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Economy)  
Prif Swyddog (Cynllunio, Amgylchedd ac  
Economi)



The Planning Inspectors  
Flintshire LDP EiP

By email via Programme Officer

Your Ref/Eich Cy	Letter dated 10.12.21
Our Ref/Ein Cy	AR/LDP/EiP
Date/Dyddiad	Friday 17 <sup>th</sup> December 2021
Ask for/Gofynner am	Andy Roberts
Direct Dial/Rhif Union	01352 703211
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E-mail/e-bost	Andy.roberts@flintshire.gov.uk

Dear Inspectors

## Re: Inspectors' initial findings on phosphates work

### Introduction

1. The Council acknowledges receipt of your initial findings in relation to the above, and also thanks you for your comments in relation to the work that has been done to date, in such a short space of time, to address the phosphates issue. We are also grateful to the collaborative effort of colleagues in Wrexham County Borough Council and respective expert consultants, who have together helped to produce the mitigation strategy which I agree will stand others in good stead.
2. The position that both Councils were placed in by the NRW advice was an invidious one, given that no guidance had been provided by them on how to address this matter. This has required, as you say, an approach which represents the first of its kind in Wales in relation to demonstrating the soundness of an LDP.
3. The Council's response to your letter that follows is in three parts:
  - A general commentary on some of the overarching points made in your letter;
  - Specific responses to the questions you have posed in paragraph 14 of your letter relating to the position with housing supply;
  - The Council's response to your view on what may be feasible to provide as further information, as set out in paragraphs 17 and 18 of your letter.

### General Commentary

4. The Council acknowledges that you recognise that the work done in relation to mitigating the impact of phosphates from new development on the River Dee and Bala Lake SAC is sufficient for you to find "that the LDP complies with the legal and regulatory procedural requirements including the HRA". This has provided the Council with some comfort given it felt that this was the only outstanding

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We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.

Ry dym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn dd-ued i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.



matter to address. Whilst you refer in paragraph 4 of your letter to NRW guidance resulting in two essential requirements, the second of which is 'having a high degree of certainty that allocated sites will be delivered', in the context of NRW advice this must surely only relate to the need to ensure that the requirements of the Habitat Regulations are complied with. The Council considers that it has fully met these requirements as indicated by NRW's support in principle for the strategy, as set out in the statement of common ground.

5. The Council also acknowledges your concerns about the timing of elements of the DCPRS and the production of essential documents, though equally you state that timing in itself is not a fatal issue. This despite the fact that you said in your earlier letter to the Council on its approach to phosphates that you felt we had made good progress and that the approach was thorough and appropriate. The Council agrees with your last point on timing that it is not in itself fatal, and would like to point out that as the strategy was produced jointly with Wrexham, it is therefore bound into the general principles of the delivery timeframes which are more pressing for Wrexham given the extended length of their Examination and the need to have an adopted plan in place, and where the scale of the impact is far more significant for Wrexham than Flintshire. The Council has already provided evidence (FCC033) to show that there is flexibility in the position of the four affected sites in the LDP trajectory, allowing for delayed delivery if necessary but enabling full contribution during the plan period. This is further expanded on below.
6. The Council also wishes to challenge a statement in paragraph 11 of your letter, where it is concluded that "the necessary mitigation costs will seriously affect the viability of sites". This is on the basis that there appears to be no evidence to substantiate this statement and, given the present position with the LDP examination and the lack of experience of mitigating phosphates in Wales, it is an equally likely proposition that mitigation costs **will not** seriously affect the viability of sites. At best it is too early to judge with certainty and so it is the Council's view that to conclude this at present is going beyond the point at which the evidence is available to confirm the position either way. This point is supported by Welsh Government in their statement referred to below. The Inspectors may wish to consider an option to reword this element of the letter prior to its publication.
7. The Council also wishes to reference its wholehearted support for the statement presented by Welsh Government (OP005 refers) in relation to the ability of the Council to be able to reasonably demonstrate with sufficient accuracy and in a timely manner, the likely costs of mitigation for each of the four affected sites. The Council are particularly concerned about the depth of evidence now being sought having regard to the plan making process and the unique position that the Council (along with Wrexham) is in in relation to this matter. Having spent considerable time and resource in providing key evidence to the Examination on viability, site selection and the sustainability of allocations identified in the plan, none of this has taken account of the need at the plan level for mitigation measures to deal with the issue of phosphates. As the strategy points out, there

is a broad range of options to mitigate this issue, many of which are at a larger catchment scale which is where the main sources of the problem lie and where the LPA has no direct control. There is insufficient information at this time to assess with certainty the respective costs of these various mitigation measures, their likely development and in what timeframe, in order to provide a balanced response to the question of how the issue of phosphates will be mitigated and without creating an imbalanced bias for the plan or developers to appear to have to solve it all or alone. There are wider responsibilities that must also be factored in as pointed out in the strategy, with an expectation that others must respond as the LPA are doing now.

