

Time	5.00 pm	Public Meeting?	YES	Type of meeting	Executive
Venue	Committee Room 3, Third Floor - Civic Centre, St Peter's Square, Wolverhampton WV1 1SH				

Membership

Chair	Cllr Stephen Simkins (Lab)
Vice-Chair	Cllr Steve Evans (Lab)

Labour

Cllr Obaida Ahmed
Cllr Paula Brookfield
Cllr Chris Burden
Cllr Craig Collingswood
Cllr Jacqui Coogan
Cllr Bhupinder Gakhal
Cllr Jasbir Jaspal
Cllr Louise Miles

Quorum for this meeting is three voting members.

Information for the Public

If you have any queries about this meeting, please contact the Democratic Services team:

Contact	Dereck Francis
Tel/Email	Tel: 01902 555835 or dereck.francis@wolverhampton.gov.uk
Address	Democratic Services, Civic Centre, 1st floor, St Peter's Square, Wolverhampton WV1 1RL

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Some items are discussed in private because of their confidential or commercial nature. These reports are not available to the public.

Agenda

Part 1 – items open to the press and public

Item No. *Title*

MEETING BUSINESS ITEMS

- 1 **Apologies for absence**
- 2 **Declaration of interests**
- 3 **Minutes of the previous meeting** (Pages 5 - 10)
[For approval]

DECISION ITEMS (RED - FOR DECISION BY THE COUNCIL)

- 4 **Our City: Our Plan Refresh 2024-2025** (Pages 11 - 68)
[To approve a refreshed Our City: Our Plan for the 2024-2025 Municipal Year]
- 5 **Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy** (Pages 69 - 124)
[The approve the Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy]
- 6 **Treasury Management Strategy 2024-2025** (Pages 125 - 224)
[To approve the Treasury Management Strategy 2024-2025]
- 7 **2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027** (Pages 225 - 288)
[To present a balanced budget for 2024-2025 aligned to the Council Plan priorities and an update on the Medium Term Financial Strategy 2024-2025 to 2026-2027]
- 8 **Wolverhampton Homes Delivery Plan for 2024 - 2025** (Pages 289 - 332)
[To approve the Wolverhampton Homes Delivery Plan for 2024 – 2025]
- 9 **Good Growth Strategy** (Pages 333 - 420)
[To approve the Council's new strategic economic plan]

DECISION ITEMS (AMBER - DELEGATED TO THE CABINET)

- 10 **Wolverhampton Local Plan - Issues and Preferred Options Consultations**
(Pages 421 - 786)
[To approve the Wolverhampton Local Plan Issues and Preferred Options Report]
- 11 **West Midlands Combined Authority Single Settlement Memorandum of Understanding** (Pages 787 - 824)
[Formal ratification of the single settlement memorandum of understanding (MoU) between the West Midlands Combined Authority and His Majesty's Government]

12

Determined Admission Arrangements for Community and Voluntary Controlled Schools 2025-2026 (Pages 825 - 874)

[To approve the schemes for co-ordinated school admission arrangements for secondary and primary schools and the admission arrangements for community and voluntary controlled schools for 2025-2026]

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CITY OF WOLVERHAMPTON COUNCIL	Meeting of the Cabinet Minutes - 17 January 2024
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Attendance

Members of the Cabinet

Cllr Steve Evans (Vice-Chair, in the Chair)
Cllr Obaida Ahmed
Cllr Paula Brookfield
Cllr Chris Burden
Cllr Craig Collingswood
Cllr Jacqui Coogan
Cllr Jasbir Jaspal
Cllr Louise Miles

Employees

Tim Johnson	Chief Executive
John Denley	Director of Public Health
Ian Fegan	Director of Communications and Visitor Experience
Alison Hinds	Director of Children's Services
James Howse	Director of Finance
Charlotte Johns	Director of Strategy and Growth
Richard Lawrence	Director of Regeneration
David Pattison	Chief Operating Officer
John Roseblade	Director of Resident Services
Becky Wilkinson	Director of Adult Social Services
Dereck Francis	Democratic Services Officer
Jacob Stokes	Democratic Services Officer

Part 1 – items open to the press and public

- | <i>Item No.</i> | <i>Title</i> |
|-----------------|---|
| 1 | Apologies for absence
Apologies for absence were submitted on behalf of Councillors Stephen Simkins (Chair) and Bhupinder Gakhal. |
| 2 | Declaration of interests
No declarations of interests were made. |
| 3 | Minutes of the previous meeting
Resolved:
That the minutes of the previous meeting held on 13 December 2023 be approved as a correct record and signed by the Chair. |

4 **Housing Revenue Account Business Plan 2024 - 2025 including Rent and Service Charges**

Councillor Steve Evans presented the report on an updated Housing Revenue Account (HRA) Business Plan 2024-2025 for recommendation to Full Council. The Business Plan aimed to balance the continuing maintenance of and investment in the existing Council housing stock, improving, and redeveloping housing estates and the provision of new homes for rent. The report also provided, as an integral part of that Business Plan, a proposed HRA budget for 2024-2025, including proposed rents and service charges to take effect from 1 April 2024, and a proposed HRA Capital Programme for the period 2024-2025 to 2028-2029 for recommendation to Full Council.

Councillor Evans reported that the proposed rent increase was based on a government formula for restricting annual rent increases on social and affordable rent properties until at least 2025. The government had made clear that councils should adhere to the formula and could go up to the maximum figure. He explained that the proposed increase would be insufficient to address all of the measures and minimum standards government had placed on the Council to deliver. It was noted that the Council's proposed rents are below the West Midlands average and the national average and a lot less than private sector renting. Councillor Evans also acknowledged that the proposed increase would put extra pressure on families and confirmed that there would be support. A hardship fund of £300,000 would be set up and the Council and Wolverhampton Homes would work with any tenants who are genuinely struggling financially due to the rent increase.

Resolved:

That Council be recommended to:

1. Adopt the Business Plan set out at Appendix 1 to the report as the approved Housing Revenue Account Business Plan including:
 - a. The revenue budget for 2024-2025 at Appendix 1 to the report.
 - b. The Capital Programme for 2024-2025 to 2028-2029 at Appendix 2 to the report that includes the following among the proposed investment plans:
 - £100 million for new homes
 - £67 million provision for estate remodelling
 - £41 million to complete the refurbishment of the Heath Town estate
 - £46 million remediation works to non-traditional properties including energy efficiency improvements
 - £141 million for programmes to high rise estates to include building safety improvements, infrastructure replacement, and external works to include energy efficiency
 - £34 million for low and medium rise infrastructure improvements
2. Approve the implementation of an increase of 7.7% to social housing rents in accordance with the Rent Standard and the Welfare Reform and Work Act 2016 and to give 28 days notice to all secure and introductory tenants of the rent increase from 1 April 2024.
3. Approve the rates for garage rents and service charges set out in Appendix 3 to the report and formally notifies tenants.
4. Approve an increase to Shared Ownership rents of 7.7%.

5. Approve allowances to Managing Agents as follows:
 - Wolverhampton Homes £47,700,000
 - Bushbury Hill Estate Management Board £2,070,000
 - Dovecotes TMO £1,280,000
6. Delegate authority to the Deputy Leader: City Housing in consultation with the Director of Resident Services to approve managing allowances to New Park Village Tenant Management Cooperative to allow for further work on costs relating to the redevelopment of the estate and management responsibilities.
7. Delegate authority to the Deputy Leader: City Housing in consultation with the Director of Resident Services to approve the equity sale of Shared Ownership properties.

That Cabinet notes:

1. From 1 April 2020 the Regulator of Social Housing has regulated social rents charged by Local Authorities as set out in the Rent Standard 2020. Local authorities are able to apply a rent increase below the maximum set out in the standard but the decision would be taken in the context of the affordability in terms of a balanced HRA business plan that ensures service delivery and investment can be maintained over the lifetime of the business plan.
2. That, in the opinion of the Director of Finance (Section 151 Officer) the current levels of reserves and provisions is appropriate and adequate for the forthcoming financial year.
3. The increasing cost pressures from policy and legislative changes; Building Safety Act (2022), Fire Safety (England) Regulations 2023, the Regulator and the Social Housing Ombudsman, and a shift from reactive to a proactive regulatory regime.
4. The HRA revenue budget includes provision of £300,000 for those tenants who may experience financial hardship due to the rent increase.

5 **Council Tax Base and Business Rates (NDR) Net Rate Yield 2024-2025 and Update on the Provisional Local Government Finance Settlement**

Councillor Louise Miles presented the report that set the Wolverhampton Collection Fund 2024-2025 which the Council manages on behalf of local precepting bodies and central government. It was proposed that the council tax base for 2024-2025 be set at 66,645.60 Band D equivalent properties and the Net Rate Yield for business rates for 2024-2025 be set at £78.6 million. Proposals to extend the Council's local scheme for Business Rates Discretion Relief with effect from 1 April 2024 were also recommended for approval. The report also provided an update on the Provisional Local Government Finance Settlement announced on 18 December 2023. Councillor Louise Miles delivered an assessment of the settlement and concluded by saying that the immediate response to the settlement was to again ask the government on behalf of Wolverhampton's residents, to introduce fairer longer term funding for councils and for their residents.

Resolved:

1. That the Collection Fund Council Tax Base for 2024-2025 be set at 66,645.60 Band D equivalents.

2. That the Collection Fund Business Rates, also referred to as Non-Domestic Rates (NDR), Net Rate Yield for 2024-2025 be set at £78.6 million.
3. That authority be delegated to the Cabinet Member for Resources, in consultation with the interim Director of Finance, to approve amendments to:
 - a. The final Business Rates Net Rate Yield as required as a result of changes to the NNDR 1 form (National Non-Domestic Rates return) by the Department for Levelling Up, Housing and Communities or data revisions and changes in projections.
 - b. The Council Tax Base as a result of any data revisions and changes in projections.
4. That the following extensions to the local Business Rates Discretionary Relief Policy be approved:
 - a. In respect of charitable and voluntary organisations for one year from 1 April 2024.
 - b. In respect of Retail, Hospitality and Leisure Business Rates relief scheme for one year from 1 April 2024.
 - c. In respect of transitional relief for the period from 1 April 2024 to 31 March 2026.
 - d. In respect of supporting small businesses for the period from 1 April 2024 to 31 March 2026.
 - e. In respect of Improvement Relief for the period from 1 April 2024 to 31 March 2029.
5. That applications for discretionary rate relief should be made within the financial year for which relief is being sought effective from 1 April 2024. Authority be delegated to the interim Director of Finance in consultation with the Head of Revenues and Benefits to award relief in exceptional circumstances for applications received after this time.
6. That authority be delegated to the interim Director of Finance in consultation with the Head of Revenues and Benefits to award relief in individual cases which satisfy the criteria for the categories of discretionary rate relief in accordance with Section 47 Local Government Finance Act 1988.
7. That the outcome of the 2024-2025 Provisional Local Government Finance Settlement be noted.

6 **Collection Fund Estimated Outturn 2023-2024**

Councillor Louise Miles presented the report on the estimated outturn for the Council Tax and Business Rates also referred to as Non Domestic Rates (NDR) transactions on the Collection Fund in 2023-2024. Delegated authority was sought to confirm any final changes to the forecast outturn and to confirm and arrange final payments to the precepting authorities, West Midlands Police and Crime Commissioner and West Midlands Fire and Rescue Authority.

Resolved:

1. That it be approved that the estimated outturn for Council Tax in 2023-2024 is a cumulative surplus of approximately £546,000 which includes the carry forward of the in-year 2020-2021 deficit, which the Government confirmed could be spread over three years from 2021- 2022 to 2023-2024.

2. That it be approved that the estimated outturn for Business Rates, also referred to as Non-Domestic Rates, in 2023-2024 is a cumulative surplus of approximately £3.3 million with an estimated deficit in 2023-2024 totalling approximately £354,000.
3. That authority be delegated to the Cabinet Member for Resources, in consultation with the interim Director of Finance, to confirm any final changes to the forecast outturn reflecting any further information received ahead of the statutory deadline of 31 January 2024.
4. That authority be delegated to the interim Director of Finance to confirm and arrange the final payments to the precepting authorities.

7 **Response to Dudley, Sandwell and Telford & Wrekin Local Plan Consultations and South Staffordshire Duty to Cooperate letter**

Councillor Steve Evans presented the report on the implications of and principles for responses to consultations on the Sandwell, Dudley, Telford and Wrekin Local Plans. He highlighted that the responses recognised the local councils had done everything they could to meet all development needs within their area through their Local Plans. Sadley, Wolverhampton would not be in a position to support them through the allocation of land within the emerging Wolverhampton Local Plan. The report also set out the principles of a response to South Staffordshire Council's (SSC's) Duty to Co-operate letter. Councillor Evans noted that SSC's draft Local Plan included a number of significant housing and employment development allocations on land currently within the green belt on the edge of the city and on the border of other local authorities. The proposals to build on land that borders other local authorities would undoubtedly put pressure on neighbouring local authorities for infrastructure such as roads, schools, doctors surgeries.

Resolved:

1. That the City of Wolverhampton Council response to the Sandwell Local Plan Draft Plan consultation be approved on the basis of the approach set out in paragraphs 3.4 to 3.7 of the report.
2. That the City of Wolverhampton Council response to the Dudley Local Plan Draft Plan consultation be approved on the basis of the approach set out in paragraphs 4.4 to 4.7 of the report.
3. That the City of Wolverhampton Council response to the Telford & Wrekin Local Plan Draft Plan consultation be approved on the basis of the approach set out in paragraphs 5.8 to 5.10 of the report.
4. That the City of Wolverhampton Council response to the South Staffordshire Council Duty to Cooperate Letter be approved on the basis of the approach set out in paragraph 6.4 of the report.

8 **Annual Health and Safety Report - 2023**

Councillor Paula Brookfield presented the report on proposed revisions to the Council's Corporate Health and Safety Policy and the Annual Health and Safety Management Report 2023. The main changes in this year's report was the updated structure within the organisation for managing health and safety, with recruitment of additional staff into vacancies. This had broadened the Health and Safety team's ability to respond to service area requests for support and advice and had led to a

more proactive and planned service. Councillor Brookfield thanked Tim Munro, Head of Service Health and Safety and his team for their continuing efforts to maintain health and safety within the organisation as well as protecting members of the public who may be affected by the Council's activities.

Resolved:

1. That the revisions to the Corporate Health and Safety Policy on the updated structure within the organisation for managing health and safety, and that the Policy is endorsed by the new Leader of the Council, Councillor Stephen Simkins be approved.
2. That the progress and action taken during 2023 with regards to managing health and safety in the organisation be noted.

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Our City: Our Plan Refresh 2024-2025	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Stephen Simkins Leader of the Council	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Charlotte Johns, Director of Strategy	
Originating service	Policy and Strategy	
Accountable employee	Laura Collings Tel Email	Head of Policy and Strategy 01902550414 laura.collings@wolverhampton.gov.uk
Report to be/has been considered by	Scrutiny Board Full Council	6 February 2024 28 February 2024

Recommendations for decision:

That Cabinet recommends that Council:

1. Approve the Our City: Our Plan refresh for 2024-2025, the City of Wolverhampton Council Plan.
2. Seeks cross party engagement to deliver the priorities set out in Our City: Our Plan the strategic framework to level up our city.

Recommendations for noting:

The Cabinet is asked to note:

1. That the priorities of Our City: Our Plan have been developed through a continuous conversation with our communities and partners.
2. That a presentation and draft Our City: Our Plan was received by Scrutiny Board on the 6 February 2024.

1.0 Purpose

- 1.1 The purpose of this report is to approve the refreshed City of Wolverhampton Council Plan, Our City: Our Plan for the 2024-2025 municipal year.

2.0 Background

- 2.1 The Council Plan is a key component of the Council's policy framework and supports development of the medium-term financial strategy (MTFS) and annual budget. Our City: Our Plan was first approved by Full Council on 2 March 2022. It is good practice that the plan is refreshed annually to ensure that the Council's resource continues to be aligned to the needs and priorities of local people.
- 2.2 The plan has been shaped by Wolverhampton residents, businesses and partners and outlines the strategic vision for our city. The Council's approach to increasing economic prosperity, improving outcomes for local people and tackling inequalities within our communities; while addressing the net zero challenge.
- 2.3 These are things that the Council cannot do alone. We must continue to work in a way that ensures we maintain continued financial sustainability of the Council, as well as strengthening the Council's role as a partner, enabler, leader and as an anchor organisation in Wolverhampton. The plan describes the way that we bring people and organisations from across the city together, to work as one; in order to make the biggest positive difference to the lives of those who live, work, study and visit here.
- 2.4 The achievement of the vision and priorities in the plan will help Wolverhampton benefit from opportunities presented by levelling up and the region's new Deeper Devolution Deal; meeting the challenges of global economic uncertainty; and dealing with the issues most important to our communities, such as the cost-of-living crisis.
- 2.5 This item was considered as pre-decision scrutiny on 6 February 2024 by Scrutiny Board.

3.0 Our City: Our Plan Refresh 2024-2025

- 3.1 As part of the process to refresh the plan the priorities, principles, objectives and performance framework have been reviewed. The plan continues to set out an overarching ambition that 'Wulfrunians will live longer, healthier lives.' Delivery of this ambition is supported by six overarching priorities.

- Strong families where children grow up well and achieve their full potential
- Fulfilled lives for all with quality care for those that need it
- Healthy, inclusive communities
- Good homes in well-connected neighbourhoods
- More local people into good jobs and training
- Thriving economy in all parts of the city

3.2 These priorities together with the associated key outcomes, objectives and activity form a framework to improve outcomes for local people. Supporting the six overarching priorities are cross cutting principles. In the 2024-2025 refresh the Wolverhampton Pound has been added as a fourth principle.

- **Climate Action:** The plan is aligned to the Council's ambitious low carbon programme which includes commitment to 2028 Net Zero targets and likewise a city wide 2041 target.
- **Driven by Digital:** Wolverhampton is at the forefront of digital infrastructure and innovation, and now more than ever we have seen the importance of digital skills and connectivity to social and economic participation for the City's residents.
- **Fair and Equal:** The Council will continue to tackle the inequalities in our city which impact on the opportunities of local people. The plan is aligned to our Equality, Diversity and Inclusion strategy which is underpinned by directorate level action plans.
- **Wolverhampton Pound:** Using the collective power of our local institutions, businesses and people to retain as much local wealth as possible. We are working closely with the city's anchor institutions to maximise the impact of the Wolverhampton Pound.

4.0 Service Planning

4.1 To support delivery of Our City: Our Plan a new service planning approach has been embedded across the Council. This ensures that we have a golden thread running from our overarching strategic framework through to on the ground delivery. Each service plan sets out how the service will contribute to the outcomes and priorities set out in Our City: Our Plan with consideration given to performance measures, timescales, interdependencies, resources, risk management and workforce planning. Service plans will be refreshed at appropriate points during the year to ensure that they include timely, up to date information.

5.0 Governance, Monitoring and Performance

- 5.1 Our City: Our Plan incorporates clear performance indicators against each of the six overarching priorities, as well as the Our Council priority. The performance framework provides high-level city data on key priorities, benchmarks city performance against national and regional data. This is supported by a suite of Council indicators which measure and track the impact of Council activity and interventions. As part of the refresh of Our City: Our Plan the performance framework has also been reviewed and small updates made to the indicators.
- 5.2 Quarterly reports are taken to Cabinet on performance against these measures alongside the budget. Regular reporting on performance is also taken to Scrutiny Board and relevant Scrutiny panels. This process helps to embed the golden thread of data flowing

between all levels of Council activity ensuring data driven decision making and that an understanding of performance is evident in everything we do.

- 5.3 As we move into 2024-2025 a section will be added to the Council's corporate report template where report authors will be asked to detail Our City: Our Plan implications. Delivery of the plan will continue to be at the forefront of how we shape and deliver the Council core activity and priorities.

