysbyty Gwynedd, Ysbyty Glan Clwyd and Ysbyty Maelor</li><li>• Directors of Social Services for Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire, and Wrexham</li><li>• Heads of Social Services for Isle of Anglesey, Gwynedd, Conwy, Denbighshire, Flintshire, and Wrexham</li><li>• Lead for Regional Partnership Board</li><li>• Chief Officer North Wales Community Health Council</li></ul>

Element of audit methods	Description
Observations	<p>We observed the following meeting(s):</p> <ul style="list-style-type: none"> <li>• North Wales Regional Partnership Board</li> <li>• North Wales Leadership Group</li> <li>• Health Board Performance, Finance, and Information Governance Committee</li> </ul> <p>We also observed the following individual(s):</p> <ul style="list-style-type: none"> <li>• Head of Nursing and Site Manager, Ysbyty Gwynedd</li> <li>• Progress Chaser and Home Hub Officer, Ysbyty Maelor</li> <li>• Site Manager and Home First Officer, Ysbyty Glan Clwyd</li> </ul>
Data analysis	<p>We analysed the following national data:</p> <ul style="list-style-type: none"> <li>• Monthly social services dataset submitted to the Welsh Government</li> <li>• Monthly delayed discharges dataset submitted to the NHS Executive</li> <li>• StatsWales data</li> <li>• Ambulance service indicators</li> </ul> <p>We also analysed data provided by the Health Board relating to all emergency medicine patients discharged in October 2022 with a length of stay greater than 21 days (excluding those who died)</p>
Focus groups	<p>We undertook focus groups with social workers from each of the local authority areas, except for Isle of Anglesey.</p>
Case note review	<p>We reviewed a sample of 32 case notes relating to emergency medicine patients discharged in October 2022 with a length of stay greater than 21 days (excluding those who died).</p>

# Appendix 2

## Reasons for delayed discharges

The following exhibit sets out the reasons for delayed discharges in the Health Board compared to the all-Wales position.

### Exhibit 13: reasons for delayed discharges as a percentage of all delays (February 2024)

Reason for delay	Percentage delayed	All-Wales average
Awaiting joint assessment	15.7	9.0
Awaiting social worker allocation	15.1	8.5
Awaiting completion of clinical assessment (nursing /allied health professionals / medical / pharmacy)	13.3	10.3
Awaiting start of new home care package	10.5	8.0
Awaiting completion of assessment by social care	5.6	15.7
Awaiting nursing home availability	4.6	2.6
Awaiting residential care home manager to visit and assess (Standard 3 residential)	4.6	2.5
Awaiting Elderly Mental Illness (EMI) residential availability	4.3	2.3
Awaiting residential home availability	4.3	2.8
Awaiting reablement care package	3.1	3.0
Awaiting health completion of assessment/provision for equipment	2.8	1.4
Awaiting EMI nursing availability	1.9	2.0
Awaiting funding decision (funded nursing care (FNC) / continuing health care (CHC))	1.5	1.5
Awaiting completion of arrangements prior to placement	0.9	3.5
Awaiting funding decision	0.9	0.8
Awaiting nursing care home manager to visit and assess (Standard 3 residential)	0.9	2.1
Awaiting specialist bed availability	0.9	1.1
No suitable abode	0.9	2.3
Patient / family refusing to move to next stage of care/ discharge	0.9	1.6

Source: Welsh Government

Note: where the reasons for delay relate to two or less patients, these have been excluded to minimise any risk of identifying individual patients.

### Top five reasons for delayed discharges by local authority

The following exhibits set out the top five reasons for delayed discharges for each of the local authorities compared to the Health Board wide and all-Wales position.

#### Exhibit 14: top five reasons for delayed discharges as a percentage of all delays (February 2024) – Conwy

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	25.5	13.3	10.3
Awaiting health completion of assessment/ provision for equipment	12.8	2.8	1.4
Awaiting residential care home manager to visit and assess (Standard 3 residential)	12.8	4.6	2.5
Awaiting joint assessment	8.5	15.7	9.0
Awaiting start of a new home care package	6.4	10.5	8.0

Source: Welsh Government

#### Exhibit 15: top five<sup>22</sup> reasons for delayed discharges as a percentage of all delays (February 2024) – Denbighshire

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting joint assessment	18.8	15.7	9.0
Awaiting residential care home manager to visit and assess (Standard 3 residential)	15.6	4.6	2.5
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	12.5	13.3	10.3

Source: Welsh Government

<sup>22</sup> All other reasons related to two or less patients

**Exhibit 16: top five reasons for delayed discharges as a percentage of all delays  
(February 2024) – Flintshire**

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting social worker allocation	20.4	15.1	8.5
Awaiting joint assessment	18.5	15.7	9.0
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	16.7	13.3	10.3
Awaiting start of new home care package	11.1	10.5	8.0
Awaiting completion of assessment by social care	5.5	5.6	15.7

Source: Welsh Government

**Exhibit 17: top five reasons for delayed discharges as a percentage of all delays  
(February 2024) – Gwynedd**

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting joint assessment	15.7	15.7	9.0
Awaiting start of new home care package	15.7	10.5	8.0
Awaiting nursing home availability	13.7	4.6	2.6
Awaiting social worker allocation	9.8	15.1	8.5
Awaiting EMI residential availability	7.8	4.3	2.3

Source: Welsh Government

**Exhibit 18: top five reasons for delayed discharges as a percentage of all delays  
(February 2024) – Isle of Anglesey**

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting joint assessment	22.7	15.7	9.0
Awaiting social worker allocation	18.2	15.1	8.5
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	11.4	13.3	10.3
Awaiting completion of assessment by social care	9.1	5.6	15.7
Awaiting start of new home care package	9.1	10.5	8.0

Source: Welsh Government

**Exhibit 19: top five reasons for delayed discharges as a percentage of all delays  
(February 2024) – Wrexham**

Reason for delay	Percentage delayed	Health Board average	All-Wales average
Awaiting social worker allocation	21.6	15.1	8.5
Awaiting joint assessment	13.4	15.7	9.0
Awaiting completion of clinical assessment (nursing / allied health professional / medical / pharmacy)	11.3	13.3	10.3
Awaiting start of new home care package	11.3	10.5	8.0
Awaiting completion of assessment by social care	6.2	5.6	15.7

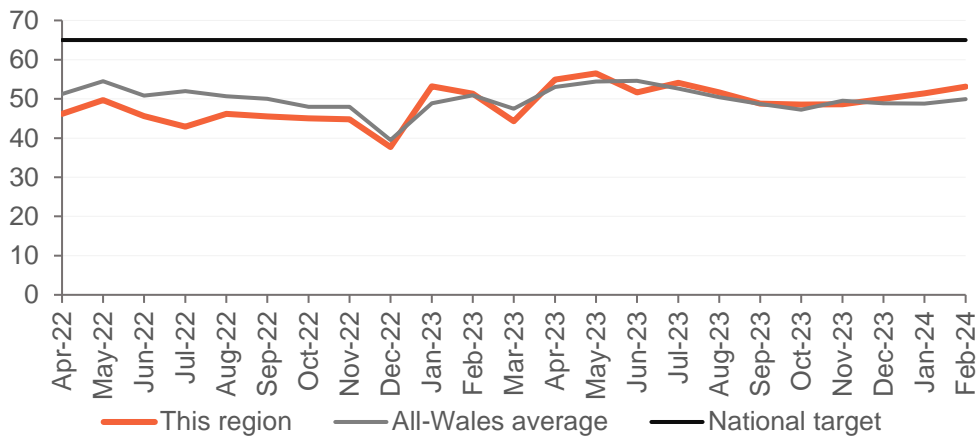
Source: Welsh Government

# Appendix 3

## Urgent and emergency care performance

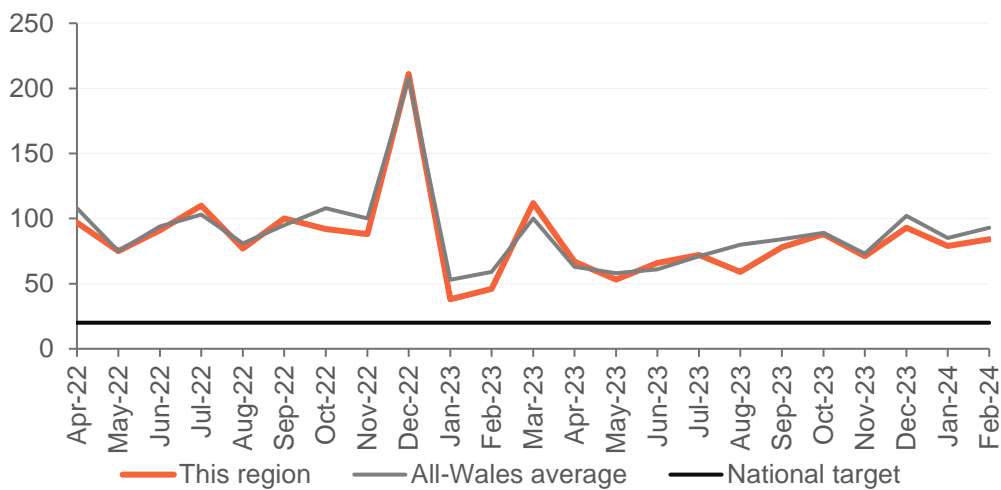
The following exhibits set out the region's performance across a range of urgent and emergency care performance indicators in comparison to the position across Wales since April 2022.

**Exhibit 20: percentage of emergency responses to red calls arriving within (up to and including) 8 minutes – national target of 65%**



Source: Ambulance Services Indicators

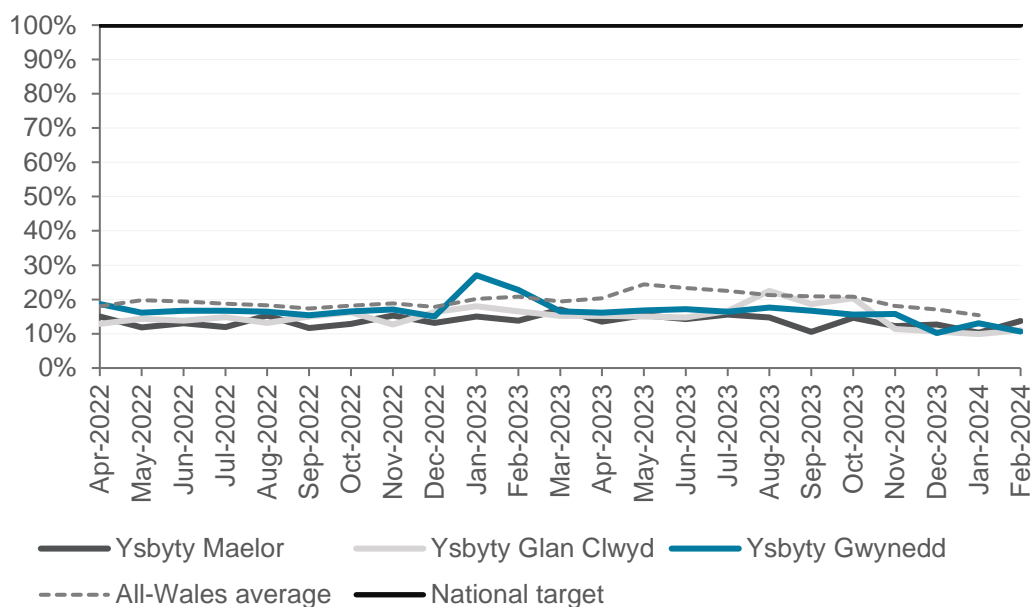
**Exhibit 21: median response time for amber calls (minutes) – 50<sup>th</sup> percentile – national target of 20 minutes**



Source: Ambulance Services Indicators

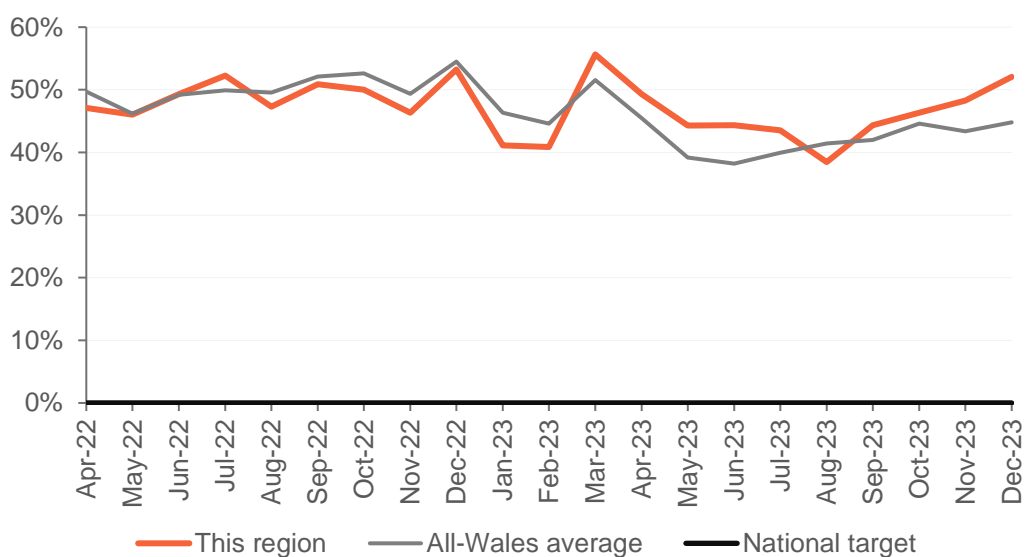


**Exhibit 22: percentage of ambulance handovers within 15 minutes at a major emergency department – national target of 100%**



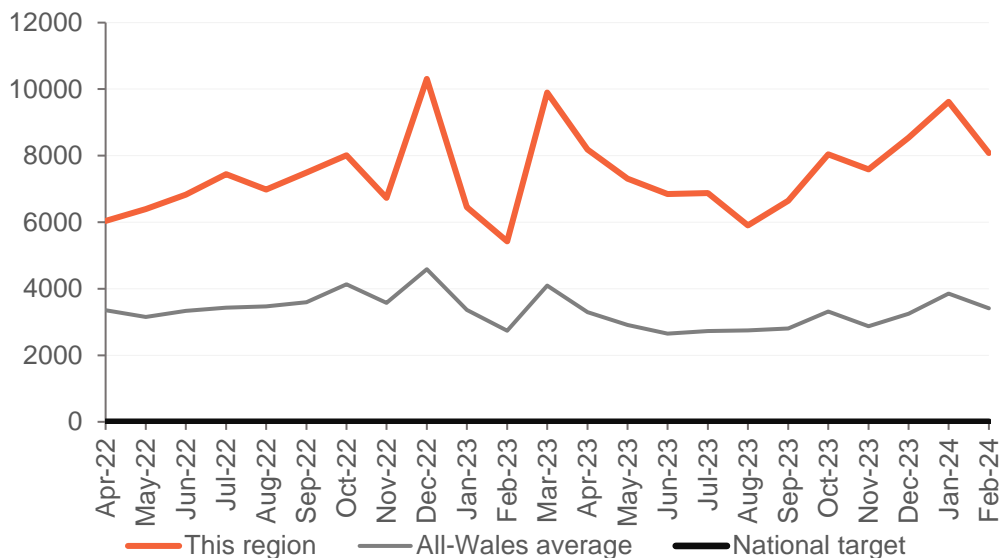
Source: Welsh Ambulance Services NHS Trust

**Exhibit 23: percentage of ambulance handovers over 1 hour – national target of zero**



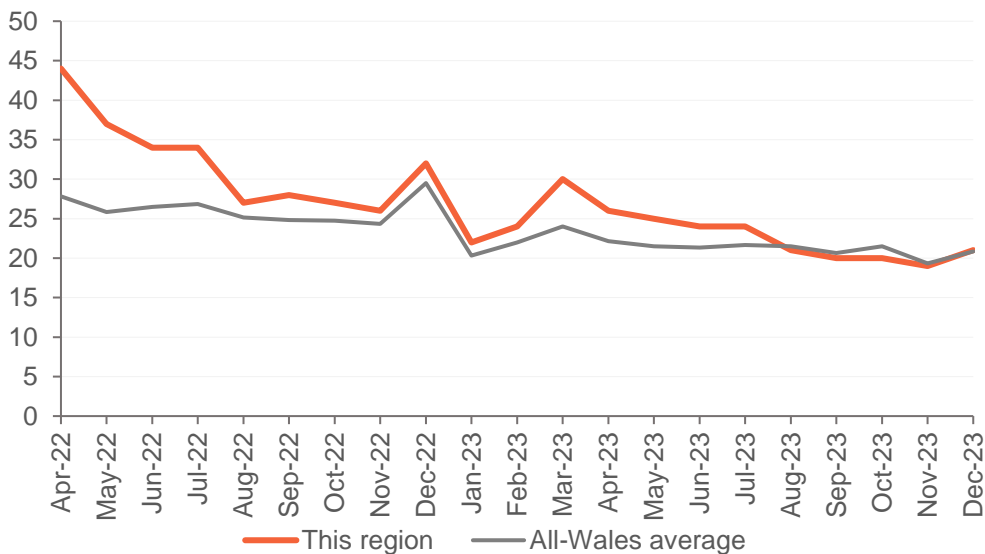
Source: Ambulance Services Indicators

**Exhibit 24: total number of hours lost following notification to handover over 15 minutes**



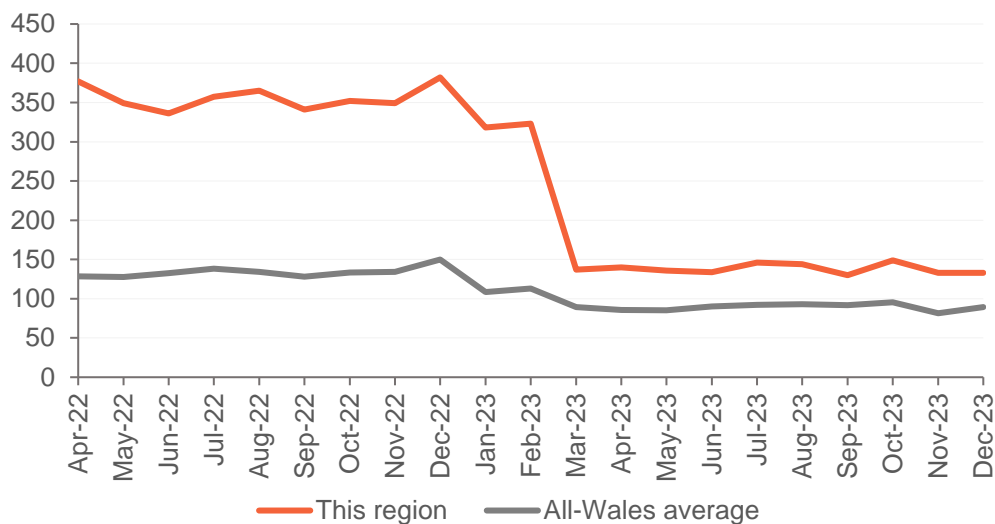
Source: Ambulance Services Indicators

**Exhibit 25: median time (minutes) from arrival at an emergency department to triage by a clinician) – national target of 12-month reduction**



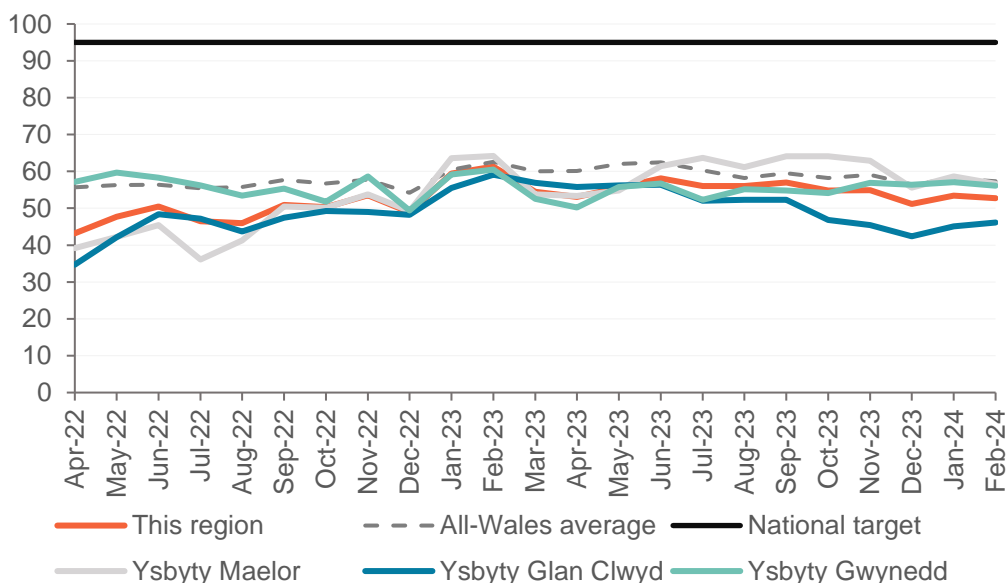
Source: StatsWales

**Exhibit 26: Median time (minutes) from arrival at an emergency department to assessment by senior clinical decision maker – national target of 12-month reduction**



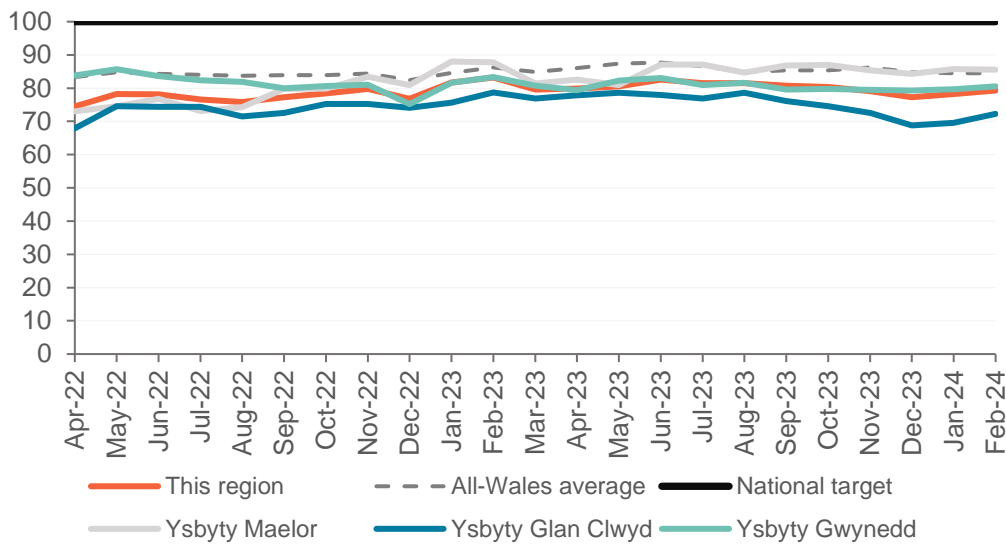
Source: StatsWales

**Exhibit 27: Percentage of patients spending less than four hours in a major emergency department – national target of 95%**



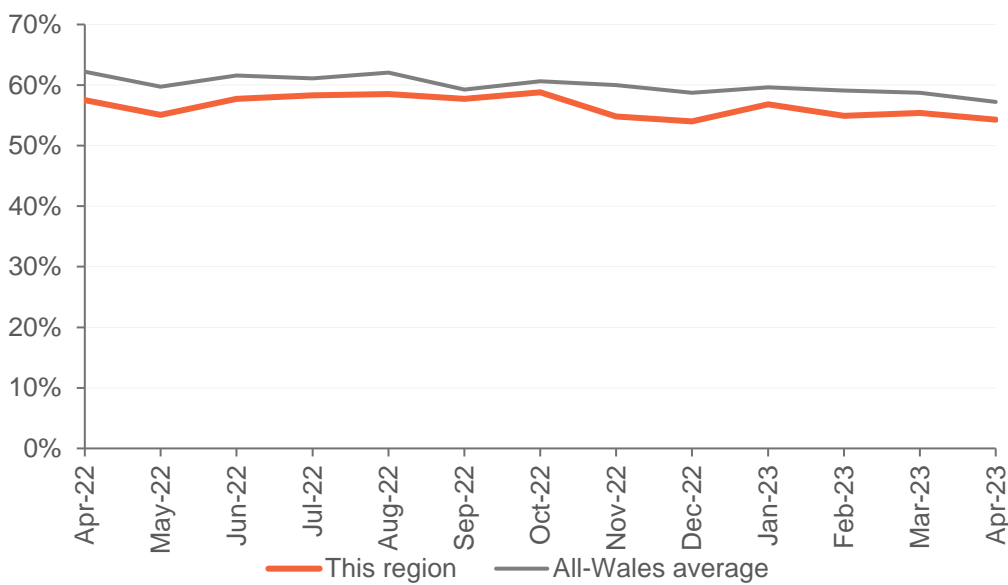
Source: StatsWales

**Exhibit 28: Percentage of patients spending less than 12 hours in a major emergency department – national target of 100%**



Source: StatsWales

**Exhibit 29: Percentage of total emergency bed days accrued by people with a length of stay over 21 days – national target of 12-month reduction**



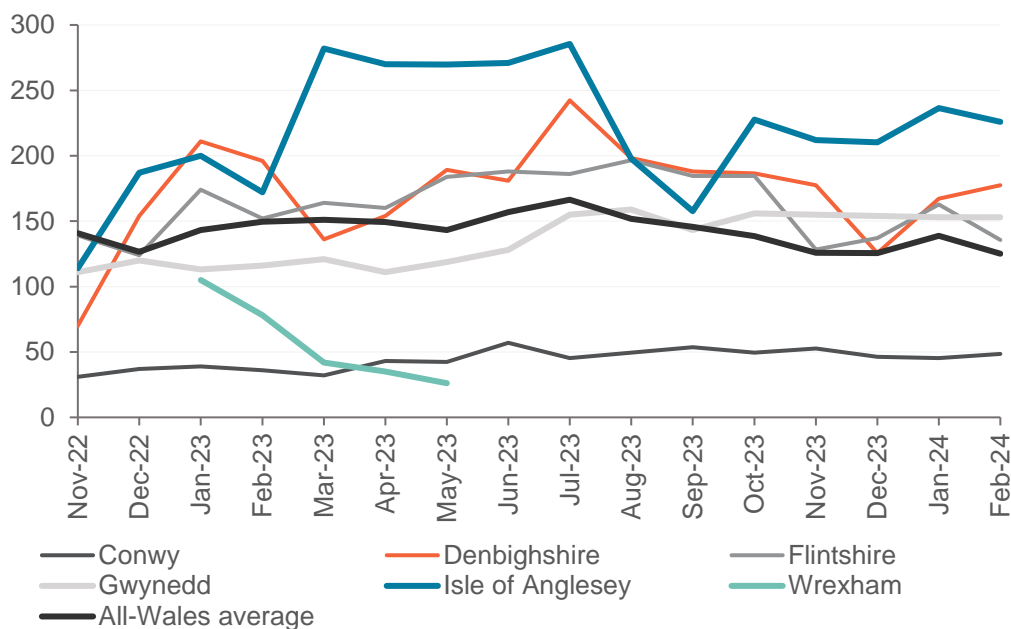
Source: StatsWales

# Appendix 5

## Waits for social care assessments and care packages

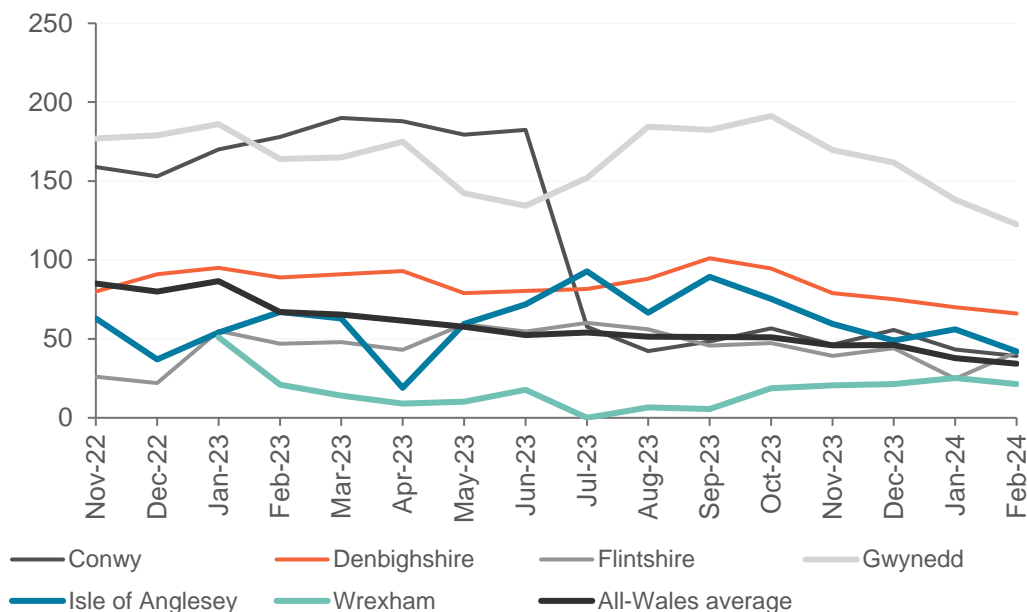
The following exhibits set out the region's waits performance for social care assessment and receipt of a range of care packages in comparison to the position across Wales since November 2022.