8. The Council also wishes to remind the Inspector that with reference to the strategy and in a proportional sense, the impacts from just four development sites (550 units) needs to be contextualised in the sense that any one measure alone, has the likelihood of mitigating the full impact from the affected sites. To illustrate this, tables 4.7 and 4.8 of the strategy essentially summarise that in the worst case scenario of the affected wwtw discharging at their permit level of 1mg/litre, 11ha of mitigation wetland would be required; this reduces to 5-6ha if the treatment works continue to perform as they are well within their permit levels; and would reduce further to only 3ha if NRW introduce new and tighter permit discharge levels of 0.25mg/litre, as is experienced in areas in England where this is an issue. One or two modest wetland areas would therefore mitigate the whole impact for the four sites for the plan period, without other likely scenarios such as NRW implementing new tighter licenses and Welsh Water having to comply through AMP8 investment within the plan period.
9. As the statement from Welsh Government refers, a contingency allowance has been made in the assumptions underpinning the LDP viability study to cater for unforeseen or abnormal costs arising. In appendix 2 of the study and the example assessment shown for a typical 100 unit development, this contingency amounts to 2.5% of construction costs and amounts to £2,819 per unit in the example. Whilst the Council is unable at present to accurately estimate the likely mitigation costs for phosphates, given the proportionate scale of impact set out above, it is the Council's view that these are not likely to be excessive to the point of rendering development unviable or undeliverable. Equally, whilst the Inspector has raised a specific concern about the knock on effect on delivery of affordable housing, if the phosphate costs were to impact on development viability there is sufficient scope to vary the delivery of affordable housing. This is justified for a number of reasons:
  - Policy HN3 (as amended by MAC075) sets out area specific percentage targets for achieving affordable housing. These are, as per the amendment to the plan, set as a maximum and were accepted by the Council in response to the concerns of the HBF and developers that the percentages could go higher. As amended, there is the opportunity to consider at what level of provision up to the maximum (supported with

evidence of need) exists at the time of development to justify the level of provision.

- This more flexible approach allows the Council as LPA and decision maker at the DM stage to weigh all material factors in the planning balance, including the relationship of the cost of site specific phosphate mitigation (given this appears at present to be of highest importance to mitigate) to viability and other provisions, including affordable housing (para 4.2.21 of PPW11 refers).
- The affordable housing target has already been altered as a result of the loss of up to 50% of the housing proposed at Warren Hall, but additional provision is also likely to come forward as an RSL has now acquired the allocated site at Northop Road Flint, intends to increase overall site yield by 50 units, and also will provide up to 60% of the units as affordable, rather than the 15% required by policy HN3. This illustrates that the plan cannot foresee all eventualities, but that there is sufficient policy flexibility and scope to ensure that the issue of mitigating phosphates can be accommodated by the Plan, without significant detriment to site deliverability or the provision of affordable housing or other policy requirements.

10. The Council considers that there is also a key role for site owners and developers to be able to accommodate reasonable mitigation costs as part of the process of acquiring sites and calculating development economics, and in this sense the need for phosphate mitigation where it arises is no different in principle to either habitat mitigation costs or general infrastructure costs such as increasing drainage capacity, that are relatively common factors in development schemes, dealt with at the DM stage. These are site specific and do not prevent development from taking place.

11. The Council has also reflected on your concluding comment that having an adopted plan in place is of paramount importance. We agree wholeheartedly with this and we will continue to assist you in achieving this in whatever way we practically can, as clearly the dangers of not having an adopted plan in place are significant. For example, this will prevent the provision of housing including affordable housing from happening in a plan led manner which is potentially not sustainable. Equally, the lack of an adopted plan in place by the end of 2022 will prevent Welsh Water from being able to make a meaningful case with any certainty, to secure investment in AMP8 for general infrastructure improvements, let alone the need to upgrade wwtw to deal with phosphates. It also calls into question, the ability of Flintshire to be able to realistically contribute to the aim of policy 20 of Future Wales: National Plan in relation to its role as part of a national growth area. This has knock-on effects for the ability to plan for Flintshire's contribution to a North Wales Strategic Development Plan.