6.0 Scrutiny and Consultation

- 6.1 The annual refresh of Our City: Our Plan forms part of a continuous process of engagement with residents, businesses and other key stakeholders throughout the year which focuses on understanding people's priorities for Wolverhampton.
- 6.2 Throughout the year there are opportunities for local people to help shape future strategy, service delivery and feedback their priorities for the city. Between 1 January 2023 and 31 December 2023 over 4,400 people responded to online consultations through the Council's Citizen Space platform. There is a continuous process to ensure these views are fed into the annual refresh of Our City: Our Plan.
- 6.3 In addition, the 'Your Priorities for Wolverhampton' survey was launched between the 13 December 2023 and 7 February 2024. It received 541 responses and provided an opportunity for local people to tell us what is most important to them. Respondents were asked to feed back which elements of Our City: Our Plan were most important to them and what their priorities were for the city. Feedback included:
- When asked to select which of the six Our City: Our Plan priorities were most important to them, the top three priorities were:
 1. Strong families where children grow up well and achieve their full potential
 2. Fulfilled lives with quality care for those that need it
 3. Thriving economy in all parts of the city
 - When asked which of the three cross cutting principles in Our City: Our Plan was important to them 59.1% said Fair and Inclusive.
 - When asked which public services were most important to them Adult Services was the most selected at 44.9%.
- 6.4 We will continue to engage with communities and city partners as we deliver our Council Plan throughout 2024-2025. This will be taken forward as a continuous conversation with our communities and targeted opportunities to co-produce innovative solutions to the City's challenges.
- 6.5 On the 6 February 2024, Scrutiny Board was presented with the draft Our City: Our Plan. Comments from Scrutiny Board included:

- The importance of the sixth priority ‘Thriving economy in all parts of the city’ to the economic prosperity of Wolverhampton and the role foreign direct investment can have to support this.
- Highlighting the Council’s role to support health partners to ensure residents have access to healthcare services.
- Continuing to monitor delivery of our central vision that ‘Wulfrunians will live longer, healthier lives’ through our the Our City: Our Plan performance framework.

7.0 Evaluation of alternative options

- 7.1 Option 1 would be to not refresh Our City: Our Plan.
- 7.2 Option 2 and the chosen option is to refresh Our City: Our Plan which will enable the city to address key emerging challenges and priorities, and to capitalise on new opportunities to level up our city.

8.0 Reasons for decision(s)

- 8.1 The Council Plan is a key component of the Council’s policy framework and supports development of the medium-term financial strategy and annual budget. Cabinet is recommended to approve the refreshed Our City: Our Plan to ensure the Council’s to have a strong strategic framework which reflects the needs of local people and ensures resources continue to be aligned to city priorities.

9.0 Financial implications

- 9.1 There are no direct financial implications to the plan itself although the actions outline projects and programmes that will have financial implications; these will be subject to individual reports as appropriate in line with financial procedure rules.
- 9.2 All costs associated with engagement and the preparation of the plan will be accommodated within existing budgets.
[LD/08012024/F]

10.0 Legal implications

- 10.1 There are no direct legal implications arising from this report. The approval of the Council Plan is a function reserved to Council under the constitution and that includes a refresh of the Plan and as such Cabinet can make a recommendation but ultimately the decision must be taken by Council.
- 10.2 Legal Services will be engaged if and when required to advise should any legal matters arise from this report.
[RR/11012024/Q]

11.0 Equalities implications

11.1 Fair and Equal is one of the three cross cutting principles of the refreshed plan. All programmes and projects noted in the plan will also be subject to individual equalities analysis.

12.0 All other implications

12.1 Our City: Our Plan has implications across the Council, including climate change, Wolverhampton Pound, health, and wellbeing and digital which will continue to be considered and managed as part of the delivery of this plan.

12.2 Health and wellbeing is an important part of everyday life. It is integral to leading a happy and healthy lifestyle. Through its focus on these wider determinants the delivery of the Our City: Our Plan priorities recognises the role of the council in contributing to ensuring that our communities are stronger, healthier, and thriving places to live.

12.3 We will continue to contribute to the delivery of the council's climate change action plan to meet our commitment to be next carbon neutral as a Council by 2028, with regular progress reports to Cabinet.

12.4 The plan is aligned to the Digital Wolves strategy approved by Cabinet in March 2022, setting out how as a city and as a council we can harness the benefits of digital and technology for local people.

12.5 The performance framework for each thematic area of the plan will enable continued oversight of the indicators that underpin the central commitment to Wulfrunians living longer, healthier lives.

13.0 Schedule of background papers

13.1 N/A

14.0 Appendices

14.1 Appendix 1: Our City: Our Plan Document



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OUR CITY: OUR PLAN

2024/2025

FOREWORD

We are ambitious for our city, this plan sets out a shared vision that speaks to all who live, work, study, invest and visit here. We are a diverse city committed to the values of equality, fairness and inclusivity. We celebrate that. Our belief in the city, its people and businesses is at the centre of what we do.

The context in which we are operating continues to be challenging. Local government is facing difficult and uncertain times. Local people, businesses and our partners in the city continue to feel the impact of global economic uncertainty and recovery from the pandemic.

The cost of living is still the number one concern for most families. This council's focus has always been to support all of our residents as much as we can to get through these difficult financial times, while also helping them become more resilient for the future. We've already done much to tackle this crisis and have approached it as one city, one council, with our partners and everyone playing a part.

We will continue to support those in our city who need us most whilst working alongside our partners to drive the long-term prosperity of Wolverhampton.

This year we've made major strides to secure our city's position as a growing green economy. Phase 1 of the

Green Innovation Corridor has been named as a major pillar of the West Midlands Investment Zone, whilst also securing further funding from Government through the Levelling Up Fund. Our long term vision for the Green Innovation Corridor builds on Wolverhampton's position as a centre for sustainable construction, and will create skilled jobs for local people in the emerging green economy.

We're continuing to accelerate our city centre regeneration to maximise its role as key driver of economic growth in our city, including hundreds of new homes at Canalside, new employment and leisure space at city centre west and the commercial district.

We secured the best possible deal for Wolverhampton through the West Midlands Deeper Devolution Deal. Bringing new investment, powers and control to the region which will support our ambitions for the city.

We know there's still much to do, we will be there for our residents and businesses to help them thrive into the future.



Councillor
Stephen Simkins
Leader of the Council



Tim Johnson
Chief Executive

INTRODUCTION

Our City: Our Plan sets out how we will work with our partners and communities to build a more prosperous and inclusive Wolverhampton where everyone can share in the opportunities and success of our city.

The city is going through a period of significant transformation with new investment, new opportunities, and new challenges. We are an ambitious city and council. This plan sets out how we will continue to deliver consistently good services, in tough financial times, whilst managing our money so we can invest in the things that matter to local people and continue to transform our city together.

We will work with all of our partners to connect people, places and communities to unlock potential and create change. We will do this by using a systemic place-based approach within wards in the city, which will provide opportunities to co-design and co-produce with our communities, developing long term resilience and capacity to tackle inequalities and reduce deprivation. This signifies how our council will operate moving forward as we develop a new community relationship, helping to eliminate barriers and develop networks between local people and key partner organisations in the city. Our focus will be on prevention and support and tackling the root causes to shape neighbourhoods around what people need.

Our plan is structured around 6 priorities shaped by local people:

- Strong families where children grow up well and achieve their full potential;
- Fulfilled lives for all with quality care for those that need it;
- Healthy, inclusive communities;
- Good homes in well-connected neighbourhoods;
- More local people into good jobs and training;
- Thriving economy in all parts of the city.

All that we do as an organisation will be to support delivery of these priorities. Whilst they are presented as six separate priorities, they are interlinked and support one another. We cannot deliver in isolation, and we will continue to work as 'one council' and 'one city'. This plan is for residents, local businesses, people who work and visit here and all those providing services for the city. We will work alongside our partners to ensure that no community is left behind and that everyone can share and benefit from the opportunities being created in our city.

OUR PRINCIPLES

Our six overarching priorities are supported by four cross cutting principles.



CLIMATE ACTION

The climate emergency remains one of the biggest long-term challenges facing the world today. Our climate change strategy 'Future Generations' sets a target to make the City of Wolverhampton Council carbon-neutral by 2028. We are committed to delivering on the recommendations of our Climate Citizen Assembly and to upholding the promises we made when the Council declared a climate emergency in 2019.



DRIVEN BY DIGITAL

The city is at the forefront of digital infrastructure and innovation. Wolverhampton is one of the first cities in the world to host a 5G accelerator hub making us truly a world leader in emerging technology. Now more than ever digital skills and connectivity are vital to ensure our residents can access services, interact with friends and family, and enter the job market.



FAIR AND EQUAL

We will continue to tackle the inequalities in our communities which impact on the opportunities of local people. The Council's 'Excellent' rated equalities framework is at the heart of this plan. Everybody in our city, whatever their background, should have a pathway to achieve their potential and succeed. No community will be left behind as we transform our city together.

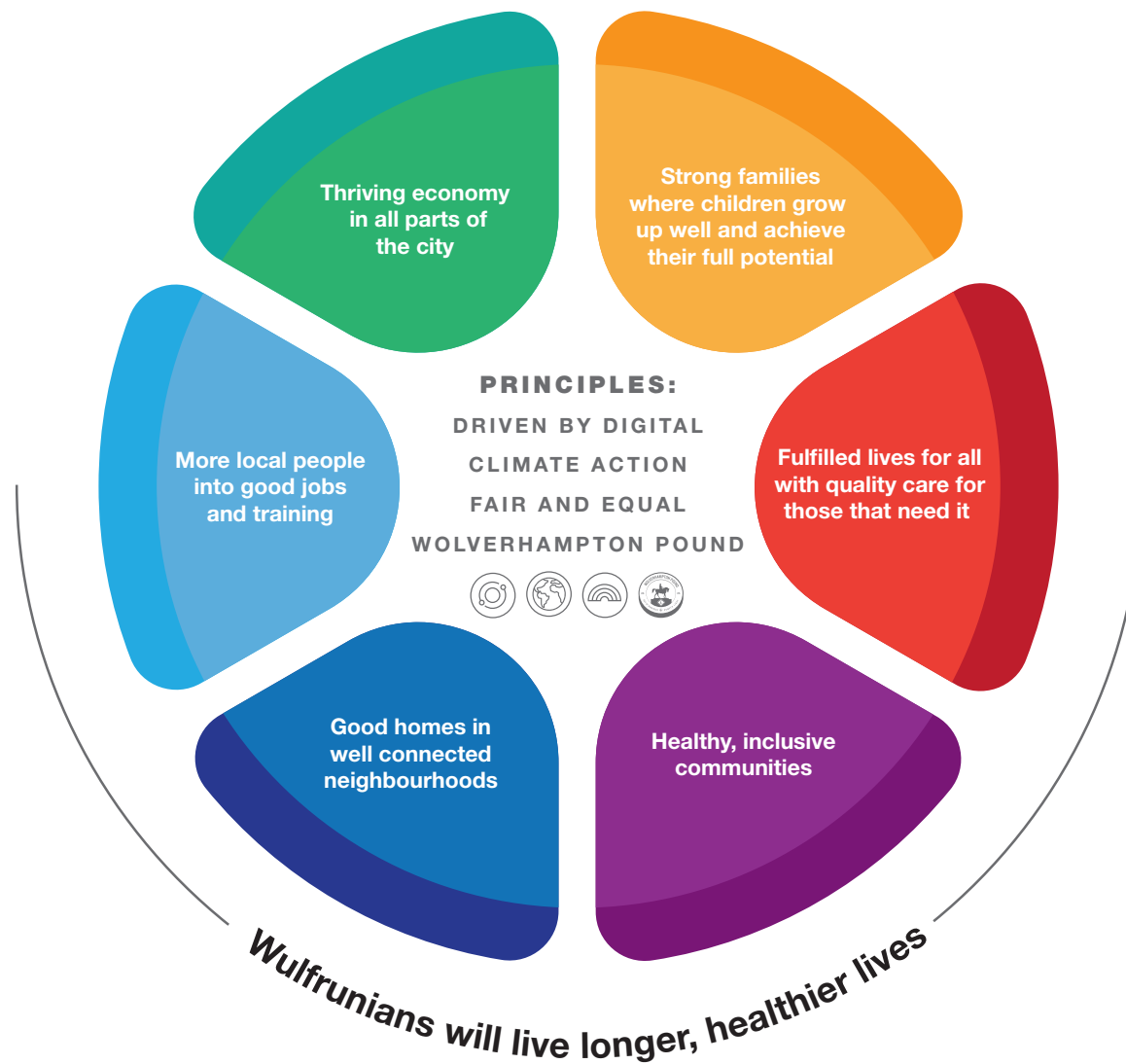


WOLVERHAMPTON POUND

Through the Wolverhampton Pound we want to use the combined power of institutions, businesses and communities to retain local wealth, creating new jobs and opportunities. We'll do this in partnership with the city's anchor institutions.

OUR CITY: OUR PLAN

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We will deliver our vision and key priorities through:

Our City Outcomes

1 Strong families where children grow up well and achieve their full potential

- Children have the best start in life, with good early development
- High quality education which closes the attainment gap
- Children and young people grow up happy with good physical, social, mental health and wellbeing
- Every young person in the city is equipped for adulthood with life skills and ready for work
- Strengthen families where children need extra support or are at risk

2 Fulfilled lives for all with quality care for those that need it

- Build a resilient and responsive Health and Social Care system
- Maximise independence for people with care and support needs
- Work as a system to make sure people get the right support at the right time

3 Healthy, inclusive communities

- Support and protect residents from communicable diseases such as influenza and Covid by preventing, containing, and managing outbreaks
- Close the gap on healthy life expectancy
- Help people live happier more active lives
- Protect vulnerable people at risk of harm and exploitation
- Inclusive, welcoming communities where people feel safe and look out for each other

4 Good homes in well connected neighbourhoods

- Work together to deliver more new homes
- Safe and healthy homes for all
- Access to a secure home for all
- Clean, green neighbourhoods and community space

5 More local people into good jobs and training

- Help create good quality jobs
- Work in partnership to support local people into work and better jobs
- Flexible skills system which supports local businesses to grow and residents to access high quality training and better jobs

6 Thriving economy in all parts of the city

- Support local businesses to start up, scale up and thrive
- Attract new investment which brings social and economic benefit to all
- Well-connected businesses and residents
- Vibrant high streets with quality culture and leisure offer
- Grow the low carbon and circular economy

Our Principles



CLIMATE ACTION



DRIVEN BY DIGITAL



(FAIR AND EQUAL



WOLVERHAMPTON POUND

Measuring Success

Our Corporate Performance Framework



2023/2024 SNAPSHOT



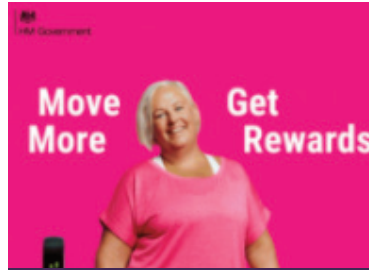
FAMILY HUBS

We launched new Family Hubs network across the city, providing 'one stop shops' for guidance on a range of circumstances to support families through pregnancy and beyond, including infant feeding, mental health and wellbeing, health visiting support and parenting classes.



STAYING CLOSE PROGRAMME

Wolverhampton joined the 'Staying Close' programme, which provides a package of support and guidance to young people leaving care, including ensuring they have accommodation, resources, and practical and emotional help provided by a member of staff from their former children's home, to help them thrive as independent adults.



BETTER HEALTH: REWARDS PROGRAMME

Wolverhampton was selected by government to exclusively pilot Better Health: Rewards, which allowed residents to earn points for completing health and wellbeing challenges, which they could then exchange for rewards including discounts for cinema or theme park tickets, and clothes or food vouchers.



WOLVERHAMPTON BUSINESS WEEK

In September 2023, Wolverhampton celebrated its tenth anniversary, with hundreds of people from the city and beyond engaging in a wide range of events to support and celebrate local businesses.



REOPENING OF THE HALLS WOLVERHAMPTON

Wolverhampton celebrated the completion of major construction works on The Halls Wolverhampton and the official handover of the iconic venue to world class operator AEG Presents UK. The venue opened to the public in June 2023.



CITY LEARNING QUARTER

We have secured the main contract with our chosen constructor to ensure the new City Learning Quarter city centre site is completed for the start of the 2025/26 academic year. The site will establish transformational facilities for the City of Wolverhampton College, Adult Education Wolverhampton and Central Library.



CANALSIDE TRANSFORMATION

We have reached a major milestone in the Canalside regeneration plans after completing a land deal with developer Placefirst. The development will deliver a new canalside community as part of a wider regeneration project in the area, working alongside the Canal and River Trust and West Midlands Combined Authority.



GREEN INNOVATION CORRIDOR

We have secured Investment Zone status and up to £20 million of investment from Government to bring forward the Green Innovation Corridor. The GIC will drive the Green Industrial Revolution, building upon Wolverhampton's sustainable construction, green credentials and circular economy for transformation that will create quality jobs for local people.



HYDROTREATED VEGETABLE OIL (HVO) TRIAL

We are trialling the use of Hydrotreated Vegetable Oil (HVO) to fuel our fleet as a way of reducing carbon emissions. The trial, which involves different types of council vehicles, is aimed at exploring the use of HVO as an eco-friendly fuel in place of diesel. Initial results show that HVO consumption (miles per gallon) is similar to that of diesel, but the carbon emissions are around 90% reduced.



COST OF LIVING SUPPORT

Since 2020 we've awarded £15 million to help all those experiencing financial difficulties as a direct result of the cost of living crisis. This year we've again designated 20 warm spaces in venues across the city, supported homeless households evicted through the private rented sector, tackled bed poverty through our Good Night Project and provided energy support.



STRONG FAMILIES WHERE CHILDREN GROW UP WELL AND ACHIEVE THEIR FULL POTENTIAL

We want all children and young people in our city to grow up happy and healthy and to realise their full potential. Families, wider social networks, communities and schools are important to helping children and young people achieve this, but at different times in their lives they may face challenges and need different types of support. Our aim is to help families early, preventing problems from becoming entrenched and responding to early warning signs so that children and young people have the right support to thrive.

Our new Education, Skills and Employment Strategy provides a framework and programme of work to ensure that children have the best start in life and are able to access high quality education which prepares them for the world of work.

There is strong evidence to show that the first 1,000 days of a child's life have a profound effect on outcomes for that child's entire life. Well supported parents, good health advice and opportunities for high quality early learning provide the foundation all children need to be healthy and to make the most of their abilities and talents as they grow up. This is particularly important for disadvantaged children where support in the early years can have the greatest impact. Working with our city-wide network of partners we will continue to deliver integrated high quality early years support increasing the number of children who are school ready.

Good education is key to delivering on our high ambitions for children and young people in the city. Our vision is to create an inclusive education system which promotes the highest standards for all children and young people, closes the attainment gap and allows every pupil to achieve their full potential. Education standards across the city continue to improve. We will continue to build on this upward trend ensuring that all children whatever their background leave the education system with the skills, confidence, and drive to succeed.

If our city and communities are to thrive, our young people must have a clear pathway from education into good quality work. Too many of our young people are finding it difficult to get into and to sustain employment.

We will continue to work in an integrated way with education providers, businesses, and families to prepare young people for the world of work. We need to ensure that young people get the highest quality careers advice and guidance throughout their education which is aligned to labour market opportunities and helps them make informed decisions about their next steps. We will support all young people to make successful transitions into adulthood in particular those who are looked after, with special education needs, disabilities or vulnerabilities.

Children and young people's emotional wellbeing, physical and mental health are vitally important and underpin positive outcomes in childhood and success as an adult. Through our #YES Youth commitment we will continue to help our young people be healthy, be connected and be heard, valuing their contribution in making Wolverhampton a great place to grow up and learn. The commitment also recognises the need to involve young people in shaping services, with co-production a key element.

We continue to make real progress supporting some of our most vulnerable residents through our Supporting Families programme, working with families to improve their life chances. Moving forward we will continue to build on this to transform services which support families, investing in early help approaches, delivering services early through family hubs and intervening early to prevent problems developing or escalating. In July 2023 Wolverhampton was one of three areas in England chosen to deliver the Families First for Children programme. As a 'pathfinder' we will test new ways to reform the children's social care system, helping children to stay with their families in safe and loving homes, whilst protecting vulnerable children where and when needed. We want all children and young people to grow up in a safe and secure home, stepping in to safeguard and protect them when required to improve their long-term outcomes.