**Exhibit 30: number of adults waiting for a social care assessment (per 100,000 head of population)**



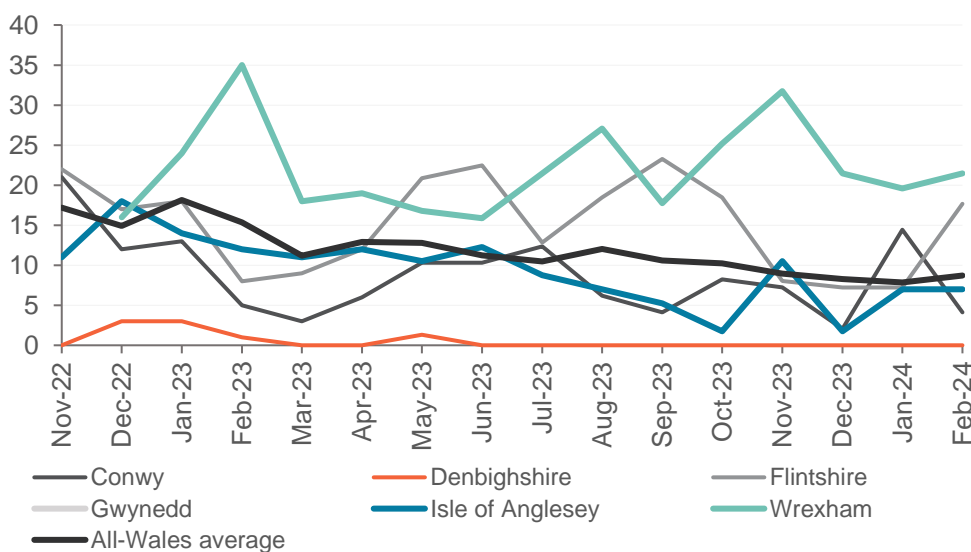
Source: Welsh Government

**Exhibit 31: number of adults waiting for domiciliary care (per 100,000 head of population)**



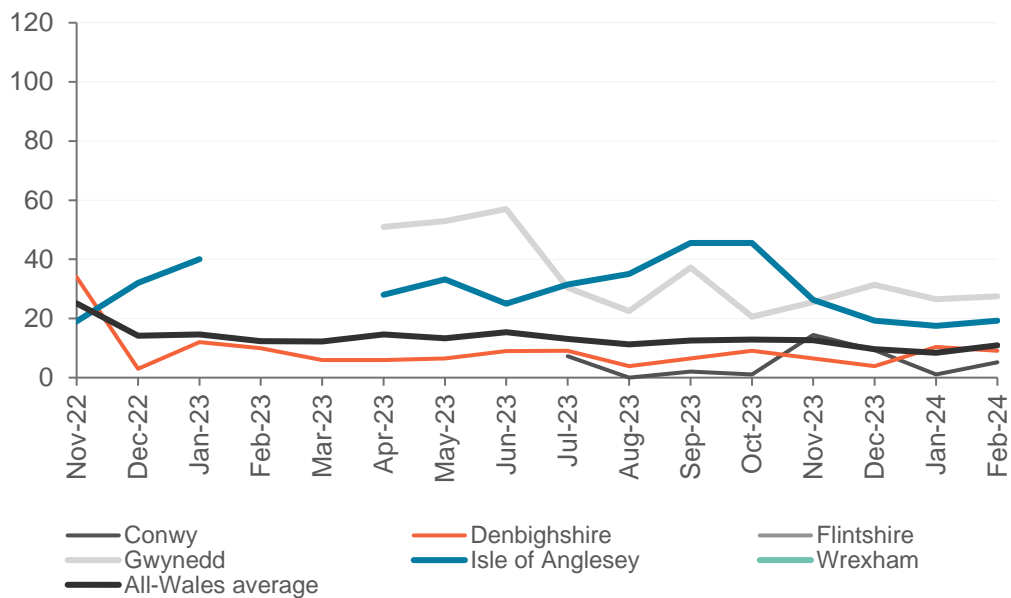
Source: Welsh Government

**Exhibit 32: number of adults waiting for reablement (per 100,000 head of population)**



Source: Welsh Government

**Exhibit 33: number of adults waiting for long-term care home accommodation (per 100,000 head of population)**



Source: Welsh Government



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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.





## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Procurement of Client Information System
<b>Cabinet Member</b>	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
<b>Report Author</b>	Chief Officer (Social Services)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

The Social Services portfolio is reliant on an electronic client information system (PARIS) which underpins social care processes and functions. The system supports care planning, service deliver, correspondence between individuals and the Council, as well as providing performance information and data exports to support the financial assessment and charging for care and support.

The PARIS product has performed well for the local authority over many years, but it is now end of life and the current provider no longer provides a social care software system, but instead has developed electronic patient record software to support health and mental health services.

The PARIS contract expiry date of the 31<sup>st</sup> March 2025, has recently been extended until the 31<sup>st</sup> March 2028 to support the transition to a new system in the next three years and is in line with the contract held by Denbighshire County Council who entered into a joint procurement process for PARIS originally.

### **RECOMMENDATIONS**

1	To receive an update on the activity undertaken to date to procure a replacement client information system for the Social Services portfolio.
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## **REPORT DETAILS**

<b>1.00</b>	<b>BACKGROUND AND CONTEXT</b>
1.01	<p>The joint procurement of a replacement client information system for Flintshire Social Services and Denbighshire County Council Social Services commenced in the summer of 2022 with the issuing a PIN (Prior Information Notice) on Sell2Wales to test the market for appropriate suppliers. At that time, it was the authority's intention to undertake a joint procurement process with Denbighshire County Council, as the majority of other social services portfolios in Wales were using the WCCIS (Wales Community Care Integrated System) Care Director V5 and whilst there were concerns about the performance of WCCIS, there were no proposals to move away from it.</p>
1.02	<p>Following a successful response to the PIN, a significant piece of work was undertaken jointly with Denbighshire County Council and our joint Procurement Service to develop a detailed specification for the new system, alongside a series of demonstrations from providers where end users were able to view the potential systems.</p>
1.03	<p>The work on the specification was completed in spring 2023 with a view to going out to market through either an open tender process or the use of an existing framework and a tender award to be completed by summer 2023.</p>
1.04	<p>During the early summer of 2023 it became clear that the lifespan and functionality of the WCCIS programme and software was limited and a replacement system was required.</p>
1.05	<p>A national Connecting Care programme was tasked to support the procurement of new social care systems for Wales. It was determined that it was prudent for Flintshire and Denbighshire to pause our procurement process and join the national approach, which aligned to the position of the other four local authorities in North Wales.</p>
1.06	<p>Over the last 12 months, Welsh Government have supported an integrated health and social care procurement exercise lead by Digital Health and Care Wales (DHCW ) who deliver digital services for NHS Wales. Across Wales eighteen local authorities have joined this procurement exercise. The remaining four councils did not join the WCCIS programme and have procured their own social care case management systems. They are not involved in the current procurement process. However, they must be engaged as part of other areas of the programme such as data standards and the future shared care record.</p>
1.07	<p>A Local Government Senior Responsible Officer (SRO) Advisory Group has been established to provide a proactive approach to driving the procurement process. Flintshire has supported this work by providing our detailed specification information. National agreement is being sought to formally endorse the SRO group as the governance mechanism for the social care elements of the programme. This approach would bring greater local government control over the social care element of the Connecting Care programme.</p>

1.08	Progress in procuring new systems is progressing through clusters and Flintshire is part of the North Wales cluster. In July 2024 an Invitation To Tender (ITT) was issued on Sell2Wales and the Tender submission deadline date of 26 <sup>th</sup> August 2024. It is anticipated that the contract award will take place on the 5 <sup>th</sup> November 2024.
1.09	The cluster approach aligns national ambition for a once for Wales approach to delivering integrated care to the citizens of Wales and the need for regional and local autonomy to identify the social care system that will support local need and operational delivery.
1.10	<b>Implementation</b>
1.11	The procurement of a replacement system for Paris has been a priority for Social Services for a number of years and there is corporate recognition of the importance of a client information system. As a result, the Digital Strategy Board have given the replacement work a Priority 1 status in the Corporate IT workplan and currently wait to hear the outcome of the tender process and subsequent proposals for implementation.
1.12	Our Implementation Plan will utilise existing staff resources within the Business Systems Team in Social Services to lead on the implementation work. However, there will be additional inputting, testing, data migration, legacy system data storage and corporate resources required to implement such a significant system. Ultimately, the implementation plan and associated timelines will need to be balance a range of Priority 1 projects across the organisation and available capacity.
1.13	We have been in contact with colleagues from both Education & Youth Portfolio and Planning, Environment & Economy Portfolio, both of whom have recent undertaken significant system changes to draw on their experience, lessons, and approach.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	WLGA, ADSS Cymru (Association of Directors of Social Services) and each local authority are requesting information from Welsh Government on their proposals for financial support system implementation across Wales. There was an initial acknowledgement of the need for funding support but that has not yet translated into definitive information. National financial support is a critical interdependency given the local authority's financial position.
2.02	The DHCW has developed a business case for social care systems which contains significant amounts of funding and resource for DHCW. There is current active dialogue for this funding to be redeployed to support the delivery of the social care elements of the Connected Care programme. Through WLGA, local government is now producing a separate business case for the relevant elements of the programme to inform a submission to Welsh Government for funding consideration.

2.03	Locally the anticipated costs of a replacement systems are being reviewed as part of the tender evaluation exercise. This work will inform any shortfall between a national financial offer, once known, and the actual system costs to the local authority including data migration. An updated MTFs pressures bid will be submitted with the likely implementation date commencing in the financial year 2025/26 but with more significant work and costs anticipated for the financial year 2026/27.
<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	The impact of the failure of the existing Paris system or the failure to procure a replacement system is high given the central role the system plays in storing client records, service provision and interfaces with our systems to charge for services.
<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	N/A
<b>5.00</b>	<b>APPENDICES</b>
5.01	None
<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	N/A
<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Jane Davies, Senior Manager Safeguarding and Commissioning <b>Telephone:</b> 01352 702503 <b>E-mail:</b> <a href="mailto:jane.m.davies@flintshire.gov.uk">jane.m.davies@flintshire.gov.uk</a>
<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	None.



## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Children and Families Safeguarding Hub
<b>Cabinet Member</b>	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
<b>Report Author</b>	Chief Officer (Social Services)
<b>Type of Report</b>	Operational

### **EXECUTIVE SUMMARY**

A Children and Family Safeguarding Hub was formed in June 2024 to strengthen multi-agency safeguarding decisions for children at risk. The Safeguarding Hub provides a proactive response to feedback partner agencies expressed to Care Inspectorate Wales (CIW) during their inspection of Flintshire Social Services in December 2023. CIW report that during the inspection agencies advised that “they wished to be more involved in initial strategy discussions/meetings”. Flintshire’s Safeguarding Hub brings together different agencies to enable fast information sharing with the purpose of making an efficient and timely decision to safeguard vulnerable children at risk.

The Safeguarding Hub enables professionals to efficiently and quickly gather and process information to assess safeguarding risks. This multi-agency partnership and coordination supports professionals to make informed, appropriate, and proportionate decisions when it comes to child safety.

Flintshire Safeguarding Hub do not hold cases, it is part of our front door screening process where decisions are made to decide next steps in line with the Wales Safeguarding Procedures.

The Flintshire Safeguarding Hub draws on the Multi-Agency Safeguarding Hub model (MASH) to provide a robust and proven model for safeguarding vulnerable children.

### **RECOMMENDATIONS**

	That Members note and endorse the establishment of the Children and Families Safeguarding Hub to facilitate multi-agency information sharing
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	and support efficient, informed, and timely decisions to safeguarding children at risk.
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## **REPORT DETAILS**

<b>1.00</b>	<b>FLINTSHIRE SAFEGUARDING HUB</b>
1.01	Flintshire Safeguarding Hub was created in June 2024 to enhance multi-agency safeguarding practice for children at risk. Drawing on effective and strong partnership working the Safeguarding Hub has been designed to facilitate efficient and timely sharing of relevant and appropriate information and collaborative decision making.
1.02	The Flintshire Safeguarding Hub receives child protection reports (referrals) that have already been screened and assessed as requiring a multi-agency approach and oversight. Representatives from the different agencies in the Safeguarding Hub collate information from their agency to build up a holistic picture of the circumstances of the case and the associated risks to the child. As a result, more informed decisions can be made about what action to take, and support can be targeted to the most urgent cases.
1.03	<p>Flintshire Safeguarding Hubs representatives include:</p> <ul style="list-style-type: none"> <li>• Childrens Services</li> <li>• Adult Services</li> <li>• Police</li> <li>• Education</li> <li>• Probation</li> <li>• Women’s Aid</li> <li>• Housing</li> <li>• Mental Health Services when required.</li> </ul> <p>Representatives from other agencies will be brought into the meeting at any time depending on the individual case circumstances as well as social workers from other local authorities when required.</p>
1.04	Flintshire Safeguarding Hub is held at 11am daily via Microsoft Teams. On average between five and ten cases are discussed at Flintshire Safeguarding Hub each day.
1.05	<b>Purpose of Flintshire Safeguarding Hub</b>
1.06	Flintshire Safeguarding Hub brings together agencies from services that have contact with children who may be at risk of significant harm to make the best possible use of their combined knowledge to keep them safe from harm. It enables those agencies in the Safeguarding Hub to share relevant and appropriate information lawfully and securely with others so that a true and balanced risk assessment can be made, and appropriate intervention agreed.

1.07	The agencies within the Safeguarding Hub work together to help identify need, vulnerability, risk, and harm in respect of all referrals discussed within the Safeguarding Hub. The known strengths, resilience and protective factors aligned to each case can also be discussed to establish if the presenting concerns/ risks can be managed safely at a lower threshold of intervention such as early help. Once the level of need or risk is identified the multi-agency group decide the initial multi-agency actions required to protect and support the child.
1.08	<b>Why is Safeguarding Hub Important?</b>
1.09	Flintshire Safeguarding Hub facilitates more accurate assessment of risk and need, as safeguarding decisions are based on coordinated, sufficient, accurate and timely intelligence. A key aspect of this is the ability to compile intelligence from a wider range of sources to build a more complete picture of cases in a timely way.
1.10	The intended benefits of the Safeguarding Hub are: <ul style="list-style-type: none"> <li>i) effective coordination and management of safeguarding responses across agencies with a 'right service right time' approach for families</li> <li>ii) improved understanding of thresholds and practice standards across agencies</li> <li>iii) improved identification of risk and opportunity for earlier intervention, taking preventative action before risk escalates.</li> <li>iv) a reduction in repeat referrals, and a reduction in 'No Further Actions'</li> <li>v) improvement of the quality of our response to safeguarding</li> </ul>
1.11	Reporting systems to track performance and outcomes is not yet configured within our IT system (PARIS). We are therefore exploring the establishment of a 'performance tracker' to capture essential performance data until an automated report can be developed.
1.12	<b>Future of Flintshire Safeguarding Hub</b>
1.13	The Safeguarding Hub is still in its infancy and although we have successfully implemented the model into our practice, we still require further core members to join the daily meeting. We require core members from Health and Early Intervention. There are ongoing discussions with to achieve this.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	The Safeguarding Hub brings together existing staff working within organisations. Working together avoids duplication of processes across agencies, and allows practitioners to step-up and step-down risk assessments, contributing to better targeting and allocation of resources. Greater efficiencies in processes and resources will contribute to the multi-agency challenge of responding to high levels of referrals and complexity of need.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	The multi-agency safeguarding hub model is a nationally recognised, researched, and developed approach in effectively managing and reducing risk associated with our most vulnerable children. The sustained commitment and deployment of workforce from partner agencies is critical to the successful operation of the Safeguarding Hub, particularly within the context of shared challenges in workforce shortages and financial pressures. Embedding proportionate performance and quality measures to evidence the impact of the Safeguarding Hub will be critical in sustaining agency commitment.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Ongoing Meetings with North Wales Police which was later extended to meetings with other partner agencies.  Consideration given to other Local Authority MASH Models.

<b>5.00</b>	<b>CONTACT OFFICER DETAILS</b>
5.01	<b>Contact Officer:</b> Sarah Grant, Senior Manager, Children's Services <b>Telephone:</b> 01352 701313 <b>Email:</b> <a href="mailto:sarah.grant2@flintshire.gov.uk">sarah.grant2@flintshire.gov.uk</a>

<b>6.00</b>	<b>GLOSSARY OF TERMS</b>
	None.





## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Expansion of Specialist Education Provision
<b>Cabinet Member</b>	Cabinet Member for Education, Welsh Language and Culture
<b>Report Author</b>	Chief Officer (Education & Youth)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

This report seeks to inform Cabinet of the outcomes from the statutory consultation undertaken to consult on the proposal to expand inhouse specialist education provision at Ysgol Pen Coch primary special school, Flint to include the management of the centre Canolfan Enfys which is currently under the management of the Pupil Referral Unit Plas Derwen.

This report also seeks Cabinet's continued support and commentary for the proposed expansion of inhouse specialist education provision.

This report is also requesting a mandate from Cabinet to proceed to issue a statutory notice to enter into a 28-day period for objections. This legal process is in line with the requirements of The School Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018.

## RECOMMENDATIONS

1	Cabinet reviews the outcomes from the consultation.
2	Cabinet agrees to support and provide any commentary for the proposed expansion of inhouse specialist education provision at Ysgol Pen Coch primary special school, Flint.
3	Cabinet agrees to proceed to issuing a statutory notice to commence a 28-day period for objections.

**REPORT DETAILS**

<b>1.00</b>	<b>EXPLAINING THE EXPANSION OF SPECIALIST EDUCATION PROVISION</b>
1.01	The Council is experiencing challenges in meeting its statutory duties with regards to educational provision for children with additional learning needs due a lack of specialist placements both inhouse and externally. Since the pandemic, there has been a rise in the number of children for whom mainstream schools are unable to meet their presenting needs.
1.02	The Council has a range of specialist provision which includes county Resource Bases in mainstream schools which allows for those with a higher level of need to be co-educated in designated settings. These cater for needs such as social communication, hearing impairment and behaviour/social emotional difficulties. Apart from two secondary Resources for dyslexia and hearing impairment, our Resource provision is full or oversubscribed.
1.03	The Council also has two specialist schools namely Ysgol Pen Coch (primary) and Ysgol Maes Hyfryd (secondary) which cater for those children with more severe learning difficulties, along with the recently newly built Plas Derwen Pupil Referral Unit. Both specialist schools are at capacity resulting in the need to seek external placements known as out of county (OOC) provision.
1.04	A review of the presenting need indicates that investment in the primary specialist sector at Ysgol Pen Coch is a priority at this time pending any future decisions around further significant investment in the Council's specialist educational provision. The school is currently at capacity with 98 learners on roll. The number of places the school can accommodate is subject to need and dependent on the nature of the learners' needs and accommodation requirements, e.g., specialist equipment and staffing support requirements. The existing building cannot cater for any additional learners. This, alongside the lack of OOC provision has led to a waiting list for specialist placements.
1.05	Following the statutory inspection of Plas Derwen Pupil Referral Unit (PRU), Estyn questioned the suitability of the foundation phase centre Canolfan Enfys sitting under the registration and management of the portfolio PRU and tasked the Council with seeking alternative arrangements.
1.06	Canolfyn Enfys caters for 24 children aged 3 to 7 with a range of complex needs, the majority of which transfer to Ysgol Pen Coch. Prior to 2012, the Centre had been an assessment facility under the management of Ysgol Pen Coch. However, operational challenges at the time resulted in the provision coming under the management of the Council. Having considered the options, the preference is to re-register the provision with Ysgol Pen Coch given the similarities in presenting needs and the Governing Body has been approached to consider this proposal.

1.07	On 21 <sup>st</sup> November 2023 Cabinet approved to proceed to issue a statutory notice for an increase in pupil places at Ysgol Pen Coch, Flint. Expansion of places at this point will include for taking over management of Canolfyn Enfys, increasing the current capacity of Ysgol Pen Coch from 98 to 128 by March 2025.				
1.08	<p>Statutory consultation commenced on 5 June 2024 and ended on 16 July 2024. 80 responses were received including a formal response from Estyn and school pupil council. 91% of responders supported the proposal. The key positive and negative themes from the consultation responses are noted below.</p> <p><b>Children &amp; Young People Responders</b></p> <p>There were no responses to the consultation proposal paper based or online survey.</p> <p><b>Adult Responders</b></p> <table border="1" data-bbox="304 819 1382 2110"> <thead> <tr> <th data-bbox="304 819 847 882">Positives</th> <th data-bbox="847 819 1382 882">Negatives</th> </tr> </thead> <tbody> <tr> <td data-bbox="304 882 847 2110"> <ul style="list-style-type: none"> <li>• More places for children who need it and are stuck in mainstream</li> <li>• Pen Coch better aligned with pupils</li> <li>• Many pupils feed into Pen Coch from Canolfan Enfys already</li> <li>• Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch.</li> <li>• The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys.</li> <li>• Recommended teaching and learning strategies are consistent across both settings.</li> <li>• It would be good to spread numbers across two sites rather than keep them all on one.</li> <li>• Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch.</li> <li>• Estyn considers that the proposal is likely to maintain the standard of education in the area (Estyn)</li> </ul> </td> <td data-bbox="847 882 1382 2110"> <ul style="list-style-type: none"> <li>• Pen Coch cannot currently manage the children they have so adding more will increase the issue.</li> <li>• Staff being split across two sites – lack of detail in the proposal leading some Ysgol Pen Coch staff to believe they will be asked to do more without suitable compensation.</li> <li>• Ysgol Pen Coch is already understaffed and underfunded – this will stretch resources even further.</li> <li>• Depends on whether Ysgol Pen Coch is extended properly to accommodate the additional numbers.</li> <li>• Further assurances required that Canolfan Enfys jobs will be secured in Mold.</li> <li>• The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standard of learning and wellbeing (Estyn)</li> </ul> </td> </tr> </tbody> </table>	Positives	Negatives	<ul style="list-style-type: none"> <li>• More places for children who need it and are stuck in mainstream</li> <li>• Pen Coch better aligned with pupils</li> <li>• Many pupils feed into Pen Coch from Canolfan Enfys already</li> <li>• Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch.</li> <li>• The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys.</li> <li>• Recommended teaching and learning strategies are consistent across both settings.</li> <li>• It would be good to spread numbers across two sites rather than keep them all on one.</li> <li>• Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch.</li> <li>• Estyn considers that the proposal is likely to maintain the standard of education in the area (Estyn)</li> </ul>	<ul style="list-style-type: none"> <li>• Pen Coch cannot currently manage the children they have so adding more will increase the issue.</li> <li>• Staff being split across two sites – lack of detail in the proposal leading some Ysgol Pen Coch staff to believe they will be asked to do more without suitable compensation.</li> <li>• Ysgol Pen Coch is already understaffed and underfunded – this will stretch resources even further.</li> <li>• Depends on whether Ysgol Pen Coch is extended properly to accommodate the additional numbers.</li> <li>• Further assurances required that Canolfan Enfys jobs will be secured in Mold.</li> <li>• The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standard of learning and wellbeing (Estyn)</li> </ul>
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	<p>More detailed responses to the comments can be found in Appendix A including a formal response from Estyn.</p>										
1.09	<p>When reviewing the outcome of the consultation process for Ysgol Pen Coch. Cabinet are asked to consider the following points:-</p> <ul style="list-style-type: none"> <li>• the likely impact on quality and standards in education,</li> <li>• the likely impact on the community, and</li> <li>• the likely effect of different travelling arrangements</li> </ul> <p>Cabinet are asked to consider and confirm whether it considers the implementation of the proposal, (wholly or partly) to be the most appropriate response to the reasons it identified for the proposal and give reasons for its conclusion.</p>										
1.10	<p>Timescales for approvals are noted below:-</p> <table border="1" data-bbox="306 994 970 1072"> <tr> <td>Informal Cabinet</td> <td>1<sup>st</sup> October 2024</td> </tr> <tr> <td>Cabinet</td> <td>15<sup>th</sup> October 2024</td> </tr> </table> <p>Should COT and Informal Cabinet determine that this report should be discussed at Education Youth &amp; Culture Scrutiny Committee timescales for approvals would be as follows:-</p> <table border="1" data-bbox="306 1256 970 1444"> <tr> <td>Informal Cabinet</td> <td>1<sup>st</sup> October 2024</td> </tr> <tr> <td>Education, Youth &amp; Culture Scrutiny Committee</td> <td>17<sup>th</sup> October 2024</td> </tr> <tr> <td>Cabinet</td> <td>19<sup>th</sup> November 2024</td> </tr> </table> <p>Subject to Cabinet approval the statutory notice would be issued from November 2024 onwards. This provides time for officers to prepare the appropriate paperwork.</p>	Informal Cabinet	1 <sup>st</sup> October 2024	Cabinet	15 <sup>th</sup> October 2024	Informal Cabinet	1 <sup>st</sup> October 2024	Education, Youth & Culture Scrutiny Committee	17 <sup>th</sup> October 2024	Cabinet	19 <sup>th</sup> November 2024
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<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	<p>A number of options for expanding the provision at Ysgol Pen Coch are still under consideration including the addition of building extensions and refurbishment of other facilities within the Education &amp; Youth Portfolio. All options are being fully considered and further information will be provided to Cabinet as part of any future consultation process.</p>