## Impact on Housing Supply

12. In paragraph 13 you have set out that you wish to try to identify the extent of the problem and the resultant effect on the plan's delivery of housing. In paragraph 14 you then set out a number of specific questions which the Council has responded to below. In paragraph 15 you then say that from the responses to the questions posed in para 14, you will be able to identify the likely shortfall in housing delivery as a result of the phosphates constraints and consider the implications for the LDP. Whilst the Council understands this general approach, it does appear to be premised on the assumption that phosphates is an absolute barrier to development and that it will impact on housing delivery i.e. there **will** be a shortfall. **The Council does not agree with this position** and clearly it has set out in its approach via policy EN15 and the strategy, that there are a number of ways the impact can be mitigated to allow development to proceed, and/or there are safeguards in the plan to prevent development happening without mitigation of some form. NRW agree with the principle of this stance, as do Welsh Government.
13. That said, and to demonstrate using a worst case scenario of the four sites not delivering any housing, the Council's responses below highlight that even in this extreme scenario, housing supply can be maintained, sufficient flexibility remains, and the plan can deliver its housing requirement with the housing that remains in the plan.

***Qn 1. We are aware that there are approximately 550 units anticipated to come forward from the four affected allocations and that this amounts to 7% of the LDP's total housing requirement. In the first instance we wish the Council to confirm that this is the case. We would also request answers to the following questions, the aim of which is to ascertain the potential overall impact on housing supply.***

14. The Council can confirm that the total units anticipated to come forward on the four affected allocations does total 550 units. This equates to 7.9% of the LDP's housing requirement figure (of 6,950) and 6.99% of the LDP's housing provision figure (of 7,870). For clarity the sites and yields are set out below:

Site ref	Site name	units	Notes
HN1.1	Well Street, Buckley	140	Revised yield - see MAC115
HN1.6	Denbigh Rd / Gwernaffield Rd, Mold	238	Revised yield - see MAC115
HN1.9	Wrexham Road, HCAC	80	As per Deposit Plan
HN1.10	Cae Isa, New Brighton	92	Revised yield - see MAC115
Total		<b>550</b>	

15. The Council set out its revised trajectory for housing allocations in MAC115 and also commented on the trajectory in respect of the four affected allocations in

para 6.4 of its Hearing Statement FCC033. The table below is an extract from the trajectory relating to the four sites which has been updated to identify the planning status of each allocation and the flexibility for delivery within the trajectory. The table clearly shows that there is flexibility of between two and four years before the end of the Plan period. This provides a sufficient 'window' during which appropriate and necessary mitigation measures can be drawn up and sites implemented before the end of the Plan period.

site	units	Planning application?	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30
HN1.1	140	Outline <a href="#">062458</a>				46	47	47	flexibility			
HN1.6	238	Full <a href="#">061994</a>			38	40	40	40	40	40	flexibility	
HN1.9	80	None – pre-app				20	30	30	flexibility			
HN1.10	92	Full <a href="#">063507</a>			15	30	30	17	flexibility			

**Qn 2. Does the updated housing balance sheet rely on any unimplemented or pending (ie not yet issued) permissions for housing development in the affected area?**

16. No, the updated housing balance sheet does not rely on any planning permissions not yet issued. All the sites listed in the updated commitments trajectory and included in the housing balance sheet as commitments (as at 1.4.20) have the benefit of an issued planning permission [see MAC113 for updated list of commitments]. A small number of sites do require the approval of reserved matters, as explained below.

**Qn 3. If so, do these depend on reserved matters applications, or are they subject to the finalisation of S106 agreements etc before the issue of a planning permission? If such cases exist, the need for an HRA should be reconsidered in the light of NRW's guidance.**

17. The Council can confirm that none of the committed sites in the commitments trajectory are the subject of S106 agreements which need to be finalised. Sites with planning permissions subject to the finalisation of a S106 agreement have been specifically excluded from the commitments list (see para 2.4.2 of BP10A (FCC002)). Analysis of the committed sites shows that three sites within the affected area (with a total capacity of 36 units) have outline permissions which require the submission and approval of reserved matter applications. The sites are:

- Brook Farm, Buckley – 16 units
- Side of 61 Brunswick Rd, Buckley - 10 units
- Land adj Siglen Uchaf, Gwernmynydd – 10 units

18. Whilst the Council will therefore consider the need for HRA assessment for these sites in line with its current practice on existing applications, this does not mean that these sites are undeliverable due to phosphates, and given their relative small individual and cumulative scale (and until assessed) an option clearly open to the LPA as decision maker is to conclude that none of these alone, or in combination, would have a significant impact on the SAC. It would also not be correct to assume that no improvement in phosphate levels from the various types of mitigation in the strategy will not be in place or underway by the time these sites reach Reserved Matters stage, to further confirm that they can go ahead on the basis of the nutrient neutral approach having been achieved or exceeded for their small scale of development. The Council already has a protocol in place and in use for Development Management purposes to assess each application potentially impacted by phosphates.