Strong families where children grow up well and achieve their full potential

Outcomes	Objectives	
<p>1.1 Children have the best start in life and good early development</p>	<ul style="list-style-type: none"> All families will have a healthy start in life from healthy early pregnancy to healthy early years. Every child in the city can attend a high-quality early years setting. Support parents and families to ensure children are school ready and make a successful transition into education. 	<ul style="list-style-type: none"> Delivery of multi-agency support at the earliest opportunity will be through family hubs supporting our city start to life offer. Families will be supported by multi-agency early help offer to ensure they get the right information and support at the right time.
<p>1.2 High quality education which closes the attainment gap</p>	<ul style="list-style-type: none"> Support our education system to recover from the impact of Covid-19 to enable all children and young people in the city to 'catch up' on missed learning. Every child or young person in the city will have a positive learning experience at school. Support all schools and education settings to have effective provision for children and young people with special educational needs and disabilities so they can make good progress in their learning and aspire for employment and an independent life. 	<ul style="list-style-type: none"> Work in partnership with our schools and education settings to build a system with the highest quality education through continuous improvement and support. Work with our partners to close the attainment gap of children from ethnic minority backgrounds, children in care or those from deprived households. Inclusive education within the city lays the foundation of high aspirations and ambitions for our young people.
<p>1.3 Children and young people grow up happy with good physical, social, mental health and wellbeing</p>	<ul style="list-style-type: none"> Children and young people will be physically and mentally healthy and well. Work with partner agencies to continue to build up a strong network and information base of positive and healthy activities and opportunities for all children and young people across the city. 	<ul style="list-style-type: none"> Support children and young people to build healthy relationships, in their network, communities and schools. Further develop our multi-agency approach to mental health services for children and young people ensuring pathways to support are clear and accessible. Ensure there are structured ways for young people to engage with statutory services at a strategic and operational level to help shape delivery.

Strong families where children grow up well and achieve their full potential

Outcomes	Objectives	
<p>1.4 Every young person in the city is equipped for adulthood with life skills and ready for work</p>	<ul style="list-style-type: none"> • Support all young people to make successful transitions into adulthood in particular those who are in our care, with special educational needs, disabled or vulnerable. • Work in an integrated way with education providers, businesses, and families to prepare young people for the world of work and to live independently. • Build pathways for young people to stay on in full time education, employment, or training, including apprenticeships, internships and business start-ups. <ul style="list-style-type: none"> • Have high quality education, employment and training post-16 which meets the needs of all our children and in particular supports those with special educational needs and disabilities (SEND), those from an ethnic minority background, young people who are in our care, and those living with deprivation. 	
<p>1.5 Strengthen families where children need extra support or are at risk</p>	<ul style="list-style-type: none"> • Work with parents and carers to try to remove the barriers which some children face in achieving their full potential, stepping in to safeguard and protect children and young people when required. • Collaborate with schools, parents and carers and a range of stakeholders to identify early those most at risk of missing education and build the skills to intervene successfully. <ul style="list-style-type: none"> • Offer tailored specialist support to parents and carers of children with additional needs who may require additional help. • Support parents and carers affected by drug or alcohol misuse, domestic abuse or poor emotional health and wellbeing making sure that their children are safe and cared for. • Support our care leavers into suitable accommodation, training, education or employment as they move into adulthood. 	

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To achieve these outcomes, key activity we will deliver includes:

- Ensure that we offer consistently high-quality services to children, young people and families across the city.
- Continue to deliver Yo! Holiday Squad activities building on the huge success of our Yo! Summer Festival.
- Further develop a multi-agency approach to supporting children and young people's mental health and wellbeing through mental health support services.
- Improve opportunities and services for children and young people with special educational needs and Education Health and Care Plans aged 0 - 25 years old through our SEND and Inclusion Strategy and Written Statement of Action.
- Use our status as a Families First for Children programme pathfinder to ensure early help and intervention is available for families with challenges such as addiction, domestic abuse or poor mental health, to help them overcome adversity and stay together where possible.
- Deliver co-produced strategies and services with children and families by embedding the co-production charter across the city.
- Further embed and deliver our multi-agency Exploitation and Missing hub and Power 2 team to support vulnerable young people and adults at risk of exploitation.
- Further develop our early help offer for families with children with special educational needs and disabilities.
- Ensure every child and young person in the city has the tech and connectivity they need to succeed with their learning.
- Develop a programme of activity to promote the importance of the first 1001 days and how everyone in Wolverhampton can play a part in developing resilient children who are ready to learn and are school ready.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term mission in relation to this area:

- By 2030, the number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators

- % of Early Years and Childcare settings rated Good or Outstanding
- % of take up of 2-year-olds benefiting from early education
- % of schools in the city that are rated Good or Outstanding
- Average Attainment 8 score per pupil
- % gap in Attainment 8 score gap between advantaged and disadvantaged children
- % of 16- and 17-year-olds with SEND in education, employment or training
- % of care leavers in education, employment or training
- First time entrants into the Youth Justice System per 10,000 population

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- Rate of children open to social care per 10,000 population under 18.
- % of repeat referrals into Children's Social Care with 12 months.
- % of children and young people in care who have had 3 or more homes in the year.
- % of Education, Health and Care plans issued within 20 weeks



FULFILLED LIVES FOR ALL WITH QUALITY CARE FOR THOSE THAT NEED IT

We want all residents of the city to live independent lives for longer and to have a good quality of life. Being in good health for as long as possible impacts on our relationships with family and friends, and our ability to fully participate in the community and to contribute to the local economy. Staying in good health into older age is also closely related to how much support and care a person needs and their use of services such as adult social care.

Through Adult Social Care we will continue to maximise people's independence and connect individuals with people and places that will help them to get on with their lives. Where people need formal support, that support will be shaped to focus on what a good life looks like for that individual and their family, recognising that each individual's needs will be unique to them. This can include support to engage in work, training, education, volunteering, or support to socialise with family and friends, maintain personal relationships and improve wellbeing.

We will continue to invest in preventative services and new technology which increases quality of life for people with care and support needs. We will intervene early to support families and individuals, helping people retain or regain their skills and confidence to prevent needs from developing. We will continue to provide the right information and advice to support individuals to plan for the future, helping them to remain in their own homes and communities for longer and giving them real choice and control to live healthier, happier more fulfilled lives.

We will continue to strengthen our health and care system through our Wolverhampton Cares programme which is our commitment as a Council to work with partners to support the city's care sector, care workers and family carers ensuring equality of access to high quality care for all. We will support our family and young carers by ensuring they are aware of the help and support that is available to them. We will work to improve access to and the provision of the best possible services by developing a Wolverhampton Cares set of standards.

Working together alongside our partners including the NHS, care providers, voluntary and community groups and our place-based partnership, OneWolverhampton, we will seek to increase capacity across the care sector, encourage recruitment of care workers and help providers keep the fantastic workers they already have. A well skilled and resilient health and care workforce is key to achieving our future vision for care and support in the city.



Fulfilled lives for all with quality care for those that need it

Outcomes	Objectives	
<p>2.1 Build a resilient and responsive Health and Social Care system</p>	<ul style="list-style-type: none"> • Support our partners to improve access to healthcare services and ensure the quality of those services. • Develop new ways to support care providers to recruit and retain staff to build a stable and sustainable care workforce in the city. 	<ul style="list-style-type: none"> • Support health and care providers to build resilience and thrive in a changing health and care market. • Ensure the health and care system has the support, resources, skills, and capacity to deal with any future outbreaks of infectious diseases.
<p>2.2 Maximise independence for people with care and support needs</p>	<ul style="list-style-type: none"> • Connect more people to their communities and ensure they have easy access to information and advice when they need it. • Support people with care and support needs to live as independently as they can in their own homes, for as long as possible. • Supporting more people with care and support needs to have more choice and control and be able to live their idea of a good life. • Make sure people are able to leave hospital as soon as they are well enough with support from community care. • Support disabled and older people to regain their independence following time in hospital or personal crisis. 	<ul style="list-style-type: none"> • Continue to invest in preventative services and technology to increase independence and reduce long term pressure on the health and social care sector. • Work with partners to tackle the barriers to sustainable employment and participation for disabled people. • Support families to build financial resilience and independence, so they can thrive. • Deliver services and systems that work for carers, support young carers, and recognise and support carers in the wider community • Build research and evidence to improve outcomes for carers.

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Fulfilled lives for all with quality care for those that need it

Outcomes	Objectives	
<p>2.3 Work as a system to make sure people get the right support at the right time</p>	<ul style="list-style-type: none"> • We will develop our local integrated care networks to provide responsive and integrated care linking primary care, community health services, mental health and social care. • Work across health and care to develop integrated and place-based care to support residents in their neighbourhoods, with a focus on prevention. 	<ul style="list-style-type: none"> • Work in partnership with local people to ensure health and care pathways are informed and co-produced by people with lived experience, under-represented and protected groups. • Safeguard adults whose circumstances make them vulnerable and protect them from harm.

To achieve these outcomes, key activity we will deliver includes:

- Improving services with £2 million investment in early help, local support and to safeguard those at risk of abuse and neglect.
- Boost support services for all of our city's fantastic carers – the unsung partners, children, relatives and friends who support their loved ones through 'thick and thin'.
- Continue to embed co-production principles into how we work so people who use adult social care services, and their families, work alongside us sharing their experience to help shape, design and develop our services.
- Continue to develop our whole family approach to ensure that those within our communities that will need a lifetime of care have a positive transition as they move from childhood into adulthood.
- We will continue to improve quality and assurance of the social care provider marker, ensuring we are future proofing adult social care through the development and delivery of a new technology strategy.
- We will continue to develop our activity and offer at the front door to make sure people can access the right support in the right place, at the right time.
- We will continue to transform adult social care in the city working alongside our local, regional, and national partners.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term mission in relation to this area:

- By 2030, the gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by 5 years.
- By 2030, well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators:

- % of older people (aged 65 and older) who were still at home 91 days after discharge from hospital into reablement/rehabilitation services
- % of carers who use services who found it easy to find information about services and/or support
- Workforce Turnover Rate (LA and Providers)

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- % of social care users supported to remain in their own homes
- % of adults who use services who say social care services help them to feel safe and secure
- % of adults in receipt of long-term services who are in control of their own lives



HEALTHY, INCLUSIVE COMMUNITIES

A good start in life, high-quality education and employment, and a decent home in a thriving community are the strongest factors that influence both how long a person is likely to live and their quality of life. This is because health is influenced by more than just biological factors; social, economic and the physical environment all play a part. Getting these factors right, addressing health inequalities and enabling access to high quality health and care services, will therefore have a significant impact on the health and wellbeing of our residents.

The City of Wolverhampton is similar to most local authorities in that it faces common public health challenges. These include high obesity and physical inactivity levels, smoking, alcohol misuse and a high prevalence of long-term conditions. Our City Lifestyle Survey has helped us to better understand the complex health landscape in Wolverhampton, and what we can do as an organisation to improve health outcomes.

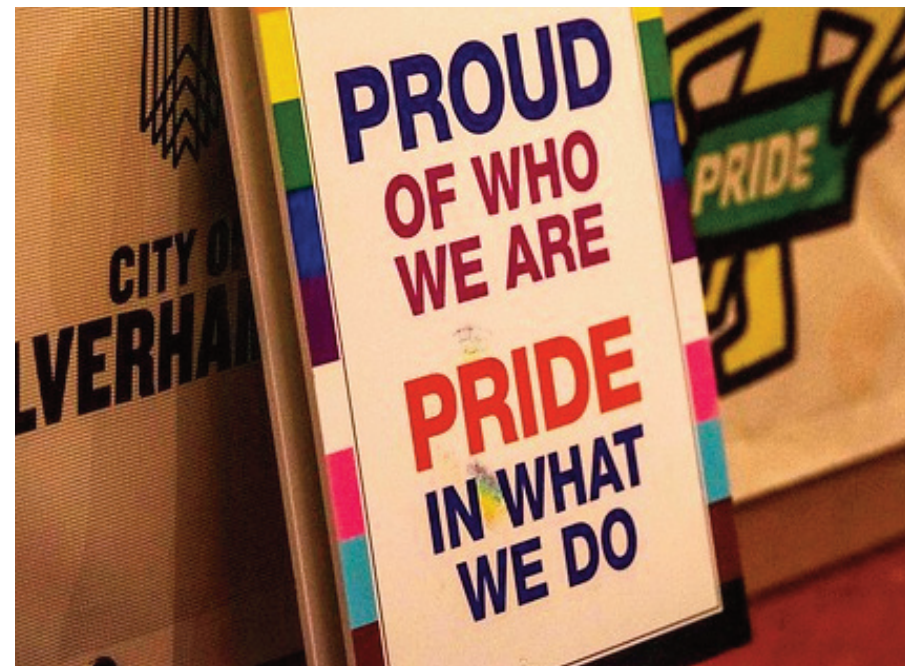
There are a number of factors which strongly influence these challenges, meaning tackling them requires an innovative multi-agency response building on our established strong partnership working practice, and with local people at the centre of this approach.

Community empowerment is central to these efforts. We are committed to further embedding an approach which builds on local assets and works with local people to ‘co-produce’ sustainable solutions to local issues, creating capacity, sustainability and resilience. Alongside this we will continue to engage with communities to assess the longer-term impacts of the Covid-19 pandemic and the current cost of living crisis on their mental health and wellbeing and roll out new initiatives which support local people to be active and well.

We will continue to work with our partners to support safe, inclusive and connected neighbourhoods to thrive. We recognise that some groups of people face additional barriers or challenges, such as those who experience domestic abuse or are vulnerable to exploitation. Together we will ensure vital safeguarding responses are in place to protect those who need us most.

Asylum seekers and refugees are also some of the most vulnerable in our communities and can have a range of different and complex needs. We are a city of sanctuary in Wolverhampton, and we will continue to play our part and welcome our fair share of the world’s most vulnerable people. Through a multiagency approach we will promote the health, economic and social inclusion of new communities in our city through skills, housing, and wellbeing support.

Working together for a healthier, inclusive city with strategic oversight from our Health and Wellbeing Together Board and supported by our place-based partnership, OneWolverhampton, will enable us to respond to current challenges and plan for the future.



Healthy, inclusive communities

Outcomes	Objectives	
<p>3.1 Support and protect the city and residents from communicable diseases such as influenza and Covid by preventing, containing and managing outbreaks of infectious disease</p>	<ul style="list-style-type: none"> • Work with partners to prevent, contain and manage outbreaks of infectious diseases. • Work with individuals, settings and communities to encourage safe behaviours. • Work with partners to increase vaccine uptake, education, awareness and uptake of treatments across all communities, especially amongst our most vulnerable residents. 	<ul style="list-style-type: none"> • Support UK Health Security Agency and the wider public health system to respond quickly and appropriately to any emerging outbreaks, with a particular focus on care settings. • Maintain resilience and plan for the future by working with partners in the Health Protection Forum.
<p>3.2 Close the gap on healthy life expectancy</p>	<ul style="list-style-type: none"> • Increase our understanding around health inequalities and our local population – including developing and implementing an approach to data capture, data linkage and data sharing. 	<ul style="list-style-type: none"> • Work collaboratively across all parts of the health and care system to join-up, promote and embed action to reduce health inequalities. • Work with partners to enable access to high quality health and care services.

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Healthy, inclusive communities

Outcomes	Objectives	
<p>3.3 Help people live happier more active lives</p>	<ul style="list-style-type: none"> • Work with partners, including our grass roots sports organisations, to create a city where everyone can be physically active. • Maximise the use of our city's green spaces to get Wolverhampton moving more. • Upgrade our council leisure facilities and offer so that residents have first class facilities. • Apply the learning from the successful pilot of the Better Health: Rewards programme and create further opportunities to increase physical activity participation rates, informed by behaviour change methodologies. 	<ul style="list-style-type: none"> • Work with partners from across the city to develop a strategic mental health and wellbeing framework for Wolverhampton outlining the actions we will take together to make sure local people can feel good and function well in our communities. • Work with partners to reduce the prevalence of smoking across Wolverhampton, supporting the Government's ambition for a 'Smokefree Generation'. • Support behaviour change through the commissioning of tier 2 adult weight management and smoking cessation services in partnership with the local NHS.
<p>3.4 Protect vulnerable people at risk of harm and exploitation</p>	<ul style="list-style-type: none"> • Safeguard young people on the cusp of, or at risk of, becoming involved in youth violence and/or exploitation. • Increase identification, reporting and recording of modern slavery to protect victims and disrupt offenders. 	<ul style="list-style-type: none"> • Increase early identification of domestic abuse reporting to ensure that victims are supported at the earliest possible point.
<p>3.5 Inclusive, welcoming communities where people feel safe and look out for each other</p>	<ul style="list-style-type: none"> • Growing voluntary and community sector which supports local people to thrive in their communities. • Develop multi-agency approaches to tackle and reduce Hate Crime based on a zero-tolerance approach: crime targeted at people because of their race, religion, disability, sexual orientation or transgender identity. • New and transient communities are welcomed into the city; people can resettle as equal citizens and/or feel safe when visiting. 	<ul style="list-style-type: none"> • Raise community confidence and reduce the fear of crime using our relationships with partners and communities as well as our physical assets including the built environment. • Target hyper local areas of high deprivation working collaboratively with system partners and co-producing interventions with residents and communities contributing to wider ward based interventions. • Embed Love Your Community to increase community connections and pride.

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To achieve these outcomes, key activity we will deliver includes:

- Help our city effectively manage the risk from communicable diseases by working with partners to prevent, contain and manage outbreaks, including the promotion of vaccinations, treatments, education and awareness to keep people safe from harm.
- Implement Health and Wellbeing Together board's Physical Activity Strategy.
- Take action to improve mental health and wellbeing in the city including support for working age adults and isolated older people.
- Coordinate and commission targeted, multi-agency preventative interventions to safeguard those on the cusp of, or at risk of, becoming involved in exploitation and youth violence, and victims of domestic abuse and modern slavery.
- Refresh the current interpersonal violence strategy ensuring the voices of victims and survivors of violence and abuse are central in determining priorities.
- Deliver targeted, partnership interventions to tackle the harm caused in our families through alcohol and drug abuse.
- Utilise the findings from our updated Joint Strategic Needs Assessment to focus on shared priorities which tackle health inequalities and improve outcomes for our city's residents.
- Fund your local GP to carry out a healthy heart check for all eligible residents aged 40 and over to help identify health risks such as high blood pressure and cholesterol levels and also provide advice to keep all residents healthy.
- Aim to increase cancer screening uptake across bowel, breast and cervical cancer screening programmes through working with our colleagues in the NHS and respective cancer screening hubs.
- Work with partners to deliver targeted, multi-agency interventions in our most deprived neighbourhoods and streets to transform the livelihoods of local families and individuals in the places they live.
- Develop a Voluntary and Community sector strategy to enhance partnership working and focus on supporting the sector to grow and thrive.
- Sign up to the national Prevention Concordat for Better Mental Health to galvanise system wide commitment to strengthening protective factors, reducing risk factors and reducing mental health inequalities across the city.
- Work with partners to ensure residents have equal and fair access to all wellbeing support services.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term mission in relation to this area:

- By 2030, the gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by 5 years.
- By 2030, well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- By 2030, homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators:

- Hypertension prevalence
- Diabetes prevalence
- Coronary Heart Disease prevalence
- Chronic Kidney Disease prevalence
- Stroke prevalence
- Dementia prevalence
- Alcohol specific mortality per 100,000
- % of physically inactive adults (Public Health Outcomes Framework)
- % of less active children (Active Lives Survey)
- % Domestic Abuse related incidents and crimes
- Suicide rate (all persons) per 100,000

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- % of 40-74 years attending offered health checks
- Number of individuals in treatment for alcohol (increase)
- Number of successful completions of alcohol treatment (no representation - increase)
- Number of alcohol detoxes (increase in referred, initiated and completed)
- WV Active membership numbers with breakdowns by - long term health conditions, disabilities, low-socioeconomic groups, minority ethnic groups.
- Number of 'free' activities for CYP in the city and uptake by - long term health conditions, disabilities, low-socioeconomic groups, minority ethnic groups
- Number of referrals to physical activity opportunities by a health professional
- Number of people receiving specialist domestic abuse support in the community to prevent further harm
- Number of domestic abuse cases referred to Multi Agency Risk Assessment Conference (MARAC)



GOOD HOMES IN WELL-CONNECTED NEIGHBOURHOODS

The home in which a family lives is one of the most important factors in determining their wellbeing and prosperity. We are committed to ensuring that every resident has a safe, stable and affordable home so they can achieve their full potential and build communities where everyone can thrive.

Key to achieving this ambition is to ensure that we have enough homes to meet local need and to attract new people to live and work in the city. Following the achievements of the Housing Strategy 'Better Homes for All' 2019-2024, we are developing our refreshed Housing Strategy to set out how we will continue to develop our partnerships to increase housing development, improve quality, choice and affordability of homes on offer so that our housing market meets the needs and aspirations of existing and future residents.

The city has been named one of the top UK cities to raise a family and over 600 new homes were built last year in the city. We are delivering our ambitious plans to revitalise our city centre with a new high quality living offer at key sites including The Royal, Brewers Yard and Canalside South which will increase footfall, diversify our city centre offer and support local businesses to grow. Through our own council led new build, housing regeneration and council owned housing company WV Living we will support the development of new homes. We will continue to ensure that new housing developments have the right housing to support older, disabled and vulnerable residents.