2.02	<p>There are associated revenue costs attached to the proposal and these are outlined below. These have been captured within the Medium Term Financial Strategy (MTFS):</p> <table border="1" data-bbox="320 280 1378 504"> <thead> <tr> <th data-bbox="320 280 676 387">Revenue Pressure</th> <th data-bbox="676 280 1032 387">Estimated full year cost</th> <th data-bbox="1032 280 1378 387">Implementation date</th> </tr> </thead> <tbody> <tr> <td data-bbox="320 387 676 504">Canolfan Enfys reregistration</td> <td data-bbox="676 387 1032 504">£0.135m</td> <td data-bbox="1032 387 1378 504">Winter 2024</td> </tr> </tbody> </table>	Revenue Pressure	Estimated full year cost	Implementation date	Canolfan Enfys reregistration	£0.135m	Winter 2024
Revenue Pressure	Estimated full year cost	Implementation date					
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2.03	<p>An additional financial consideration is that of transport costs. The Council provides transport for children who are deemed to required specialist provision. Pupils accessing Canolfan Enfys already access transport and this arrangement will not change under this proposal. Any additional pupils moving from mainstream provision will be entitled to transport.</p>						

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>												
3.01	<p>All projects and consultations within the school modernisation programme are managed using a risk register. Risks are managed accordingly, and financial risks are managed through a programme contingency. Any high-level risk which cannot be managed with the projects/programme will be incorporated into the risk register for the Education and Youth Portfolio.</p>												
3.02	<p>Ways of Working (Sustainable Development) Principles</p> <table border="1" data-bbox="320 1205 1378 2011"> <thead> <tr> <th data-bbox="320 1205 762 1272">Ways of Working Principle</th> <th data-bbox="762 1205 1378 1272">Impact</th> </tr> </thead> <tbody> <tr> <td data-bbox="320 1272 762 1417">Long-term</td> <td data-bbox="762 1272 1378 1417">Positive - Ensures that high quality specialist education places are available to communities to meet demand of specialist educational</td> </tr> <tr> <td data-bbox="320 1417 762 1570">Prevention</td> <td data-bbox="762 1417 1378 1570">Positive - preventing inappropriate placements for the most vulnerable learners.</td> </tr> <tr> <td data-bbox="320 1570 762 1715">Integration</td> <td data-bbox="762 1570 1378 1715">Positive – the additional specialist education places will integrate children from varying backgrounds.</td> </tr> <tr> <td data-bbox="320 1715 762 1861">Collaboration</td> <td data-bbox="762 1715 1378 1861">Positive – partnership arrangements inhouse and with external parties including school governing bodies.</td> </tr> <tr> <td data-bbox="320 1861 762 2011">Involvement</td> <td data-bbox="762 1861 1378 2011">Positive - The proposed projects involves a range of stakeholders to enable its delivery.</td> </tr> </tbody> </table>	Ways of Working Principle	Impact	Long-term	Positive - Ensures that high quality specialist education places are available to communities to meet demand of specialist educational	Prevention	Positive - preventing inappropriate placements for the most vulnerable learners.	Integration	Positive – the additional specialist education places will integrate children from varying backgrounds.	Collaboration	Positive – partnership arrangements inhouse and with external parties including school governing bodies.	Involvement	Positive - The proposed projects involves a range of stakeholders to enable its delivery.
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3.03	<p data-bbox="320 136 727 168">Well-being Principle Impacts</p> <p data-bbox="320 210 1350 277">Against the seven well-being goals of the Act, the potential impact of the report and its recommendations would be evaluated as follows:-</p> <table border="1" data-bbox="320 315 1382 1603"> <thead> <tr> <th data-bbox="320 315 762 376">Well-being Principle</th> <th data-bbox="767 315 1382 376">Impact</th> </tr> </thead> <tbody> <tr> <td data-bbox="320 383 762 517">Prosperous Wales</td> <td data-bbox="767 383 1382 517">Positive - Ensuring our schools are in the right place and of the right type.</td> </tr> <tr> <td data-bbox="320 524 762 696">Resilient Wales</td> <td data-bbox="767 524 1382 696">Positive - Use of sustainable and recycled materials during construction, more energy efficient, potential reduction in carbon</td> </tr> <tr> <td data-bbox="320 703 762 875">Healthier Wales</td> <td data-bbox="767 703 1382 875">Positive - Improved physical infrastructure, facilities and services which positively impact on the wellbeing of the school and its community.</td> </tr> <tr> <td data-bbox="320 882 762 1055">More Equal Wales</td> <td data-bbox="767 882 1382 1055">Positive - Assessments are already embedded in school culture. Opening up more specialist education places to those who need them.</td> </tr> <tr> <td data-bbox="320 1061 762 1279">Cohesive Wales</td> <td data-bbox="767 1061 1382 1279">Positive - School network widens its number of places for specialist provision through delivery of facilities of the right type in the right place and services are appropriately aligned.</td> </tr> <tr> <td data-bbox="320 1285 762 1458">Vibrant Wales</td> <td data-bbox="767 1285 1382 1458">Positive - Enables facilities and services to work together to improve, both curricular, extra-curricular and community use of school buildings.</td> </tr> <tr> <td data-bbox="320 1464 762 1603">Globally Responsible Wales</td> <td data-bbox="767 1464 1382 1603">Positive - Delivers more sustainable services and added benefits for the community.</td> </tr> </tbody> </table>	Well-being Principle	Impact	Prosperous Wales	Positive - Ensuring our schools are in the right place and of the right type.	Resilient Wales	Positive - Use of sustainable and recycled materials during construction, more energy efficient, potential reduction in carbon	Healthier Wales	Positive - Improved physical infrastructure, facilities and services which positively impact on the wellbeing of the school and its community.	More Equal Wales	Positive - Assessments are already embedded in school culture. Opening up more specialist education places to those who need them.	Cohesive Wales	Positive - School network widens its number of places for specialist provision through delivery of facilities of the right type in the right place and services are appropriately aligned.	Vibrant Wales	Positive - Enables facilities and services to work together to improve, both curricular, extra-curricular and community use of school buildings.	Globally Responsible Wales	Positive - Delivers more sustainable services and added benefits for the community.
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4.00	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Determination on statutory proposals is the responsibility of Cabinet.
4.02	Subject to Cabinet agreement, statutory notice would be issued to invite anyone to make objections to the proposals will be issued, through the School Standards and Organisation (Wales) Act 2013, School Organisation Code by the School Modernisation Team. If objections are received, the Council must publish an objection report providing a summary of the objections and their responses to them within 28 days of the end of the objection period.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix A – Consultation Report summarising the responses from the consultation exercise.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	School Organisation Code – The School Standards and Organisation (Wales) Act 2018 <a href="https://www.gov.wales/sites/default/files/publications/2018-10/schoolorganisation-code-second-edition.pdf">https://www.gov.wales/sites/default/files/publications/2018-10/schoolorganisation-code-second-edition.pdf</a>
6.02	Link to consultation reference documents  <a href="https://www.flintshire.gov.uk/en/Resident/Schools/School-ModernisationRelated/Home.aspx">https://www.flintshire.gov.uk/en/Resident/Schools/School-ModernisationRelated/Home.aspx</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Jennie Williams, Senior Manager Planning and Provision <b>Telephone:</b> 01352 704015 <b>E-mail:</b> <a href="mailto:jennie.williams@flintshire.gov.uk">jennie.williams@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<b>Sustainable Communities for Learning</b> - Is a collaboration between the Welsh Government (WG), the Welsh Local Government Association (WLGA) and local authorities. It is a major, long-term and strategic capital investment programme with the aim of creating a generation of 21st century schools in Wales.  <b>School Organisation Code</b> – The new School Standards and Organisation (Wales) Act 2018 makes Local Authorities responsible (rather than the Welsh Ministers prior to October 2018) for the determination of most statutory school organisation proposals that receive objections.

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**APPENDIX A: Consultation Report summarising the responses from the consultation exercise**



# CONSULTATION REPORT

## **Proposal to Reorganise Canolfan Enfys Specialist Provision**

**Reorganising Canolfan Enfys to place the provision under the management of Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025**

**September 2024**

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8	Response from Governors	8
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Appendix A	Consultation Document recipient list	
Appendix B	Estyn's response to the Formal Consultation Document	
Appendix C	Summary of Responses	
Appendix E	FCCs Responses to issues raised	

This consultation document is published in hard copy, if you require a paper copy of this document, or a copy of the document in a different format for example braille or large print, or help with interpretation in a different language, please contact the School Modernisation Team on 01352 702188 / 704015 / 01352 704014, or e-mail [21stCenturySchools@flintshire.gov.uk](mailto:21stCenturySchools@flintshire.gov.uk).

## 1. Introduction

1.1 Following the end of a school organisation consultation period, the Welsh Government's School Organisation Code requires the proposer (the Council) to publish a consultation report. In this document the proposer is required to:

- Summarise each of the issues raised by consultees;
- responding to these by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons;
- setting out Estyn's response to the consultation in full; and
- responding to Estyn's response by means of clarification, amendment to the proposal or rejection of the concerns, with supporting reasons.

1.2 The results from the consultation process should be considered by decision-makers prior to determining any recommendation relating to the proposal.

## 2.0 The Proposal and Consultation

2.1 On Thursday 21st November 2023, Cabinet resolved to:

Open a period of formal consultation with key stakeholders to reorganise Canolfan Enfys to place the provision under the management of Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025, with a future report to be provided to Cabinet.

2.2 The Council proposes to deliver this increase in nominal capacity by:

- Reorganising the provision at Canolfan Enfys under the management of Ysgol Pen Coch whilst maintaining both provisions on their current sites.

2.3 Consultation was carried out in accordance with the School Organisation Code. The consultation period ran from, Wednesday 5<sup>th</sup> June 2024 and ended, Tuesday 16<sup>th</sup> July 2024.

2.4 In accordance with the code, the consultation documents were published on Flintshire County Council's website, Wednesday 5<sup>th</sup> June 2024, and a link to the consultation documents was provided to stakeholders. A complete list of recipients can be found in **Appendix A**.

2.5 Age-appropriate versions of the consultation document, for children and young people, were also published on the Flintshire County Council website. All versions of the consultation documents can be found in the School Modernisation section page on the Flintshire County Council website at the following link:

<https://www.flintshire.gov.uk/en/Resident/Schools/School-Modernisation-Related/Canolfan-Enfys.aspx>

2.6 Hard copies were available on request at Canolfan Enfys, Ysgol Pen Coch and Plas Derwen.

- 2.7 A post box was made available at Canolfan Enfys, Ysgol Pen Coch and Plas Derwen for consultation responses to be posted and collected by a member of the School Modernisation Team.
- 2.8 The Council produced a response document (standard response form) to assist and encourage people to give their views. This formed part of the consultation document and was also published on the Council's website. The children and young people's version of the consultation document contained an adapted more user-friendly response form. The consultation response form was converted into an online survey using the Smart Survey online tool. Links to the survey and a QR code were also published on the website.
- 2.9 All consultees received an e-mail with the link directing them to the formal consultation document, supplementary documents, and also the link to the online survey on the first day of the consultation 5<sup>th</sup> June, 2024.
- 2.10 Documents were produced in both Welsh and English.

### 3.0 Consultation events/meetings

- 3.1 Consultation events were not held as part of this process. Instead, questions could be submitted by e-mail, with Council Officers providing a response within 7 days.

### 4.0 Consultation responses

- 4.1 The Council received 80 responses during the consultation period submitted through the online standard consultation form. 47 of these were fully completed responses.
- 4.2 School pupil voice sessions were considered but it was felt that due to the social, emotional and communication difficulties of the pupils attending each provision this was not practical.
- 4.3 In addition, a formal response was submitted from Estyn, the full response from Estyn is set out in **Appendix B**.
- 4.4 The table below show the methods people used to respond to the consultation:

Method of contact	Number of Contacts Received
Consultation Standard Response Forms (all online)	79
Children & Young People's Response Forms	0
Letters and E-mails	0
Children and Young People Letters and E-mails	0
School Council Responses - email	0
School Governors Responses (no formal response from GB but some Governors filled in the online form counted above)	0
Union Response	0
Estyn Response	1
AM and MP Response	0

## 5.0 School Pupil Response

5.1 School pupil voice sessions were considered but it was felt that due to the social, emotional and communication difficulties of the pupils attending each provision this was not practical.

## 6.0 Response from Estyn

6.1 The main points made by Estyn in response to the proposal and the Council's response to them are set out below. The full response received from Estyn is set out in **Appendix B**.

Estyn Comment	FCC Response
<p>The proposal sets out suitably the range of alternate options considered and makes sensible conclusions based on the Council's assessment of these. The proposal states that changes will have a limited impact on the local environment, for example on home to school transport, as most pupils currently use the school minibus to attend school. However, while transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change.</p>	<p>There would be no change to travel times as pupils would continue to attend the same provision in the same location using their current method of transport.</p>
<p>The proposal considers the implications for governance, stating that that responsibility will move from the Management Committee at Plas Derwen (PRU) to the governing body at Ysgol Pen Coch. It recognises the main impact on staffing being the Headteacher from Ysgol Pen Coch taking on the day-to-day running of Canolfan Enfys with the support of the current leadership team at both settings. The proposal identifies the risks of a change in leadership and highlights the current arrangements for support between the two settings and a review of working practices in the future.</p>	<p>Noted</p>
<p>However, the local authority is not clear enough about the potential impact of the proposal on pupils' standards of learning nor on their well-being.</p>	<p>Ysgol Pen Coch has significant experience of educating children will a similar range of complex needs, with many of the children attending Canolfan Enfys transferring to placements at Ysgol Pen Coch. The change of leadership will allow for strategies used within the specialist school to be implemented at an earlier point, enabling the children to</p>

	<p>benefit from these at the start of their educational placement at the centre. Ysgol Pen Coch has access to a wide range of resources and equipment that can be shared in response to pupil's needs to support their access to the curriculum. Existing collaboration between Ysgol Pen Coch and Canolfan Enfys has already identified areas of focus including enhancing the learning environment, strategies to develop pupil communication skills and implementation of an effective assessment system. Implementation of the proposal will allow for the continued focus on these and provide for access to additional time, expertise and resource to develop and embed effective practice in these areas.</p>
<p>The proposals be further strengthened by including further detail regarding how staff will work together to bring about improvements and with more specific reference to the mentioned review of working practices to identify timescales and potential foci.</p>	<p>Staff at Canolfan Enfys will access training alongside colleagues at Ysgol Pen Coch to further develop their knowledge and expertise to meet the needs of the children within the centre. This will be through access to training events, staff shadowing and also the modelling of effective interventions and strategies. There is a level of collaboration between Canolfan Enfys and Ysgol Pen Coch already in place. Implementation of the proposal will allow for an initial review of staff skillsets and training needs which can then be built into the continued professional development programme for Ysgol Pen Coch. The further development of the staff knowledge, skills and understanding, the curriculum offer along with adaptations to the learning environment will provide for an enhanced learning experience for the children which will impact not only on their levels of engagement and outcomes but also on their well-being.</p>

6.2 The response from Estyn sets out its view that the proposal is likely to maintain the standard of provision in the area.

**7.0 Standard Response forms**

7.1 The standard response form was designed to establish:

- the capacity in which they were responding;
- whether or not people were in favour of the proposal and any comments they wish to make;
- the effect on opportunities to use the Welsh Language;
- whether they wanted to be notified of publication of the consultation report;
- Equalities Information.

7.2 On the response forms, we asked people to confirm whether they were responding as a parent, a prospective parent, teacher, governor, member of the community or other. Further details of the respondents are set out in **Appendix C**.

7.3 Over half of the responses were from staff associated with the provisions at 52%. 29% of responses were received from current parents, carers and guardians.

7.4 91% of respondents agreed with the proposal. Of those that did not agree with the proposal 3 were current parents and 2 were members of staff associated with the provisions.

7.5 Respondents were able to provide additional comments on whether they did or did not support the proposal. An analysis of the frequency of issues being raised within the comments section and those from Estyn is below. The responses have been grouped into the categories which should be taken into account by relevant bodies when exercising their functions of preparing and publishing school organisation proposals, or approving/determining them.

<b>CONSULTEE RESPONSES</b>		<b>No</b>
<b>1. Resourcing of Education and other Financial Implications</b>		
<ul style="list-style-type: none"> <li>• Concerns that Ysgol Pen Coch is already understaffed and underfinanced.</li> <li>• Lack of detail in the proposal about how staff will be utilised. Concerns that they will be asked to do more without suitable compensation.</li> <li>• Depends on whether Ysgol Pen Coch is extended properly to accommodate additional pupils.</li> <li>• Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch.</li> <li>• Concern that Ysgol Pen Coch struggle to manage the behaviour of the children they currently have so adding more will increase the issue.</li> <li>• Further reassurances required that Canolfan Enfys will be retained on the current Mold site.</li> </ul>	6	
<b>2. Need for places and the Impact on Accessibility of schools</b>		
<ul style="list-style-type: none"> <li>• More specialist places for children in mainstream requiring support.</li> <li>• Many pupils feed into Ysgol Pen Coch already.</li> <li>• It would be good to spread pupils across two sites rather than keep them all on one.</li> </ul>	13	



7.6

<b>3. Quality and Standards of Education</b>	
<ul style="list-style-type: none"> <li>• Pen Coch better aligned with Canolfan Enfys than Plas Derwen (PRU)</li> <li>• The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys.</li> <li>• Recommended teaching and learning strategies are consistent across both settings.</li> <li>• Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch.</li> <li>• The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being (Estyn response)</li> </ul>	17
<b>4. Community Impact</b>	
<ul style="list-style-type: none"> <li>• While transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change (Estyn response)</li> <li>• The local authority has not provided a Community Impact Assessment as part of this proposal (Estyn response)</li> </ul>	1
<b>5. Welsh in Education Strategic Plan</b>	
<ul style="list-style-type: none"> <li>• The local authority outlines that the proposal would not provide for additional Welsh medium primary school places. However, the local authority has not provided a Welsh Language Impact Assessment as part of this proposal (Estyn response)</li> </ul>	1
<b>6. Equalities/Anti Poverty Impact</b>	
<ul style="list-style-type: none"> <li>• No comments were received regarding this area.</li> </ul>	0

A full summary analysis of the responses received via the standard response form is set out in **Appendix C**, the Councils responses to these can be found at **Appendix D**.

## 8.0 Responses from Assembly Members and Members of Parliament

8.1 No responses were received from AMs/MPs.

## 9.0 Responses from Governors

9.1 In total 5 responses were received during the consultation period from Governors. All Governors who completed the standard consultation response form were in support of the proposal.

## 10 Next Steps

10.1 Flintshire County Council Cabinet Members will meet on 15<sup>th</sup> October 2024 to discuss the proposal to reorganise Canolfan Enfys and place the provision under the management of Ysgol Pen Coch increasing the nominal capacity from 98 to 128 from 1<sup>st</sup> March 2025. Having been provided with the information gathered through the Consultation, the decision will be taken by Cabinet whether to continue to the Statutory Notice for determining the proposal. This consists of a 28 day formal Objection Period whereby any objections to the proposal must be made in writing or by email. Following this the Cabinet will then need to



consider another report, summarising any objections received and decide whether or not to proceed to implementation.

- 10.2 Any comments made against the proposal during the consultation period will not be treated as objections. If any consultees wish to object this must be done in writing during the objection period. Information on how to do this will be clearly stated on the Statutory Notice in due course.

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## APPENDIX A

### Consultation Document (Adult and Children's and Young People Versions); Transport Assessment, Equality and Welsh Language Impact Assessment, Community Impact Assessment Recipient List

This formal consultation document was sent to a wide range of consultees including:

Requirement under the Organisational Code 011/2018	It will be distributed to
School community	<p>The Headteacher, teachers and staff of Ysgol Pen Coch.</p> <p>Teachers and staff at Canolfan Enfys.</p> <p>Pupils at Ysgol Pen Coch and Canolfan Enfys.</p> <p>Parents, carers, and guardians (and where possible prospective parents, carers and guardians) of pupils attending Ysgol Pen Coch and Canolfan Enfys.</p> <p>The Headteacher, teachers, staff of Plas Derwen (Pupil Referral Unit)</p>
the maintaining or proposed maintaining authority for any school likely to be affected by the proposals;	Flintshire County Council is submitting the proposal
any other local authority likely to be affected - including in the case of dedicated Special Education Need (SEN)/Additional Learning Need (ALN) provision any authority placing or likely to place statemented pupils in it;	
the Church in Wales and Roman Catholic Diocesan Authority for the area in which any school likely to be affected is located;	
any other appropriate religious body for any school likely to be affected by the proposals;	
The governing body any school which is the subject of the proposals and of other schools likely to be affected by the proposals, including those that might receive any displaced pupils.	Governing Body of Ysgol Pen Coch Management Committee of Plas Derwen (Pupil Referral Unit)
The governing body of other schools which the proposer considers are likely to be affected by the proposals;	Governing Body of Maes Hyfryd
The Welsh Ministers.	
Assembly Members (AMs) and Members of Parliament (MPs) representing the area served by/intended to be served by any school which is the subject of the proposals.	Rob Roberts Hannah Blythyn
Estyn.	Chief Inspector of Education and Training in Wales
Teaching and staff trade unions representing teachers and other staff at any school which is the subject of the proposals.	Representatives of NASUWT; NEU; UCAC; ASCL; UNISON

The relevant Regional Education Consortium.	GwE advisor for Plas Derwen/Pen Coch
The relevant Regional Transport Consortium.	
The Police and Crime Commissioner for the area served by/intended to be served by any school which is the subject of the proposals.	Police Commissioner for North Wales
Any community or town council for the area served by/intended to be served by any school which is the subject of the proposals	Flint Town Council Mold Town Council
The local Communities First Partnership (in relevant areas).	
In the case of proposals affecting nursery provision, any independent providers who may be affected;	
In the case of proposals affecting nursery provision, the Children and Young People's Partnership and/or the Early Years Development and Childcare Partnerships where present.	Early Years Wales PACEY
In the case of proposals affecting Special Education Need/Additional Learning Need provision, any relevant health or third sector bodies with an interest.	Betsi Cadwaladr University Health Board
In the case of proposals affecting secondary provision, any further education institutions serving the area of the school.	
In the case of proposals affecting secondary provision, parents of pupils attending primary schools from which pupils normally transfer to that secondary school.	
In the case of proposals affecting Welsh language provision, the Welsh Language Commissioner.	
Other	All Flintshire Council Councillors

## APPENDIX B

### Estyn response to proposal

#### Proposal to Reorganise Canolfan Enfys Specialist Provision

This report has been prepared by Her Majesty's Inspectors of Education and Training in Wales. Under the terms of the School Standards and Organisation (Wales) Act 2013 and its associated Code, proposers are required to send consultation documents to Estyn. However, Estyn is not a body which is required to act in accordance with the Code and the Act places no statutory requirements on Estyn in respect of school organisation matters. Therefore, as a body being consulted, Estyn will provide their opinion only on the overall merits of school organisation proposals.

Estyn has considered the educational aspects of the proposal and has produced the following response to the information provided by the proposer.

#### Summary/Conclusion

This consultation is as a result of Flintshire Council's proposal to reorganise Canolfan Enfys and move the provision from under the current management of Plas Derwen (Pupil Referral Unit) to management by Ysgol Pen Coch and increase the nominal capacity from 98 to 128 from 1st March 2025.

This proposal outlines the Council's commitment to respond to findings from the Estyn Inspection in October 2022. In order to address the recommendations of this report, the Council considers that this provision will benefit from the more suitable support and leadership that can be provided by Ysgol Pen Coch.

Estyn considers that the proposal is likely to maintain the standard of education provision in the area. However, the proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being

#### Description and benefits

The proposal states clearly the rationale for reorganising the provision to utilise the expertise of staff and improve standards at Canolfan Enfys.

The proposal appears to provide effective opportunities for stakeholders, organisations, and members of the public to respond. This includes opportunities to access additional information online, through QR codes or via email directly to the Council. However, it does not include a consultation workshop, instead directing attention to a direct email for questions. The proposal includes clear dates for the consultation and a deadline for responses to be received.

