



**Row A** - illustrates the annual average completions from large windfall sites of 50 dwellings pa, which is derived from the Urban Capacity Study (UCS) where the Council assessed the 18 year completion trend (116 dpa) and then assumed a 50% discount on this to arrive at 50 dpa. Row A shows that if the allowance were applied for each year of the entire plan period it would have provided 750 units over the 15 year plan period.

**Row B** - shows the same allowance derived from the UCS applied from the base date of the deposit LDP (2018) for the remaining 12 years of the plan period. This results in a total contribution of 600 units from large windfalls (50 dpa X 12 = 600).

**Row C** - in reality, and as the Council explained in its background paper 10 (BP10) published alongside the Deposit LDP, the allowance was unlikely to be provided evenly over the plan period, and also it is likely that the contribution would be lower in the early years from the base date of the supply (2018). Rather than anticipate the full allowance of 50 dpa therefore, the Council assumed 0, then 20, and then 40 in the first three years from the Deposit base date (figures in red), and so 90 of the expected 150 units would not be recovered in these first three years. To compensate for this under-recovery of large windfalls in these years, the Council then redistributed the un-recovered 90 units evenly over the remaining 9 years of the plan period, thereby increasing the average assumption of 50 dpa to 60 dpa for that period. This still results in a total contribution from large windfalls of 600 units which was the contribution shown in the housing balance sheet.

**Row D** – The publication of the DPM3 provided revised guidance relating to producing the housing trajectory specifically the removal of the need to show a 5 year supply. Also, to avoid double counting the manual advises that there should be no completions from large windfalls in the first two years from the base date. As the Council updated the base date of the supply to 2020, and following the guidance in the manual, Row D shows that no completions have been assumed for large windfalls in the first two years from 2020 (figures in blue), and also that the redistributed rate for large windfalls (60 dpa) from the previous row has been consistently applied, but only to the remaining 8 years of the plan period. This results in an expected provision of 480 units from large windfalls over this period (i.e. 60 X 8 = 480).

**Row E** – To illustrate how modest and reasonable the assumptions are about the contribution that is likely from large windfalls, Row E shows the actual completions from large windfall sites in the first five years of the plan. This shows that a total of 489 units have been provided at an annual average of 98 dpa, which is almost double the assumed rate in the plan. Given that the deposit plan only assumed a total contribution of 600 units from large windfalls to the end of the plan period, and that 489 have already been provided, the plan has 10 years to recover the expected residual (111 units) at a rate of only 11 per year. As the actual trend is likely to continue at a much greater rate than this, then it is highly likely that

large windfalls will make a much greater contribution to housing supply than the plan assumes. In fact, if the plan recovers large windfalls at the assumed rate of 50 dpa for the remaining 10 years then a further 389 units would be provided than anticipated, thereby providing additional flexibility to the Plan.

The Table below lists the sites that have contributed the large windfall completions in the first 5 years of the plan. Only 44 of these units were on sites granted on appeal in relation to TAN 1 before its revocation.

**Table 1.**

**Windfall completions on large sites 2015-20**

	2015-16	2016-17	2017-18	2018-19	2019-20
Ysgol Fabanod, Holywell					55
Kinnerton Lane, Kinnerton *				31	13
Ysgol Goffa Court, Earl Lea site, Flint			73	19	
West of Greenwood Grange, Dobshill					24
Territorial House, Connah's Quay				11	
Buckley Health Centre				24	
Jubilee Rd./ Manor Drive, Custom House School, Connah's Quay		12		14	
The Walks, Flint		4	88		
Church St., Connah's Quay			10		
Gateway to Wales Hotel, Garden City			21		
Allied Bakeries, Saltney			3	35	36
Ysgol Delyn, Mold			16		
<b>Total</b>		<b>16</b>	<b>211</b>	<b>134</b>	<b>128</b>

\*Granted on appeal

Total = 489 (or 445 excluding the 44 granted on appeal)