We are continuing to drive up the quality of existing housing in the city, so all residents have a safe and healthy home. Working with private landlords and tenants to improve the standards of housing and security of tenure in the private rented sector. We are pushing forward with ambitious plans to transform our housing estates with new homes, refurbished housing, and improved leisure space.

Focusing on just the number of new homes is not enough. That is why we will continue to raise the quality of life for all our residents by ensuring neighbourhoods in the city are places of opportunity with good quality education, excellent transport links and local health services close by. Good local amenities and services are a key component to growing resilient, inclusive communities, helping to reduce isolation, and building connections that enable residents to support each other.

We will continue to protect and invest in our parks and green open space. The benefits of spending time outside are widely recognised, with access to green spaces, including trees and woodland, proven to improve both our physical and mental wellbeing. Access to green spaces can encourage physical activity and help reduce obesity, relieve stress, encourage social interaction and improve quality of life.

Increasing the energy efficiency of homes is now more important than ever to reduce carbon emissions, tackle fuel poverty and ultimately deliver on our ambition to make the city carbon neutral. 35% of all carbon emissions in the city come from housing. We continue to support initiatives that increase the EPC ratings in thermally inefficient homes. That is why we are working with city partners to invest in retrofit programmes, and to build new homes up to the maximum possible energy efficiency standards.

We are committed to ending rough sleeping in the city and through our Homelessness Prevention Strategy we will tackle the underlying causes which can lead people to become homeless, including mental health, family breakdown, substance misuse and poverty. Working with our public, private and voluntary, community and social enterprise (VCSE) partners to offer early assistance and timely advice to help people secure suitable accommodation and support services which enable them to live independently and to stay in their own homes. This will include continuing our successful work through the Housing First programme which has supported 48 people into secure tenancies since its launch.

Good homes in well-connected neighbourhoods

Outcomes	Objectives	
<p>4.1 Work together to deliver more new homes</p>	<ul style="list-style-type: none"> • Work in partnership with Government, the West Midlands Combined Authority, housing associations and developers to secure the new homes the city needs. • Continue to progress the review of the Local Plan to make sure we have the right site opportunities available to help meet our long-term housing needs. • Provide high quality planning services which support high quality new developments and monitors housing supply. 	<ul style="list-style-type: none"> • Use our own land and assets to facilitate and support the development of new homes and neighbourhoods. • Ensure that the city has housing which meets the needs of all residents including supported and specialist accommodation. • Ensure that new developments have the right mix of tenures and affordable homes so that all residents have the opportunity to access good quality housing.
<p>4.2 Safe and healthy homes for all</p>	<ul style="list-style-type: none"> • Continue to use our enforcement powers and landlord licensing to ensure local people have access to good quality private rented housing. • Use the full range of legal actions available including compulsory purchase orders to ensure empty properties are brought back into use for rent or sale, to be lived in as homes. 	<ul style="list-style-type: none"> • Work with our partners to increase the energy efficiency of homes in the city to reduce carbon emissions and fuel poverty. • Work with our network of housing providers in the city to ensure we have a robust, consistent approach to housing standards. • Work with the police and other partners to ensure neighbourhoods are safe and free from anti-social behaviour.

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Good homes in well-connected neighbourhoods

Outcomes	Objectives	
<p>4.3 Access to a secure home</p>	<ul style="list-style-type: none"> • Prevent homelessness wherever possible intervening early to provide high quality support services to keep people in their own homes. • Work in partnership with other services to find long-term, affordable housing solutions for people threatened with homelessness. 	<ul style="list-style-type: none"> • Work with city partners in the public and voluntary sectors to offer targeted and flexible support to help people off the street and reduce rough sleeping. • Increase the number of employment opportunities for vulnerable residents, including those who are homeless or at risk of homelessness.
<p>4.4 Clean, green neighbourhoods and public space</p> <p>Page 47</p>	<ul style="list-style-type: none"> • All residents have access to clean open space and parks in their neighbourhoods and local areas. • Protect and enhance our environment, improve air quality and support resident's health and wellbeing by delivering an ambitious tree planting programme. • Minimise the amount of waste generated by our residents and businesses and increase levels of recycling. 	<ul style="list-style-type: none"> • Provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users. • Maintain cleanliness across all of our neighbourhoods and take a robust pro-active approach to fly tipping. • Provide an attractive and well-maintained public realm across our city and town centres.
<p>4.5 Well-connected businesses and residents</p>	<ul style="list-style-type: none"> • Continue to roll out digital infrastructure and data 'Smart City' technology to drive innovation and futureproof our city. • Work with partners to deliver major infrastructure projects to improve transport links in the city. • Invest in sustainable transport infrastructure such as electric vehicle charging points which reduce carbon emissions. 	<ul style="list-style-type: none"> • Improve walking, cycling and bus networks, as well as public transport interchanges, enabling people to move easily around the city to encourage residents to make travel choices which minimise air pollution. • Coordinate and manage all street works, liaising with utility companies to minimise disruption and congestion on the road network.

To achieve these outcomes, key activity we will deliver includes:

- Deliver over 1,000 new low carbon homes and thousands of new local jobs at our Canalside South development – one of the largest city centre residential developments in the West Midlands.
- Increasing the pace and scale of council house new build by bringing forward suitable sites and promoting a supply of homes that meet the needs of those residents in the greatest housing need.
- Boldly plan a programme of renewal and targeted interventions that replaces defective council homes with new homes fit for the future. Aligning ourselves to maximise regeneration funding and investment opportunities.
- We will redevelop over 1,000 non-traditional properties using energy efficient modern methods of construction, transforming Heath Town estate and New Park Village.
- Use our Council owned housing company, WV Living, to build new homes, and require that any external contract appointments evidence a commitment to the training and employment of local people.
- Continue to progress the Wolverhampton Local Plan to make sure we have the right site opportunities available to help meet our long-term housing needs.
- Help rough sleepers rebuild their lives and send out a clear message that no-one needs to sleep out on our streets with £4.5 million investment in a new, city centre hub and multi-agency support team.
- Continue to deliver our Housing First programme to support people with a history of entrenched rough sleeping to access secure homes with intensive wraparound support, so they can start to rebuild their lives.
- Switch all 30,000 street-lights across our city to energy efficient LED lighting with smart sensors - saving around 4,000 tonnes of carbon a year.
- Tackle fly-tipping in our city through partnership working keeping our neighbourhoods clean and green.
- Work to resettle and integrate refugees in the city utilising affordable and sustainable privately rented accommodation.
- Improve the city's transport infrastructure with investment in new, major schemes such as the City East Gateway, investment in upgrading existing infrastructure and investment in digital and new technology.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term mission in relation to this area:

- By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.
- By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators:

- Number of new builds completed in the city
- % of new builds that are affordable housing (against planning target)
- Net additional dwellings in the city
- % of housing stock that is empty / empty homes
- Housing affordability ratio
- Total crime recorded per 1000 population

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- % of planning application decisions made with 13 weeks or agreed timescales
- % of planning application decisions made with 8 weeks or agreed timescales
- Number of homeless families moved into secure housing
- Average time spent in temporary accommodation
- Energy efficiency of housing stock
- Carbon reduction against 2024/25 target
- Number of council homes where energy performance has been improved through retrofit programmes
- % fly tipping incidents on CWC land resolved in 5 working days
- % of recycled and composted household waste
- % of trees on public land inspected every two years
- % of carriageways in city assessed as high quality



MORE LOCAL PEOPLE INTO GOOD JOBS AND TRAINING

All residents in Wolverhampton need an income which can support them and their family. We want all local people to have the right support and opportunities to get a stable job with decent pay so that they can build a future and help us grow our city together.

Wolverhampton is home to thousands of businesses which offer a range of fantastic employment opportunities. Skill levels in the city have been steadily increasing with the numbers of local people securing higher level qualifications at record numbers. However, there remain areas for improvement and the current education, skills and employment system in the city faces a number of challenges arising from a legacy of deindustrialisation, low aspirations, pockets of entrenched worklessness, relatively low pay, low skill levels and more recently the impact of the Covid-19 pandemic and cost of living crisis. We also know that some of our residents face a range of barriers to employment from poor health to caring responsibilities.

In 2023 we launched our new Education, Skills and Employment Strategy which sets out how we will work with our partners to break down barriers and improve access to good quality work and training pathways for all. This strategy sets out a long-term holistic view for education, skills and employment. It presents a clear vision for how we can deliver a flexible, adaptable and resilient skills system which is able to respond to emerging opportunity areas. We will do this by joining up activity across schools, further education, training providers and other organisations to ensure that there is a seamless, whole-system approach to education, work and skills.

Locally and nationally our economy is changing, and the skills local people will need to be successful in the workplace is changing with it. Having good digital skills is now more important than ever to support the rapid shift to digital technologies, the climate change challenge is leading to increasing demand for skills to support the low carbon economy, and our aging population means our reliance on our critical health and social care workforce will continue to rise. We will work with our partners to align the city's education and skills system with our new business growth programme. This will ensure that residents have the skills local employers need now and in the future.

To support our lifelong learning offer we are investing in state-of-the-art learning facilities in the city to ensure our residents have access to first class facilities to grow and build their skills. The City Learning Quarter, a partnership between the Council and City of Wolverhampton College, will co-locate the college, Adult Education Service and city centre library in one location. This isn't just about new physical space but a new seamless learner offer for the city, which will support new school leavers, those looking to upskill, and local people who want support to move back into work.



More local people into good jobs and training

Outcomes	Objectives
<p>5.1 Help create good quality local jobs</p>	<ul style="list-style-type: none"> • Ensure investment in the city increases the number of quality jobs for local people. • Incorporate and monitor social value/local employment clauses through the council's supply chain. • Leverage agreements with investors and partners to maximise benefits for local people, including by securing the delivery of S106 skills and training opportunities. <ul style="list-style-type: none"> • Through our business growth programme develop those sectors of the economy which offer the best employment opportunities for our residents. • Work with our public sector partners and the Wolverhampton Anchor Network to set a high standard for employment across the city.
<p>5.2 Work in partnership to support local people into work and better jobs</p>	<ul style="list-style-type: none"> • Continue to work with partners to ensure that employment support in the city is joined up and new national programmes complement existing local activity. • Establish clear pathways and entry routes for unemployed adults, particularly those from under-represented groups to access employment in growth sectors or where there are skills shortages. • Build on the city centre Wolves at Work Youth Hub and Adult Hub using our community venues to deliver co-located employment and skills support to residents in their local areas. <ul style="list-style-type: none"> • Grow and diversify our adult and community education offer to support local people to develop digital and other skills to increase their employability and wellbeing. • Provide wrap around support and dedicated work coaches for local people looking for work or to retrain through our Wolves at Work programme. • Provide a one stop shop for employment and skills support in the city through our Wolves Workbox digital platform, making easier for local people to find advice and support. • Work with employers and other city partners to champion inclusive employment practices to ensure there is a pathway to success for all residents in our city.

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More local people into good jobs and training

Outcomes	Objectives	
<p>5.3 Flexible skills system which supports local businesses to grow and residents to access high quality training and better jobs</p>	<ul style="list-style-type: none"> • Work with partners to maximise the number of apprenticeship and training opportunities for young people and adults in the city. • Work with our partners including businesses, job centres, training providers, colleges and the University to develop flexible pathways for local people who are in work to retrain and progress. • Support local businesses with workforce recruitment and planning particularly in those sectors which face recruitment and retention challenges. 	<ul style="list-style-type: none"> • Align our education and skills system with our business growth programme to ensure local people have the skills employers needs now and in the future. • Ensure we have a range of higher-level skills and training support available in the city aligned to growth sectors to support productivity and higher wage jobs.

To achieve these outcomes, key activity we will deliver includes:

- Increasing employment in our city with new job, training and apprenticeship opportunities through our Wolves at Work programme.
- Futureproofing our skills system through the City Learning Quarter, a partnership between the City of Wolverhampton Council and Wolverhampton College, which will establish a skills and learning hub, safeguarding hundreds of jobs and increasing footfall in the city centre, as the scheme will see thousands of students located at the new city centre campus.
- Continuing to deliver jobs and opportunities for city residents through our employment and skills programmes. Providing one to one employment support for job seekers of all ages, plus targeted support, e.g. over 50s; people with disabilities.
- We will work with partners in communities to ensure that support is inclusive, and reaches the most vulnerable and furthest away from the jobs market.
- We will support the participation of our young people aged 16 to 19 into education, employment or training, supporting those at risk of NEET and those who drop out of education or work to re-engage.
- We will offer specialist training in key economic sectors or in sectors where recruitment of appropriately qualified staff is particularly acute, e.g. childcare.
- We will offer skills training to those residents whose learning needs are unmet by existing programmes.
- Through our Wolverhampton Anchor Network, we will develop skills plans for the health and wellbeing, cultural and creative and green sectors in the city, so we can align training and education opportunities to the industries of the future.
- Continuing our specialist employment support programmes for our most vulnerable residents, including adults with learning disabilities.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term mission in relation to this area:

- By 2030, the number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators:

- Number of working age adults (16-64) claiming unemployment benefits
- Number of young adults (18-24) claiming unemployment benefits
- Levels of 16-17 year olds Not in Education, Employment or Training

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- Number of jobs created / safeguarded in the city through the Investment Team
- % Local Authority spend of apprenticeship levy
- Number of apprentices and graduate placements within the council



THRIVING ECONOMY IN ALL PARTS OF THE CITY

Our approach to economic growth is centred on a principle of ‘good growth’. This means achieving both the right quantity and the right quality of growth; creating a strong, productive and resilient economy where a radical uplift in business competitiveness, productivity and profits goes hand in hand with access to good jobs that pay higher wages, and where all residents have access to opportunity and enjoy improved quality of life.

The success of our approach to economic growth ultimately relies on delivering not just good growth, but good green growth. We now face a new growing challenge to support our residents and businesses to decarbonise our economy and make our city net carbon neutral by 2041. We are growing our economy and supporting the city transition to net zero through the development a Green Innovation Corridor. It builds on Wolverhampton’s growth as a centre for sustainable construction and will create skilled jobs for local people in the emerging green economy. Delivered in partnership with the University of Wolverhampton, the initial phases of the programme will establish an innovation hub at Wolverhampton Science Park.

We are launching our new Business Growth Offer which will work in partnership with Business Growth West Midlands and other public and private business support providers to help businesses increase their productivity through investing in new technology, new products, processes and employee skills. Support is available to help businesses to invest to create growth and new jobs. SMEs are the backbone of our economy and are critical to closing the city’s productivity gap with London and the South East of England.

The Wolverhampton Investment Prospectus sets out an ambitious regeneration programme for the city which is informed by social-economic indicators, market intelligence and investment appetite. It includes large residential schemes such as Brewers Yard and Canalside South, the office led Commercial District and leisure opportunities around the Molineux and City Centre West. Through our prospectus we have set out our ambitious plans to reimagine and transform our city and town centres. We will use the strength of the city's cultural and creative offer to secure our status as an 'Event City', creating a new sense of place in our city and town centre's.

Through the Wolverhampton Anchor Network, we are working with our public sector partners and large employers in the city to use our collective spending power to support the local economy, spread opportunity and build resilience. This includes our commitment to the Wolverhampton Pound which places a greater emphasis on procuring goods and services locally increasing the amount we spend through our supply chains with SMEs and social enterprise.



Thriving economy in all parts of the city

Outcomes	Objectives	
<p>6.1 Support local businesses to start up, scale up and thrive</p>	<ul style="list-style-type: none"> • Grow emerging sectors in the city to strengthen supply chains and create new skilled jobs locally, including those in the green economy, creative and digital, professional services and others. • Increase the numbers of entrepreneurs who develop new start-ups in the city and who choose Wolverhampton as a place to grow their business. • Drive inclusivity and equality across the business base in the city, ensuring ethnicity, gender and socio-economic background are not barriers to starting and growing a business. <ul style="list-style-type: none"> • We will simplify access to business support services in the city and wider region through partnership working and digital technology making it easier to do business in Wolverhampton. • Use data and insight to identify trends, understand needs, targeting our resources and interventions in an evidence based way. 	
<p>6.2 Attract new investment which brings social and economic benefit to all</p>	<ul style="list-style-type: none"> • Champion the city's offer continuing to raise the profile of the city nationally and internationally as a great place to invest and do business. • Ensure public and private investment opportunities create good work opportunities for local people and support our businesses to grow. • Work proactively to attract new businesses to the city to diversify our business base and increase the resilience of our local economy. <ul style="list-style-type: none"> • Develop and deliver sector specific action plans to support growth of key sectors in the city. • Build an even closer relationship with investors and strategic employers through effective account management to better understand their needs and how they can contribute to growth in our city. • Support the delivery of a range of workspaces to meet the needs of a growing economy, attracting new businesses and allowing existing businesses to grow and diversify. 	

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Thriving economy in all parts of the city

Outcomes	Objectives	
<p>6.3 Vibrant high streets with quality culture and leisure offer</p>	<ul style="list-style-type: none"> Secure and deliver investment in our high streets and town centres to help them thrive, including public realm, events, meanwhile uses, arts and culture. Support and deliver a range of events in the city, from sport at the Molineux, music festivals in our parks, through to activities in our libraries and culture in venues across the city (The Halls and Bilston Town Hall). 	<ul style="list-style-type: none"> Safeguard and strengthen the city's cultural heritage by investing in, and encouraging access to our heritage assets, museums, and libraries. Promote creative and cultural activity and infrastructure that enables people to gain skills and employment in creative industries and increases investment into the city. Ensure that all of our communities and visitors can engage with and benefit from our city wide culture and arts offer.
<p>6.4 Grow the low carbon and circular economy</p>	<ul style="list-style-type: none"> Encourage the development of a more circular economy with better design, maintenance, repair, reuse and recycling of goods. Work with public and private sectors to transform how resources are procured, used, consumed and disposed of. 	<ul style="list-style-type: none"> Embed low carbon practices within procurement and other services through increased knowledge and training as part of both publicly funded business support activity and private sector led activity.

To achieve these outcomes, key activity we will deliver includes:

- First class economic growth support with a focus on the issues most important to local businesses, including: access to finance, net zero transition, workforce planning, innovation and accessing new markets.
- Leverage the Wolverhampton Pound's spending power so millions more are spent in our city to create job and business opportunities.
- Speed up the roll out of ultra-fast broadband and 5G to every home and business in our city and develop the region's first super-smart networked council tower block to help hundreds of residents access health and wellbeing support and jobs.
- Supporting local businesses with £381,000 of grant funding to support SME growth and investment in net zero innovation
- Utilise £6m of investment from the Future High Streets Fund to develop the Bell Street Box Space to draw in an estimated 250,000 visitors to the city centre a year.
- Launch our new strategic economic plan for the city, our Good Growth strategy setting out future growth sectors, skills needs and infrastructure investment.
- Bring in hundreds of thousands of visitors a year and millions of pounds to the local economy with a new five-year 'Event City' plan, supported by first class cultural venues and multi-million pound investment in new public spaces.
- Deliver thousands of new, local jobs by expanding i54, growing our commercial district, building 10,000 new homes and developing new employment land covering the same area as 77 football pitches.
- Deliver our Bilston Health and Regeneration programme which includes the Bilston Health and Wellbeing Hub. As well as improvements to the Town Centre this will bring new commercial space, market enhancements, public realm comprising pocket park and urban garden, complemented by active travel.
- Deliver the £3 million Wednesfield Towns Fund which aims to boost the high street by providing enhancements to the public realm, shop fronts and market, increasing footfall, job retention and improved connectivity.

Measuring Performance

In the Levelling Up White Paper (February 2022), the government have set out the following long term missions in relation to this area:

- By 2030, pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- By 2030, domestic public investment in R&D outside the Greater Southeast will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- By 2030, the UK will have nationwide gigabit-capable broadband and 4G coverage, with 5G coverage for the majority of the population.
- By 2030, pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.

Key System Indicators

We aim to improve performance and meet / exceed national averages in the following key system indicators:

- Businesses that survive one year in city
- Businesses that survive five years in the city
- % of premises in the city with full fibre coverage
- Number of rapid charging electric car points in the city
- Number of empty properties in the city

Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- Wolverhampton based businesses supported by the Council
- Number of new investment opportunities generated by the Council

OUR COUNCIL

To deliver our ambitions for the city and the priorities set out in this plan, the council needs to ensure it has the right people, technology, assets and resources. The Our Council priority sets out six workstreams to achieve this;



Our Assets

Sustainable assets which support our workforce, partners and communities.



Our Data

Evidence led decision making and analytics with robust performance framework.



Our Digital

Maximise how we use digital and other technologies to deliver better services and outcomes.