The proposal sets out suitably the range of alternate options considered and makes sensible conclusions based on the Council's assessment of these. The proposal states that changes will have a limited impact on the local environment, for example on home to school transport, as most pupils currently use the school minibus to attend school. However, while transport arrangements would be kept the same, the

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### **Description and benefits**

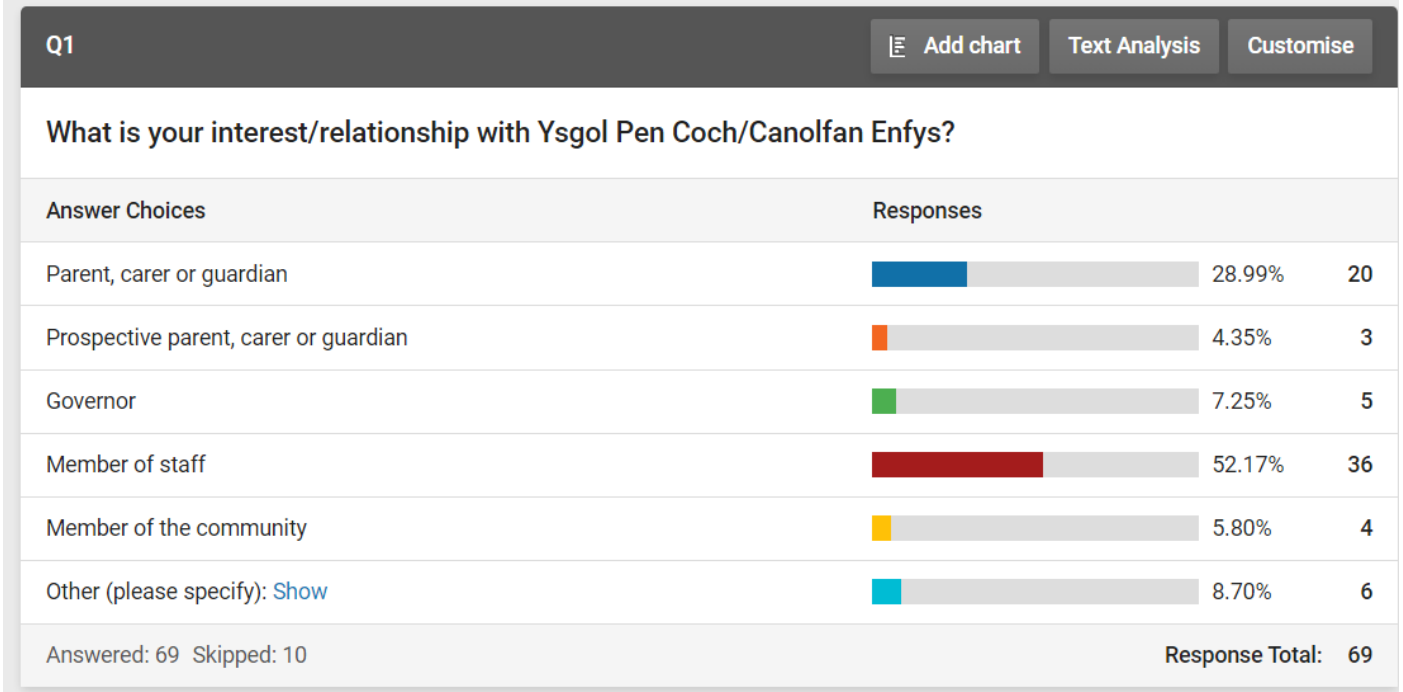
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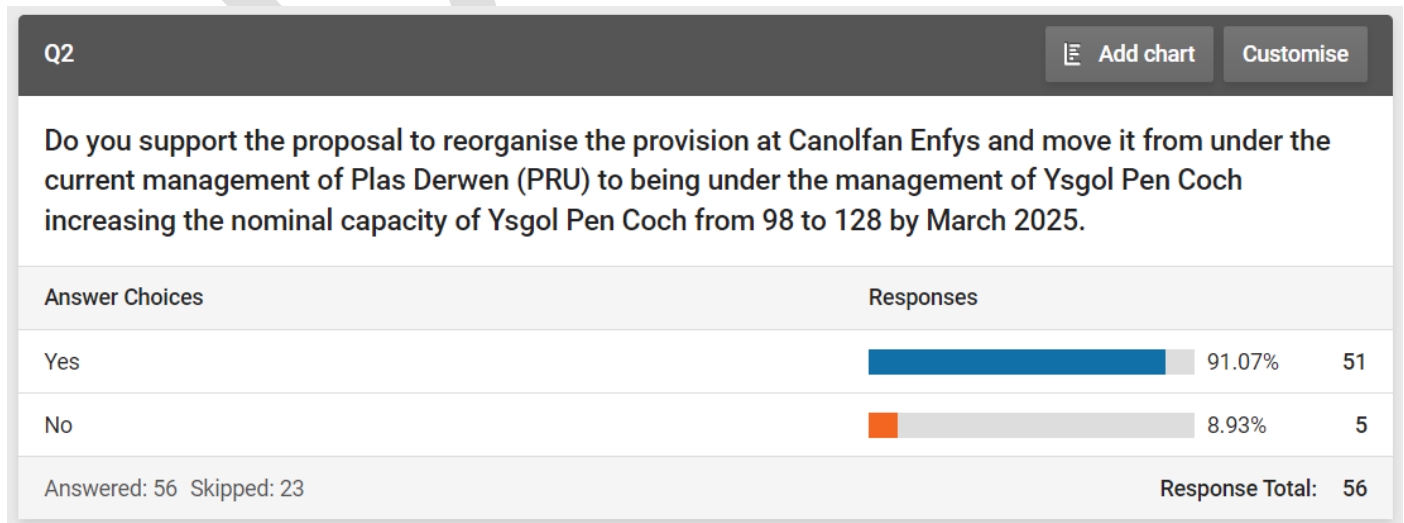
## APPENDIX C

### Summary of responses to Standard Response Forms



*\*Respondents were able to respond in more than one capacity. This explains why the total answered does not tally.*

**Comments:** Over half of respondents were members of staff associated with the provisions. The results do not break the percentage down into staff members from individual schools. The 8.7% who responded through the 'other' category were a combination of health professionals, supply staff and a member of staff from a feeder school to Ysgol Pen Coch.





**Comments:** 91% of respondents agree with the proposal. Those who did not and left comments as to why they did not agree cited concerns about resources being spread thinly across two sites and the impact of the proposal on individual job roles and the location of work.

Theme	No	Example Comments
<b>Positive response to need for additional spaces</b>	10	<ul style="list-style-type: none"> <li>• An increase in the amount of pupils also means more places for children who need it.</li> <li>• There are so many children incorrectly placed in mainstream school settings who need more a specialist setting but there is not enough room. Increasing the amount of pupils who can attend this school is absolutely essential.</li> <li>• There is a lack of spaces in Flintshire for children with special needs. My child had to wait many months before a space became available at Pen Coch.</li> <li>• At Ysgol Pen Coch we are at full capacity so it would be a good idea to spread the numbers across both sites.</li> </ul>
<b>Positive response to impact on teaching and learning</b>	20	<ul style="list-style-type: none"> <li>• The staff at Canolfan Enfys are fantastic with the Children and I feel that with the more specific expertise Pen Coch can offer it will give them the opportunity to be able to offer the Children more appropriate opportunities and education.</li> <li>• We are all specialists staff, our expertise should be shared to support the children and other specialist staff.</li> <li>• Ysgol Pen Coch has a huge amount of experience and a strong leadership team that can, I feel, develop the unit in line with the systems/processes in place at Ysgol Pen Coch and thereby creating a nurturing environment for the pupils attending the unit to assessed and prepared for entry into either a mainstream or sen school life.</li> <li>• From my experience, the cohort of children attending Canolfan Enfys in the past 2-3 years especially, have presented with similar needs to children attending Pen Coch. My assessment approaches and subsequent targets, as well as classroom strategies recommended are not dissimilar across the two schools. From a professional and service level, this change would not affect SLT input as the way we organise and input into the two schools is the same.</li> <li>• Canolfan Enfys is not a PRU provision and would be much better suited to links to Pen Coch. The staff team at CE would benefit from the support of being part of the YPC staff team, to access skills and expertise of staff experiencing the same challenges. Will also provide a smoother transition for pupils from Pen Coch to Maes Hyfryd. The management team of Pen Coch have a much better understanding of the needs of these pupils that PRU leaders and will therefore be</li> </ul>

		<p>able to offer stronger support and leadership to the provision.</p> <ul style="list-style-type: none"> <li>• The needs of the pupils and diagnosis are additional learning needs that require the support and processes in place from a specialist aln school rather than a Pru. Many pupils feed into ypc from Canalfon Enfys and the support to can provide will only be if benefits to the pupils in both schools.</li> <li>• Pupils needs are more aligned with pupils at Pen Coch so hopefully will get targeted support. Hoping for greater involvement and support from SLT at Pen Coch as they understand the needs of our pupils.</li> <li>• I think the two schools working together would be great. They both have their own things that make them great schools and working together would give children with additional needs an amazing chance.</li> <li>• Easier access to information / guidance for staff members if needed. The children will benefit from enhanced learning opportunities and resources that Pen Coch have to offer.</li> </ul>
<p><b>Concerns with proposal</b></p>	<p>6</p>	<ul style="list-style-type: none"> <li>• The council need to ensure parents are aware of anything that may change under this new management, ahead of it happening.</li> <li>• Am I to assume this mean splitting staff across two site? I am cynical that this is in the best interests of the pupils. Your document does not provide any details of changes other than a very broad, will now fall under the management of YPC. In an attempt to obfuscate; the real reason is revealed. To save money by getting YPC staff to do more without compensating them.</li> <li>• Ysgol pen coch is already understaffed and under funded this will stretch resources even further.</li> <li>• Depends whether the school is extended appropriately to accommodate.</li> <li>• I would like some further assurance that our jobs are secure in Mold.</li> <li>• Concerns remain regarding the logistics of two sites as this has been tried before, but learning from that experience and that of Plas Derwen oversight, I feel that this should be workable.</li> </ul>



## Appendix D - Summary of Responses from Consultation

The Council received **48** full responses during the consultation period submitted through the online standard consultation form including a formal response from Estyn. There were an additional **32** partial responses meaning an overall total of **80** responses.

### Summary of responses to Standard Response Forms



#### KEY FACTS

- 91% agreed with the proposal.
- Those who disagreed were current parent/carers and members of staff.
- Over half of respondents were current members of staff.
- Over a quarter of respondents were current parents, carers or guardians.

## Appendix D - Responses and observations from FCC on comments received (including formal Estyn response)

In the online standard response form respondents were given the opportunity to provide comments on whether they did or did not support the proposal. 33 additional comments were made, of those who made comments 28 were in agreement to the proposal, while 5 were not. The responses have been grouped, by the highest frequency of comment, and into the categories which **should** be taken into account by relevant bodies when exercising their functions of preparing and publishing school organisation proposals, or approving/determining them.

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CONSULTEE RESPONSES	No	FCC Response
<b>1. Resourcing of Education and other Financial Implications</b>		
<ul style="list-style-type: none"> <li>• <b>Concerns that Ysgol Pen Coch is already understaffed and underfinanced.</b></li> <li>• <b>Lack of detail in the proposal about how staff will be utilised. Concerns that they will be asked to do more without suitable compensation.</b></li> <li>• <b>Depends on whether Ysgol Pen Coch is extended properly to accommodate additional pupils.</b></li> <li>• <b>Staff at Canolfan Enfys would benefit from the specialist support of those at Ysgol Pen Coch.</b></li> <li>• <b>Further reassurances required that Canolfan Enfys will be retained on the current Mold site.</b></li> <li>• <b>Clarification required about how staff will work together to bring about improvements (Estyn)</b></li> </ul>	6	<p>The set up of both Ysgol Pen Coch and Canolfan Enfys will remain as is with staff continuing to work at their current provisions in their current locations. There will be some cross-school working – similar to what currently takes place – to train and support staff with upskilling themselves in curriculum delivery. Leaders at Ysgol Pen Coch will be working with FCC representatives over the Autumn Term to determine and share further details on these working arrangements.</p> <p>Ongoing conversations are taking place concerning strategic options for extending Ysgol Pen Coch in the longer term. These conversations are taking place alongside leaders and governors from the school. Once the council is able to give more detail on these proposals they will do so.</p> <p><b>FCC response to Estyn comments –</b></p> <p>Staff at Canolfan Enfys will access training alongside colleagues at Ysgol Pen Coch to further develop their knowledge and expertise to meet the needs of the children within the centre. This will be through access to training events, staff shadowing and also the modelling of effective interventions and strategies. There is a level of collaboration between Canolfan Enfys and Ysgol Pen Coch already in place. Implementation of the proposal will allow for an initial review of staff skillsets and training needs which can then be built into the continued professional development programme for Ysgol Pen Coch. The further development of the staff knowledge, skills and understanding, The curriculum</p>

		offer along with adaptations to the learning environment will provide for an enhanced learning experience for the children which will impact not only on their levels of engagement and outcomes but also on their well-being.
<b>2. Need for places and the Impact on Accessibility of schools</b>		
<ul style="list-style-type: none"> <li>• More specialist places for children in mainstream requiring support.</li> <li>• Many pupils feed into Ysgol Pen Coch already.</li> <li>• It would be good to spread pupils across two sites rather than keep them all on one.</li> </ul>	13	FCC welcomes the support for the proposal. The proposal will formalise current working arrangements whilst opening up a small number of additional places.
<b>3. Quality and Standards of Education</b>		
<ul style="list-style-type: none"> <li>• Pen Coch better aligned with Canolfan Enfys than Plas Derwen (PRU)</li> <li>• The management at Ysgol Pen Coch have a better understanding of the needs of the children at Canolfan Enfys.</li> <li>• Recommended teaching and learning strategies are consistent across both settings.</li> <li>• Children at Canolfan Enfys would receive more appropriate support from staff at Ysgol Pen Coch.</li> <li>• The proposal does not consider in sufficient detail the impact of the proposed changes on pupils' standards of learning and their well-being (Estyn response)</li> </ul>	17	<p>FCC welcomes the support and understanding from members of the community at both Ysgol Pen Coch and Canolfan Enfys. Members of both communities acknowledge the positive difference that this proposal will make in supporting children at Canolfan Enfys.</p> <p><b>FCC response to Estyn comments -</b></p> <p>Ysgol Pen Coch has significant experience of educating children with a similar range of complex needs, with many of the children attending Canolfan Enfys moving onto placements at Ysgol Pen Coch. The change of leadership will allow for strategies used within the specialist school to be implemented at an earlier point, enabling the children to benefit from these at the start of their educational placement at the centre. Ysgol Pen Coch has access to a wide range of resources and equipment that can be shared in response to pupil's needs to support their access to the curriculum. Existing collaboration between Ysgol Pen Coch and Canolfan Enfys has already identified areas</p>

		of focus including enhancing the learning environment, strategies to develop pupil communication skills and implementation of an effective assessment system. Implementation of the proposal will allow for the continued focus on these and provide for access to additional time, expertise and resource to develop and embed effective practice in these areas.
<b>4. Community Impact</b>		
<ul style="list-style-type: none"> <li>• <b>While transport arrangements would be kept the same, the proposer has not been clear about travel time for pupils and how this would be affected by the change (Estyn response)</b></li> <li>• <b>The local authority has not provided a Community Impact Assessment as part of this proposal (Estyn response)</b></li> </ul>	1	There will be no changes to travel time or travel arrangements as this proposal is a formalisation of a working arrangement already in place. Children will continue to travel in the same way as they currently do to Canolfan Enfys and there will be no impact on this arrangement or the associated travel times.
<b>5. Welsh in Education Strategic Plan</b>		
<ul style="list-style-type: none"> <li>• <b>The local authority outlines that the proposal would not provide for additional Welsh medium primary school places. However, the local authority has not provided a Welsh Language Impact Assessment as part of this proposal (Estyn response)</b></li> </ul>	1	This proposal does not provide any additional Welsh medium places. The FCC ALN team are continuing to work on a strategy to increase Welsh language provision for ALN pupils.
<b>6. Equalities/Anti Poverty Impact</b>		
<ul style="list-style-type: none"> <li>• <b>No comments were received regarding this area.</b></li> </ul>	0	N/A

**Thank you to everyone who took part in this process.**

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Expansion of Specialist Additional Learning Needs Resource Provision within the Secondary Education Network
<b>Cabinet Member</b>	Cabinet Member for Education, Welsh Language and Culture
<b>Report Author</b>	Chief Officer (Education & Youth)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

This report seeks Cabinet approval to the proposed expansion of specialist resource provision within the secondary education network.

Cabinet approval to proceed to issue a statutory notice for the introduction of a new Additional Learning Needs (ALN) Resource provision at both Flint High School and Hawarden High School.

This legal process is in line with the requirements of The School Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018.

### **RECOMMENDATIONS**

1	Cabinet supports the request to expand the Council's specialist ALN resource provision within the secondary education network.
2	Cabinet support the issuing of a statutory notice for the introduction of a new ALN resource provision at Flint High School and Hawarden High School.

## **REPORT DETAILS**

<b>1.00</b>	<b>EXPLAINING THE EXPANSION OF SPECIALIST ADDITIONAL LEARNING NEEDS RESOURCE PROVISION WITHIN THE SECONDARY EDUCATION NETWORK</b>
1.01	The Council is experiencing challenges in meeting its statutory duties with regards to educational provision for children with additional learning needs due a lack of specialist placements both inhouse and externally. Since the pandemic, there has been a rise in the number of children for whom mainstream schools are unable to meet their presenting needs.
1.02	The Council has a range of specialist provision which includes county ALN Resource Bases in mainstream schools which allows for those with a higher level of need to be co-educated in designated settings. These cater for needs such as social communication, hearing impairment and behaviour/social emotional difficulties. Apart from two secondary Resources, our Resource provision is full or oversubscribed.
1.03	Under the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (ALNET), the Council has a duty to keep its specialist provision under review and a review was undertaken in 2020. At the time of the review, the Council was able to cater for the educational needs of its children with additional learning needs, but the review did identify a developing dependency on non-maintained provision, referred to as Out of County (OOC) provision, of which there was sufficient to meet demand at the time. The report made a recommendation of significant investment in the Council's specialist provision in the future to redress the dependency.
1.04	The impact of the Covid pandemic has been significant in the area of additional learning needs and has resulted in a higher demand for specialist provision nationally. This has impacted on the availability of our own provision and OOC placements along with the level of cost, with educational day placements ranging from £55k to £125k per annum depending on the level of need. Providers are in a position of strength in terms of market demand and a number of placements have been ceased where a child's needs are deemed to be too complex.
1.05	As a result of the increasing need, Flintshire currently has a waiting list for specialist provision, with a number of children being educated in settings that are not specialised to meet their needs which impacts on them, their families and the children around them.
1.06	The School Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018 describes a number of regulated alterations to maintained schools, which must not be carried out unless the relevant local authority and/or governing body have complied with the requirements imposed by the Code. One such requirement is the introduction of specialist ALN resource provision at mainstream schools as identified in section 2.3 of the Code:



	<i>'the introduction or removal of SEN provision or any change in the type of such provision. This is where the provision is in a mainstream school but the pupils who are admitted are in addition to admission number of the school. The provision must also be recognised by the local authority as reserved for pupils with SEN;'</i>
1.07	A review of ALN learner needs indicates a demand for ALN Resource places for children who present with either moderate learning difficulties alongside a range of other complexities or social, emotional, and mental health needs meaning that they struggle to access education in a mainstream setting. Resource provision caters for children who tend not to fit neatly into either mainstream or specialist school, requiring elements of both settings to meet their educational needs.
1.08	<p>Flint High School has been identified as secondary school that can operationally accommodate a new specialist ALN Resource provision to meet the needs of children with moderate learning difficulties for a number of reasons, namely:</p> <ul style="list-style-type: none"> <li>• The proximity of the school with Flintshire's secondary specialist school Ysgol Maes Hyfryd, with the schools sharing a site in Flint. This facilitates a sharing of expertise, resources and curriculum access as required,</li> <li>• The inclusive nature of the school,</li> <li>• The availability of space within the school building to support a provision of this nature,</li> <li>• The Headteacher and governing body are positive and supportive of the development,</li> <li>• The provision has been piloted as an Enhanced Provision Base within Flint High School and this is operating successfully within the setting.</li> </ul>
1.09	<p>It is proposed that a specialist ALN Resource base is also established at Hawarden High School to cater for children with social, emotional, and mental health (SEMH) needs for the following reasons:</p> <ul style="list-style-type: none"> <li>• The school is already operating an in-house provision for SEMH for pupils on roll at Hawarden High School. This could be scaled up operationally to respond to the needs of the county as a whole; there is space within the school building that could suitably accommodate this provision.</li> <li>• Trauma Informed practice is a priority for the school, and this is being developed and embedded across all areas of the school.</li> <li>• The school has significant experience of running a specialist Resource base.</li> <li>• The Headteacher and governing body are positive and supportive of the development.</li> </ul>
1.10	These proposals would create specialist ALN English medium educational provision for 25 pupils aged 11 to 16 years based at Flint High School and 15 pupils aged 11-16 based at Hawarden High School. The pupils would be on roll at the designated school with the local authority being the admitting body. Pupils would be admitted in line with the agreed entry criteria which would include the requirement for an Individual Development Plan (IDP). Any admission would start with a consultation process with the

	<p>school to ensure that they are able to meet the additional learning provision outlined in the IDP of the child. All pupils with IDPs are subject to regular review to ensure that the provision is suitable to their educational needs. The relevant Service Level agreement with the school also outlines the exit criteria which would need to be met for children to leave the provision.</p>				
1.11	<p>Resource bases operate in response to pupil needs and that of the school community. Pupils would be able to attend the base for designated intervention whilst maintaining a supported place at Flint High school or Hawarden High School. These placements enable pupils to continue to learn alongside and interact socially with their mainstream peers. Resource bases in schools also work to remove barriers to on-going inclusion within mainstream schools and serve to build its capacity to meet the wider needs of the school cohort.</p>				
1.12	<p>The proposed introduction of a new specialist ALN resource provision at Flint High School and Hawarden High School meets the requirement to consult, a process which would be undertaken by the School Modernisation Team.</p>				
1.13	<p>Timescales for approvals are noted below:-</p> <table border="1" data-bbox="304 929 970 1010"> <tr> <td>Informal Cabinet</td> <td>1<sup>st</sup> October 2024</td> </tr> <tr> <td>Cabinet</td> <td>15<sup>th</sup> October 2024</td> </tr> </table> <p>Subject to Cabinet approval the statutory consultation would be issued in January 2025. This provides time for officers to prepare the appropriate paperwork.</p>	Informal Cabinet	1 <sup>st</sup> October 2024	Cabinet	15 <sup>th</sup> October 2024
Informal Cabinet	1 <sup>st</sup> October 2024				
Cabinet	15 <sup>th</sup> October 2024				

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	<p>A number of options for expanding specialist provision across the special school network are still under consideration including the addition of temporary teaching accommodation, building extensions and refurbishment of other facilities within the Education &amp; Youth Portfolio. All options are being fully considered and further information will be provided to COT and Cabinet as part of any future consultation process.</p>

2.02	<p>There are associated revenue costs attached to the proposal for the Resource Base at Flint High School and these are outlined below. These have been captured within the Medium-Term Financial Strategy (MTFS). There will be incremental rises as the provision moves to full capacity:</p>									
	<table border="1"> <thead> <tr> <th data-bbox="322 300 676 483">Revenue Pressure</th> <th data-bbox="683 300 1027 483">Estimated full year cost (when provision is at capacity)</th> <th data-bbox="1034 300 1375 483">Implementation date</th> </tr> </thead> <tbody> <tr> <td data-bbox="322 488 676 667">Flint High School Specialist ALN Resource Provision Registration</td> <td data-bbox="683 488 1027 667">£232k</td> <td data-bbox="1034 488 1375 667">September 2025</td> </tr> <tr> <td data-bbox="322 672 676 819">Hawarden High School Specialist ALN Resource Provision Registration</td> <td data-bbox="683 672 1027 819">£237k</td> <td data-bbox="1034 672 1375 819">September 2025</td> </tr> </tbody> </table>	Revenue Pressure	Estimated full year cost (when provision is at capacity)	Implementation date	Flint High School Specialist ALN Resource Provision Registration	£232k	September 2025	Hawarden High School Specialist ALN Resource Provision Registration	£237k	September 2025
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2.03	<p>An additional financial consideration is that of transport costs. The Council provides transport for children who are deemed to required specialist provision. Pupils moving into resource provision will be entitled to transport and in the majority of cases, will have already been receiving transport to access their primary education; these pupils will generally have accessed primary Resource base provision.</p>									

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	<p>All projects and consultations within the school modernisation programme are managed using a risk register. Risks are managed accordingly, and financial risks are managed through a programme contingency. Any high-level risk which cannot be managed with the projects/programme will be incorporated into the risk register for the Education and Youth Portfolio.</p>

3.02	<p>Ways of Working (Sustainable Development) Principles</p> <table border="1"> <thead> <tr> <th data-bbox="320 197 762 255">Ways of Working Principle</th> <th data-bbox="769 197 1375 255">Impact</th> </tr> </thead> <tbody> <tr> <td data-bbox="320 264 762 427">Long-term</td> <td data-bbox="769 264 1375 427">Positive - Ensures that high quality specialist education places are available to communities to meet demand of specialist educational</td> </tr> <tr> <td data-bbox="320 436 762 577">Prevention</td> <td data-bbox="769 436 1375 577">Positive - preventing inappropriate placements for the most vulnerable learners.</td> </tr> <tr> <td data-bbox="320 586 762 728">Integration</td> <td data-bbox="769 586 1375 728">Positive – the additional specialist education places will integrate children from varying backgrounds.</td> </tr> <tr> <td data-bbox="320 736 762 878">Collaboration</td> <td data-bbox="769 736 1375 878">Positive – partnership arrangements inhouse and with external parties including school governing bodies.</td> </tr> <tr> <td data-bbox="320 887 762 1028">Involvement</td> <td data-bbox="769 887 1375 1028">Positive - The proposed projects involves a range of stakeholders to enable its delivery.</td> </tr> </tbody> </table>	Ways of Working Principle	Impact	Long-term	Positive - Ensures that high quality specialist education places are available to communities to meet demand of specialist educational	Prevention	Positive - preventing inappropriate placements for the most vulnerable learners.	Integration	Positive – the additional specialist education places will integrate children from varying backgrounds.	Collaboration	Positive – partnership arrangements inhouse and with external parties including school governing bodies.	Involvement	Positive - The proposed projects involves a range of stakeholders to enable its delivery.
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3.03	<p>Well-being Principle Impacts</p> <p>Against the seven well-being goals of the Act, the potential impact of the report and its recommendations would be evaluated as follows:-</p> <table border="1"> <thead> <tr> <th data-bbox="320 1256 762 1314">Well-being Principle</th> <th data-bbox="769 1256 1375 1314">Impact</th> </tr> </thead> <tbody> <tr> <td data-bbox="320 1323 762 1464">Prosperous Wales</td> <td data-bbox="769 1323 1375 1464">Positive - Ensuring our schools and resource bases are in the right place and of the right type.</td> </tr> <tr> <td data-bbox="320 1473 762 1637">Resilient Wales</td> <td data-bbox="769 1473 1375 1637">Positive - Use of sustainable and recycled materials during construction, more energy efficient, potential reduction in carbon</td> </tr> <tr> <td data-bbox="320 1646 762 1823">Healthier Wales</td> <td data-bbox="769 1646 1375 1823">Positive - Improved physical infrastructure, facilities and services which positively impact on the wellbeing of the school and its community.</td> </tr> <tr> <td data-bbox="320 1832 762 2009">More Equal Wales</td> <td data-bbox="769 1832 1375 2009">Positive - Assessments are already embedded in school culture. Opening up more specialist education places to those who need them.</td> </tr> <tr> <td data-bbox="320 2018 762 2076">Cohesive Wales</td> <td data-bbox="769 2018 1375 2076">Positive - School network widens its number of places for specialist provision</td> </tr> </tbody> </table>	Well-being Principle	Impact	Prosperous Wales	Positive - Ensuring our schools and resource bases are in the right place and of the right type.	Resilient Wales	Positive - Use of sustainable and recycled materials during construction, more energy efficient, potential reduction in carbon	Healthier Wales	Positive - Improved physical infrastructure, facilities and services which positively impact on the wellbeing of the school and its community.	More Equal Wales	Positive - Assessments are already embedded in school culture. Opening up more specialist education places to those who need them.	Cohesive Wales	Positive - School network widens its number of places for specialist provision
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		through delivery of facilities of the right type in the right place and services are appropriately aligned.
	Vibrant Wales	Positive - Enables facilities and services to work together to improve, both curricular, extra-curricular and community use of school buildings.
	Globally Responsible Wales	Positive - Delivers more sustainable services and added benefits for the community.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	Determination on statutory proposals is the responsibility of Cabinet.
4.02	Subject to Cabinet agreement, consultation will be carried out, through the School Standards and Organisation (Wales) Act 2013 and School Organisation Code 2018.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Appendix 1 – Copy of Anticipated Consultation Timeline.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	School Organisation Code – The School Standards and Organisation (Wales) Act 2018  <a href="https://www.gov.wales/sites/default/files/publications/2018-10/schoolorganisation-code-second-edition.pdf">https://www.gov.wales/sites/default/files/publications/2018-10/schoolorganisation-code-second-edition.pdf</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Jeanette Rock, Senior Manager Inclusion and Progression <b>Telephone:</b> 01352 704017 <b>E-mail:</b> <a href="mailto:jeanette.rock@flintshire.gov.uk">jeanette.rock@flintshire.gov.uk</a>  <b>Telephone:</b> 01352 704015 <b>E-mail:</b> <a href="mailto:jennie.williams@flintshire.gov.uk">jennie.williams@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
8.01	<p><b>School Organisation Code</b> – The new School Standards and Organisation (Wales) Act 2018 makes Local Authorities responsible (rather than the Welsh Ministers prior to October 2018) for the determination of most statutory school organisation proposals that receive objections.</p> <p><b>Revenue Funding</b> - Is linked to items that will be used within a year. Examples include salaries, heating, lighting, services and small items of equipment. Routine repairs are revenue expenditures and can include significant repairs that do not extend the life of the asset or do not improve the asset (the repairs merely return the asset to its previous condition).</p>