***Qn 4. What proportion of the remaining 111 windfall units (as at 2020) are anticipated to be located within the affected area? Is it likely that sufficient windfalls would come forward within the unaffected remainder of the county to compensate for these?***

19. While anticipation of the precise location of future windfall sites is obviously difficult, analysis of actual windfall completions over the first five years of the LDP has revealed that approx. 16% were located within the affected area, with some 84% within the unaffected remainder. Actual windfall completions in the County over the first 5 years have averaged some 98 units per annum (FCC014). Assuming that the distribution is broadly the same for the remainder of the Plan period, this would equate to some 82 windfall units **per annum** coming forward outside the affected areas. Given that only 111 units in total are required to be completed to meet the LDP windfall allowance (i.e. 11.1 units pa for the remaining 10 years) there should be more than sufficient windfalls coming forward in unaffected areas to compensate for any potential loss.

20. It should also be noted that in the 12 months since 1.4.20 a total of 35 units have been granted planning permission on large windfall sites outside the affected areas, which equates to three years of remaining windfall requirement, provided in just one year. In addition, 38 units were permitted on large windfall sites in 2020-21 in the affected area and as per the Council's view set out in paragraph 18 above, it would not be correct to simply discount these units from coming forward.

21. It is also useful to refer to the spatial strategy for the Plan as expressed through the settlement hierarchy in policy STR2 'The Location of Development'. The settlement hierarchy comprises 5 tiers but the top three tiers account for 97% of all housing within the Plan period as set out in MAC030. Analysis for the settlement hierarchy and distribution of growth highlights that:

- Tier 1 Main Service Centres are the 'main locations for new housing development' and accounts for 47% of the overall housing apportionment.

Of the 8 settlements, the majority i.e. **6 are not affected** by phosphates (as they drain to the tidal Dee);

- Tier 2 Local Service Centres are the 'locations for more modest levels of new housing development' and account for 35% of the overall housing apportionment. Of the 7 settlements the majority i.e. **5 are not affected** by phosphates (as they drain to the tidal Dee).
- Tier 3 Sustainable Settlements are the 'locations for housing development related to the scale, character and role of the settlement' and account for 15% of the overall housing apportionment. Of the 22 settlements the majority i.e. **15 are not affected** by phosphates.

22. Appendix 1 shows in tabular form the full settlement hierarchy in policy STR2 in terms of whether settlements are affected by phosphates. It is evident from the large number of settlements in the top three tiers, that the functioning and implementation of the Plans growth strategy through STR2 is not fatally affected by the phosphates issue. There is sufficient scope within the unaffected settlements for the delivery of 11 units per annum.

***Qn 5. Housing allocations HN1.5 and HN1.11 are noted in the deposit LDP as having planning permission and being under construction. Are they now complete? If not, are they both covered by full planning permission and thus capable of being completed without further applications?***

23. The Council can confirm that allocation HN1.5 (Maes Gwern Mold) has the benefit of a full planning permission for 160 units. At 1.4.21 all 160 units on the site were either completed, or under construction.

24. Allocation HN1.11 (Chester Road, Penymynydd, 181 units) also has a full planning permission covering the whole site. At 1.4.21 a total of 51 units had been completed on the site with an additional 48 units under construction. As with HN1.5, the site is capable of completion without further applications.

***Qn 6. In addition, is there potential for bringing forward into the plan period the 140 units at Northern Gateway which are currently estimated for delivery after 2030?***

25. There is certainly potential for the additional 140 units at Northern Gateway to come forward within the Plan period. This is in the context of the up to date position on the Northern Gateway site which is detailed in the table below. With the exception of the small sized Phase 3 on the Pochin site, all other sites within both the Pochin and Praxis sites either have planning permission or are the subject of current planning applications, and in the case of one plot is under construction. This reinforces the positive progress referred to by the Council in its earlier Hearing Statement and at the hearing session for Matter 3.