Our Money

Financially sustainable making the best use of our resources ensuring timely, transparent and accountable local decision making and governance.



Our People

Retain and attract the best talent, support all of our workforce to develop in an inclusive organisation.

OUR CUSTOMER PROMISE

We recently published our Customer Experience Strategy, which sets out a framework for how we will work as One Council to deliver first class customer services to our communities.

Our motivation is simple; we want to make sure our services deliver what our customers really want, when they want it, and that they are able to access those services in a way that suits them best.

To support our Customer Promise we will deliver five overarching priorities:

- Provide a seamless customer journey;
- Design customer centred services;
- Unlock the power of data and digital;
- Deliver value for money;
- Provide inclusive and accessible services for all.



DELIVERING BEST VALUE FOR WOLVERHAMPTON

A key role for us at the City of Wolverhampton Council is to ensure we are delivering best value to our residents, businesses, partners, and City.

We will do this by supporting delivery of Government's Best Value Duty:

- 1. Continuous improvement:** Make arrangements to secure continuous improvement in performance and outcomes.
- 2. Leadership:** Ensure political and administrative leaders have a clear vision and set of priorities for their area, to build local economic growth, social cohesion and a healthy local democracy.
- 3. Governance:** Have clear and robust governance and scrutiny arrangements in place that are fit for purpose, appropriate to the governance arrangements adopted locally (executive/committee system), understood by politicians and staff alike and reviewed regularly.
- 4. Culture:** Ensure that our organisational culture is determined by our shared values, ethics and beliefs, how decisions are made, as well as how elected members and officers behave, interact and carry out their roles.
- 5. Use of resources:** Ensure we have an effective internal control environment to safeguard the use of resources, and clear and effective processes to secure value for money.
- 6. Service delivery:** Provide services at a comparable level to other authorities of a similar size and location when benchmarked.
- 7. Partnerships and community engagement:** Demonstrate a clear understanding of and focus on the benefits that can be gained by effective collaborative working with local partners and community engagement in order to achieve its strategic objectives and key outcomes for local people.

OUR PARTNERS

Partnership working is a key theme running through the plan, highlighting the importance of working across sectors and service areas. It builds on achievements to date, but with renewed focus and actions to tackle cross-cutting issues such as homelessness, health inequalities, youth skills and employment.

Working across partners locally, regionally and nationally we will continue to take a whole system approach to driving change and delivering improved outcomes for local people. To realise our vision, we must continue to work closely with partners, we will continue to build on the strong partnerships with all stakeholders locally, nationally and globally to provide a strong and influential voice for the city's residents and businesses.

Our ask of city partners;

1. **To work with the Council to design and deliver innovative solutions to improve outcomes for local people.**
2. **To help us hear as widely as possible the views of communities and businesses by using your own networks to engage.**
3. **To provide robust data and evidence that you have for your area that could help ensure we are reaching those most in need.**
4. **To look at how you can support your communities and ensure nobody in our city is left behind.**

PRIDE VALUES

P

Put people first

R

Raise the city's profile and reputation

I

Inspire trust and confidence

D

Deliver together

E

Empower people to innovate

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Key Council Indicators

We aim to improve performance and meet / exceed national averages in the following key council indicators:

- Gender pay gap of council employees
- Ethnicity pay gap of council employees
- Customer Service call wait times
- Sickness absence rates
- Employee turnover rate
- Spend with local businesses

MONITORING AND EVALUATION

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This Council Plan was launched as a ‘living’ document and we will regularly review and refresh it to ensure that it continues to reflect the priorities of local people.

We will do this through a ‘Continuous Conversation’ with communities with opportunities for local people to shape our approach to delivering the plan and its priorities.

We will use this plan to align service area plans and operational activity with the strategic objectives in our priority areas. It will support decision making and determine how we use the resource we have to deliver the best outcomes, in the most effective and efficient way. We will monitor and closely manage our performance against this plan, and use it to drive delivery of our objectives.

Supporting the plan is our corporate performance framework. A set of key indicators aligned to our priority areas informed by national and local data sets. This framework will be reported alongside an update on delivery of this plan to Cabinet on a quarterly basis.

You can get this information in large print, braille, audio or in another language by calling 01902 551155 or emailing translations@wolverhampton.gov.uk

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City of Wolverhampton Council, Civic Centre, St. Peter's Square, Wolverhampton WV1 1SH

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Louise Miles Resources	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Tim Johnson, Chief Executive	
Originating service	Strategic Finance	
Accountable employee	James Howse Tel Email	Interim Director of Finance 01902 550475 James.Howse@wolverhampton.gov.uk
Report to be/has been considered by	Strategic Executive Board Council	6 February 2024 28 February 2024

Recommendations for decision:

The Cabinet recommend that Council approve:

1. The updated City of Wolverhampton Capital Strategy.
2. The revised, medium term General Fund capital programme of £373.7 million, an increase of £14.6 million from the previously approved programme, and the change in associated resources.

The Cabinet is recommended to:

1. Approve the virements for the General Fund capital programme detailed at Appendix 5 to the report for:
 - i. existing projects totalling £6.4 million;
 - ii. new projects totalling £833,000.

2. Delegate authority to the Cabinet Member for Jobs, Skills and Education, in consultation with the Interim Director of Finance and the Director of Children's Services, to approve the allocation of the Childcare Expansion Programme capital budget to individual capital projects and to enter into required grant agreements and to make grant payments where appropriate, in order that projects can be progressed in an agile and timely manner.
3. Continue both delegations to the Portfolio Holder responsible for Resources, in consultation with the Interim Director of Finance, to approve the allocation of:
 - i. The Corporate Provision and Contingency for Future Programmes budget to individual projects in order that corporate priorities may be addressed in an agile and timely manner;
 - ii. The Transformation Development Efficiency Strategy to individual transformation projects in order to benefit from the capital receipts flexibility announced in the Autumn Statement 2015 and in line with the Medium Term Financial Strategy.

Recommendations for noting:

The Cabinet is asked to note:

1. That the City of Wolverhampton Capital Strategy detailed at Appendix 1 is due to undergo further development and refinement. The result of this will be presented to members at a future meeting.

1.0 Purpose

- 1.1 To provide Cabinet with an update on the 2023-2024 financial performance of the General Fund and Housing Revenue Account (HRA) capital programmes, whilst also providing a revised forecast for 2023-2024 to 2027-2028 as at quarter three 2023-2024.
- 1.2 To recommend revisions to the current approved capital programme covering the period 2023-2024 to 2028-2029 and the updated City of Wolverhampton Capital Strategy.

2.0 Background

- 2.1 On 6 December 2023, Council approved a General Fund capital programme totalling £358.8 million and a HRA totalling £523.5 million for the period 2023-2024 to 2027-2028. Since reporting to Council on 6 December 2023 further reports have been approved, increasing the General Fund capital programme by £250,000 to £359.1 million, funded by external resources.
- 2.2 The capital programme underpins Our City: Our Plan, which was first approved by Council on 2 March 2022. To ensure that the Council's resources continue to be aligned to the needs and priorities of local people, the plan has been refreshed and developed alongside the MTFs. The refreshed Our City: Our Plan is also scheduled to be considered by Cabinet on 21 February 2024 and Council on 28 February 2024.
- 2.3 Our City: Our Plan sets out how the Council will continue to work alongside its local, regional, and national partners to improve outcomes for local people and is our strategic framework for levelling up.
- 2.4 The plan continues to identify an overarching ambition that 'Wulfrunians will live longer, healthier lives' delivered through six Council Plan priorities:
 - Strong families where children grow up well and achieve their full potential
 - Fulfilled lives with quality care for those that need it
 - Healthy, inclusive communities
 - Good homes in well connected neighbourhoods
 - More local people into good jobs and training
 - Thriving economy in all parts of the city
- 2.5 These priorities together with the associated key outcomes, objectives and activity form a framework to improve outcomes for local people and deliver our levelling up ambitions.
- 2.6 Supporting the six overarching priorities are four cross cutting principles
 - Climate Conscious
 - Driven by Digital
 - Fair and Equal
 - Wolverhampton Pound

- 2.7 The refreshed Our City: Our Plan includes the addition of the Wolverhampton Pound as one of our cross-cutting principles. Through the Wolverhampton Pound we want to retain and grow as much local wealth as possible, increasing local economic resilience, creating new jobs and opportunities.
- 2.8 The capital programme includes significant investment programmes that endeavour to create an environment where new and existing business thrive, people can develop the skills they need to secure jobs and create neighbourhoods in which people are proud to live.
- 2.9 The capital programme also reflects the priorities of the Strategic Asset Management Plan. Individual capital project delivery milestones are set and financial analysis is undertaken over the lifecycle of each project, by project managers in conjunction with Strategic Finance, and is captured in the Council's project management system. Regular project delivery updates are provided through the relevant governance structures (including Project Assurance Group where appropriate) enabling robust governance and challenge.
- 2.10 Inflation has been at the highest it has been for four decades and there is considerable uncertainty and risk of inflationary pressures across the capital programme, increases in the cost of materials are already being realised, which have resulted in budget increases on a number of projects across the capital programme. The Council will continue to monitor and report on the ongoing impact of inflation.
- 2.11 In addition to inflation risks, there are also supply chain delays, which could impact completion dates on projects and result in further cost pressures. The Council continues to assess the potential implications on its wider capital programme in terms of delivery timescales and increases in costs. Project contingency budgets are viewed in light of these pressures in order to mitigate against such cost increases, however these are unprecedented market conditions and the ongoing risk should be noted.
- 2.12 In light of ongoing financial challenges, as detailed in the 2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027 on this same agenda, the Council will continue to ensure that all projects brought forward for inclusion in the capital programme are subject to rigorous challenge and review. This includes projects funded from the Corporate Provision and Contingency for Future Programmes.
- 2.13 The capital programme makes a significant contribution to the shaping of the City and on the economy of the City and therefore will contribute to the Council's plans for Our City: Our Plan.

3.0 Capital programme - Summary

- 3.1 On 6 December 2023, Council approved a General Fund capital programme totalling £358.8 million for the period 2023-2024 to 2027-2028. Since then, further reports have been approved to increase this amount by £250,000 to £359.1 million, funded by external

resources. Full details can be found in Appendix 2 to the report and are summarised below:

- £250,000 for Digital Innovation Services for the establishment of a digital proof-of-concept capital budget to support the delivery of Council's digital innovation priorities, fully funded by Gainshare receipts generated through the Black Country superfast programme.

3.2 In addition to this, reallocation of resources totalling £3.2 million from the Corporate Provision and Contingency for Future Programmes budget to various individual projects has been approved, details of which can be found in Appendix 3 to the report and are summarised below:

- £1.7 million for the Energy from Waste (EFW) plant to undertake required capital work to ensure continued operation of the plant in an efficient and cost-effective manner;
- £1.5 million for the Chubb Cinema to contribute towards the refurbishment and fit out works of the cinema space.

3.3 This report reflects all known approvals to 2 February 2024. However, the Council continues to operate as usual, and reports subject to delegated authority may still progress during the period of preparing the report and it being considered by the Cabinet and Full Council. Where this situation arises, an update will be provided at the relevant meeting on any material changes to the information being presented.

3.4 This report considers further specific changes to budgets. A full list of the proposed capital programme can be found in Appendix 2 to the report.

3.5 Table 1 shows the approved General Fund capital programme budget compared with that proposed, along with the resources identified to finance the proposed change.

Table 1: Summary of the General Fund capital programme

General Fund capital programme	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	Total
	£000	£000	£000	£000	£000	£000	£000
Budget							
Approved	106,395	164,329	68,557	18,785	1,000	-	359,066
Variations							
New projects	383	783	-	-	-	-	1,166
Existing projects	(20,877)	(9,828)	30,098	9,058	5,000	-	13,451
	(20,494)	(9,045)	30,098	9,058	5,000	-	14,617
Projected	85,901	155,284	98,655	27,843	6,000	-	373,683
Financing							
Approved							
Internal resources	46,717	58,808	40,157	12,598	1,000	-	159,280
External resources	59,678	105,521	28,400	6,187	-	-	199,786
	106,395	164,329	68,557	18,785	1,000	-	359,066
Variations							
Internal resources	(10,068)	(374)	18,650	2,504	5,000	-	15,712
External resources	(10,426)	(8,671)	11,448	6,554	-	-	(1,095)
	(20,494)	(9,045)	30,098	9,058	5,000	-	14,617
Projected							
Internal resources	36,649	58,434	58,807	15,102	6,000	-	174,992
External resources	49,252	96,850	39,848	12,741	-	-	198,691
Projected	85,901	155,284	98,655	27,843	6,000	-	373,683

3.6 This report therefore (as set out in table above) recommends variations to the approved capital programme totalling an increase of £14.6 million which brings the total revised programme to £373.7 million.

3.7 Details of all projects that have contributed to the overall increase of £14.6 million in the General Fund capital programme can be found in Appendices 2 and 3 to the report, however, the key projects are as follows:

- The Corporate Provision and Contingency for Future Programmes budget have been revised upwards by £15.8 million over the medium-term capital programme, to ensure sufficient contingency is in place for future budget requirements and to support Council priorities. Budget provision has been incorporated into the Corporate Provision and Contingency for Future Programmes to be prudent at this stage and will be allocated to individual projects using appropriate delegations. Allocations will be reported at each Quarterly Review. Future requirements across the capital programme remain under review;
- There is £4.5 million increase relating to Disabled Facilities Grant capital programme due to grant allocation from the Department for Levelling Up, Housing and Communities (DLUHC);
- The increase above has been offset by a reduction of £4.9 million relating to the i54 Western Extension capital programme, recognising the underspend on the scheme related to specific grant and external contributions;

- In addition to this, there is a reduction of £1.0 million relating to Local Authority Delivery 3: Green Homes Grant capital project within City Housing due to time constraints of the grant;
- Further change to the budgets for existing projects relates to proposed virements to enable progress of new projects which are also seeking approval in this report. This amounts to £833,000 and is discussed in section 5 of the report.

3.8 On 24 January 2024, Council approved a revised HRA capital programme totalling £643.2 million for the period 2023-2024 to 2028-2029. Of the approved £643.2 million HRA budget, £118.7 million relates to the 2023-2024 financial year.

3.9 Table 2 shows the approved budget for information only as there are no proposed changes to the overall budget.

Table 2: Summary of the HRA capital programme

Housing Revenue Account capital programme	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	Total
	£000	£000	£000	£000	£000	£000	£000
Budget							
Approved	118,691	142,060	128,959	103,920	86,273	63,282	643,185
Projected	118,691	142,060	128,959	103,920	86,273	63,282	643,185
Financing							
Approved							
Internal resources	115,016	142,060	128,959	103,920	86,273	63,282	639,510
External resources	3,675	-	-	-	-	-	3,675
	118,691	142,060	128,959	103,920	86,273	63,282	643,185
Projected							
Internal resources	115,016	142,060	128,959	103,920	86,273	63,282	639,510
External resources	3,675	-	-	-	-	-	3,675
Projected	118,691	142,060	128,959	103,920	86,273	63,282	643,185

4.0 Existing projects

4.1 The changes proposed for existing projects within the General Fund capital programme total an increase of £14.6 million as outlined in paragraph 3.6. A more detailed listing of the individual projects can be found in Appendices 2 and 3 to the report.

4.2 Requests for budget virements between existing projects within the General Fund capital programme total £2.1 million, a summary of these is available in Appendix 5 to the report.

4.3 The following paragraphs provide commentary on the key changes to budgets and an update on key projects.

Interchange

4.4 The focus of activity is finalising the tram extension works and external public realm / plaza space outside of the station in collaboration with the West Midlands Combined Authority (WMCA) and the Midlands Metro Alliance (MMA), who are delivering the project.

- 4.5 Services commenced operating from the two new tram stops (Pipers Row and Wolverhampton Railway Station) on 17 September 2023. In doing so, services calling at the existing tram stop at St. George's have been temporarily suspended to allow works to be undertaken to support the dual operation of services to St. Georges and the two new stops. Works have paused on site and discussions are ongoing to finalise the metro completion programme inclusive of the re-opening of the St. George's tram stop, remaining works along Pipers Row and Railway Drive and the station plaza urban realm works.

City Learning Quarter

- 4.6 City Learning Quarter (CLQ) is one of the Council's top regeneration priorities being fundamental to the levelling up approach for the City. The Council is managing the delivery of the CLQ programme which includes Phase 1, the City of Wolverhampton College Advanced Technology and Automotive Centre (ATAC – formerly CoWTEchC) and Phase 2, which will create a lifelong learning hub in Wolverhampton City Centre comprising a new, refurbished and extended College building, with integrated and improved Library and Adult Education facilities at land around the existing College's Metro One building at Bilston Street.
- 4.7 The CLQ Programme has successfully secured public funding of approximately £69.2 million from multiple sources. Phase 1, ATAC has benefited from Black Country Local Enterprise Partnership (BCLEP) and WMCA grant awards while Phase 2 will be funded by a combination of BCLEP, Council & College Contributions, Towns Fund, Levelling Up Fund and Department for Education Capital Funding.
- 4.8 Works on ATAC are progressing well and to programme, with completion of the new building anticipated in July 2024 to enable the college opening for the new term in September 2024. Construction works have also commenced on the main college site, which will complete in September 2025, for use by the college in the 2025/26 academic year.
- 4.9 The tender process for the works to the Central Library are underway, which will see investment to enable the co-location of Library and Adult Education services within the building. The project will also see essential repairs to the façade of the Grade II* listed building. The current target completion for the Library works is Summer 2025.

I54 Western Extension

- 4.10 This is a joint venture (JV) project with Staffordshire County Council and South Staffordshire District Council to construct access roads and serviced platforms ready for development. The works reached completion of the physical works in June 2023.
- 4.11 Global manufacturer, Fortune Brands Innovations, have completed their building and are well advanced with their fitout of their specific manufacturing equipment to meet their manufacturing commencement target date in February 2024. The new state-of-the-art manufacturing centre of excellence will also be the Company's EMEA (Europe, Middle

East and Africa) headquarters facility. Recruitment and training support is being provided by the JV Partners as they commence operations and start to welcome staff to the new facility. Circa 250 permanent jobs will be generated over the next few years as they ramp up production, including training opportunities for apprentices and graduates. The HQ building will also include a Customer Experience Centre and Training Facility. Marketing continues for the remaining 25 acres which has seen some positive interest which is being considered by the JV Partners.

- 4.12 Financial projections over the last twelve months have indicated that there will be significant savings against the JV budget of £38.5 million. Whilst the project is still incurring residual capital expenditure as it moves through to full plot occupation and the implementation of various Management Company process and activities, latest estimates (including significant contingencies) indicate that there will be an overall JV project saving in the region of £12.6 million. The project has also secured additional grant support during its life as well as firm interest in the developed plots, both of which will have a positive impact on the Council's capital programme. The budgetary position has been updated to reflect this projected underspend, and can be found at Appendix 3 to this report, including £4.2m of Council resources which has been made available to support other capital priorities.
- 4.13 It should be noted, however, that in the event of additional infrastructure or enabling works being required to facilitate a potential occupier and land disposal, such works would be subject to a specific business case under the direction of the i54 Steering Group.

Investment Prospectus Phase 1 Delivery Strategy

- 4.14 A Cabinet paper was approved in March 2023 which endorsed selection of five schemes across four sites based on criteria around land ownership, existing development agreements, developed scheme proposals and understanding of funding requirements, and secured a series of delegations towards their advancement.
- 4.15 As part of this programme, the delivery of a higher quality hotel has been identified by the Council as a priority for the city linked to the existing and emerging leisure demand.
- 4.16 Key challenges exist in the delivery of new hotel, a business case and delivery options paper with clear recommendations on implications in respect of any requirement for Council investment is being progressed alongside external commercial advice on market assessment, best practice and profit & loss models, alongside reviewing any potential commercial terms arising from the preferred delivery route.
- 4.17 At City Centre West, the English Cities Fund (ECF), the JV between nationwide placemaker, Muse, Legal & General, one of the UK's leading financial services groups and major global investor, and Homes England, will enter a partnership with the Council to deliver development plans. The partnership was approved at a Cabinet meeting on 18 October 2023. It follows a Memorandum of Understanding between the Council and ECF,

which functions as a delivery vehicle to work in partnership with the public sector to transform urban areas and create exceptional new places. Work is underway to explore scheme proposals and potential routes to formally engage development partners to bring forward a comprehensive scheme on a phased basis.

- 4.18 Similarly, at St Georges, a report was approved by Cabinet on 13 December 2023 recommending the appointment of social impact developers Capital&Centric, who are developing the scheme to Outline Business Case, at which point the Council will determine the best development option and delivery route for the scheme.