## Anticipated Timeline

### Flint High School & Hawarden High School Proposed expansion of specialist resource provision

DATE	SCHOOL TERM	KEY MILESTONES
October 2024	Autumn Term	Cabinet Approval to commence with Statutory Proposals
December 2024 earliest January 2025 latest	Winter Term	Consultation document published. Must be published on a school day (42 days with 20 school days)
Feb 2025 Earliest March 2025 latest	Spring Term	Consultation Ends
April 2025	Spring Term	Publication of Consultation Report (at least 2 weeks prior to publishing a notice)
May 2025 (Cabinet on 13 May)	Spring Term	Cabinet review of consultation report and decision on whether or not to proceed to a Notice
June 2025	Summer Term	If agreed Statutory Notice published providing a 28 day period for objections. (Must be published on a school day and with 15 school days in the period)
July 2025	Summer Term	End of objection period
September/October 2025	Autumn Term	Cabinet Determination and Publication of Objection report. (Must be done within 7 days of the date of determination)

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Cabinet	
<b>Date of Meeting</b>	15 <sup>th</sup> October 2024
<b>Report Subject</b>	Additional HMO Licensing Consultation
<b>Cabinet Member</b>	Cabinet Member for Planning, Public Health and Public Protection
<b>Report Author</b>	Chief Officer (Planning, Economy and Environment)
<b>Type of Report</b>	Operational

## **EXECUTIVE SUMMARY**

Flintshire County Council's 2024/25 budget made provision for additional staffing to implement a new 'Additional Licensing' regime for Houses of Multiple Occupation (HMOs). Subject to the outcome of public consultation, this could mean that all houses of multiple occupation (HMOs) will need to be licenced.

Before such licensing arrangements can be introduced Flintshire County Council is required to consult with stakeholders.

## **RECOMMENDATIONS**

1	To approve the commencement of a formal consultation on 'Additional Licensing' for Houses of Multiple Occupation which will be open to the public and stakeholders.
2	To receive the outcome of the consultation exercise when it has been completed.

## **REPORT DETAILS**

1.0	LEGISLATIVE BACKGROUND
1.01	<p>The Housing Act 2004 introduced a duty for local authorities to operate a Mandatory Licensing scheme for certain types of HMOs which consist of:</p> <ul style="list-style-type: none"> <li>• Three or more storeys</li> <li>• With five or more occupants</li> <li>• Forming two or more households.</li> </ul> <p>The aim of Mandatory Licensing is to ensure that HMOs are properly managed by a 'fit and proper' person; that the premises are suitably</p>

	equipped with adequate amenities and facilities; and that fire safety arrangements are adequate.
1.02	Only a small number of HMOs in Flintshire fall within the mandatory licensing criteria. As of September 2024, there are fourteen HMOs that require such a licence.
1.03	The Housing Act 2004 also contains provisions to enable local authorities to extend their licensing scheme to other categories of HMO to address particular problems not covered by mandatory licensing, such as low standards in the private rented sector or anti-social behaviour. A licensing scheme that can cover all HMOs is called 'Additional Licensing'.
1.04	Section 56 of the Housing Act 2004 gives the local authority the power to either designate the area of their district, or an area in their district, as subject to additional licensing.
1.05	Section 63(3) of the Act states that the local authority may require a licensing application to be accompanied by a fee, fixed by the local authority.
1.06	<p>Before introducing such a scheme, the Housing Act requires the local authority to take reasonable steps to consult with those who are likely to be affected by the designation of an 'Additional Licensing' scheme. The local authority must also consider any representations received prior to implementation. It states:</p> <p style="text-align: center;"><i>Before making a designation, the authority must—</i></p> <p style="text-align: center;"><i>(a) take reasonable steps to consult persons who are likely to be affected by the designation; and</i></p> <p style="text-align: center;"><i>(b) consider any representations made in accordance with the consultation and not withdrawn.</i></p>
<b>2.0</b>	<b>THE BENEFITS OF ADDITIONAL LICENSING</b>
2.01	<p>The effective and efficient management of the private rented sector, and in particular HMO properties, has many benefits. It is anticipated that additional licensing could ensure greater compliance with legal housing requirements. Smaller HMOs, at present, only come to the attention of the Housing Enforcement Team when either a complaint is made about the property, or concern is raised by other professionals.</p> <p>Such a scheme could also identify where such properties are located in the county, which could assist wider policy development in areas, such as Planning.</p>
2.02	<p>In line with the Council Plan 2023-2028, introducing additional licensing will help support the Council's aims to:</p> <ul style="list-style-type: none"> <li>• Support the private sector to raise standards in the management and condition of housing and promote tenancy sustainment in our communities.</li> </ul>

	<p>The requirements associated with additional licensing will help to contribute to the Council Plan by:</p> <ul style="list-style-type: none"> <li>• Ensuring landlords and tenants are supported to sustain quality homes and well managed tenancies within the local private sector.</li> <li>• Maximising opportunities within the private rented sector for low-income households to live successfully Relieve pressures on homelessness services through better access to privately rented homes.</li> <li>• Raise living standards for tenants living in houses of multi-occupation.</li> </ul>
<b>3.00</b>	<b>AREAS TO BE CONSIDERED AS PART OF THE CONSULTATION</b>
3.01	<p>A public consultation exercise will be required to be undertaken if Additional Licensing is to be introduced. It is proposed that consultation is carried out with the following individuals, groups, and organisations:</p> <ul style="list-style-type: none"> <li>• Tenants/ Contract Holders</li> <li>• Landlords</li> <li>• Local Letting/ Managing Agents</li> <li>• Local Residents</li> <li>• Rent Smart Wales</li> <li>• North Wales Fire and Rescue</li> <li>• North Wales Police</li> <li>• Shelter Cymru</li> <li>• Elected Members</li> <li>• Other associated Council Departments (Waste, Homelessness Teams etc)</li> <li>• The Property Ombudsman</li> <li>• Flintshire Local Voluntary Council</li> <li>• Flintshire Citizens Advice Bureau</li> <li>• Neighbouring Local Authorities</li> <li>• Town and Community Councils</li> </ul> <p>It should be noted that Rent Smart Wales holds data for FCC landlords and managing agents. This data can be used to target those who have properties registered in Flintshire.</p> <p>Other methods of reaching the community will be to communicate the message through the FCC website; to write to groups and organisations and where applicable, to carry out letter drops. Information can also be provided to Connect Offices, libraries, community centres and Town Community Councils.</p> <p>The consultation period will be required to last for a minimum of 10 weeks. After that period findings will be shared with Members.</p>
3.02	<p>It is proposed that the new licensing regime should include all types of HMOs that meets one of the following two categories that do not fall within the mandatory licensing scheme:</p>

	<p>a) Any type of HMO as defined by Section 254 of the Housing Act 2004 which is occupied by two or more households.</p> <p>b) HMO properties which are defined within the scope of Section 257 of the Housing Act 2004. It relates to a building (or part of a building) which has been converted into, and consist of, self-contained flats. Buildings of this description are also classed as HMOs if;</p> <p>i. the conversion work was not done in accordance with 'appropriate building standards' and still does not comply with them, and</p> <p>ii. less than two-thirds of the self-contained flats are "owner-occupied."</p>
3.03	<p>For the reasons outlined above it is recommended that the additional licensing of HMOs is carried out across the whole county of Flintshire. This is because Flintshire has a wide and varied housing stock of HMOs throughout the county. The most common hazards related to the following areas:</p> <ul style="list-style-type: none"> <li>• Damp and Mould Growth.</li> <li>• Fire</li> <li>• Domestic Hygiene, Pests and Refuse</li> <li>• Electrical Hazards</li> <li>• Excess cold</li> </ul>

<b>4.00</b>	<b>RESOURCE IMPLICATIONS</b>
4.01	Budget has been allocated to recruit new officers to implement this scheme as there is no capacity within the existing service.

<b>5.00</b>	<b>CONSULTATIONS REQUIRED / CARRIED OUT</b>
5.01	As outlined in the report

<b>6.00</b>	<b>RISK MANAGEMENT</b>
6.01	This is a means of managing a housing associated risk due to an increase in compliance with the required standards once the regime has been established.

<b>7.00</b>	<b>APPENDICES</b>
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6.01	None
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<b>8.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
8.01	<b>Contact Officer:</b> Sian Jones, Community and Business Protection Manager <b>Telephone:</b> 01352 702132 <b>E-mail:</b> <a href="mailto:sian-jones@flintshire.gov.uk">sian-jones@flintshire.gov.uk</a>

<b>9.00</b>	<b>GLOSSARY OF TERMS</b>
9.01	Not required

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## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Food Service Plan 2024-25 for Flintshire County Council
<b>Cabinet Member</b>	Cabinet Member for Planning, Public Health and Public Protection
<b>Report Author</b>	Chief Officer (Planning, Environment and Economy)
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

The purpose of the Food Service Plan is to provide an overview of the Food and Animal Feed Service in line with The Framework Agreement on Official Feed and Food Controls by Local Authorities April 2010. The plan sets out the aims and objectives for the Service for the forthcoming year and how these are to be achieved.

### RECOMMENDATIONS

1	To approve the Food Service Plan 2024-25.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE FOOD PLAN FOR FLINTSHIRE COUNTY COUNCIL 2024-25</b>
1.01	Local authorities are required by the Food Standards Agency (FSA) to take the necessary action to implement the Framework Agreement on Official Feed and Food Controls by Local Authorities. This Framework Agreement became operational from 1st April 2001. The Framework has been developed to ensure a consistent food law enforcement service throughout the country.
1.02	The Service Plan has been produced by officers of the Food Safety and Standards Team within the Planning, Environment and Economy portfolio in line with the model format contained within the Food Law Code of Practice (Wales) July 2021. It outlines the proposals for service delivery for the period 1st April 2024 to 31 <sup>st</sup> March 2025. It also contains a review of the service performance for 2023-24 with overall performance for 2023-24 detailed in Appendix 3 within the Service Plan.
1.03	The elements of the Food Service, namely Food Safety, Food Standards and Animal Feed are managed by the Team Manager – Food Safety and Food Standards, who reports into the Community and Business Protection Manager.
1.04	<p>Key achievements for 2023-24 include:</p> <ul style="list-style-type: none"><li>• All Category A Food Standards premises inspections due were achieved</li><li>• All Category A-B Food Hygiene premises inspections due were achieved</li><li>• 99% of Category C Food Hygiene inspections due were completed</li><li>• The service dealt with 13 Food Incidents</li></ul> <p>Targets for 2024-25 are:</p> <ul style="list-style-type: none"><li>• To complete all Category A - Category C Food Hygiene inspections</li><li>• To complete all overdue and due in-year Category D Food Hygiene inspections</li><li>• To complete all Category E Food Hygiene interventions by inspection or Alternative Enforcement Strategy questionnaire that are due or overdue</li><li>• To complete all Category A and Category B Food Standards inspections</li><li>• To complete all Category C Food Standards interventions by inspection or Alternative Enforcement Strategy questionnaire that are due or overdue</li><li>• To inspect all new businesses prioritised for inspection throughout the year</li><li>• To inspect Feed businesses programmed for inspection as per the Regional Funding model</li></ul>



1.05	The Food Safety and Food Standards service areas were subject to a targeted audit by FSA Wales in June 2024. The auditors were pleased with the progress that had been made since the pandemic. The audit report indicated that good progress has been made to address the recommendations highlighted and that a risk-based approach is being taken.
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<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	The cost of implementing the plan will be met within the existing Planning, Environment and Economy portfolio budget.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	The Plan follows the 'farm to fork' principle to ensure food is safe for consumption by all.

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	None.

<b>5.00</b>	<b>APPENDICES</b>
5.01	Food Service Plan 2024 – 25.

<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	None.

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Helen O'Loughlin, Team Manager – Food Safety and Food Standards <b>Telephone:</b> 01352 703390 <b>E-mail:</b> helen.o'loughlin@flintshre.gov.uk

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<b>Food Standards Agency</b> - is a non-ministerial government department supported by seven agencies and public bodies. It is the central competent authority for the UK in relation to European Union food

legislation. In Wales, The Food Standards Agency in Wales is responsible for Food Safety and Hygiene and Food Labelling Policy. It works with local authorities to enforce Food Safety, Standards and Feed regulations.

**The Framework Agreement on Official Feed and Food Controls by Local Authorities** - sets out what the Food Standards Agency expects from local authorities in their delivery of official controls on feed and food law. It was developed in consultation with local authorities, local government associations and the relevant professional bodies.

**Food Law Code of Practice (Wales) July 2021** - the Food Law Code of Practice is issued under section 40(1) of the Food Safety Act 1990, Regulation 24(1) of The Food Hygiene (Wales) Regulations 2006 and Regulation 6(1) of The Official Feed and Food Controls (Wales) Regulations 2009. It sets out the execution and enforcement of food legislation by Food Authorities and relates to Wales only. The code specifies how a local authority should risk rate a food business following its inspection which determines the frequency of food hygiene and standards inspections of that business. For Food Hygiene there are five risk bands A – E, for Food Standards there are three risk bands, A – C. There is a corresponding Code of Practice for Feed.

**Regional Funding Model for Feed** - Since 1<sup>st</sup> April 2015, the number of inspections of feed premises has been determined by FSA in Wales in the form of the 'North Wales Feed Enforcement Delivery Plan'.

**Alternative Enforcement Strategy** – every Competent Authority must devise an Alternative Enforcement Strategy to determine how they will conduct official controls duties at premises rated as low risk (i.e. rated Category E for food hygiene and Category C for food standards). Food hygiene ratings cannot be awarded as a result of this type of intervention. Ratings can only be awarded as a result of a food hygiene inspection of the premises.

# **FOOD SERVICE PLAN**

**2024-2025**



# FLINTSHIRE COUNTY COUNCIL

## FOOD SERVICE PLAN 2024-25

### INTRODUCTION

The Service Plan relates to the year commencing 1st April 2024 and ending 31st March 2025. It covers the service provision for the Food Safety, Food Standards and Animal Feed functions of Flintshire County Council.

The purpose of this Plan is to provide:

- Information about the scope of the Service
- Information about the services provided
- Information about the means of Service provision
- Information about performance of the Food Service against Performance Targets set out in the Plan
- Information relating to reviewing performance in order to address any variance from meeting the requirements of the Service Plan

Service Plans are usually produced annually to allow for meaningful review and progression, in accordance with the requirements of the Food Standards Agency (FSA) “Framework Agreement on Local Authority Food Law Enforcement” and the Food Law Code of Practice (Wales) July 2021.

In respect to Animal Feed, this function is delivered as part of the North Wales Regional Feed Enforcement Delivery Plan. This is funded by Food Standards Agency in Wales (FSA Wales) with all inspection and sampling targets being reviewed and set by FSA Wales.

For 2024-25, the service is planning to fully realign with the Food Law Code of Practice. As further endorsement of the level of realignment achieved, the Food Standards Agency in Wales have undertaken a targeted audit of the service in June 2024. At this time, the service was deemed to be making good progress on recovery and is taking a risk-based approach.

**FLINTSHIRE COUNTY COUNCIL  
FOOD SERVICE PLAN 2024-25**

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## 1.0 SERVICE AIMS AND OBJECTIVES

### 1.1 Aims and Objectives

The aims of the Food Service are to:

1. Promote, through education and enforcement, the sale and/or production of food which is fit and without risk to health.
2. Prevent and control the spread of food borne illness through education and enforcement.

These will be achieved by:

- (a) Providing a complete and holistic food law enforcement service covering the areas of food hygiene and safety, food standards and animal feed in accordance with relevant food legislation and Codes of Practice, fulfilling statutory obligations.
- (b) Providing a responsive service to demand driven elements such as food safety incidents, outbreaks of food related infectious disease, complaints and request for advice from both businesses and members of the public, in accordance with relevant statutory Codes of Practice
- (c) Assisting businesses to comply with all relevant legislation by using a balance of techniques and approaches to ensure the safety and well-being of the Public and of the environment in line with the Public Protection Enforcement Policy 2010.
- (d) Maintaining an up-to-date database of all food establishments in the County so that resources can be effectively defined and utilised to meet statutory, national and locally defined targets of inspection, sampling, specific initiatives and tasks set by FSA Wales, other agencies, or based on local need.
- (e) Providing an open and transparent Food Service with clear lines of communication for service users.

### 1.2 Links to Corporate Objectives and Plans

The objectives of the Food Service cut across a range of priorities within the Council Plan. It is particularly relevant to the Economy priority area, which includes a sub-priority of Business.

Details of the Plan are available on the Council's website.

The Food Service sits within the Community and Business Protection Service of the Planning, Environment and Economy Portfolio. Each Service area within Community and Business Protection writes annual Operational Action Plans, which have been informed by a range of external and internal drivers and through a greater focus on robust risk assessment, intelligence led intervention, targeting and performance management. All team members contribute to devising the Operational Action Plans for each Service Area. Food and Feed Law regulation is a statutory duty of the Council.

The following Service Improvement Data is also usually monitored and reported on within the Service Plan:

- (a) Food Safety inspections undertaken
- (b) Food Standards inspections undertaken
- (c) New Food Safety and Standards businesses inspected
- (e) Feed inspections carried out
- (f) New Feed businesses inspected

The Food Service will continue to implement performance management systems to improve the efficiency and effectiveness of service delivery in a meaningful way to the citizens of Flintshire.

From July 2021 to the end of March 2023, performance monitoring had focused on the performance of the service against the Food Standards Agency COVID-19 Local Authority Recovery Plan: guidance and advice to local authorities for the period from 1 July 2021 to 2023-24. This was to ensure resources were targeted where they added the greatest value in providing safeguards for public health and consumer protection in relation to food and to maintain the credibility of the Food Hygiene Rating Scheme. During 2023-24, the Food Hygiene and Food Standards service areas were working towards full realignment with the Food Law Code of Practice.

For 2024-25, performance will be monitored against the Food Law Code of Practice (Wales) July 2021 for those premises due inspection within this financial year and against Appendix 2 of this plan for Medium and Low risk premises that are overdue their inspection.

## 2.0 BACKGROUND

### 2.1 Authority Profile

Flintshire is a Unitary Authority of 43,464 hectares and a population of approximately 155,000 as per the 2021

Census. It is made up of a mixture of small towns and conurbations, particularly to the south, with rural and agricultural land is predominantly located in the north. The population is subjected to small seasonal fluctuations due to influx of tourists to the area. It has several industrial estates on which food manufacturers are located, as well as headquarters for several food manufacturers including one large national food retailer. The coastal edge of Flintshire County Council abuts the Dee Estuary upon which a cockle and mussel bed is situated. There is a small port located at Mostyn.

## 2.2 Organisational Structure

The Food Service sits in the Community and Business Protection Service within the Planning, Environment and Economy portfolio area. The responsibility of the Food and Feed service sits under the Team Manager – Food Safety and Food Standards, with the line management of most Feed officers being the responsibility of the Team Manager - Trading Standards Compliance and Animal Health. Feed officers also undertake other Trading Standards functions such as Animal Health. Both team managers' report to the Community and Business Protection Manager. The organisational structure of the Food and Feed Service is illustrated on the chart detailed in Appendix 1. Appendix 1 also includes the Management and Cabinet structure of the Council.

The Lead Officer for Food Safety is the Team Manager – Food Safety and Food Standards. The Lead Officer for Food Standards is the Specialist Trading Standards Officer (Food Standards) and the Lead Officer for Feed is Specialist Trading Standards Officer (Feed). Specialist services are provided by Public Health Wales and Public Analyst Scientific Services as the Public Analyst.

## 2.3 Scope of the Food Service

The scope of the service is detailed below:

### Food Safety

- Enforcement of food safety and food hygiene legislation in all food establishments in the County
- Registration of food businesses and / or approval
- Implementation of the Food Hygiene Rating (Wales) Act 2013
- Investigation of food complaints relating to fitness of food for human consumption; the nature, substance



or microbiological quality of the food, taking appropriate action as necessary

- Investigation of all complaints which relate to hygiene matters in food businesses
- Investigation of sporadic and suspected cases of food-related notifiable diseases
- Investigation and control of outbreaks of food poisoning and food-related notifiable diseases
- Respond to Food Alerts and food-related incidents
- Advice to food business, responses to plans, licensing and land charges referrals
- Providing relevant export attestations to businesses
- Act as Home and/or Originating Authority for other companies where necessary
- Undertake food sampling in accordance with the Sampling Programme
- Educational and promotional initiatives, when appropriate and based on local need

#### Food Standards

- Respond to requests for consumer advice regarding standards, labelling and composition
- Undertake a programme of visits to food premises within Flintshire
- Investigation of complaints relating to the nature, quality or substance of food and complaints relating to mislabelling of food, taking appropriate action as necessary
- Provide advice and guidance to food businesses
- Undertake food sampling in accordance with the Sampling Programme and in response to incidents
- Undertake promotional and educational initiatives, when appropriate
- Act as Home Authority and Originating Authority for food businesses within Flintshire, where necessary

#### Feed

- Undertake a pre-planned programme of visits to feed premises within Flintshire
- Undertake a programme of Feed sampling
- Provide advice, information and support to feed business operators, including manufacturers, distributors, and users of feed products
- Investigation of complaints relating to feedstuffs and complaint-based sampling of feed

## 2.4 Demands of the Food Service

The Service Delivery Point for the Food Safety, Food Standards and Feed Service is Ty Dewi Sant, Ewloe. For all of the above, the Service Delivery Points are usually open during normal office hours of 8.30 a.m. – 5.00 p.m. The service operates a hybrid working model for service delivery. The team provides a duty system to respond to reactive elements of the service.

There is no official “out of hours” provision. However, there is a call centre who will contact a team member should Food-related incidents be logged.

There are 1390 food premises in Flintshire. A full breakdown by activity type is provided below:

**Table 1: Breakdown of food premises in Flintshire by FSA activity type**

<b>Premises Type</b>	<b>Number</b>
Primary Producer	9
Supermarket / Hypermarket	37
Manufacturers / Processors	46
Retailer – Others	56
Importers / Exporters	1
Distributors / Transporters	53
Small Retailer	242
Restaurant / Café / Canteen	195
Hotel / Guest House	14
Pub Club	150
Takeaway	135
Caring Establishments	181
Schools / Colleges	87
Mobile Food Unit	45
Restaurant / Caterers – Other	138

There are 19 premises approved under Assimilated Regulation (EC) 853/2004 as they handle products of animal origin. This regulation places additional control measures and legislative requirements on these types of premises.

The types of food manufacturers within Flintshire vary greatly in the types of processes they use to produce food. These range from cooked meat and ready meal

manufacturers with national distribution, through to an on-farm milk pasteuriser supplying milk locally and shellfish dispatch centre. The diversity in the types of manufacturers operating within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

### Dee Estuary and Shellfish

The Dee Estuary has one actively fished cockle bed falling within Flintshire's jurisdiction. The remaining beds fall within Wirral Council's jurisdiction. Regulation of the shellfish bed places significant demands on the Team, particularly during the cockle opening season. The bed has a Class A classification, meaning that cockle harvested from this bed during these months is considered safe to consume without any further processing and can be exported to the EU. The bed is due to be opened at the end of July to the end of September. A further biomass survey will be undertaken by Natural Resources Wales (NRW) in September to determine whether the bed will be open after September.

The management of the Dee accounts for a large portion of the Sampling Budget due to the statutory sampling of the water and shellfish for both microbiological classification and for algal biotoxin monitoring.

There are several companies operating as buyers, grading yards and / or collection points for cockle harvested elsewhere within the UK at different times throughout the year. There is also one approved Dispatch Centre under Assimilated (EC) Regulation 853/2004.

Enforcement on the Dee involves a cross-agency partnership working with NRW, Wirral Council, the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), other Local Authorities, the North Western Inshore Fisheries and Conservation Authorities (NW IFCA) and FSA Wales.

There are approximately 50 licensed cockle gatherers for the Dee Estuary with a low number of endorsees. There are 12 businesses registered with fishing vessels also.

### Port Health

There is a port at Mostyn. The service has responsibility in relation to ships coming into port requiring a Ship Sanitation Certificate or a food hygiene inspection.