Plot / Phase	Units	Developer	Planning status	Notes
<b>Pochin</b>				
Phase 1	129	Keepmoat	060411 reserved matters	Planning permission issued
Phase 2	104	Lane End (Clwyd Alyn HA)	061585 reserved matters	under consideration
Phase 3	n/a	-	-	Small site – 0.58ha / 21 units
Phase 4	400	Bellway	063591 reserved matters	under consideration
<b>Praxis</b>				
H1 H2 H8 (part)	283	Countryside Homes	059414 Reserved matters approved	under construction
H3 H5 H6 H7 H8 (part)	368	Bellway / Anwyl	062898 Reserved matters	Granted Planning permission at Committee 15/12/21

26. The Council has explained at the Examination and in FCC007 that the development rates incorporated for the Northern Gateway site in its Allocated Sites Trajectory are conservative, and less than the figures provided by the developers/ landowners themselves. Table 1 in FCC007 details the future development rates anticipated by the actual developers on Northern Gateway, as submitted to the Examination. These development rates are higher than those of the Council and based on these the site would be fully developed within the Plan period, including the 140 units. Monitoring of the site since 1.4.20 shows that 112 units were completed in the 12 months up to 1.4.21, which is in line with the developers' trajectory, and higher than the Council's anticipated 90 units.

### **Impact on Housing Delivery**

27. At present the Plan's housing balance sheet reflects that after five years of housing delivery, the plan has delivered at the intended rate and remains on track to continue to deliver the balance of its housing requirement, (a point acknowledged by the Inspectors letter in para 9). Following all of the changes agreed as part of the examination of the housing provision in the plan, there is at year 6 of the plan period (i.e. from 2020 onwards) a remaining flexibility of 13.2% (920 units) of the original requirement, to assist with provision for the remaining ten years of the plan period.

28. Following the point made in paragraph 15 above, about taking a worst case scenario approach, the Council has amended the available flexibility as follows:

- a. Removing the -550 units from supply altogether
  - b. Adding in the +140 from Northern Gateway
  - c. Removing the -36 commitments in the affected area
  - d. Adding in additional units likely to be achieved at Northop Rd, Flint +50
29. This results in a net reduction in provision of -396 units, reducing flexibility from 920 to 524. In terms of the overall housing requirement, this reduces the percentage flexibility from 13.2% to 7.5% over the entire plan period.
30. However, we are already 5 years into the plan period (for the purposes of LDP EiP) and 2,609 units have already been delivered, leaving 4,341 of the requirement remaining. The updated housing balance sheet shows that to deliver this residual, there are 920 units over allocated or that make up the flexibility allowance still remaining. This equates to 21.2% of the remaining requirement to be delivered.
31. So even when the net figure from para 29 above (-396) is removed from the available flexibility, this leaves 524 units as flexibility, which is still either 7.5% of the overall requirement at year 6 of the plan period, or 12.1% of the requirement that remains to be delivered.
32. From the above assessment therefore, even if it is assumed that none of the 550 affected units would come forward (an unreasonable assumption as sites are otherwise sustainable and mitigation costs are unknown at this stage), a third of the way through the plan period the plan still has 75% of the starting flexibility remaining to assist with housing delivery, or there exists an overprovision of 12.1% (524 units) to deliver the remaining requirement of 4,341.
33. In terms of the implications for the LDP and housing delivery therefore, in the extreme scenario that none of the units on the four affected allocations come forward, it is the Council's view that there is still more than sufficient sustainable housing supported by a healthy flexibility allowance, to ensure the delivery of the remaining LDP housing requirement of 4,341 units. On this basis, the Council considers that the plan is and will remain sound.

### **Provision of Further Information/Assistance**

34. In your letter to the Council you suggested at paragraphs 17 and 18, examples of further information that may assist you in resolving this matter, should the information above on housing supply not be sufficient. The Council has held initial meetings with its expert consultants, Welsh Water, has been in contact with NRW for further information, and has written to the developers involved with the four sites setting out the issues and seeking their participation in preparing some form of site specific delivery statements, taking account of the issues raised by phosphates.