Green Innovation Corridor

- 4.19 The Council and the University of Wolverhampton submitted their LUF3 grant application submission on 16 February 2024 in order to secure £20 million worth of delivery funding. The proposals as part of the submission outline the development options for key sites on the Springfield campus to support ongoing Research & Development and new employment space for green industry companies. The delivery of the proposed developments is targeted for completion by March 2026.

Brewers Yard Phase 1 – Culwell Depot relocation and new wholesale markets

- 4.20 The first phase of the Brewers Yard masterplan, a scheme aiming to unlock three key brownfield sites to enable the delivery of up to 1,300 homes is now in progress. Phase 1 involves the relocation of Fleet services operations from the existing Culwell Street site to a new facility at the Council owned Wholesale Market site, supporting the modernisation of the Fleet and Meals on Wheels services, enabling land remediation works of the Culwell Street site to allow for disposal for residential development. The project has received grant funding from WMCA and the Towns Fund, with the balance of monies supported by Council prudential borrowing.
- 4.21 The scheme has received outline planning consent and Royal Institute of British Architects (RIBA) stage 4 design is complete with the project now out to tender and replies expected March 2024. The ground investigation and mineshaft remediation works are complete at the Wholesale Market site for the first of two mineshafts. To help minimise any programme delays a number of enabling packages have commenced.
- 4.22 The project pre-tender estimate is within budget but requires value engineering proposals to be put forward by the tenderers. The procurement process has been structured to take advantage of market input to seek value engineering and design efficiencies. Based on the advice from the Quantity Surveyor and Project Manager the scheme has been de-risked and the budget and contingencies will be reviewed when the tender process is completed.

Oxley Health & Wellbeing Facility and Self & Custom Build New Homes

- 4.23 The Council owned former Oxley Day Training Centre was a vacant asset subject to ongoing anti-social behaviour and holding costs. With the support of the Black Country

Integrated Care Board (ICB) a proposal has been prepared to consider the site for a much needed health & wellbeing facility.

- 4.24 Following a range of stakeholder engagement activities, an outline planning application was submitted last year and has received consent. The project sought approval for two complimentary buildings consisting of a modern health & wellbeing facility and 23 new homes. The full appointment of the RIBA stage 4 design team has occurred and detailed construction design is well underway. Going forward site investigations are to be carried out to further help de-risk the project by understanding ground risk.
- 4.25 The project has attracted grant funding from the Local Government Association (LGA) and contributions from the ICB. The balance of monies are supported by Council prudential borrowing and capital receipts generated by the scheme. Funding applications are currently under consideration from Homes England and WMCA to further support the scheme.

One Public Estate – Asset Transformation Programme (Loxdale, Stowheath & Hickman Avenue Depot)

- 4.26 The proposed project is the relocation of existing services from the former Loxdale Primary School (Loxdale) and Stowheath Day Training Centre (Stowheath) to Hickman Avenue Depot, to unlock the Stowheath and Loxdale brownfield sites for residential development. This project forms part of the wider Asset Transformation Programme. Council approval was obtained for this project to proceed, subject to grant, on 29 March 2023.
- 4.27 The funding bid with the Brownfield Land Release Fund 2 (BLRF2) Round 3 is under preparation and targeted for submission in February 2024. Other efforts are ongoing to secure the balance of grant funding required for the scheme. Part funding has been secured from the Land and Property Investment Fund (LPIF) funding secured for the Loxdale and Stowheath schemes totalling £2 million.

Asset Decarbonisation

- 4.28 The Council has committed to becoming a net zero organisation, with the largest contributors to its carbon footprint being heating and electricity across the corporate estate. Work is ongoing to understand fully the cost implications related to the decarbonisation of the Council's estate and an energy survey and feasibility programme is underway. This will help to ensure that any interventions are targeted appropriately and are in line with the Council's Strategic Asset Plan.
- 4.29 In addition, the Council is currently undergoing a fleet electrification programme to help meet its net zero target. So far, it has introduced 42 ultra-low emission vehicles and installed 34 chargers in its depots. Following a successful trial of the use of Hydrotreated Vegetable Oil (HVO), the Council is exploring opportunities to increase use of this fuel, as a way of further reducing carbon emissions.

Bell Street Box Space

- 4.30 The Bell Street Box Space project “Bell Works” will create an entertainment and hospitality destination venue, to enhance the City’s visitor offer and to drive footfall along the recently pedestrianised Victoria Street. The project also includes new public car parking. It is now moving towards the delivery phase, with the venue planning application recently submitted. Alongside this, the team are exploring operating models.
- 4.31 Phase 1 works, including the demolition of 1-7A Cleveland Street, have been completed at below original forecast cost estimate. The Neville Garratt building has been acquired and vacated to enhance the site to enable it to accommodate on site Heavy Goods Vehicle (HGV) servicing and to divert National Grid buried cables and associated easements and facilitate the relocation of the existing substation to enable emergency vehicular access without adverse impact on the Box Space scheme.
- 4.32 The next phase of construction works is dependent upon planning permission and building regulation approval, with the main construction contract being aligned with plans to secure an operator of the required calibre to deliver the Council’s vision for this exciting visitor economy project.

City East Gateway – Phase 1 and 2

- 4.33 City East Gateway Phases 1 and 2 is one of the City of Wolverhampton’s top transportation scheme priorities, delivering transformational change to the highway network on the A454, linking the city centre to the wider region as part of the Key Route Network and providing access to regeneration priority sites within the Canalside Quarter. The scheme includes improvements to ensure journey time reliability for all road users, new infrastructure to encourage use of sustainable transport including walking and cycling and delivering environmental and air quality benefits.

The estimated £46 million scheme is at Outline Business Case (OBC) stage, with a submission now made to the DfT to secure £44 million from the Major Road Network funding. In addition, the scheme has allocated £6 million in principle match funding through City Region Sustainable Transport Settlement (CRSTS) funding. Further development funding to continue the progression of the scheme has been secured for the 2023/2024 financial year, with delivery of the scheme expected to commence on site in 2025.

City Centre Public Realm

- 4.34 With support from the Towns Fund and CRSTS, and Active Travel Fund a £18 million next phase of improvements for the Lichfield Street and Queens Square environment is now under consultation. The scheme aims to provide an environment which supports café culture, provides spacious areas for pedestrians and events, and encourages use of active and sustainable travel modes to access and move around the city centre. The Full Business Case (FBC) has been submitted to the West Midlands Combined Authority for

CRSTS funding, early contractor engagement is due to commence Spring 2024 with a start on site later in the year.

Active Travel Schemes

- 4.35 The Active Travel Fund (ATF) provides a competitive opportunity for Local Authorities to bid for delivery of schemes which facilitate cycling and walking in their areas. The Council successfully secured funding in all rounds to date, and have delivered schemes which ease congestion, improve access to opportunity across the city and support residents in making active lifestyle choices.
- 4.36 ATF 3 bids have secured a total of £3.5 million This will deliver a section of new cycle route from Noose Lane along the A454, connecting across the borough boundary into Willenhall. This will complement other schemes along the A454 corridor aiming to achieve a continuous cycle route between Wolverhampton and Walsall. It also includes further investment to extend the successful scheme from ATF2 along the Wednesfield Road to connect with an existing cycleway on Wednesfield Way. Delivery on site expected to commence Spring 2024 for Noose Lane and Autumn 2024 for Wednesfield Road.
- 4.37 Recently announced ATF4 includes a grant of £2.6 million to fund the extension of the successful ATF2 ring road scheme from Chapel Ash to Broad Street, providing a key link between the city centre and several existing and planned cycle routes along the key radial routes Stafford Road, Wednesfield Road, Willenhall Road and Birmingham New Road. Construction on this is anticipated to begin in Summer 2024/25.

Wednesfield Towns Fund

- 4.38 Through the successful award of £3.3 million the project will deliver a series of high street interventions that will activate and regenerate the Town Centre. Following extensive and ongoing engagement with the public and stakeholders in the area, a series of priority actions have been agreed including improvements to the north and south gateways to the town which are aimed at improving the linkages and connectivity with existing retail and residential, particularly with Bentley Bridge to the south. Other improvements include upgrades to retail frontages and pedestrian access points onto the high street and canal. Links to new and existing cycle routes are also a priority to encourage greater take up of active travel in the area.
- 4.39 The Council has been working closely with the High Streets Task Force to focus on a Placemaking strategy for the town and as well as those activities already identified, the Towns Fund will also help with activations within the town centre such as creating the infrastructure for and supporting the organisation of events and attractions including the creation of new play areas and improvements to how the current market looks and functions.
- 4.40 Detailed design work for these interventions has already begun and further consultation will follow. It is anticipated that works will take 18 months to complete.

Housing Revenue Account (HRA)

- 4.41 The forecast for the HRA 2023-2024 capital programme as at quarter 3 totals £118.7 million, as approved by Council on 24 January 2024 as part of the Housing Revenue Account Business Plan 2024-2025 including Rent and Service Charges Cabinet report of the 17 January 2024. The report sets out investment plans up to 2028-2029 based on the commitment to maximise the provision of additional homes whilst also prioritising the needs of existing stock with emphasis on building safety, decency, energy efficiency and replacing homes where it is no longer viable to maintain them .
- 4.42 The 2023-2024 forecast reflects an overall budget increase of £4.9 million, as was approved by Cabinet and Council in January 2024. This includes additional budget for Disabled Adaptations (£1.0 million), Internal Decency Works (£1.9 million) and Remedial works to non-traditional properties which are all related to demand.
- 4.43 Approval is sought to delegate authority to the Cabinet Member for Jobs, Skills and Education, in consultation with the Director of Finance and the Director of Children’s Services, to approve the allocation of the Childcare Expansion Programme capital budget to individual capital projects and to enter into required grant agreements and to make grant payments where appropriate, in order that projects can be progressed in an agile and timely manner.
- 4.44 Approval is also sought to continue both delegations to the Portfolio Holder responsible for Resources, in consultation with the Director of Finance, to approve the allocation of:
- i. The Corporate Provision and Contingency for Future Programmes budget to individual projects in order that corporate priorities may be addressed in an agile and timely manner;
 - ii. The Transformation Development Efficiency Strategy to individual transformation projects in order to benefit from the capital receipts flexibility announced in the Autumn Statement 2015 and in line with the Medium Term Financial Strategy.

5.0 New projects and virements

- 5.1 Table 3 provides a summary of new projects requiring approval, covering the period 2023-2024 to 2027-2028, and identifying where additional funding is required and where the new expenditure can be met from existing resources. A detailed analysis of the individual projects included in this table can be found in Appendix 4 to the report.

Table 3: Summary of new projects requiring approval

Directorate	2023-2024 to 2028-2029		
	Forecast outturn	Additional external resources required	Virements from existing projects
	£000	£000	£000
General Fund	1,166	333	833
Total	1,166	333	833

- 5.2 The new projects requiring approval are funded from additional external resources of £333,000 and virements totalling £833,000. This is discussed below whilst a list of the virements can be found in Appendix 5 to the report:
- An increase funded externally relates to new project within Education. Approval is sought for the Childcare Expansion Programme for the provision of new early years entitlement and wraparound places, fully funded by grant allocation from the Department for Education (DfE).
- 5.3 New projects created through virements relate to Corporate Asset Management Fund, Education and Waste and Recycling Strategy capital programmes and are summarised below. A detailed list of new projects can be found in Appendix 5 to the report.
- 5.4 In summary, approval sought for the following new projects created through virements totalling £833,000:
- £450,000 is proposed for new project within the Corporate Asset Management Fund capital programme to ensure Council assets are statutory compliant and fit for purpose. Virement is proposed from existing Corporate Provision and Contingency for Future Programmes budget;
 - £150,000 is required for four new projects within the Schools Capital Maintenance capital programme to facilitate works across various schools in the City. Virements are funded from existing external resources available within the programme;
 - £140,000 is proposed for two new projects within the Schools Devolved Formula Capital programme to support ICT enhancement works in Nurseries and Primary schools. Virements are funded from existing external resources available within the programme;
 - £93,000 is requested for acquisition of dust suppression skips within the Waste and Recycling Strategy capital programme to meet the Health, Safety and Environment requirements. Virement is proposed from existing Corporate Provision and Contingency for Future Programmes budget.
- 5.5 On 6 July 2023, Cabinet approved the recommendation to delegate authority to the Deputy Director of Assets to approve virements from the provision for future projects budget within the Corporate Asset Management capital programme to individual schemes in order that corporate priorities can be addressed in an agile and timely manner. It should be noted that there were two virements totalling £50,000 approved through the delegated authority to support urgent works which can be seen in the Appendix 6 to the report.
- 6.0 Medium term capital programme financing**
- 6.1 Table 4 details the approved financing for the capital programme for 2023-2024 to 2028-2029 and incorporates the requested approvals for projects included in this report.

Table 4: Approved and forecast capital financing 2023-2024 to 2028-2029

2023-2024 to 2028-2029				
General Fund capital programme	Approved budget	Recommended budget	Variance	Resource as % of expenditure
	£000	£000	£000	
Expenditure	359,066	373,683	14,617	
Financing				
Internal resources				
Capital receipts	53,445	51,541	(1,904)	13.8%
Prudential borrowing	104,718	122,397	17,679	32.8%
Revenue contributions	1,117	1,054	(63)	0.3%
Reserves	-	-	-	0.0%
Subtotal	159,280	174,992	15,712	46.9%
External resources				
Grants & contributions	199,786	198,691	(1,095)	53.1%
Subtotal	199,786	198,691	(1,095)	53.1%
Total	359,066	373,683	14,617	100.0%

2023-2024 to 2028-2029				
Housing Revenue Account capital programme	Approved budget	Recommended budget	Variance	Resource as % of expenditure
	£000	£000	£000	
Expenditure	643,185	643,185	-	
Financing				
Internal resources				
Capital receipts	35,637	35,637	-	5.5%
Prudential borrowing	458,953	458,953	-	71.3%
Revenue contributions	2,289	2,289	-	0.4%
Reserves	142,631	142,631	-	22.2%
Subtotal	639,510	639,510	-	99.4%
External resources				
Grants & contributions	3,675	3,675	-	0.6%
Subtotal	3,675	3,675	-	0.6%
Total	643,185	643,185	-	100.0%

- 6.2 Capital receipts totalling £51.5 million have been assumed within the General Fund capital programme over the medium term period 2023-2024 to 2028-2029 and can be seen in Table 5. This is reduction of £1.9 million when compared to the approved budget, which has arisen due to re-profiling of receipts and capital requirements.
- 6.3 In order to be prudent, a detailed review of the schedule of asset disposals is undertaken to identify only those that are likely to be completed. The planned utilisation of capital receipts will reflect the need to balance the benefit for both the capital programme and the revenue budget and will form part of the ongoing Medium Term Financial Strategy.

- 6.4 Whilst the forecast of capital receipts is deemed prudent at this stage, it will continue to be monitored closely throughout the financial year. In the event that capital receipts assumptions change, updates will be provided in future reports to Councillors.

Table 5: Receipts assumed in the revised General Fund capital programme

General Fund	Projected						Total £000
	2023 - 2024 £000	2024 - 2025 £000	2025 - 2026 £000	2026 - 2027 £000	2027 - 2028 £000	2028 - 2029 £000	
Capital programme receipts	7,400	6,200	16,500	7,400	9,000	5,000	51,500

- 6.5 It is the Council's strategy to use capital receipts to reduce the Council's need to borrow to fund the approved capital programme. Capital expenditure has a direct impact upon the Council's revenue budgets and therefore needs to be restricted to projects essential to the Council's priorities. Any proposals to increase the level of the capital programme are considered in accordance with the Capital Strategy.

7.0 Key budget risks

- 7.1 A key risk currently to the Council's capital programme is the market rate of inflation and the impact this could have on costs to deliver projects. Inflation is at the highest it has been for four decades and there is considerable uncertainty which is impacting contract pricing. In addition to the inflationary risks there are also supply chain delays, which could impact completion dates on projects and result in further cost pressures. The position in relation to these risks, continues to be monitored and to mitigate these risks contingency budgets are being reviewed. The current market conditions are however unprecedented, therefore quantification of the value of risk to the Council at this time is difficult.
- 7.2 An analysis of the risks associated with the capital programme, along with the details of the risk control measures that are in place in order to manage and mitigate these risks as far as possible can be viewed online on the Council's website by following the link below:

[Capital Programme | City Of Wolverhampton Council](#)

- 7.3 The overall risk associated with the programme continues to be quantified as amber.

8.0 Evaluation of alternative options

- 8.1 This report provides an update on progress of capital projects during 2023-2024 and anticipated budget requirement for future years. The evaluation of alternative project options is detailed in individual investment proposals.

9.0 Reasons for decisions

- 9.1 To seek Cabinet's recommendation to Council to approve the revised capital budgets. This will ensure that the capital programme reflects the latest forecasts and budget requirements.

10.0 Financial implications

- 10.1 The financial implications are discussed in the body of this report. The revenue implications of the new and existing projects seeking approval for additional or changes in resources for the General Fund are fully reflected in the treasury management budget forecasts included in the report 'Treasury Management Strategy 2024-2025' also on the agenda for approval at this meeting.
- 10.2 New capital grant notifications received during quarter three 2023-2024 can be seen in the table below. Notifications can either confirm new, or additions to existing grants, or reflect reductions in existing grants where resources are no longer required:

Service	Funding body	Name of grant	Project(s) funding	£000
City Housing	Department for Levelling Up, Housing and Communities	Disabled Facilities Grant	Disabled Facilities Grant capital works	4,500
School Planning & Resources	Department for Education	Childcare Expansion Grant	Childcare Expansion Programme	333
Enterprise	UK Shared Prosperity Fund via WMCA	UK Shared Prosperity Fund	UK Shared Prosperity Fund - Support to SMEs	14
City Development	Land and Property Investment Fund (from LEP)	LPIF - Plot Development Western Extension	*Western Extension Plot Development	(1,777)
City Housing	Department for Business, Energy and Industrial Strategy (BEIS) via Midlands Net Zero Hub	Local Authority Delivery 3 : Green Homes Grant	Local Authority Delivery 3 : Green Homes	(1,000)
Enterprise	European Regional Development Fund	ERDF - AIM for GOLD	*Aim for Gold	(45)
Total grant notifications				2,025

*Grant fully claimed, resources no longer required.

[RJ/12022024/J]

11.0 Legal implications

- 11.1 Section 151 of the Local Government Act 1972 requires local authorities to make arrangements for the proper administration of their financial affairs.
- 11.2 The Local Government Act 2003 brought in the current regime for capital finance for local authorities. It reduced the level of central control over local authority borrowing and capital expenditure.
- 11.3 Each project mentioned in this report will have its own specific legal implications, raised and tailored in their respective reports.

[TC/09022024/C]

12.0 Equalities implications

- 12.1 There is a range of individual projects delivered through the Council's capital programme that have significant impacts on specific groups and equality implications should be considered when individual capital projects are being developed.

12.2 This requirement would also apply if there were to be any redirection of capital funding in year to ensure that the impact of any changes is considered.

13.0 All other implications

13.1 A wide range of projects delivered through the capital programme have significant environment implications and are geared to promote improvements to the physical environment.

13.2 Projects funded and delivered through the Council's capital programme typically have significant impact on the Council's property portfolio. Corporate landlord implications must be considered and included in relevant documents and reports when individual capital projects and programmes are being developed.

13.3 There is a range of individual projects delivered through the Council's capital programme which could have health and wellbeing implications, these should be considered when individual capital projects are being developed.

14.0 Schedule of background papers

14.1 Council, 6 December 2023 - [Capital Programme 2023-2024 to 2027-2028 Quarter Two Review](#);

14.2 Cabinet (Resources) Panel, 13 December 2023 – [Transforming the Chubb Cinema to Boost City Centre Vibrancy](#);

14.3 Individual Executive Decision Notice, 13 December 2023 – [LEP Gainshare monies for Digital Innovation Purpose](#);

14.4 Council, 24 January 2024 - [Housing Revenue Account Business Plan 2024-2025 including Rent and Service Charges](#);

14.5 Individual Executive Decision Notice, 6 February 2024 – [Allocation of budget for EFW Enhancement work \(Turbine and Outage\)](#).