## Food Hygiene Rating (Wales) Act 2013 and associated legislation

Since 28th November 2013, the Food Hygiene Rating (Wales) Act 2013 mandated businesses with a food hygiene rating to display a valid food hygiene rating sticker. The administration of this Act accounts for a considerable volume of work for the Team. The introduction of the Food Hygiene Rating (Promotion of Food Hygiene Rating) (Wales) Regulations 2016, required takeaway food premises to provide a prescribed bi-lingual phrase on promotional literature which contains a price of the food and a method of ordering it remotely.

The Service is committed to delivering the requirements of the Food Hygiene Rating (Wales) Act 2013 and its associated regulations.

### Premises Profile

The premises profile, as defined in the Food Law Code of Practice (Wales) July 2021, is detailed in Table 2:

**Table 2: Breakdown of premises profile by risk band for Food Safety and Food Standards – May 2024**

FOOD STANDARDS			FOOD SAFETY			
Risk	Min.	No. of	Risk	Min.	No. of	
High - A	12 months	7	High	A	6 months	2
				B	12 months	19
Medium - B	2 years	369		C	18 months	338
Low - C	5 years	948	Medium	D	2 years	378
			Low	E	3 years	572
OUTSIDE		13		OUTSIDE		13
UNRATED		62		UNRATED		62
<b>TOTAL</b>		<b>1399*</b>		<b>TOTAL</b>		<b>1384*</b>

\*please note – data within the new database is being reviewed to check for any anomalies. Figures in Table 2 have been taken from the end of year return data.

### Feed

Under the Assimilated EU Feed Hygiene Regulation (183/2005), feed activities are clearly defined and are

broken down in to 'Approved' and 'Registered' feed activities. Activities requiring Approval include any activity involving the manufacture and/or placing on the market of feed additives with all such activities being classed as high risk. There are currently no businesses in Flintshire that have an Approval under the Regulations.

'Registered' feed activities are all other feed activities that are undertaken of which there are 14 registerable feed activities defined and coded by the FSA these are termed as 'R Codes' and run consecutively from R01 (the highest risk activity) through to R14 (the lowest risk activity).

**Table 3: Breakdown of Feed premises by activity type – Apr 24**

R01 - Manufacturer	3
R04 – Mobile Mixer	0
R05 – Distributor (including 1 Importer)	13
R06 – Pet Food Manufacturer	1
R07 – Supplier of Surplus Food	19
R08 - Transporter	4
R09 - Stores	1
R10 – On-farm mixer (Annex II)	3
R11 – On-farm mixer	32
R12 – Co-product producer	5
R13 – Livestock Farm	432
R14 – Arable Farm	4

The diversity in the types of Feed Businesses operating and activities being undertaken within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

Following a review by FSA Wales in 2014 of the delivery of Animal Feeding Stuffs Enforcement across Wales, the system for risk assessing feed activities was simplified with all registerable feed activities across Wales being broken down in to one of two categories based on risk. These two categories are referred to as '*Above the Line*' and '*Below the Line*'. Above the line activities are high risk activities, which include businesses undertaking any 'Approved' feed activity and those engaged in 'Registered' feed activities involving production, processing, storage, transportation, sale of feed, or supply of food co-products, or surplus foods for use in animal feed and ultimately human consumption as part of the human food chain. These activities require a 'qualified' and 'competent' officer to inspect them.

Below the line activities are the low-risk activities that include premises that are feeding animal feed stuffs to livestock or growing straight feed crops that are to be consumed in their natural state such as silage. This applies to all of Flintshire's farms. These activities have a lower requirement for officers to be able to perform these activities, requiring that an officer be 'competent' to complete this work.

Since 1<sup>st</sup> April 2015, the number of inspections of feed premises has been determined by FSA Wales in the form of the 'North Wales Feed Enforcement Delivery Plan'.

The breakdown of the Feed premises profile is detailed below by risk band:

**Table 4: Breakdown of the premises profile by risk band for Feed.**

<b>FEEDINGSTUFFS</b>		
<b>Risk</b>	<b>Frequency of Inspection</b>	<b>Total no. of registered activities subject to inspection</b>
High	Every 3 years (as per Feed Law Code of Practice)	81
Low / Medium	Every 14 years (as per Feed Law Code of Practice)	436
<b>TOTAL inspectable registered activities</b>		<b>517</b>

The majority of food business owners are English speaking with a low requirement for written reports in Welsh. All advisory literature is produced bilingually in accordance with the Welsh Language Standards which came in to force on 30 March 2016. Approximately 14% of residents in Flintshire are recorded as Welsh speaking.

Approximately 4% of food businesses are of ethnic origin (Asian, Chinese, Turkish and Greek) and once again advisory literature is available in a range of ethnic languages to assist in understanding.

## 2.5 Regulation Policy

The Food Service undertakes enforcement in accordance with the Community and Business Protection Enforcement Policy which was approved by Members in

2010 and reviewed in 2020. This policy has been based upon the principles of the Enforcement Concordat adopted by Members in September 2000 and the Regulators Compliance Code. There is also a Food Safety and Food Standards Enforcement procedure which provides direction to officers in relation to their role.

There is an Enforcement Policy for residents, “Regulation and Enforcement – Involving Local Residents”, which was approved by Council in September 2011.

### 3.0 SERVICE DELIVERY

#### 3.1. Interventions at Food Establishments

The Food Service carries out inspections in accordance with pre-planned programmes drawn up annually and commencing on 1<sup>st</sup> April each year to coincide with the reporting requirements to FSA Wales. These inspection programmes are based on the risk rating of the premises.

The Food Law Code of Practice stipulates the type of inspection and intervention which can be applied at different risk bands of premises for both Food Hygiene and Food Standards. The corresponding Code of Practice gives the same direction in relation to Feed Interventions.

High risk premises must receive specific types of inspection. However, the Code of Practice allows for Alternative Enforcement Strategies (AES) to be applied to interventions at low-risk premises i.e. those that are risk band E for Food Hygiene or risk band C for Food Standards. The service uses AES questionnaires for this purpose.

#### Food Safety and Food Standards

For Food Hygiene Risk Bands A – C (High Risk), the team achieved 99% of inspections due. For the remaining 2 inspections that had not been completed, 1 of them had been subject to an intervention but could not be classed as an official control inspection for the purpose of the end of year return.

For Food Standards Risk Band A (High Risk), the team achieved 100% of inspections due.

As part of the move to realign with the Food Law Code of Practice, the service had prioritised interventions in Category D Food Hygiene and Category B Food

Standards premises (Medium Risk) over the lowest risk Category E Food Safety and Category C Food Standards premises (Low Risk). The service had also prioritised low risk Category C Food Standards premises that were due or overdue their Cat A – Category D Food Safety inspections.

For risk band Category D (Medium Risk) Hygiene premises, out of 292 inspections due or overdue, there were 156 outstanding by the end of March 2024 which gives a percentage of 47% of inspections achieved. For the low-risk Category E Food Hygiene interventions due or overdue, there were 203 interventions outstanding at the end of March 2024, which gives a percentage of 46% achieved.

For risk band Category B (Medium Risk) Food Standards premises, out of 199 inspections due or overdue, there were 76 inspections outstanding at the end of March 2024, which gives a percentage of inspections achieved of 62%. For Category C Food Standards, out of a total of 454 interventions due or overdue, there were 213 interventions outstanding at the end of March 2024, which gives a percentage of 53% achieved.

The service became aware of 209 new businesses during the year, of which 147 business received both a Food Hygiene and Food Standards inspection. By the end of March 2024, there were 30 businesses that were overdue their new business inspection by more than 28 days.

While the service had planned to realign fully with the Code of Practice, it was reliant on them being fully staffed throughout the year and the full effect on service delivery of moving to the new database provider was not known at the time of the previous service plan. During 2023/24, one officer left the service area to move to a new position – this left the team with a vacancy for four months. Two officers were also moved from completing programmed work to assist in the preparation and / or implementation of the new database for a significant period of time. Overall, while the service did not fully realign with the CoP during 2023-24, it made good progress which built on the significant work that had been done during 2022-23.

For 2024-25, the service is planning to fully realign with the Food Law Code of Practice. As further endorsement of the level of realignment achieved to date, the Food



Standards Agency in Wales have undertaken a targeted audit of the service in June 2024. At this time, the service was deemed to be making good progress on recovery and is taking a risk-based approach.

With regards to new businesses opening during the year, the service will prioritise those new businesses that undertake open food high risk food preparation but will also endeavour to inspect 90% of all of those businesses that begin to trade during the remainder of the year for both Food Hygiene and Food Standards.

The key objectives for the coming year in relation to programmed inspection and enforcement work are:

#### Food Safety

- Inspect all Category A – Category D Food Hygiene premises
- Inspect new businesses overdue from 2023-24
- Carry out prioritisation of new businesses we become aware of in 2024-25 and inspect 90% of those registering during the year
- Inspect those Category E food hygiene premises identified as requiring an inspection
- Carry out Alternative Enforcement Questionnaires at the remaining Category E risk band premises that are due this financial year or overdue by the end of March 2025
- To follow the requirements of the Food Hygiene Rating (Wales) Act 2013 and associated regulations
- To revisit all premises receiving a Food Hygiene Rating of 2 or lower to assess compliance, in line with the All Wales Revisit Policy
- To inspect any low-risk premises where local intelligence highlights a potential issue with compliance levels

#### Food Standards

- Undertake Food Standards inspections at all Category A – Category B premises due / overdue
- Inspect all those Category C food standards premises due their Category A – Category D Food Hygiene inspection
- Inspect new businesses overdue from 2023-24

- Carry out prioritisation of new businesses we become aware of in 2024-25 and inspect 90% of those registering throughout the year
- Inspect those Category C Food Standards premises identified as requiring an inspection
- Carry out Alternative Enforcement Questionnaires at the remaining Category C risk band premises that are due this financial year or overdue by the end of March 2025
- To revisit all premises with major non-compliance with Allergen Information requirements
- To inspect any Category C Standards premises where local intelligence highlights a potential issue with compliance levels

A full breakdown of premises programmed for inspection 2024-2025 by risk band is given in Appendix 2.

There were 24 revisits for Food Hygiene and Food Standards in 2023-24. The number of revisits may increase this year due to the increase in number of full inspections undertaken and due to a potential drop in compliance levels found in Category D Food Hygiene and Category B Food Standards premises.

### Feed

For 2023-24, the FSA-directed inspection programme allocated 82 inspections to Flintshire, 17 Above the Line, 65 Below the Line. For a fuller description of 'above the line' and 'below the line', please refer to pages 8-9. In total, the number of inspections achieved was 43 and 14 premises no longer trading, which gave 25 inspections outstanding. The target was not met due to a temporary reduction in staffing levels.

FSA Wales have reduced the funding available to the regional delivery model which impacts on the number of Below the Line inspections that will be completed in 2024-25. Risk assessment has been applied to prioritise inspections. All 10 of the Above the line inspections due have been prioritised for inspection. For Below the Line premises, 36 inspections have been prioritised based on:

- Farms that are not registered but are known to keep livestock by other information sources
- Farms that have registered for Feed but have not yet been inspected and farms we become aware of as trading within the coming year

- Farms that due their Feed inspection this year or overdue and are not members of a Farm Assurance Scheme

The full breakdown of these by the activity code is detailed in Table C in Appendix 2.

### 3.1.1 Additional Targeted Inspection/ Enforcement Activity

Additional targeted inspection and enforcement activity due to be undertaken is as follows:

- Shellfish – compliance assessment with the completion of registration documents
- Effective and professional liaison and co-operation relating to Primary Authority (PA) matters.
- Investigation of notified food safety related fraud incidents including referrals made anonymously.
- Issue of Ship Sanitation Certificates for incoming vessels to the Port of Mostyn.
- Appropriate response and liaison with other agencies for Civil Contingency matters.

### 3.1.2 Resources for Inspections and Additional Enforcement Activity

#### Food Safety and Food Standards

Food hygiene inspections will be undertaken by Environmental Health Officers (EHOs) and Food Safety Officers (FSOs). A full breakdown of resources is given in 4.2 – Staffing Allocation.

Food Standards work will be carried by the Specialist Trading Standards Officer (STSO), EHOs and FSOs.

Other areas of Trading Standards work within food premises such as Weights and Measures will be carried out by the STSO within the Food Safety and Food Standards Team. This places an absolute requirement for a fully competent Trading Standards Officer to be within the Team.

#### Feed

All aspects of Feed work will be carried out by 0.2 FTE fully qualified STSO and 0.4 FTE Trading Standards Enforcement Officers (TSEOs). This work is to be distributed across 7 officers - 5 of the Feed officers are based in the Trading Standards Compliance and Animal Health Team and 2 officers are based in the Food Safety

and Food Standards team.

### 3.2 Food/Feed Complaints

Food complaints cover the full range relating to fitness for human consumption, presence of extraneous matter in foods, microbial contamination and Food Standards issues such as food labelling, chemical adulteration and spoilage of food. It is the policy of the Food Service to investigate all food complaints reported including those made anonymously.

#### Food Safety and Food Standards

All food complaints are dealt with in accordance with the Food Law Code of Practice (Wales) July 2021, having regard to the Public Protection Enforcement Policy 2010.

Based on data for previous years, the estimated number of Food Safety and Food Standards complaints is between 120 and 140. This estimation does not include food complaints referred by other Local Authorities when acting as Home or Originating Authority.

#### Feed

All feed complaints will be dealt with in accordance with the Feed Law Code of Practice (Wales) 2014, having regard to the documented Public Protection Enforcement Policy 2010.

The number of Feed related complaints received by the service is low, typically no more than 3 a year.

### 3.3 Home Authority and Primary Authority

#### Food Safety and Food Standards

Flintshire County Council subscribes to both the Primary Authority and the Home Authority Principle. The Food Safety and Food Standards Service acts as both Home Authority and/or Originating Authority for approximately 50 food businesses. Flintshire is also committed to improving relationships with business and will continue to develop relationships with business and encourage effective business engagement at all times.

There is currently no Primary Authority (PA) partnership in place with any Flintshire-based business for either

### 3.4 Advice to Business

Food Safety, Food Standards or Feed. However, as an Enforcing Authority, the team regularly liaises with local authorities who are a PA for a company in relation to inspections and / or complaints / sampling results.

The policy of the Food Service is to provide a balanced approach between the provision of advice and enforcement activity. The Service is committed to providing an effective and responsive advice and assistance service, both during inspections or upon request, for all Flintshire businesses, including a service in accordance with the Regulatory Delivery Primary Authority Principle and the Local Government Regulation Home Authority Principle.

In addition, the Service provides advisory literature to businesses to assist them with compliance with relevant legislation.

#### Food Safety and Food Standards

To maximise the use of resources, advice is targeted as follows:

- During inspections and as part of follow up documentation
- Advice, information and guidance on request, including to new businesses
- Through guidance information available on the website and sign posting to the FSA's website
- Distribution of food safety and food standards material to food businesses, as required

Based on data from the last 3 years, the estimated number of requests for advice is anticipated to be approximately 220-250 in relation to Food Safety and Standards. Advice to businesses is provided by all members of the Team.

#### Feed

Flintshire is committed to supporting feed businesses and working with them to enable compliance with all regulatory and best practice standards, and to protect animal health and welfare, and the human food chain. In order to maximise the use of limited resources, advice is targeted as follows:

- During inspections and as part of follow up documentation
- Advice, information and guidance on request, including to new businesses
- Through sign posting to guidance information available on the Trading Standards Wales and FSA websites
- Distribution of relevant feed hygiene and standards material to feed businesses.

Based on last year's requests, it is anticipated that the service will receive 10-15 requests for advice from Feed businesses, outside of the advice provided as part of the programme of Feed inspections.

### 3.5 Food Sampling

#### Food Safety and Food Standards

Sampling will be carried out in accordance with the documented Sampling Policy for the Food Service which was referred for Member Approval in July 2001. The sampling programme is devised so that the procurement of samples will follow a risk-based approach. The programme takes in to account statutory requirements as well as the requirements of the FSA, the Welsh Food Microbiological Forum and local need.

Samples taken for Food Standards issues are submitted for analysis by the formally appointed and NAMAS accredited Public Analyst for the Council (and Agricultural Analyst for Animal Feed purposes) at Public Analyst Scientific Services, Valiant Way, Wolverhampton, WV9 5GB.

Samples taken as part of the Sampling Programme for Food Safety issues are submitted for microbiological examination by the designated and NAMAS accredited laboratory of Public Health Wales, Ysbyty Gwynedd, Penrhosgarnedd, Bangor. Each Local Authority is allocated sampling credits by Public Health Wales.

Reactive sampling as a result of a food complaint or during food poisoning investigations and sampling undertaking as part of an Infectious Disease incident or outbreak are sent to the laboratory at Ysbyty Gwynedd.

A member of the team attends the WFMF, which is responsible for devising Food Safety Sampling Surveys across Wales, based on risk assessment and intelligence

to target resources at particular foods or food poisoning organisms of concern within the UK. Samples are taken as part of programmed inspections at manufacturers and premises where product specific legislation applies.

The anticipated number of samples for Food Standards is approximately 25 including samples taken for labelling checks as planned sampling and from complaints.

There was no Regional Sampling project for Food Standards in 2023-24 as the region did not get confirmation from FSA Wales in sufficient time to run the sampling project. For 2024-25, there is a proposed regional sampling project, which will be reliant on grant funding from FSA Wales.

Samples will be taken as part of programmed inspections at manufacturers, approved premises and premises where product-specific legislation applies for analysis.

For Food Safety, there will be statutory sampling for shellfish classification, biotoxin monitoring, WFMF Surveys and in response to any serious food complaints / hygiene concerns. The anticipated number of samples for Food Microbiological examination is around 60 samples including the shellfish sampling.

#### Feed

There will be a minimal amount of sampling work undertaken by Flintshire officers in relation to Feed as this is prioritised and funded on a regional basis. Other than sampling directly funded by FSA Wales, any other feed samples taken during 2024-25 will only be done in response to complaints received or feed safety incidents.

### 3.6 Food/Feed Safety Incidents

#### Food Safety and Food Standards

Food Alerts will be initiated and responded to in accordance the Food Law Code of Practice. The contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. The resource implication of this function depends upon the category of Food Alert and the extent of businesses affected within Flintshire. There were 13 food incidents during 2023-24. From previous data, we anticipate we will be involved in 8 to 14 food incidents during 2024-25.

## Feed

Alerts will be initiated and responded to in accordance with the Feed Law Code of Practice (Wales) 2014. Responses to Feed Alerts will be kept in a centralised documented format and the contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. It is difficult to quantify the resource implication of this function as it depends upon the nature of the Feed Alert and the source, type, quantity and distribution of feed product involved.

### 3.7 Liaison with Other Organisations

The Food Service is committed to ensuring effective liaison with other relevant organisations to enforce consistency of approach. This includes liaison with:

- FSA Wales, NRW, CEFAS and Public Health Wales (PHW)
- Professional bodies such as Chartered Institute of Environmental Health (CIEH), Chartered Trading Standards Institute (CTSI)
- Other Local Authorities
- Relevant local and regional bodies such as the Dee Estuary Cockle Fishery Advisory Group and North Wales and Wirral Shellfish Liaison Group
- Liaison with regional and national panels including the All Wales Food Safety and Communicable Disease Expert Groups, WFMF, Food Hygiene Rating Steering Group and North Wales Food and Communicable Disease Task Group
- Relevant service areas within Flintshire County Council such a Planning and Licensing

The Food Team have monthly Team Meetings. There is also a weekly management meeting for Team Managers and the Service Manager.

The Feed element of the service is committed to ensuring effective liaison with partners and other relevant organisations to ensure consistency of approach. This includes liaison with:

- FSA Wales, Veterinary Medicines Directorate (VMD), Animal and Plant Health Agency (APHA)
- Professional bodies such as CTSI, National Trading Standards (NTS) and the Association of Chief Trading Standards Officers (ACTSO).



- Other Local Authorities across Wales and the UK
- Partner Local Authorities in the North Wales Feed Enforcement Delivery Plan (Wrexham, Denbighshire, Conwy, Gwynedd, Anglesey)
- Liaison with regional and national panels including the joint Trading Standards Wales/FSA Feed Working Group, Trading Standards Wales and UK Animal Health and Welfare Panels

Officers who deliver the Feed service have regular meetings with the Team Manager – Food Safety and Food Standards and one to ones with their line manager.

### 3.8 Food Safety and Standards Promotional Work

Educational and promotional activities are important components of a comprehensive Food Service.

#### Food Safety and Food Standards

During 2023-24, advice was provided to business during inspections, sampling, complaint investigations and Alternative Enforcement questionnaire completion. Guidance was sent to food and drink exhibitors at Mold Food and Drink Festival as well as providing face-to-face advice to businesses at the event.

For 2024-25, we are proposing to undertake promotional work as part of the North Wales Food Standards sampling project on American Imported Confectionary and Drinks.

#### Feed

Officers provide advice and guidance on compliance with legal and best practice standards during inspections and when carrying out routine animal health and welfare and disease control work. Promotion work is usually done as part of routine inspection or in response to enquiries made by business to the service.

### 3.9 Control and Investigation of Outbreaks and Food Related Infectious Disease

Investigation and control of food-related infectious disease is in line with the Communicable Disease Outbreak Plan for Wales, which was approved by Members in 2011. The plan was revised by Public Health Wales in conjunction with partners including local authorities and published in January 2024.

Investigations of sporadic notifications of food related infections disease follow documented procedures. It is estimated there will be approximately 330 - 350 cases of sporadic notifications and between 0 and 10 outbreaks. Public Health Wales have introduced molecular testing of faecal samples of suspected cases and this has resulted in an increase in the number of positive cases detected for specific organisms.

*Campylobacter* was the highest incidence of food-borne illness for 2023-2024 in Flintshire and account for approximately 74% of cases. Cases of *Campylobacter* were sent a questionnaire to complete which, when returned to the service, was reviewed by a competent officer to assess for any food-related risk factors.

Outbreaks are characteristically resource intensive but do not follow an annual trend, therefore the anticipated burden on staffing cannot be predicted. Should they occur the impact on resources cannot be over-estimated and would require rapid contingency planning for maintaining the delivery of the rest of the Service.

## 4.0 RESOURCES

### 4.1 Financial Allocation

The financial allocation for the Food Service is split between budgets provided for the Food Safety and Food Standards and for Animal Health. The expected overall level of expenditure providing the Food Safety and Food Standards Service for 2024-25 is detailed in Table 5.

**Table 5: Expected Overall Budget for the Food Safety and Food Standards Team 2024-2025**

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£642,738
(b) Travel (mileage and rail warrants)	£4,127
(c) Equipment	£3,460
(d) Sampling	£4,177
(e) Shellfish Sampling	£10,000
(f) Support Costs for Printing and Translation	£1,150
(g) Training	Centrally held budget.

The Food Sampling budget covers Food Safety and Food Standards. This is in addition to the allocation provided by Public Health Wales. Additional funding can be made available should there be an incident. There is an income target of £8,712 which is generated by Food Hygiene re-rating inspections, Export Health Attestations and Ship Sanitation Inspections.

Table 6 shows the expected overall level of expenditure for Feed Service delivery:

**Table 6: Expected Budget for the Feed Service Delivery 2024-25**

<b>COST ITEM</b>	<b>FINANCIAL ALLOCATION</b>
(a) Staffing (total staff costs )	£30,494
(b) Travel (including mileages and Subsistence	£891
(c) Equipment	£500.00
(d) Sampling	Budget is held Regionally
(e) Training	Centrally held budget

#### 4.2 Staffing Allocation

The Food Safety and Food Standards team consists of the Team Manager – Food Safety and Food Standards 1.0 FTE, 6.5 FTE Environmental Health Officers (EHOs), 3.0 FTE Food Safety Officers (FSOs), 1.0 FTE Specialist Trading Standards Officer – Food Standards (STSO) and 1.0 FTE Trading Standards Enforcement Officer (TSEO). The Team Manager – Food Safety and Food Standards is the Lead Officer for Food Safety and the STSO is the Lead Officer for Food Standards, both of which are designations required by the Food Law Code of Practice.

EHOs and FSOs undertake both Hygiene and Standards work. The STSO undertakes Food Standards, Feed and other TS duties in Food premises. The TSEO does not undertake any Food Safety or Food Standards duties – they undertake Animal Health, Feed and other TS duties in non-food businesses.

For part of 2023/24 and 2024/25, there has also been a fixed-term Trainee EHO position which has been funded by the FCC Modern Trainee scheme. This post finishes as of September 2024.

Administrative support is provided by 1.0 FTE Administration Officer which sits within the Planning, Environment and Economy portfolio.

All EHOs in post are qualified and registered with the Environmental Health Registration Board or subsequent requirements. All of the FSOs hold the Higher Certificate in Food Control. All officers are qualified in HACCP Principles (Hazard Analysis Critical Control Points).

Officers are authorised appropriately for the duties they perform. Two of the EHOs are at a level of authorisation which does not allow them to serve Hygiene Emergency Prohibition Notices or seize and detain food. They are due to be assessed against the competency framework during the year for their authorisation being increased.

The STSO – Food Standards holds the Diploma in Trading Standards and has also successfully completed the five-day QMS Auditor/Lead Auditor training course.

The breakdown of resources required to deliver the Food Safety and Food Standards service is given below:

**Table 7: Full Breakdown of Resources by Full Time Equivalent (FTE) to Deliver the Food Safety and Food Standards Service**

<b>Intervention Type</b>	<b>Food Safety FTE</b>	<b>Food Standards FTE</b>
Inspections	4.2	3.2
Revisits	0.1	0.1
Complaints and Food Incidents	0.4	0.1
Primary Authority	0.0	0.0
Food Business advice/promotion/ other Non-Official Controls Interventions	0.6	0.1
Communicable Disease	1.4	N/A
Sampling	0.2	0.2
Service Management / Technical Support / Regional Liaison	1.2	
<b>TOTAL FTE</b>	<b>11.8*</b>	

\*the 0.3FTE gap has been filled by a Trainee EHO, who is due to leave their post at the end of August 2024.

The inspection resource requirement is based on completing the majority of inspections as joint inspections i.e. the officer does both a Food Safety and Food Standards inspection during the same visit. This flexibility is key to ensuring the service can be delivered based on current resources.

### Feed

All aspects of Feed work will be carried out by seven individual officers who sit in either the Food Safety and Food Standards team or the Compliance and Animal Health team within the Community and Business Protection service. The overall management of the Feed service area is the responsibility of the Team Manager – Food Safety and Food Standards. The Lead Officer for Feed is currently provided by the Team Manager – Trading Standards Compliance and Animal Health.

All officers involved in the delivery of the feed service also undertake other duties which are non-Feed related. The Feed component of their roles for this year equates to 0.2 FTE Specialist Trading Standards Officer and 0.4 FTE Trading Standards Enforcement Officer.