35. The difficulty for the Council is that even if we attempt to provide some of this information, we are concerned about the degree of certainty that we and therefore you could place on it, in assisting with the determination of the soundness of the plan. It does not seem correct to the Council to either find a plan unsound on the basis of no evidence, or evidence that is at best speculative. For example, whilst we can engage with the prospective developers of the four sites, the Council is unclear how proactive either DCWW or NRW will be in suggesting mitigation of any sort from their mutual perspectives. Conversely, were NRW to clarify to DCWW that they intend to review permits on affected wwtw within the next 12 months, this would prompt DCWW to have to act to remain compliant. This in itself would provide the solution to the issue for all affected development in the Plan and beyond. The point being that there are so many variables to consider with this matter, it is difficult to be certain beyond a limited level at this time.
36. DCWW are currently preparing a position statement which, when received, will be provided to the Inspectors. This will confirm DCWW's support for the approach set out in the strategy as well as their own difficulty in being able to quantify mitigation costs at present. DCWW's position is also that their wwtw are currently performing well within the current permit limits set by NRW and until these permit levels are amended, DCWW do not need to make any changes. Equally they have stated to the Council that the lack of certainty from NRW regarding the review of permits, as well as the lack of an adopted plan in place, will cause significant difficulties in the process of planning for future investment in their infrastructure via AMP8.
37. The Council has also already contacted NRW to seek guidance on when they intend to review permit consents at wwtw as this seems to the Council to be such an obvious necessity. This will provide guidance to DCWW on what is needed to comply with tighter phosphate concentration levels for discharging into SAC rivers. As stated earlier, this has to happen relatively quickly to give DCWW the opportunity to cost out the implications and seek funding via the AMP8 programme. That then for example, provides a basis to calculate developer contributions to accelerate these costs.
38. The Council fully appreciates the difficult position the Inspectors are also in, and it is confident that the above response identifies that there is sufficient assurance in terms of both the approach to phosphate mitigation with policy backstop and also housing delivery, even in a worst case scenario, for the Inspectors to find that the Plan has enough sustainable provision plus flexibility to ensure the delivery of the remaining housing requirement, and invites you to find accordingly.
39. In the event that further information is required, the Council has set out its concerns about the certainty this would provide, aligned to the similar concerns conveyed by Welsh Government in their recent statement. We await the Inspectors further guidance on this matter and will do all we can to assist the

Inspectors to progress the plan to adoption. Given the closeness to Christmas and notwithstanding the detailed nature of this response, the Council would appreciate some guidance from the Inspectors as to whether further work is needed and what the next steps for the Examination are.

40. Finally, the Council would like to wish the Inspectors a peaceful Christmas and a Happy New Year.

Yours sincerely,

A handwritten signature in black ink that reads "Andrew Roberts". The signature is written in a cursive style with a horizontal line at the end.

Andrew Roberts  
Service Manager Strategy

Appendix 1

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW with existing phosphate stripping in place but permit not up to date	WWTW without Phosphate Stripping in place or planned	Settlements not affected by phosphates (drain to tidal Dee)
<b>Deposit LDP</b>						
Tier 1 Main Service Centres				Buckley Mold		Aston & Shotton Connah's Quay Flint Holywell Queensfesrri Saltney
Tier 2 Local Service Centres				HCAC Mynydd Isa		Broughton Ewloe Garden City Greenfield Hawarden
Tier 3 Sustainable Settlements				Leeswood New Brighton Penyffordd / Pnymynydd Sychdyn	Alltami Caerwys Treuddyn	Bagillt Bretton Brynford Caerwys Carmel

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW with existing phosphate stripping in place but permit not up to date	WWTW without Phosphate Stripping in place or planned	Settlements not affected by phosphates (drain to tidal Dee)
				Coed Talon / Pontybodkin		Drury / Burmtwood Ffynnongroyw Gronant Higher KInnerton Mancot Mostyn (Maes Pennant) Northop Northop Hall Pentre Sandycroft
Tier 4 Defined Villages				Gwernymynydd Nercwys Gwernaffield	Cilcain Lixwm Nannerch Pantymwyn Rhosesmor Rhydymwyn Ysceifiog	Flint Mountain Pentre Halkyn Pen y ffordd Talacre Trelawnyd Trelogan & Berthengham Whitford
Tier 5				Cadole	Afonwen	Gorsedd

LDP Settlement Hierarchy / Category	WWTW with existing phosphate stripping in place and up to date permit	WWTW with phosphate stripping improvements planned in AMP 7 (2020-2025)	WWTW with phosphate stripping improvements planned in AMP 8 (2026-2030)	WWTW with existing phosphate stripping in place but permit not up to date	WWTW without Phosphate Stripping in place or planned	Settlements not affected by phosphates (drain to tidal Dee)
Undefined Villages				Cymau Dobshill Ffrith Llanfynydd Pontbyddyn	Rhes y Cae	Gwaenysgor Gwespyr Halkyn Rhewl Mostyn