15.0 Appendices

15.1 Appendix 1: Capital Strategy 2024-2025;

15.2 Appendix 2: Detailed project budgets;

15.3 Appendix 3: Detailed forecast change;

15.4 Appendix 4: Projects requiring approval;

15.5 Appendix 5: Virements for approval;

15.6 Appendix 6: Virements to note.

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The City of Wolverhampton Council

Capital Strategy

1.0 Introduction – what is the capital strategy?

- 1.1 The Capital Strategy is a key document for the Council and forms part of the authority's integrated capital, revenue, strategic asset management and balance sheet planning. The following sections provide a high-level overview of how capital expenditure, capital financing and treasury management activity are undertaken in line with service objectives, whilst taking account of stewardship, value for money, prudence, sustainability and affordability.
- 1.2 Furthermore, it provides a framework by which investment decisions will be made, an overview of risk management, the implications for future financial sustainability and the governance processes for approval and monitoring of capital expenditure in line with requirements under the Prudential Code for Capital Finance in Local Authorities.
- 1.3 The Capital Strategy has direct links to other Council strategies and plans such as the Treasury Management Strategy, Housing Strategy, Strategic Asset Management Plan, and forms a key part of the Council's Medium Term Financial Strategy (MTFS). These all underpin the delivery of Our City: Our Plan.

2.0 Capital expenditure - how does capital expenditure fit in with the Council's wider objectives? What is the framework in place to ensure effective and sustainable investment?

- 2.1 The Council's Capital Strategy is underpinned by the strategic approach to align resources to Our City, Our Plan which was first approved by Council on 2 March 2022. To ensure that the Council's resources continue to be aligned to the needs and priorities of local people the plan has been refreshed.
- 2.2 Our City, Our Plan sets out an ambition that 'Wulfrunians will live longer, healthier lives.' Delivery of this ambition is supported by six overarching priorities.
- Strong families where children grow up well and achieve their full potential
 - Fulfilled lives for all with quality care for those that need it
 - Healthy, inclusive communities
 - Good homes in well-connected neighbourhoods
 - More local people into good jobs and training
 - Thriving economy in all parts of the city.

Supporting the six overarching priorities are three cross cutting principles:

- Climate Conscious
- Driven by Digital
- Fair and Equal
- Wolverhampton Pound

- 2.3 Like many other councils, the City of Wolverhampton Council has experienced significant funding reductions over the last 10 years and more recently significant increases in costs, and we need to make careful choices in where we prioritise the money we spend. However, despite the financial challenges faced, the Council's capital programme includes significant investment programmes that endeavour to create an environment where new and existing business thrive, people can develop the skills they need to secure jobs and to create neighbourhoods in which people are proud to live.
- 2.4 The Council's capital investment aims to attract further inward investment to help the local economy to grow and thrive, so every pound invested by the authority generates a local economic benefit well in excess of this initial investment.
- 2.5 The **Vision 2030** details our ambition to work with commercial partners to enable major developments in the city centre and embed collaborative working with the private sector as the primary driver of inclusive growth in the city. Looking into the horizon, what might the City of Wolverhampton look and feel like in 2030? The City is already one of the fastest changing cities in the UK and is playing a leading role in supporting devolution to the West Midlands via the West Midlands Combined Authority. Our medium term capital investment plans to 2027-2028 mark a significant step change and will take us closer to the City described in our 'New Horizons' vision for the City of Wolverhampton in 2030. In 2030 Wolverhampton will be place where people come from far and wide to work, shop, study and enjoy our vibrant city but this can only be realised by effective collaboration across the City and beyond. We will transform our City into a prosperous and inclusive place that celebrates its diversity and heritage and plays its part on the regional, national and international stage.
- 2.6 The Council's Capital Strategy includes all capital expenditure and capital investment decisions not only as an individual local authority but also those entered into under group arrangements or other partnership arrangements. Detailed financial planning is focussed on the medium term to reflect the availability of robust information including the timing of asset disposals, government funding and local tax generation.
- 2.7 A key element of achieving our goals is how we use all our resources, and this includes our land and buildings. To support this, the Council has an **Asset Management Policy** in place which provides an overview of the Council's land and property estate, together with the main priorities for managing and developing that estate over the next five years. The key principles and priorities of this plan are reflected in the Capital Strategy. The Strategic Asset Plan is in the process of being reviewed and refreshed during 2024, and a new Plan will be implemented by December 2024.
- 2.8 In addition to this, the Council has a **Housing strategy** which will support Wolverhampton in achieving its long term ambitions for housing; improving the quality and supply of housing, to support current and future residents who will have a fundamental role to play in developing Wolverhampton's identity and economic function as a key place on the regional, UK and international stage.

- 2.9 Furthermore, the **Vision for Public Health for the City of Wolverhampton by 2030** provides an approach and framework for improving the health and wellbeing and reducing inequalities of the city's population. Having the best start in life, an excellent education, a stable, rewarding job and a decent home in a thriving community are the strongest factors that influence both how long a person is likely to live and their quality of life. Evidence suggests that getting these factors right, coupled with enabling access to high quality health and care services, will have a significant impact on the behaviours, lifestyle choices and health of our residents. This Vision focusses on making the greatest impact on these areas that influence health and wellbeing and outlines a way of working that will help support doing so.
- 2.10 In July 2019, the Council declared a 'Climate Emergency', noting the impact of climate change around the world. The Council's Climate Change Strategy outlines the Council's commitment to be carbon-neutral by 2028 and how the Council will work with a wide range of partners across the city to safeguard health, safety and well-being of our City and the future generations that will inherit it.
- 2.11 The Council has also designed the **Youth Engagement Strategy**, #YES, to improve the well-being of all children and young people living in the City of Wolverhampton. This vision is 'Happy Healthy Children and Young People'. It recognises the importance of young people's voice in shaping services, valuing their contribution in making the City a great place to bring up families.

3.0 Capital Expenditure and the Medium Term Financial Strategy

- 3.1 Capital investment results in the enhancement or creation of a new asset. The expenditure often spans a number of years and may be funded from a variety of sources including capital receipts and borrowing. However, when developing the Capital Programme, close attention is paid to the direct impact capital expenditure can have on revenue budgets and the Council's **Medium Term Financial Strategy** and the **Housing Revenue Account Business Plan**, including the cost of borrowing in the form of interest charges and Minimum Revenue Provision.
- 3.2 It is a statutory requirement under Section 33 of the Local Government Finance Act 1992 (the Act), for the Council to produce a balanced budget. When calculating its budget requirement for the forthcoming financial year, the Council must include the revenue costs that result from capital financing decisions. Therefore, increases in capital expenditure must be limited to a level whereby increases in interest charges, Minimum Revenue Provision and other costs associated with borrowing to finance capital expenditure, as well as any increases in running costs from new capital projects, are contained to a level which is affordable and sustainable within the projected income of the Council for the foreseeable future. The **Medium Term Financial Strategy** is updated regularly to incorporate the ongoing revenue implications arising as a result of existing and new capital investment decisions, as well as ongoing maintenance costs, to ensure that that investment decisions are affordable and sustainable.

3.3 As detailed in the Council's **Treasury Management Strategy**, it is a statutory duty under Section 3 of the Act and supporting regulations, for the Council to determine and keep under review how much it can afford to borrow. The amount so determined is termed the "Affordable Borrowing Limit". In England and Wales, the Authorised Limit represents the legislative limit specified in the Act.

3.4 The Council must have regard to the Prudential Code when setting the Authorised Limit, which essentially requires it to ensure that total capital investment remains within sustainable limits and, in particular, that the impact upon its future Council tax and Council housing rent levels is 'acceptable'.

4.0 Capital Funding Streams

4.1 The capital programme can be funded from a variety of internal and external resources, as detailed below:

- Capital receipts – money received from the disposal of land and other assets, and from the repayment of grants and loans made by the Council.
- Prudential borrowing – monies obtained by the Council from entering into a loan agreement.
- Revenue contributions – a contribution from the revenue budget to fund capital expenditure.
- Reserves – money set aside for a specific purpose that can be applied to fund capital expenditure.
- Capital grants – a funding contribution, often by Central Government, towards the cost of capital projects.
- Section 106 contributions – a financial contribution from private developers towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place.
- External contributions – a financial contribution from an external organisation.

4.2 The Council aims to maximise external funding opportunities through:

- Collaboration with public sector partners, such the West Midlands Combined Authority and Government Departments;
- The development of strategic investment pipeline so that we are ready for grant opportunities when they arise.

5.0 Project establishment and approval

5.1 As a Council we undertake a significant number of projects and programmes each year. Business cases for capital project proposals are initially prepared by project managers in accordance with the Council's Project Management Process. The business case will include an appraisal of the project identifying the objectives of the project. In addition to this, the project manager will seek guidance and support from subject matter experts within the organisation to enable them to consider project implications such as capital and revenue expenditure over the project lifecycle, risks associated with project delivery and legal implications.

- 5.2 In order to ensure the development of robust business cases and governance procedures, an internal multi-disciplinary Officer led working group, titled Project Assurance Group (PAG), reviews and discusses the details of projects at the initiation stage. The Group provide assurance that representatives of key business areas, including legal, finance, asset management, procurement, commercial and EDI have reviewed and discussed the details of projects, including any interdependencies that may exist, and that the project will be delivered in accordance with priorities as set out in **Our City, Our Plan**, prior to being submitted to the next stage of the process.
- 5.3 In order to ensure strategic oversight of projects, they are reviewed by Leadership Teams and/or Strategic Executive Board (SEB). SEB, including the Council's Director of Finance, strategically review project business cases to ensure that the project will be delivered in accordance with Council priorities and is affordable. Capital projects will be assessed and prioritised based on:
- Council priorities;
 - Asset Management Plan priorities;
 - City wide priorities;
 - Identified need including health and safety requirements;
 - Affordability;
 - Deliverability;
 - Income generation including business rates and council tax receipts;
 - Compatibility with Council strategies;
 - Transformation.
- 5.4 If the project receives SEB agreement it will be included in reports presented to Cabinet and Full Council for consideration and approval, as required in the **Financial Procedure Rules** within the Council's **Constitution**. If the project is approved, project expenditure and financing will then be built into the Council's capital programme and **Medium Term Financial Strategy** (MTFS) or **Housing Revenue Account Business Plan**.
- 5.5 To manage our capital projects effectively and efficiently, we need to know how we are performing. In order to do this, individual capital project delivery milestones and financial analysis is undertaken over the lifecycle of each project, by project managers in conjunction with professional colleagues from across the organisation including Strategic Finance and is updated in the Council's project management system. Regular project delivery updates are provided to directorate leadership teams or project boards and will also be provided to PAG, where appropriate, enabling robust governance and challenge.

6.0 Governance

- 6.1 The City of Wolverhampton Council's Full Council makes decisions on a variety of issues, primarily linked with the budgetary and policy framework. Full Council will provide overall direction and approval of the Capital Strategy, and investment in the Capital Programme.

- 6.2 Cabinet and Full Council will continue to receive quarterly capital programme and treasury management monitoring reports throughout the financial year and will approve variations to the capital programme as appropriate.
- 6.3 The Strategic Executive Board has responsibility for the strategic development, management and monitoring of the capital and investment programme.
- 6.4 The Director Finance will report on the sustainability and affordability of individual capital projects and the overarching capital programme, including the implications on the Medium Term Financial Strategy.
- 6.5 Through the work of Scrutiny Board and Resources and Equality Scrutiny Panel there is oversight and scrutiny of performance and budget monitoring, budget and MTFs and treasury management strategy.

7.0 Projected Capital Programme

- 7.1 The Capital Strategy, for the Council's General and Housing Revenue Account, sets out the plans to invest over £800 million in the City over the next five years together with the funding to support that investment.
- 7.2 The HRA Business Plan outlines the Council's approach to utilising HRA borrowing flexibilities to increase the provision of new homes for rent, whilst continuing to invest in better and safer homes programmes to the existing stock and improving and redeveloping housing estates.
- 7.3 The Council's projected General and Housing Revenue Account capital programmes are detailed in the table below:

Table 1 – Projected Capital Programme 2023-2024 to 2028-2029

General Revenue Account capital programme	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	Total
	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme							
Projected Budget	85,901	155,284	98,655	27,843	6,000	-	373,683
Projected Financing							
Internal resources	36,649	58,434	58,807	15,102	6,000	-	174,992
External resources	49,252	96,850	39,848	12,741	-	-	198,691
Projected Financing	85,901	155,284	98,655	27,843	6,000	-	373,683
Housing Revenue Account							
Projected Budget	118,691	142,060	128,959	103,920	86,273	63,282	643,185
Projected Financing							
Internal resources	115,016	142,060	128,959	103,920	86,273	63,282	639,510
External resources	3,675	-	-	-	-	-	3,675
Projected Financing	118,691	142,060	128,959	103,920	86,273	63,282	643,185

- 7.4 The table below details the projected financing for the capital programme over the medium term period.

Table 2 - Projected capital financing 2023-2024 to 2028-2029

2023-2024 to 2028-2029		
General Fund capital programme	Recommended budget £000	Resource as % of expenditure
Expenditure	373,683	
Financing		
Internal resources		
Capital receipts	51,541	13.8%
Prudential borrowing	122,397	32.8%
Revenue contributions	1,054	0.3%
Reserves	-	0.0%
Subtotal	174,992	46.9%
External resources		
Grants & contributions	198,691	53.1%
Subtotal	198,691	53.1%
Total	373,683	100.0%
2023-2024 to 2028-2029		
Housing Revenue Account capital programme	Recommended budget £000	Resource as % of expenditure
Expenditure	643,185	
Financing		
Internal resources		
Capital receipts	35,637	5.5%
Prudential borrowing	458,953	71.3%
Revenue contributions	2,289	0.4%
Reserves	142,631	22.2%
Subtotal	639,510	99.4%
External resources		
Grants & contributions	3,675	0.6%
Subtotal	3,675	0.6%
Total	643,185	100.0%

- 7.5 Capital receipts totalling £51.5 million have been assumed within the General Fund capital programme. In order to be prudent, a detailed review of the schedule of disposals is undertaken to identify only those that are likely to be completed. The planned utilisation of capital receipts is kept under review and reflects the need to balance the benefit for both the capital programme and the revenue budget.

8.0 Debt, Borrowing and Treasury Management

8.1 Treasury management is defined as:

“the management of the local authority’s borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

8.2 The Council’s **Treasury Management Strategy Report** incorporates six elements:

- The Treasury Management Strategy – this document summarises in strategic terms the approach the Council will take in performing its treasury management activities.
- The Annual Investment Strategy – this document sets out in detail the conditions under which the Council will place investments.
- The Prudential and Treasury Management Indicators – this document details indicators that will be kept under review to ensure affordability or prudence.
- Minimum Revenue Provision Statement – this document details the annual revenue charge which spreads the financing of capital expenditure over the life expectancy of the asset.
- The Disclosure for Certainty Rate – this document details information required in order for the Council to access cheaper borrowing rates.
- The Treasury Management Policy – this document defines the policy and objectives of treasury management activities.

8.3 The Council continues to follow a strategy of keeping cash balances to a minimum and avoiding external borrowing unless absolutely necessary. In the short term, this has resulted in significant revenue budget reductions, whilst also serving to protect the Council from the risk of exposure to loss on the money markets, which remain relatively fragile.

8.4 The Council’s forecast external debt/prudential borrowing over the medium term is detailed in the table below:

Table 3 – Forecast External Debt over the medium term

PI 2 - Estimates and actual capital financing requirement General and HRA.				
The capital financing requirement measures the authority's underlying need to borrow for a capital purpose.				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
General Fund *	672,037	703,861	719,479	700,699
HRA	371,451	471,372	560,116	623,860
Total capital financing requirement	1,043,488	1,175,233	1,279,595	1,324,559
* Service investments included in General Fund figure. These relate to areas such as capital expenditure on investment properties and loans to third parties etc. for service and regeneration delivery purposes.	34,436	38,086	38,163	39,304
Movement in capital financing requirement represented by:				
New borrowing for capital expenditure	109,818	169,950	141,883	82,672
Less minimum revenue provision/voluntary minimum revenue provision	(35,925)	(38,205)	(37,521)	(37,708)
Movement in capital financing requirement	73,893	131,745	104,362	44,964

- 8.5 The Council has a statutory duty under Section 3 of the Local Government Finance Act 1992 (the Act) and supporting regulations, to determine and keep under review how much it can afford to borrow. The amount so determined is termed the “Affordable Borrowing Limit”. In England and Wales the Authorised Limit represents the legislative limit specified in the Act.
- 8.6 When setting the Authorised Limit, the Council must have regard to the Prudential Code, which essentially requires it to ensure that total capital investment remains within sustainable limits and, in particular, that the impact upon its future Council tax and Council housing rent levels is ‘acceptable’. The Authorised Limit for the current financial year and three successive financial years and can be seen in the following table:

Table 4 – Authorised Limit for External Debt

PI 3 - Authorised limit for external debt				
These limits apply to the total external debt gross of investments and separately identify borrowing from other long term liabilities such as finance leases including Private Finance Initiatives (PFI). This is a self determined level reviewed and set each budget setting cycle.				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Limit	Limit	Limit	Limit
	£000	£000	£000	£000
Borrowing	1,137,035	1,184,887	1,324,196	1,400,635
Other Long Term Liabilities	75,960	76,416	72,939	69,309
Total Authorised Limit	1,212,995	1,261,303	1,397,135	1,469,944
Forecast External Debt as at 21 February 2024:				
Borrowing	820,109	967,398	1,078,236	1,136,830
Other Long Term Liabilities	73,960	74,416	70,939	67,309
	894,069	1,041,814	1,149,175	1,204,139
Variance (Under) / Over Authorised limit	(318,926)	(219,489)	(247,960)	(265,805)
Authorised limit for service investments included in the above figures				
Authorised Limit	57,928	49,064	48,281	49,702
Forecast External Debt as at 21 February 2024:	44,319	47,968	48,046	49,187
Variance (Under) / Over Authorised limit	(13,609)	(1,096)	(235)	(515)

- 8.7 As can be seen from the table above, the forecast level of external debt is within the Authorised Limit for each year.
- 8.8 The Council has adopted a prudent approach to managing risk. In order to minimise the risk, the Council applies a minimum acceptable credit criteria as detailed in the Annual Investment Strategy.
- 9.0 Service and Commercial investments Commercial Activity**
- 9.1 The Council continues to ensure that opportunities for commercialism and shared services are considered. Investments in order to support income generation is part of the Council’s financial strategy, however as detailed in the [Treasury Management Strategy](#), non-treasury/service and commercial investments should be of benefit to the economic,

social or environmental well-being of the area served by the City of Wolverhampton Council and/or the West Midlands Combined Authority and not held primarily for yield.

- 9.2 The codes of practice issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) contains investment guidance which complements the guidance issued by the Department for Levelling Up Housing and Communities. The most recent version of this guidance released December 2021, requires local authorities to produce disclosures on financial and non-financial investments held.
- 9.3 Investments held for treasury management purposes are disclosed in the **Treasury Management Strategy**, whilst investments held for non-treasury management purposes are detailed in the following paragraphs.
- 9.4 Investments held for non-treasury management purposes include investments such as loans, shares and other non-financial investments including property investment assets. When considering service investment, consideration is given to the level of exposure to different sectors in the market and the needs of the City.
- 9.5 Whilst Wolverhampton holds a number of investments that are classed under the guidance as service investments, the Council's investments are held primarily in order to secure wider strategic objectives as detailed in **Our City, Our Plan**. This includes inclusive growth and creating neighbourhoods in which people are proud to live. Revenue income streams arising as a result of holding these investments is a secondary benefit which supports the Council's financial strategy.
- 9.6 Long-term investments held by the Council for non-treasury management purposes have been funded from borrowing and include:
- Equity investment and loans to WV Living – the Council's wholly owned housing company established in 2016;
 - YOO Recruit Ltd – the Council's wholly owned recruitment agency established in 2014 (the Council initially working capital in Yoo recruit to support cashflow which has been repaid in full);
 - Investment properties such as i9, i10 and i11
 - Equity investment in Help to Own – a new affordable housing product alongside the West Midlands Combined Authority.
- 9.7 WV Living – The Council established a Housing Company to develop affordable and desirable new homes within Wolverhampton for rent and sale after identifying a need in the City for housing. This was a targeted and careful intervention by the Council to unlock sites and ensure that the City is a place where people want to work and live. The strategic response to address the housing need generates a commercial return for the Council that will contribute to the MTFs, however as stated above, whilst beneficial in supporting the financial strategy this is the secondary objective. WV Living has a Board of Directors, who include Council and non-Council Directors, who keep the Business Plan under constant review to ensure security of funds.