The STSO – Food Standards satisfies all of the criteria to be deemed ‘qualified’ and ‘competent’ to undertake the full breadth of Feed interventions. At the time of writing, the STSO in the Trading Standards Compliance and Animal Health team is vacant and is going through the recruitment process.

Four of the TSEOs satisfy the ‘competency’ criteria based on experience and training that enables them to perform Below the Line Feed work on Livestock and Arable Farms. A further TSEO is due to commence their Feed portfolio in 2025/26 which will enable them to undertake both Above and Below the Line inspections. Until this time, they are undertaking a supported programme of work that will enable them to undertake Below the Line inspections during 2024/25.

### 4.3 Staff Development Plan

During the forthcoming year the following training is planned:

- (i) Support of national and regional seminars on relevant subject matters.

(ii) In-house training sessions

Each member of the Team will receive the required twenty hours Continuing Professional Development as required by the Food Law Code of Practice (Wales) July 2021 (or thirty hours for officers with Chartered Status). Staff will be subject to annual Staff Appraisals in line with the Corporate policy with a mid-year review which identifies and tracks training and development needs. All staff have monthly one to ones with the Team Manager to identify and monitor areas requiring development.

All officers achieved the required CPD during 2023-24 and they are fully supported to achieve this for 2024-25.

Feed

All authorised officers will take part in training to ensure they meet the CPD requirements for Feed during 2024-25. All feed training is provided regionally across Wales as part of the North Wales Regional Feed Enforcement Delivery Plan that is funded by FSA.

## 5.0 QUALITY ASSESSMENT

### 5.1 Quality Assessment and Internal Monitoring

#### Food Safety and Food Standards

Within the Food Service, quality systems are in place to ensure that work is completed and checked by a competent person in line with the fully documented Internal Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the Placis Database. Work Instructions are provided on key areas of work retained within formal Procedure Manuals.

The Team Manager sits on the North Wales Food and Communicable Disease Task Group, the All Wales Food Safety Expert Group and the All Wales Communicable Disease Expert Group. The STSO – Food Standards also sits on the North Wales Food and Communicable Disease Task Group. These forums offer the opportunity to discuss a wide range of quality issues relevant to Food Law Enforcement and Food Hygiene incidents and outbreaks.

The service completed and returned End of Year Return questionnaires to the FSA which assessed the service's

performance against the FSA-priorities during 2023-24 for Food Hygiene, Food Standards and Feed.

During 2023-24, internal training sessions were held as a result of the Internal Monitoring undertaken. As a result of this training, further training on completion of inspection records was also provided.

### Feed

Quality systems are also in place to ensure that work is completed and checked by a competent person in line with the fully documented Quality Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the database.

In addition, for the whole Food service, external audits including focused audits, are undertaken by FSA Wales (frequency determined by FSA). The last audit was a targeted audit of the Food Safety and Food Standards service areas in June 2024.

The North Wales Regional Feed Delivery was audited by FSA Wales in November 2019. This audit did not involve FCC directly as two other North Wales were selected.

## 6.0 REVIEW PROCESS

### 6.1 Review Against the Service Plan

The Service Plan is subject to annual review. Performance against this Service Plan is monitored by:

- Monthly team meetings
- Monthly one to ones with individual team members
- Informal team briefings held on a regular basis
- Quarterly Feed returns to the regional Feed officer

The FSA require two returns per year for the Food Hygiene and Food Standards elements of the service; one as a six-monthly return and one as year-end.

Appendix 3 provides full quantitative analysis of service delivery during 2023-24.

As overarching achievements:

- 99% of Category A - Category C Hygiene inspections were completed
- 100% of Category A Food Standards inspections

were completed

- The team dealt with 13 Food Incidents
- The move to the new database supplier in October 2023

A review of progress with the programme of inspections was undertaken early in Quarter 4 as to the effect of the implementation of the new database on service delivery. As a result of this review, the programme was amended and a team member was removed from programmed work and reactive work to work fully on the new database implementation.

## 6.2 Identification of Any Variation from the Service Plan

The main areas where the service deviated from the Service Plan for 2023-24 were:

- A fewer number of inspections of Category D Food Hygiene premises were undertaken than were due / overdue
- A fewer number of Category B Food Standards inspections were completed than were due / overdue
- The number of Below the Line Feed inspections undertaken was lower than programmed

For Food Safety and Food Standards, the targets not met were due to the team being 1.0FTE down for a proportion of the year and due to the introduction of the new database which has impacted considerably on service delivery.

For Feed, the officer resource available was impacted for a significant proportion of the year due to other priorities on vapes and due to staff absence for part of the year.

## 6.3 Key Areas of Improvement / Development

The main areas for improvement or further development are:

- To inspect all overdue new businesses which had been prioritised for inspection
- To inspect the overdue Category D premises by the end of Quarter 3
- To undertake AES interventions at the overdue Cat E Food Hygiene inspection
- To complete the overdue Category B Food



#### 6.4 Forthcoming Considerations

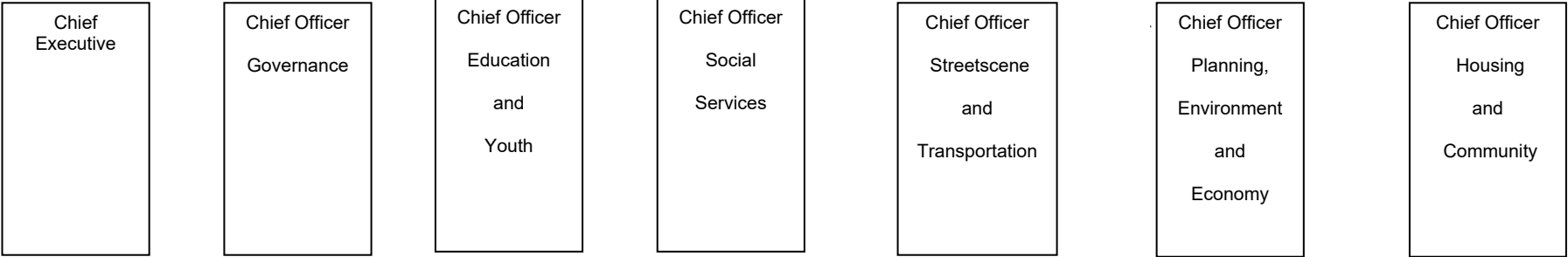
##### Standards inspections

- To achieve the inspection of all Feed premises that are Below the Line, funded by the regional model
  - To register those Feed businesses that have previously not registered with the service
  - To improve the accuracy of the database in relation to Feed
  - To devise and follow a schedule for updating all relevant processes, procedures and documentation to reflect the changes due to the implementation of the new database
- 
- While the FSA have directed LAs to return to service delivery as per the Code of Practice, the backlog of lower risk premises inspections is such that the intervention frequency cannot be undertaken within 28 days of the inspection due date. The impact of this backlog on service delivery as per the code will continue for the coming year. The prioritisation of interventions will be done based on risk and on any relevant information
  - Further consultation is expected in 2024-25 on the outcome of the pilot on the new Food Standards Delivery Model as part of the FSA's Achieving Business Compliance programme
  - The service is in the process of signing up to the FSA's Register a Food Business platform which will streamline the food business registration process
  - The Food Safety and Food Standards service has been audited by FSA Wales in June 2024. The recommendations resulting from this audit and the corresponding Action Plan will be progressed
  - FSA Wales are continuing with a requirement for all LAs in Wales to submit six-monthly data collection, which they commenced during the COVID-pandemic. This places an additional burden on LAs to prepare this data twice yearly

Chart 1

# FLINTSHIRE COUNTY COUNCIL - ORGANISATIONAL STRUCTURE

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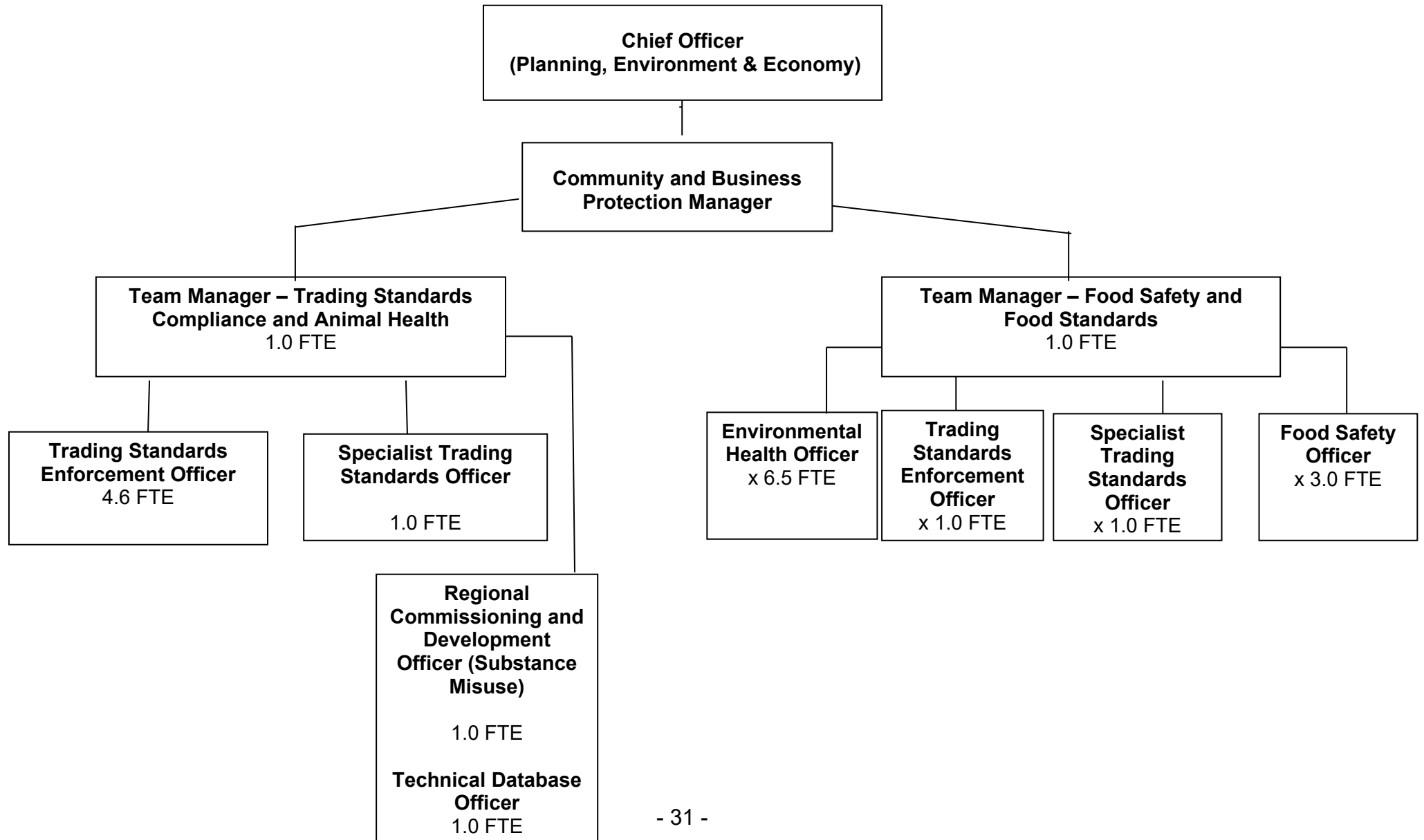
## FLINTSHIRE COUNTY COUNCIL – COMMITTEE STRUCTURE

Please refer to the Flintshire County Council website for a current Committee structure:

<https://committeemeetings.flintshire.gov.uk/mgListCommittees.aspx?bcr=1>

Chart 3

# COMMUNITY AND BUSINESS PROTECTION - FOOD AND FEED SERVICE



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**APPENDIX 2**

**Table A - breakdown of the profile of programmed Food Safety inspections for 2024-25 by Risk Rating:**

<b>PROGRAMMED INSPECTIONS - FOOD HYGIENE</b>		
<b>Risk</b>	<b>Number Due in Year</b>	<b>Number Outstanding from 2023-24</b>
A	2	0
B	18	0
C	220	2
D	105	156
E	83 (6* )	203 (48*)
New Businesses from previous year	N/A	54
<b>SUB-TOTAL</b>	351 inspections / 77 AES questionnaires	260 inspections / 155 AES questionnaires
<b>TOTAL</b>	<b>611 inspections / 232 AES questionnaires</b>	

**Table B - breakdown of the profile of programmed Food Standards inspections for 2024-25 by Risk Rating:**

<b>PROGRAMMED INSPECTIONS - FOOD STANDARDS</b>		
<b>Risk</b>	<b>Number Due</b>	<b>Number Outstanding from 2023-24</b>
A	3	0
B	174	76
C	72 (30*)	213 (123*)
New Businesses from previous year	N/A	54
<b>SUB-TOTAL</b>	207 inspections / 42 AES questionnaires	253 inspections / 90 AES questionnaires
<b>TOTAL</b>	<b>460 inspections / 132 AES questionnaires</b>	

The Risk Rating is determined in accordance with the Food Law Code of Practice. For Food Safety High Risk premises are those with a Risk Rating of A - C. For Food Standards High Risk premises are those with a Risk Rating of A.

The tables do not include the number of new businesses that we anticipate we will become aware of during the year.

\*denotes the number of physical inspections that have been programmed. The remaining number of premises will be completed as an Alternative Enforcement Strategy (AES) questionnaire.

**Table C - breakdown of the profile of programmed Feed inspections for 2024-25 by Feed Business Activity:**

	<b>PROGRAMMED INSPECTIONS - FEED</b>	
<b>High Risk (ATL)/Low Risk (BTL)</b>	<b>Registered/Approved Feed Business Activity</b>	<b>Number Due</b>
High Risk – R01-4	Manufacturer of Feed	2
High Risk – R12	Co Product Producers	1
High Risk – R09	Feed Stores	0
High Risk – R05	Feed Distributor	5
High Risk – R08	Feed Transporter	0
High Risk – R10 and R11	On Farm Feed Mixers	1
High Risk – R07	Supplier of Surplus Food	1
High Risk – R06	Pet Food Manufacturer	0
Low Risk – R13	Livestock Farms	36
Low Risk – R14	Arable Farms	0
	<b>Total</b>	<b>46</b>

## APPENDIX 3 – PERFORMANCE 2023-24

### Food Safety

<b>Risk</b>	<b>Interventions Due</b>	<b>No. outstanding at 1<sup>st</sup> Apr 2024</b>	<b>% Achieved</b>
A High Risk	3	0	100
B High Risk	28	0	100
C High Risk	164	2	99
D Medium Risk	292	156	47
E Low Risk	376 (344 as AES)	203	46
Unrated at 1 <sup>st</sup> Apr 2023	52	2	96

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### Food Standards

<b>Risk</b>	<b>Interventions Due</b>	<b>No. outstanding at 1<sup>st</sup> Apr 2024</b>	<b>% Achieved</b>
A High	7	0	100
B Medium	199	76	62
C Low	454 (422 as AES)	213	53
Unrated at 1 <sup>st</sup> Apr 2023	54	2	96

Feed Inspections (as per requirements of FSA Regional Funding Model 2023-24)

Risk	Programmed	No. outstanding at 1 <sup>st</sup> Apr 2024	% Achieved
High	17	1	94
Medium/Low	65	24	63
<b>TOTAL</b>	<b>82</b>	<b>39</b>	<b>52</b>

**Food Hygiene Ratings**

Profile of Ratings within Flintshire: July 2024

Page 764	5 Very Good	4 Good	3 Generally Satisfactory	2 Improvement Necessary	1 Major Improvement Necessary	0 Urgent Improvement Necessary
% of Premises	85.5	11.7	1.5	0.5	0.8	0.0

Food Hygiene Rating Safeguards 2023/24

Number of Requests for Rescore Visit to be undertaken	-	16
Number of Appeals on Rating	-	0
Number of Fixed Penalty Notices	-	0
Right to Reply	-	0



## Other data in relation to Demands on Food Service

### Food and Feeding Stuffs Complaints

Food Safety number of complaints	-	109
Food Standards number of complaints	-	19
Feed number of complaints	-	1
Food Incidents	-	13
Feed Incidents	-	0

### Advice to Business

Food Safety	-	240 requests for advice
Food Standards	-	6 requests for advice
Feed	-	13 requests for advice

### Food and Feed Sampling

Food Safety	-	64 plus 9 Shellfish Classification samples
Food Standards	-	10 samples – monitoring for composition and labelling
Feed	-	0

### Control and Investigation of Outbreaks and Food Related Infectious Disease (Food Safety only)

Sporadic Notifications	-	341 (of which 254 were Campylobacter)
Outbreaks	-	0 Incidents or Outbreaks declared

### Other Types of Service Requests (Food Safety only)

<u>Water Disconnections</u>	-	10
<u>Ship Sanitation Certificates</u>	-	0
<u>Export Health Attestations</u>	-	82
<u>Shellfish Registration Document Requests</u>	-	11

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## **EXERCISE OF DELEGATED POWERS - DECISIONS TAKEN** **REPORTED TO CABINET – 15.10.24**

### **Streetscene and Transportation**

- **The Flintshire County Council (Various Roads) (20mph, 30mph, 40mph, 50mph And National Speed Limits, Restricted And Derestricted Roads) (Cadole Road And Village Road, Cadole) (50mph Speed Limit) (Amendment No. 01) Order 202-**  
To note that a formal objection has been received as part of the statutory consultation procedure which has been reviewed and considered impartially. This delegated report confirms the progression of the proposal to reduce the existing national speed limit to 50mph on Cadole Road and Village Road, Cadole
- **The Flintshire County Council High Street And Roads Adjacent, Holywell (One Way Traffic And Prohibition Of Driving) Order 20xx**  
To note that a formal objection has been received as part of the statutory consultation procedure, which has been reviewed and considered impartially. This delegated report confirms the progression of the proposal to allow vehicular traffic to enter the High Street, Holywell on a Thursday.
- **Proposed Pedestrian Crossing On Ffordd Llewelyn, Flint**  
To note that a formal objection and an unresolved matter has been received as part of the statutory consultation procedure, which has been reviewed and considered impartially. This delegated report confirms the progression of the proposal to construct a new zebra pedestrian crossing on Ffordd Llewelyn in Flint.

### **Housing and Assets**

- **Property transfer – Council Fund to Housing Revenue Account**  
This report relates to the transfer of 93 & 95 Hawarden Road, Hope, LL12 9NL. A pair of semi-detached residential properties (shown for identification purposes: edged red on the attached plan). The report seeks to transfer the properties from the Council Fund to the Housing Revenue Account.

Copies of the Delegated Powers reports are retained by the Team Leader – Committee Services and available to view on request by Members.

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**FLINTSHIRE COUNTY COUNCIL FORWARD WORK PROGRAMME ITEMS  
COUNCIL, CABINET, GOVERNANCE AND AUDIT & OVERVIEW AND SCRUTINY  
1 October 2024 TO 31 March 2025**

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
October					
Environment & Economy Overview & Scrutiny Committee	8/10/24	Streetscene and Transportation	<b>Update on Local Bus Services in Flintshire</b> To receive an update.	Operational	Cabinet Member for Streetscene and Transportation
Environment & Economy Overview & Scrutiny Committee	8/10/24	Streetscene and Transportation	<b>Review of Highways Asset Management Plan and Highway and Car Park Inspection Policy</b> To provide Scrutiny with an update on the refreshed Highway Asset Management Plan (HAMP) and reviewed Highway and Car Park Inspection Policy.	Operational	Cabinet Member for Streetscene and Transportation

Agenda 7/25

Agenda Annex

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Environment & Economy Overview & Scrutiny Committee	8/10/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (E&amp;E OSC)</b></p> <p>To consider the Forward Work Programme of the Environment &amp; Economy Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	
Environment & Economy Overview & Scrutiny Committee	8/10/24	Streetscene and Transportation	<p><b>Review of reduced opening hours at Household Recycling Centres</b></p> <p>As requested at June meeting.</p>	Operational	Cabinet Member for Streetscene and Transportation
Environment & Economy Overview & Scrutiny Committee	8/10/24	Planning, Environment and Economy	<p><b>Additional Licensing for Houses of Multiple Occupation</b></p> <p>To request the authority of Cabinet Members to undertake a consultation exercise to consider whether 'Additional Licensing' for smaller Houses of Multiple Occupation (HMO'S) should be introduced to the county as a whole.</p>	Operational	Cabinet Member for Planning, Public Health and Public Protection

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Environment & Economy Overview & Scrutiny Committee	8/10/24	Planning, Environment and Economy	<b>Food Service Plan 2024-25 for Flintshire County Council</b> To approve the Food Service Plan 2024-25	Operational	Cabinet Member for Planning, Public Health and Public Protection
Community & Housing Overview & Scrutiny Committee	9/10/24	Overview and Scrutiny	<b>Forward Work Programme and Action Tracking (C&amp;H)</b> To consider the Forward Work Programme of the Community & Housing Overview & Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.	Operational	
Community & Housing Overview & Scrutiny Committee	9/10/24	Housing and Communities	<b>Independent Review of Homelessness</b> To provide an update on the findings and recommendations following an independent review of the Council's homelessness services.	Operational	Deputy Leader of the Council and Cabinet Member for Housing and Communities
Community & Housing Overview & Scrutiny Committee	9/10/24	Housing and Communities	<b>Void Management</b> To provide an update on the number of Void properties and the work undertaken to bring in properties back into use.	Operational	Deputy Leader of the Council and Cabinet Member for Housing and Communities

<b>COMMITTEE</b>	<b>MEETING DATE</b>	<b>CHIEF OFFICER PORTFOLIO</b>	<b>AGENDA ITEM &amp; PURPOSE OF REPORT</b>	<b>REPORT TYPE (Strategic or Operational) (Cabinet only)</b>	<b>PORTFOLIO (Cabinet only)</b>
Corporate Resources Overview & Scrutiny Committee	10/10/24	Overview and Scrutiny	<b>Forward Work Programme</b> To consider the Forward Work Programme of the Corporate Resources Overview & Scrutiny Committee.	Operational	
Corporate Resources Overview & Scrutiny Committee	10/10/24	Education and Youth	<b>New Brighton – adoption of a Welsh name</b> To recommend the adoption of a Welsh name for New Brighton- Pentre Cythrel.	Strategic	Cabinet Member for Education, Welsh Language and Culture
Corporate Resources Overview & Scrutiny Committee	10/10/24	Overview and Scrutiny	<b>Action Tracking</b> To inform the Committee of progress against actions from previous meetings.	Operational	
Corporate Resources Overview & Scrutiny Committee	10/10/24	Chief Executive's	<b>Strategic Equality Plan Annual Report 2023/24</b> To present the Strategic Equality Plan Annual Report 2023/24.	Operational	Cabinet Member for Corporate Services
Corporate Resources Overview & Scrutiny Committee	10/10/24	Chief Executive's	<b>Audit Wales Report - Financial Sustainability</b> To advise on the final report received from Audit Wales.	Strategic	Cabinet Member for Finance and Social Value



COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	10/10/24	Chief Executive's	<b>Office Rationalisation Programme and County Hall Campus</b> To present a report outlining phases and indicative costs for the next focused piece of work.	Operational	Cabinet Member for Corporate Services
Corporate Resources Overview & Scrutiny Committee	10/10/24	Chief Executive's	<b>Community Safety Partnership Annual Report</b> To provide an overview of the Community Safety Partnership's activities and progress over the past 12 months.	Operational	Cabinet Member for Planning, Public Health and Public Protection
Corporate Resources Overview & Scrutiny Committee	10/10/24	Finance	<b>Revenue Budget Monitoring 2024/25 (Month 5)</b> To provide the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account.	Operational	Cabinet Member for Finance and Social Value

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Social Services	<p><b>Welsh Government Consultation: Inspection Ratings Regulations</b></p> <p>The Welsh Government is seeking our views on draft regulations which provide a system of published inspection ratings for care home services (for both adults and children) and domiciliary support services from April 2025. This report details the Councils draft response to the consultation questions.</p>	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Cabinet	15/10/24	Social Services	<p><b>Response to the Audit Wales Review “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”</b></p> <p>To present findings and the council response to the Auditor General’s review of the arrangements to support effective flow out of hospital in the North Wales region detailed within “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”.</p>	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Streetscene and Transportation	<p><b>Outstanding Debt - Write Off</b> To seek approval to write off the debt on ledger relating to Go Plant Fleet Services Ltd following the company's insolvency.</p>	Operational	Cabinet Member for Corporate Services, Cabinet Member for Streetscene and Transportation
Cabinet	15/10/24	Streetscene and Transportation	<p><b>Update on the Bus Network Grant and Local Bus Services in Flintshire</b> To provide an update on the funding arrangements for local bus services through the Bus Network Grant provided by Welsh Government and to inform members of the available options to address the £270k shortfall for local bus services in Flintshire, as well as a further pressure of £47k to address the shortfall of the Bus Network Grant across the wider north Wales region.</p>	Operational	Cabinet Member for Streetscene and Transportation

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Chief Executive's	<b>Office Rationalisation Programme and County Hall Campus</b> To present a report outlining phases and indicative costs for the next focused piece of work.	Operational	Cabinet Member for Transformation and Assets
Cabinet	15/10/24	Streetscene and Transportation	<b>Review of Highways Asset Management Plan (HAMP) and Highway and Car Park Inspection Policy</b> To seek approval of the refreshed Highway Asset Management Plan (HAMP) and reviewed Highway and Car Park Inspection Policy.	Strategic	Cabinet Member for Streetscene and Transportation
Cabinet	15/10/24	Social Services	<b>Procurement of Client Information System</b> To update on progress to procure a replacement client information system to the current system (Civica PARIS).	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Planning, Environment and Economy	<p><b>Additional Licensing for Houses of Multiple Occupation</b></p> <p>To request authority to undertake a consultation exercise to consider whether 'Additional Licensing' for smaller Houses of Multiple Occupation (HMO'S) should be introduced to the county as a whole.</p>	Operational	Cabinet Member for Planning, Public Health and Public Protection
Cabinet	15/10/24	Planning, Environment and Economy	<p><b>LDP Supplementary Planning Guidance</b></p> <p>To adopt three Supplementary Planning Notes relating to Extensions and Alterations, New Housing in the Open Countryside and the Conversion of Rural Buildings as formal supplementary planning guidance so that they can carry weight as a material planning consideration alongside the adopted Local Development Plan.</p>	Strategic	Cabinet Member for Planning, Public Health and Public Protection

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Planning, Environment and Economy	<p><b>LDP Annual Monitoring Report</b> To adopt the first Annual Monitoring Report following the adoption of the Local Development Plan to enable formal submission to Welsh Government.</p>	Strategic	Cabinet Member for Planning, Public Health and Public Protection
Cabinet	15/10/24	Education and Youth	<p><b>New Brighton – adoption of a Welsh name</b> To recommend the adoption of a Welsh name for New Brighton- Pentre Cythrel.</p>	Strategic	Cabinet Member for Education, Welsh Language and Culture
Cabinet	15/10/24	Housing and Communities	<p><b>Independent Review of Flintshire Homelessness Services</b> To provide an update on progress in relation to the Independent Review completed by Neil Morland and outline potential efficiencies through diversification of the Councils Homeless Accommodation Portfolio.</p>	Strategic	Deputy Leader of the Council and Cabinet Member for Housing and Communities

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Education and Youth	<p><b>Expansion of Specialist Additional Learning Needs Resource Provision within the Secondary Education Network</b></p> <p>This report seeks COT support to progress Cabinet approval to the proposed expansion of specialist resource provision within the secondary education network.</p>	Operational	Cabinet Member for Education, Welsh Language and Culture
Cabinet	15/10/24	Chief Executive's	<p><b>Strategic Equality Plan Annual Report 2023/24</b></p> <p>To present the Strategic Equality Plan Annual Report 2023/24.</p>	Operational	Cllr Linda Thomas
Cabinet	15/10/24	Chief Executive's	<p><b>Revenue Budget Monitoring 2024/25 (Month 5)</b></p> <p>This regular monthly report provides the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account. The position is based on actual income and expenditure as at Month 5, and projects forward to year-end.</p>	Operational	Cabinet Member for Finance and Social Value

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	15/10/24	Social Services	<b>Children and Families Safeguarding Hub</b> To update on progress of implementation which will ensure a full multi-agency approach and response to safeguarding.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Cabinet	15/10/24	Education and Youth	<b>Expansion of Specialist Education Provision</b> To advise on the outcome of the statutory consultation exercise to reorganise specialist education provision, to recommend to proceed with the proposal and allow for publication of a statutory notice providing a 28 day notice period for objections.	Operational	Cabinet Member for Education, Welsh Language and Culture
Cabinet	15/10/24	Planning, Environment and Economy	<b>Food Service Plan 2024-25 for Flintshire County Council</b> To approve the Food Service Plan 2024-25	Operational	Cabinet Member for Planning, Public Health and Public Protection



COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Education, Youth & Culture Overview & Scrutiny Committee	17/10/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (EY&amp;C OSC)</b></p> <p>To consider the Forward Work Programme of the Education, Youth &amp; Culture Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	
Education, Youth & Culture Overview & Scrutiny Committee	17/10/24	Education and Youth	<p><b>Food and Fun Programme 2024</b></p> <p>To provide an overview of the delivery of the Food and Fun Programme 2024.</p>	Operational	Cabinet Member for Education, Welsh Language and Culture
Education, Youth & Culture Overview & Scrutiny Committee	17/10/24	Education and Youth	<p><b>Flintshire County Summer Playscheme 2024</b></p> <p>To provide feedback on the Flintshire County Summer Playscheme 2024.</p>	Operational	Cabinet Member for Education, Welsh Language and Culture
Education, Youth & Culture Overview & Scrutiny Committee	17/10/24	Education and Youth	<p><b>Anti-Racist Wales Action Plan</b></p> <p>To update on how the Council is meeting the requirements of the Welsh Government Anti-racist Wales Action Plan in line with the development of the new Curriculum for Wales.</p>	Operational	Cabinet Member for Education, Welsh Language and Culture

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Education, Youth & Culture Overview & Scrutiny Committee	17/10/24	Education and Youth	<b>Self-evaluation on education services &amp; learner outcomes</b> To update Members on overall service performance including Learner Outcomes.	Operational	Cabinet Member for Education, Welsh Language and Culture
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Safeguarding Hub</b> To receive a report outlining the strengths and challenges from the newly established Safeguarding Hub.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Proposed Changes to Charges for Domiciliary and Residential Care</b> To propose and discuss changes to the financial assessment and charging for Domiciliary Care and Residential Care Services.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Mockingbird Fostering Project</b> To update on the progress of the implementation of the Mockingbird model of care.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Financial Assessments and Charging Team</b> To provide Members with information regarding the work undertaken within the Financial Assessment and Charging Team.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Response to the Audit Wales Review “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”</b> To present findings and the council response to the Auditor General’s review of the arrangements to support effective flow out of hospital in the North Wales region detailed within “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Social & Health Care Overview & Scrutiny Committee	24/10/24	Social Services	<b>Social Services Workforce Development Report</b> This report provides a summary of the work undertaken by the Social Services Workforce Development Team over the past 12 months, including details relating to recruitment activity in Social Services.	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Page 784 Social & Health Care Overview & Scrutiny Committee	24/10/24	Overview and Scrutiny	<b>Forward Work Programme and Action Tracking (S&amp;H)</b> To consider the Forward Work Programme of the Social & Health Care Overview & Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.	Operational	
November					
Environment & Economy Overview & Scrutiny Committee	12/11/24	Streetscene and Transportation	<b>Residual Waste Collections Change and Communication Plan</b> To consider the proposals.	Operational	Cabinet Member for Streetscene and Transportation

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Environment & Economy Overview & Scrutiny Committee	12/11/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (E&amp;E OSC)</b></p> <p>To consider the Forward Work Programme of the Environment &amp; Economy Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	
<span style="writing-mode: vertical-rl; transform: rotate(180deg); position: absolute; left: -40px; top: 50%; font-size: small;">Page 7 of 85</span> Community & Housing Overview & Scrutiny Committee	13/11/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (C&amp;H)</b></p> <p>To consider the Forward Work Programme of the Community &amp; Housing Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	
Community & Housing Overview & Scrutiny Committee	13/11/24	Housing and Communities	<p><b>NEW Homes review</b></p> <p>To outline the outcome of the NEW Homes review.</p>	Operational	Deputy Leader of the Council and Cabinet Member for Housing and Communities

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	14/11/24	Overview and Scrutiny	<b>Forward Work Programme</b> To consider the Forward Work Programme of the Corporate Resources Overview & Scrutiny Committee.	Operational	
Corporate Resources Overview & Scrutiny Committee	14/11/24	Governance	<b>Public Services Ombudsman for Wales Annual Letter 2023-24 and half-year complaints performance 2024-25.</b> To share the Public Services Ombudsman for Wales Annual Letter 2023-24 for Flintshire County Council and an overview of complaints received by each portfolio of the Council between 1 April 2024 – 30 September 2024.	Operational	Cabinet Member for Corporate Services
Corporate Resources Overview & Scrutiny Committee	14/11/24	Chief Executive's	<b>Capital Strategy including Prudential Indicators 2025/26 – 2027/28</b> To present the Capital Strategy 2025/26 – 2027/28 for review	Strategic	Cabinet Member for Finance and Social Value

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	14/11/24	Chief Executive's	<b>Cambrian Aquatics</b> To provide an update report on Cambrian Aquatics	Operational	Cabinet Member for Education, Welsh Language and Culture
Corporate Resources Overview & Scrutiny Committee	14/11/24	Chief Executive's	<b>Capital Programme 2025/26 – 2027/28</b> To present the Capital Programme 2025/26 – 2027/28 for review.	Strategic	Cabinet Member for Finance and Social Value
Corporate Resources Overview & Scrutiny Committee	14/11/24	Chief Executive's	<b>Cambrian Aquatics</b> To provide an update report on Cambrian Aquatics.	Operational	Cabinet Member for Education, Welsh Language and Culture
Corporate Resources Overview & Scrutiny Committee	14/11/24	Overview and Scrutiny	<b>Action Tracking</b> To inform the Committee of progress against actions from previous meetings.	Operational	

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COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	14/11/24	Finance	<p><b>Revenue Budget Monitoring 2024/25 (Month 6) and Capital Programme Monitoring 2024/25 (Month 6)</b></p> <p>To provide the Revenue Budget Monitoring 2024/25 (Month 6) Report and the Capital Programme 2024/25 (Month 6) Report.</p>	Operational	Cabinet Member for Finance and Social Value
Corporate Resources Overview & Scrutiny Committee	14/11/24	People and Resources	<p><b>Employment and Workforce Mid-year Update</b></p> <p>This report covers strategic updates in addition to the quarterly workforce statistics and their analysis.</p>	Operational	Cabinet Member for Corporate Services
Cabinet	19/11/24	Governance	<p><b>Council Tax Base for 2025/26</b></p> <p>To approve the Council Tax Base for the financial year 2025/26 as part of the process of the revenue budget setting and Council Tax setting process for the new year.</p>	Operational	Cabinet Member for Finance and Social Value



COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	19/11/24	Housing and Communities	<b>Intensive Housing Management Solutions for Homeless Accommodation</b> To gain consent to engage the above company for the purpose of delivering homeless accommodation services for up to 50 households experiencing homelessness.	Strategic	Deputy Leader of the Council and Cabinet Member for Housing and Communities
Cabinet	19/11/24	Chief Executive's	<b>Cambrian Aquatics</b> To provide an update report on Cambrian Aquatics	Operational	Cabinet Member for Education, Welsh Language and Culture
Cabinet	19/11/24	Chief Executive's	<b>Capital Programme 2025/26 – 2027/28</b> To present the Capital Programme 2025/26 – 2027/28 for recommendation to Council.	Strategic	Cabinet Member for Finance and Social Value
Cabinet	19/11/24	Chief Executive's	<b>Cambrian Aquatics</b> To provide an update report on Cambrian Aquatics	Operational	Cabinet Member for Education, Welsh Language and Culture

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	19/11/24	Chief Executive's	<b>Capital Strategy including Prudential Indicators 2025/26 – 2027/28</b> To present the Capital Strategy 2025/26 – 2027/28 for recommendation to Council	Strategic	Cabinet Member for Finance and Social Value
Cabinet	19/11/24	Chief Executive's	<b>Capital Programme Monitoring 2024/25 (Month 6)</b> To present the Month 6 Capital Programme information for 2024/25	Operational	Cabinet Member for Finance and Social Value
Cabinet	19/11/24	Governance	<b>Public Services Ombudsman for Wales Annual Letter 2023-24 and half-year complaints performance 2024-25.</b> To share the Public Services Ombudsman for Wales Annual Letter 2023-24 for Flintshire County Council and an overview of complaints received by each portfolio of the Council between 1 April 2024 – 30 September 2024.	Operational	Cabinet Member for Corporate Services

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	19/11/24	Chief Executive's	<p><b>Revenue Budget Monitoring 2024/25 (Month 6)</b>            This regular monthly report provides the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account. The position is based on actual income and expenditure as at Month 6, and projects forward to year-end.</p>	Operational	Cabinet Member for Finance and Social Value
Cabinet	19/11/24	Chief Executive's	<p><b>Strategic Risk Overview</b>            To provide Cabinet quarterly with an overview of strategic risks across the Council, including:</p> <ul style="list-style-type: none"> <li>• Details of all the strategic risks across the Council</li> <li>• High level overview of escalated and deteriorating risks</li> <li>• A real time view of what position the Council is at, at the date the report is produced.</li> </ul>	Strategic	Cabinet Member for Corporate Services

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	19/11/24	Governance	<b>Transfer of the Economic Ambition Board into the Corporate Joint Committee</b> To agree that the Corporate Joint Committee will become the accountable body for the Regional Growth Deal and will take over the responsibilities of the Economic Ambition Board.	Strategic	Cabinet Member for Corporate Services
Cabinet	19/11/24	Education and Youth	<b>Self Evaluation of Flintshire Education Services</b> To provide Cabinet with assurance on the range and quality of provision of education services in Flintshire	Operational	Cabinet Member for Education, Welsh Language and Culture
Flintshire County Council	21/11/24	Chief Executive's	<b>Treasury Management Annual Report 2023/24</b> To present to Members the draft Annual Treasury Management Report 2023/24		
Flintshire County Council	21/11/24	Governance	<b>Review of Political Balance</b> Due to a change in group membership we need to review the Political Balance and the allocation of seats on Committees.		

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Governance and Audit Committee	25/11/24	Chief Executive's	<p><b>Governance &amp; Audit Committee Self-Assessment - Action Plan</b></p> <p>To present to Committee a detailed action plan to support the results of the Committee's self-assessment. It will also form the basis for the provision of any further training required by the Committee.</p>	All Report Types	
Page 793 Governance and Audit Committee	25/11/24	Finance	<p><b>Statement of Accounts 2023/24</b></p> <p>To present the final audited version of the Statement of Accounts 2023/24 for approval.</p>	Operational	Cabinet Member for Finance and Social Value
Governance and Audit Committee	25/11/24	Governance	<p><b>Risk Management Update</b></p> <p>To be assured that the updated risk management framework is comprehensive and functional.</p>	All Report Types	

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Governance and Audit Committee	25/11/24	Social Services	<p><b>Response to the Audit Wales Review “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”</b></p> <p>To present findings and the council response to the Auditor General’s review of the arrangements to support effective flow out of hospital in the North Wales region detailed within “Urgent and Emergency Care: Flow out of Hospital – North Wales Region”</p>	Operational	Deputy Leader of the Council and Cabinet Member for Social Services and Wellbeing
Governance and Audit Committee	25/11/24	Governance	<p><b>Public Services Ombudsman for Wales Annual Letter 2023-24 and half-year complaints performance 2024-25.</b></p> <p>To share the Public Services Ombudsman for Wales Annual Letter 2023-24 for Flintshire County Council and an overview of complaints received by each portfolio of the Council between 1 April 2024 – 30 September 2024.</p>	Operational	Cabinet Member for Corporate Services

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Governance and Audit Committee	25/11/24	Chief Executive's	<b>Treasury Management Mid-Year Review 2024/25 and Q2 Update</b> To present to Members the draft Treasury Management Mid-Year Review 1st April – 30th September 2024 for comments and recommendation for approval to Cabinet.	Operational	Cabinet Member for Finance and Social Value
Education, Youth & Culture Overview & Scrutiny Committee Page 795	28/11/24	Overview and Scrutiny	<b>Forward Work Programme and Action Tracking (EY&amp;C OSC)</b> To consider the Forward Work Programme of the Education, Youth & Culture Overview & Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.	Operational	
December					
Flintshire County Council	4/12/24	Chief Executive's	<b>Capital Strategy including Prudential Indicators 2025/26 – 2027/28</b> To present the Capital Strategy 2025/26 – 2027/28 for approval		

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Flintshire County Council	4/12/24	Governance	<b>Scrutiny Arrangements for the Corporate Joint Committee</b> To consider and make recommendations to Council on the proposed scrutiny arrangements for the Corporate Joint Committee		
Flintshire County Council	4/12/24	Chief Executive's	<b>Capital Programme 2025/26 – 2027/28</b> To present the Capital Programme 2025/26 – 2027/28 for approval		
Social & Health Care Overview & Scrutiny Committee	5/12/24	Overview and Scrutiny	<b>Forward Work Programme and Action Tracking (S&amp;H)</b> To consider the Forward Work Programme of the Social & Health Care Overview & Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.	Operational	



COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Environment & Economy Overview & Scrutiny Committee	10/12/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (E&amp;E OSC)</b>            To consider the Forward Work Programme of the Environment &amp; Economy Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	
Environment & Economy Overview Scrutiny Committee Page 797	10/12/24	Streetscene and Transportation	<p><b>Conversion of the FCC fleet to electric or alternative fuels</b>            To receive a progress report on the implementation of the conversion of the FCC fleet to electric and alternative fuels.</p>	Operational	Cabinet Member for Streetscene and Transportation
Community & Housing Overview & Scrutiny Committee	11/12/24	Overview and Scrutiny	<p><b>Forward Work Programme and Action Tracking (C&amp;H)</b>            To consider the Forward Work Programme of the Community &amp; Housing Overview &amp; Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.</p>	Operational	

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	12/12/24	Overview and Scrutiny	<b>Forward Work Programme</b> To consider the Forward Work Programme of the Corporate Resources Overview & Scrutiny Committee.	Operational	
Corporate Resources Overview & Scrutiny Committee	12/12/24	Overview and Scrutiny	<b>Action Tracking</b> To inform the Committee of progress against actions from previous meetings.	Operational	
Corporate Resources Overview & Scrutiny Committee	12/12/24	Finance	<b>Revenue Budget Monitoring 2024/25 (Month 7)</b> To provide Members with the Revenue Budget Monitoring 2024/25 (Month 7) Report and Significant Variances.	Operational	Cabinet Member for Finance and Social Value
Cabinet	17/12/24	Chief Executive's	<b>Treasury Management Mid-Year Review 2024/25</b> To present to Members the draft Treasury Management Mid-Year Review for 2024/25 for recommendation to Council.	Operational	Cabinet Member for Finance and Social Value

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Cabinet	17/12/24	Chief Executive's	<b>Revenue Budget Monitoring 2024/25 (Month 7)</b> This regular monthly report provides the latest revenue budget monitoring position for 2024/25 for the Council Fund and Housing Revenue Account. The position is based on actual income and expenditure as at Month 7, and projects forward to year-end.	Operational	Cabinet Member for Finance and Social Value
January					
Corporate Resources Overview & Scrutiny Committee	16/01/25	Finance	<b>Revenue Budget Monitoring 2024/25 (Month 8)</b> To provide Members with the Revenue Budget Monitoring 2024/25 (Month 8) Report and Significant Variances.	Operational	Cabinet Member for Finance and Social Value
February					

COMMITTEE	MEETING DATE	CHIEF OFFICER PORTFOLIO	AGENDA ITEM & PURPOSE OF REPORT	REPORT TYPE (Strategic or Operational) (Cabinet only)	PORTFOLIO (Cabinet only)
Corporate Resources Overview & Scrutiny Committee	13/02/25	Finance	<b>Revenue Budget Monitoring 2024/25 (Month 9) and Capital Programme Monitoring 2024/25 (Month 9)</b> To provide the Revenue Budget Monitoring 2024/25 (Month 9) Report and the Capital Programme 2024/25 (Month 9) Report.	Operational	Cabinet Member for Finance and Social Value
Page 800 March					
Corporate Resources Overview & Scrutiny Committee	13/03/25	Finance	<b>Revenue Budget Monitoring 2024/25 (Month 10)</b> To provide Members with the Revenue Budget Monitoring 2024/25 (Month 10) Report and Significant Variances.	Operational	Cabinet Member for Finance and Social Value



## CABINET

<b>Date of Meeting</b>	Tuesday, 15 <sup>th</sup> October 2024
<b>Report Subject</b>	Office Rationalisation Programme and County Hall Campus
<b>Cabinet Member</b>	Cabinet Member for Transformation and Assets
<b>Report Author</b>	Corporate Manager - Capital Programme and Assets
<b>Type of Report</b>	Operational

### EXECUTIVE SUMMARY

The Corporate Asset Management Plan 2022 – 2027 identifies achievements made to date, including the efficiencies generated under the office rationalisation programme and the demolition of phases 3 and 4 at County Hall.

The Plan also sets out the proposal to move forward with the redevelopment of the County Hall Campus to address the future needs of the Council and provide a range of options and an integrated approach to the assets and organisations on the campus site.

The Corporate Asset Management Plan, the shift towards hybrid working arrangements in the wake of the COVID-19 pandemic, and the backdrop of unprecedented financial challenges for the Council, provide the necessary platform to proceed with the next stage in the office rationalisation programme and the County Hall Campus redevelopment.

This report provides an overview of projected costs associated with this programme of work, highlights anticipated efficiencies and an indication of when these may be realised, and outlines interdependencies.

The report provides a summary of the timing, and phasing, and seeks approval for phase 1 works, noting the costs and efficiencies.

## RECOMMENDATIONS

1	That Cabinet consider the contents of the report and provide approval to proceed with Phase 1 of the Office Accommodation and County Hall project.
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## REPORT DETAILS

<b>1.00</b>	<b>EXPLAINING THE OFFICE RATIONALISATION PROGRAMME AND COUNTY HALL CAMPUS REDEVELOPMENT</b>
1.01	<p>The 'refreshed' Corporate Asset Management Plan 2022 – 2027, containing the Council's medium-term strategy for managing its assets, was approved by Cabinet at its meeting in October 2022.</p> <p>The Plan outlines the achievements made to date under the former Asset Management Plan. This includes the progress of the office rationalisation programme in reducing occupied space in County Hall by 50%, the demolition of phases 3 and 4 at County Hall, and the move of employees to the refurbished office in Ewloe, creating efficiencies in building costs, utilities, maintenance, and rateable value.</p> <p>The Plan also highlights the requirements to take forward the redevelopment of the County Hall Campus when market conditions dictate, addressing the future needs of the Council, recognising that options and an integrated approach to the other assets and organisations on the Campus would be needed.</p>
1.02	<p>The ambitions of the Corporate Asset Management Plan, alongside the shift towards more hybrid working arrangements as we adapted to new ways of working in response to and following the COVID-19 pandemic, and the unprecedented financial challenge currently facing the Council, combine to create factors that now make it critical to progress to the next stage of the office rationalisation programme and County Hall Campus redevelopment.</p> <p>As these two projects are interconnected, they have been considered initially as one piece of work, with multiple phases.</p>
1.03	<p>Phase one of the project has already commenced and will run until 28<sup>th</sup> February 2025. The main objective of phase one is to move as much and as many people out of County Hall as is possible.</p> <p>To enable this to happen, works are required at Ty Dewi Sant. It is essential that these works are undertaken as soon as possible under phase one of the project as they are necessary to provide alternative office accommodation for employees moving out of County Hall.</p> <p>Proposed works at Ty Dewi Sant are scheduled to start, assuming approval, in Autumn 2024.</p>

1.04	There is a budget amount noted in Appendix 1, for a light refurbishment of the 3 <sup>rd</sup> Floor of the Council Offices, Flint. This follows invasive survey work which is currently being undertaken as noted in the recent communication to members and staff
1.05	Phase two of the project will have three key areas of focus: <ol style="list-style-type: none"> <li>1. An alternative heating system and utilities supply for the other organisations/assets that remain on the County Hall Campus. (as per the Councils legal obligations)</li> <li>2. Relocating the NEWydd central production kitchen out of County Hall.</li> <li>3. Complete clear out of County Hall. (which will enable the total NNDR efficiency)</li> </ol>
1.06	Phase three of the project will focus on the longer-term redevelopment of the County Hall Campus. The Officer team are currently investigating ways that the demolition costs can be offset by the holistic development of the Campus.
1.07	Reports on future phases will be presented to CROSC and Cabinet.

<b>2.00</b>	<b>RESOURCE IMPLICATIONS</b>
2.01	A summary of projected costs is provided at Appendix 1 of this report. Focus to date has been on confirming phase one costs as these are critical to ensure the move out of County Hall by 28 <sup>th</sup> February 2025.
2.02	The total estimated project costs for Phase 1 are £805,545.  Given the sequence required to complete Phase 1 works prior to the 28th February 2025, £805,545 will be required for approval in the 2024/25 Month 6 capital report as an additional allocation from the current capital surplus.
2.03	The estimates for Phase 2 work will be included in the 2025/26 – 2027/28 Capital Programme for consideration later in the year.
2.04	As when the Council vacated phases 3 and 4 of County Hall, there will be efficiencies from moving out of County Hall completely. However, there will be a phased realisation of these efficiencies, some cannot be fully realised during Phase 1.  Efficiencies have been identified and estimated as far as is possible, with an indication of the efficiencies projected for 2025-26. These can be found at Appendix 2 of this report.

<b>3.00</b>	<b>IMPACT ASSESSMENT AND RISK MANAGEMENT</b>
3.01	<p>Whilst the aim is to move as much as possible out of County Hall by 28<sup>th</sup> February 2025, there are some exceptions where this will not be possible.</p> <p>As a landlord, and as part of the contractual agreement in place, the Council is required to provide utilities to the Law Courts on the County Hall Campus. This will require the Building Management System (BMS) to remain operational and for some security and caretaking allocation to remain on site.</p>
3.02	<p>In addition to the above, NEWydd Catering &amp; Cleaning Ltd have their central kitchen at County Hall, in practical terms this cannot be relocated before 28<sup>th</sup> February 2025.</p> <p>The most suitable option for future provision is still being worked on and even if there was a confirmed plan in place, works cannot be commissioned and undertaken in the time available.</p>
3.03	<p>The need to vacate County Hall by 28<sup>th</sup> February 2025 had been fixed given the interdependency to the relocation of the Data Centre, after which time there will be no network and/or WiFi facilities at County Hall.</p> <p>Some network and WiFi services will need to be facilitated for the remaining occupied areas of County Hall during phase two. This would enable limited provision to support NEWydd's Central Production and network to support the BMS and alarm/fire systems.</p>
3.04	<p>An Integrated Impact Assessment has not been undertaken as there is no proposed change to services or service strategies/policies.</p>

<b>4.00</b>	<b>CONSULTATIONS REQUIRED/CARRIED OUT</b>
4.01	<p>A copy of this report will be presented to the Corporate Resources Overview and Scrutiny Committee (CROSC) on 10<sup>th</sup> October 2024.</p>
4.02	<p>The Office Rationalisation Programme and County Hall Campus was not included as a Non-digital Transformation Project in the report on the Transformation Programme presented to Cabinet at its meeting on 23<sup>rd</sup> July 2024. However, the Office Rationalisation Programme and County Hall Campus should fall under the Transformation Programme.</p>
4.03	<p>Reports on future phases will be presented to CROSC and Cabinet as appropriate.</p>

<b>5.00</b>	<b>APPENDICES</b>
5.01	<p>Appendix 1 – Summary of phases and projected costs (part 2)</p>
5.02	<p>Appendix 2 – Potential Efficiencies (part 2)</p>



<b>6.00</b>	<b>LIST OF ACCESSIBLE BACKGROUND DOCUMENTS</b>
6.01	Corporate Asset Management Plan, as presented to Cabinet in October 2022, available online: <a href="https://committeemeetings.flintshire.gov.uk/ieListDocuments.aspx?CId=391&amp;MId=5236&amp;Ver=4&amp;LLL=0">https://committeemeetings.flintshire.gov.uk/ieListDocuments.aspx?CId=391&amp;MId=5236&amp;Ver=4&amp;LLL=0</a>

<b>7.00</b>	<b>CONTACT OFFICER DETAILS</b>
7.01	<b>Contact Officer:</b> Kelly Oldham-Jones – Strategic Executive Officer <b>Telephone:</b> 01352 702143 <b>E-mail:</b> <a href="mailto:kelly.oldham-jones@flintshire.gov.uk">kelly.oldham-jones@flintshire.gov.uk</a>

<b>8.00</b>	<b>GLOSSARY OF TERMS</b>
	<b>Asset Management Plan</b> - A plan maintained by an authority of the condition and suitability of its assets, updated regularly and utilised to assess future capital needs.

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