- 9.8 Yoo Recruit – The Council established a recruitment agency to help get local people into temporary council jobs. The Council is the sole shareholder of the company and benefits from any profits that the company makes, however the primary reason for establishing this company was to ensure that the City is a place where people want to work and live.
- 9.9 Investment properties - The Council owns and has invested in a number of investment/commercial properties such as the i10 office block and retail facility, which was successfully opened in early 2016 attracting big name tenants such as Greene King and Tarmac. The i9 building which was completed in 2021 is now substantially let and includes the Department for Levelling Up, Housing and Communities. i9 is the first government department headquarters outside of London and will include ministerial presence. Investment in these assets encourages regeneration and inward investment into the City's local economy, the Council does not make investments purely for the purpose of providing a yield.
- 9.10 An advanced programme of lease renewals and rent reviews on investment properties is underway to maximise the income to the Council from the commercial portfolio. In addition to maximising annual rental income, this also ensures that income is secured, by locking tenants into current leases at market level rent rates.
- 9.11 All investment properties are considered as part of the Council's Asset Management Policy. The reasons for holding assets will vary and, as a result, we may need to measure their performance in different ways. Performance of each asset must therefore be linked to the strategic purpose for holding it. The Asset Challenge process means that we are reviewing each asset on a rolling programme to ensure we only keep the buildings we need in the future. This process explores the utilisation of assets, along with analysis of running and maintenance costs, and geographical location. The outcome of this process will identify asset rationalisation and disposal opportunities to support our Medium Term Financial Strategy.
- 9.12 Help to Own – The Council entered into an equity investment alongside the West Midlands Combined Authority in 2021 for an affordable housing product called 'Help to Own'. This scheme, now fully subscribed, aimed to help anyone who was struggling to get onto the property ladder and enabled individuals to enter into a tenancy agreement to rent a home for 20 years with the option for a further tenancy of 5 years and to purchase the home outright along the way. This was a targeted and careful intervention by the Council to ensure that the City is a place where people want to work and live.
- 9.13 All new service ideas/investment will follow the project establishment and approval process as detailed above. If the service investment proposal is successful, performance will be monitored on an ongoing basis following investment approval, against the agreed business plan by the relevant boards. The investment/project plan will have clearly identified performance targets which will be the baseline for decisions as to whether the investment is successful and whether it should be ceased, continued or expanded. Any significant under performance will be escalated to the relevant Director.

- 9.14 All of the Council's property, plant and equipment assets are valued at current value, and those assets with a current net book value in excess of £1.0 million are valued annually; the most recent valuation was undertaken on 31 March 2023. A rolling programme ensures that the remaining assets are revalued at least every five years. The valuations were carried out by external valuers. The housing stock valuation was carried out by Jones Lang Lasalle while the other valuations were carried out by Wilkes Head and Eve, registered RICS valuers. This ensures security of capital investment.
- 9.15 In the event that the fair value of the investment is no longer sufficient to provide security against the loss the Strategic Executive Board will need to consider whether the investment is enabling wider strategic objectives.
- 9.16 The following table details the projected level of net service and commercial investment over the medium term period:

Table 5 – Forecast Service and Commercial Investment

NTM 1 - Estimates and actual non-treasury management investment expenditure.				
This identifies the level of any non-treasury management investments (e.g. service and commercial investments).				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
Service investments	2,609	6,344	6,940	9,000
Commercial investments	-	-	-	-
	2,609	6,344	6,940	9,000

- 9.17 The following indicators are used to assess the Council's total risk exposure as a result of service and commercial investment decisions, as detailed below:

Indicator 1 – Forecast Net Debt for Service and Commercial Investment to Net Service Expenditure Ratio

	2023-2024	2024-2025	2025-2026	2026-2027
	£000	£000	£000	£000
Net Debt for Service and Commercial Investment	34,436	38,086	38,163	39,304
Net Service Expenditure	306,414	332,024	338,041	348,354
Debt to NSE Ratio	11.2%	11.5%	11.3%	11.3%

The indicator above measures the forecast level of net debt for service and commercial investments in comparison to the Council's forecast net service expenditure, where net service expenditure is a proxy for the size and financial strength of a local authority. The forecast level of cumulative net debt for service and commercial investments is projected to be less than 12% of the Council's forecast net revenue budget in each year.

Indicator 2 – Forecast Service and Commercial Income to Net Service Expenditure Ratio

	2023-2024 £000	2024-2025 £000	2025-2026 £000	2026-2027 £000
Forecast Service and Commercial Investment Income	1,685	3,191	4,105	4,659
Net Service Expenditure	306,414	332,024	338,041	348,354
Commercial Income to NSE Ratio	0.6%	1.0%	1.2%	1.3%

The indicator above measures the forecast level of service and commercial investment income in comparison to the Council's forecast net service expenditure, where net service expenditure is a proxy for the size and financial strength of a local authority. The forecast level of service and commercial investment income when compared to the Council's forecast net service expenditure is marginal, and therefore indicates that the Council's financial resilience is not heavily reliant on service and commercial investment income.

Indicator 3 – Forecast Loan to Value Ratio

	2023-2024	2024-2025	2025-2026	2026-2027
Loan to Value Ratio	0.60	0.62	0.61	0.61

The indicator above measures the forecast net debt for service and commercial investments compared to the forecast total asset value. The stable forecast loan to value ratio over the medium term indicates a steady level of borrowing, with no major increase, due to new loans, or decrease resulting from repayments.

10.0 Other long term liabilities

10.1 Liabilities and investments including PFI contracts and soft loans are assessed as part of each year's balance sheet review to ensure that information is up-to date.

11.0 Knowledge and skills

11.1 The Council recognises the importance of ensuring that all staff involved in the development and delivery of capital projects, including programme/service managers, accountants, solicitors and surveyors, are fully equipped to undertake the duties and responsibilities allocated to them. The Council seeks to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills.

11.2 In addition to this, the Council ensures that Councillors tasked with capital investment and treasury management responsibilities, including those responsible for scrutiny, have access to training relevant to their needs and those responsibilities. Those charged with governance recognise their individual responsibility to ensure that they have the necessary skills to complete their role effectively.

- 11.3 The Council also procures external professional advice where necessary to support the due diligence of capital projects including treasury management advice, financial advice and risk and assurance advice.

12.0 Corporate Strategies

- 12.1 Our City, Our Plan
- 12.2 Vision 2030
- 12.3 Strategic Asset Management Plan
- 12.4 Medium Term Financial Strategy
- 12.5 Housing Revenue Account Business Plan
- 12.6 Treasury Management Strategy
- 12.7 Financial Procedure Rules
- 12.8 Council Constitution
- 12.9 Housing Strategy
- 12.10 Vision for Public Health for the City of Wolverhampton by 2030
- 12.11 Future Generations: Our Climate Commitment
- 12.12 Youth Engagement Strategy

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total £000	Internal resources £000	External resources £000
		2023- 2024 £000	2024- 2025 £000	2025- 2026 £000	2026- 2027 £000	2027- 2028 £000	2028- 2029 £000			
General Fund capital programme										
Finance	Corporate Provision and Contingency for Future Programmes	1,352	20,310	26,700	4,000	-	-	52,362	(52,362)	-
	Transformation Development Efficiency Strategy	2,000	2,000	-	-	-	-	4,000	(4,000)	-
	WV Living - Loans	1,960	6,000	6,940	9,000	6,000	-	29,900	(29,900)	-
Communications and Visitor Experience	Bell Street Box Space	-	4,561	-	-	-	-	4,561	(4,224)	(337)
	Cleveland Street - Demolition & Site Preparation	541	76	-	-	-	-	617	(296)	(321)
	Acquisition of Neville Garratt Centre	12	-	-	-	-	-	12	(12)	-
Governance	Governance Initiatives	-	-	-	-	-	-	-	-	-
	Webcasting Infrastructure	130	-	-	-	-	-	130	(130)	-
Strategy	ICT General Programme	-	-	-	-	-	-	-	-	-
	Security Enhancement (ICT Main Prog)	281	-	-	-	-	-	281	(281)	-
	Software Upgrades (ICT Main Prog)	74	380	-	-	-	-	454	(454)	-
	Infrastructure Upgrades (ICT Main Prog)	105	325	-	-	-	-	430	(430)	-
	Data Centres (ICT Main Prog)	43	65	-	-	-	-	108	(108)	-
	IT Service Management	-	101	-	-	-	-	101	(101)	-
	Storage Refresh (ICT Main Prog)	-	278	-	-	-	-	278	(278)	-
	Future Developments	161	290	-	-	-	-	451	(451)	-
	ICT Disaster Recovery	-	-	-	-	-	-	-	-	-
	Disaster Recovery	50	-	-	-	-	-	50	(50)	-
	ICT Desktop Refresh	921	-	-	-	-	-	921	(921)	-
	Service Led ICT Projects	-	-	-	-	-	-	-	-	-
	IDOX/GIS Cloud Migration	31	-	-	-	-	-	31	(31)	-
	Fleet management system	44	-	-	-	-	-	44	(44)	-
	Migrate Care First to Eclipse_Adults and Finance Module	579	196	-	-	-	-	775	(30)	(745)
	Digital Inclusion	100	218	-	-	-	-	318	(318)	-
	Employee Alert System	30	-	-	-	-	-	30	(30)	-
	Self-Service Kiosk	-	160	-	-	-	-	160	(160)	-
	Connected Services Programme - purchase of adaptive equipment	25	-	-	-	-	-	25	-	(25)
	Full Fibre Network	120	29	-	-	-	-	149	(149)	-
	Digital Innovation Services	250	-	-	-	-	-	250	-	(250)
City Assets	Corporate Asset Management	50	-	-	-	-	-	50	(50)	-
	Haymarkets – internal / external renovation works	10	-	-	-	-	-	10	(10)	-
	Grand Theatre - FRA priority works	160	-	-	-	-	-	160	(160)	-
	Fordhouse Road Ind. Estate - roof replacement	200	1,387	-	-	-	-	1,587	(1,587)	-
	Parkfields Centre - Plant room alteration and refurbishment	5	-	-	-	-	-	5	(5)	-
	Bradley Resource Centre – mechanical plant upgrade	27	-	-	-	-	-	27	(27)	-
	Ashmore Park Community Hub – new ventilation system	2	-	-	-	-	-	2	(2)	-
	Former Oxley Day Training Centre - demolition of buildings	300	-	-	-	-	-	300	(300)	-
	Hickman Avenue - demolition of void buildings	275	-	-	-	-	-	275	(275)	-
	Merridale Offices (Youth Offending Team) – installation of new ventilation system	44	-	-	-	-	-	44	(44)	-
	Former Loxdale School – conversion of site	11	-	-	-	-	-	11	(11)	-
	Former Oxley Moor House – demolition of buildings	78	-	-	-	-	-	78	(78)	-
	Mayoral Garage – installation of new roller shutter door and security system upgrade	-	25	-	-	-	-	25	(25)	-
	Graiseley Healthy Living Centre - roof works	3	28	-	-	-	-	31	(31)	-
	Parkfields – replacement of upper floor windows	40	354	-	-	-	-	394	(394)	-
	St Chads Community Centre - replacement of Flue & Boilers	3	-	-	-	-	-	3	(3)	-
	Shaw Road HWRC - replacement of welfare facilities and installation of CCTV	113	-	-	-	-	-	113	(113)	-
	Anchor Lane HWRC - replacement of welfare facilities and installation of CCTV	125	-	-	-	-	-	125	(125)	-
	Bradley Resource Centre - fire door replacement and refurbishment	41	-	-	-	-	-	41	(41)	-
	Hickman Avenue Depot (Office) – lighting upgrade	215	-	-	-	-	-	215	(215)	-
	Eastfield Community Centre - roof replacement	53	-	-	-	-	-	53	(53)	-
	Civic Centre - reconfiguration of Customer Services area	30	-	-	-	-	-	30	(30)	-
	Wolverhampton Art Gallery – upgrade of security systems/CCTV	103	-	-	-	-	-	103	(103)	-
	Civic Centre – upgrade of CCTV to Ceremonial Car Park	33	-	-	-	-	-	33	(33)	-
	Civic Centre – replacement of heat exchanger	5	-	-	-	-	-	5	(5)	-
	Civic Centre – upgrade fire alarm	29	-	-	-	-	-	29	(29)	-
	Wolverhampton Sea Cadets – demolition of void hall	141	-	-	-	-	-	141	(141)	-
	Land adjacent to Bilston Town FC – ground clearance and removal of knotweed	5	-	-	-	-	-	5	(5)	-
	Bilston Cemetery – installation of boundary fence	25	-	-	-	-	-	25	(25)	-
	Bushbury Crematorium – upgrade of fire alarm	40	-	-	-	-	-	40	(40)	-
	Bilston Market – installation of CCTV	20	-	-	-	-	-	20	(20)	-
	Central Baths – installation of CCTV	10	-	-	-	-	-	10	(10)	-
	Wolverhampton Retail Market - installation of CCTV	30	-	-	-	-	-	30	(30)	-
	Tettenhall Paddling Pool - Plant Enclosure / Welfare Facilities	-	250	-	-	-	-	250	(250)	-
	18/19 Queen Square - window replacement	52	-	-	-	-	-	52	(52)	-
	Bingley Enterprise Centre – door and window replacements	200	-	-	-	-	-	200	(200)	-
	Eastfield Community Centre - flooring replacement	-	13	-	-	-	-	13	(13)	-
	Eastfield Community Centre - boiler and pumps replacement	-	10	-	-	-	-	10	(10)	-

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
City Assets	Neil Docherty Resource Centre - lighting upgrade	2	-	-	-	-	-	2	(2)	-
	Neil Docherty Resource Centre - flooring replacement	1	-	-	-	-	-	1	(1)	-
	Tettenhall Wood Institute - flooring replacement	-	22	-	-	-	-	22	(22)	-
	The Avenues Family Resource Centre (Low Hill SFH) – replacement of doors	22	-	-	-	-	-	22	(22)	-
	The Avenues Family Resource Centre (Low Hill SFH) – lighting upgrade	2	-	-	-	-	-	2	(2)	-
	The Avenues Family Resource Centre (Low Hill SFH) – replacement of plant room doors	2	-	-	-	-	-	2	(2)	-
	Whitmore Reans SFH – replacement of flooring	9	-	-	-	-	-	9	(9)	-
	Aldersley Leisure Village - refurbishment of 6 Changing Rooms	85	-	-	-	-	-	85	(85)	-
	Wolverhampton Art Gallery – lighting upgrade	49	-	-	-	-	-	49	(49)	-
	Civic Centre – kitchen induction hob	40	-	-	-	-	-	40	(40)	-
	Newhampton Arts Centre – ventilation chillers	189	-	-	-	-	-	189	(189)	-
	Queens Building – external stonework	13	-	-	-	-	-	13	(13)	-
	The Whitehouse project	-	888	-	-	-	-	888	(888)	-
	Bilston Retail Market - safe roof access	-	27	-	-	-	-	27	(27)	-
	Land fronting Wednesfield Way - redevelopment of land to a community/orchard garden	-	20	-	-	-	-	20	(20)	-
	Crown Street Recycle Waste - Site Refurbishment	695	180	-	-	-	-	875	(875)	-
	Wolverhampton Contact Centre - fencing replacement	11	-	-	-	-	-	11	(11)	-
	Duke Street Bungalows - toilet refurbishment works	-	30	-	-	-	-	30	(30)	-
	Lawnswood Campus - entrance refurbishment and securing void area	70	-	-	-	-	-	70	(70)	-
	Avenues (Low Hill) SFH – CCTV upgrade works and reconfigure the kitchen into a break-out space area	36	-	-	-	-	-	36	(36)	-
	Graiseley SFH - internal reconfiguration of rooms and refurbishment works	130	-	-	-	-	-	130	(130)	-
	Smestow Valley Park Nature Reserve - access point restrictions	10	40	-	-	-	-	50	(50)	-
	Former Tettenhall Railway Station (Cupcake Lane Carpark) - CCTV & lighting	10	170	-	-	-	-	180	(180)	-
	Aldersley Leisure Village - new AC units	10	-	-	-	-	-	10	(10)	-
	Civic Centre - Electrical system devices	9	-	-	-	-	-	9	(9)	-
	Ashmore Park Community Hub - new internal fire doors	12	-	-	-	-	-	12	(12)	-
	City Centre Skills and Employment Hub	117	-	-	-	-	-	117	(117)	-
	Action 4 Independence – Refurbishment works	300	-	-	-	-	-	300	(300)	-
	Aldersley Leisure Village – External steelwork fire resistant protection	-	90	-	-	-	-	90	(90)	-
	Ashmore Pak Community Hub – Window replacements	11	-	-	-	-	-	11	(11)	-
	Bert Williams Centre – CCTV system upgrade	120	-	-	-	-	-	120	(120)	-
	Bert Williams Centre – Renewal of pool water filtering system	60	-	-	-	-	-	60	(60)	-
	Bilston Community Centre - BMS upgrade & air tech controls	30	-	-	-	-	-	30	(30)	-
	Bilston Community Centre – External stoneworks and roof works	20	-	-	-	-	-	20	(20)	-
	Bilston Library – Refurbishment to accommodate Community Shop from the Bilston Hub	-	30	-	-	-	-	30	(30)	-
	Bilston Retail Market – BMS upgrade	80	-	-	-	-	-	80	(80)	-
	Bilston Town Hall – CCTV upgrade	-	22	-	-	-	-	22	(22)	-
	Bingley Strengthening Family Hub – Creation of new Health Room	30	-	-	-	-	-	30	(30)	-
	Birch Street Car Park – Structural safety works and lighting upgrade	20	280	-	-	-	-	300	(300)	-
	Bob Jones Community Hub – Roof refurbishment	-	250	-	-	-	-	250	(250)	-
	Bradmore Community Centre – Door replacements	5	-	-	-	-	-	5	(5)	-
	Central Baths - Air conditioning unit upgrade in Gym	40	-	-	-	-	-	40	(40)	-
	Civic Centre – Basement electrical mains panel and lighting upgrade	110	-	-	-	-	-	110	(110)	-
	Civic Centre – Drainage tank cleaning system in car park	-	10	-	-	-	-	10	(10)	-
	Civic Centre - Union Offices refurbishment	25	-	-	-	-	-	25	(25)	-
	Civic Centre – Mayoral EV & relocation	35	-	-	-	-	-	35	(35)	-
	Civic Centre – Cheapside flower bed water proofing system	-	40	-	-	-	-	40	(40)	-
	Civic Centre – Hearing inductions loops	1	49	-	-	-	-	50	(50)	-
	Cleveland Passage – Wall demolition and new retaining wall	-	225	-	-	-	-	225	(225)	-
	Duke St Bungalows – Windows replacements to 3 bungalows	200	-	-	-	-	-	200	(200)	-
	Eastfield Strengthening Family Hub – Roof replacement	10	-	-	-	-	-	10	(10)	-
	Eastfield Strengthening Family Hub – Creation of new health room and front door access system	50	-	-	-	-	-	50	(50)	-
	Graiseley Music School – Internal refurbishment to entrance and offices	100	-	-	-	-	-	100	(100)	-
	Graiseley Strengthening Family Hub – Roof replacement	-	100	-	-	-	-	100	(100)	-
	Grand Theatre – Stage life upgrade	-	41	-	-	-	-	41	(41)	-
	Grand Theatre – BMS upgrade	50	40	-	-	-	-	90	(90)	-
	Hickman Avenue Depot - Replacement and part renewal of roofs	-	80	-	-	-	-	80	(80)	-
	Hickman Avenue Depot - Dry rot removal and new replacement in the old School building	15	-	-	-	-	-	15	(15)	-
	Hickman Avenue Depot – Flooring replacement	-	10	-	-	-	-	10	(10)	-
	Hickman Avenue Depot – External door replacement	6	-	-	-	-	-	6	(6)	-
	Land adjacent Bilston Town Football Club – Mineshaft treatment	3	397	-	-	-	-	400	(400)	-

This report is PUBLIC
[NOT PROTECTIVELY MARKED]

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
City Assets	Low Hill Community Centre - 2 x Plant room upgrades	-	20	-	-	-	-	20	(20)	-
	Merridale Cemetery – Roof replacement works	-	20	-	-	-	-	20	(20)	-
	Merridale Cemetery – Resurfacing works & security gate	-	20	-	-	-	-	20	(20)	-
	Parkfields – Demolition of void area	100	1,297	-	-	-	-	1,397	(1,397)	-
	Pendeford Offices - Building Management Controls upgrade	14	-	-	-	-	-	14	(14)	-
	Pendeford Nature Reserve – Refurbishment works to buildings and external grounds	-	80	-	-	-	-	80	(80)	-
	Qualcast Road Salt Depot – Demolition and reinstatement of Salt Bay	185	-	-	-	-	-	185	(185)	-
	Warstones Library - Boiler replacements & hot cylinder upgrade	20	-	-	-	-	-	20	(20)	-
	Wednesfield Community Hub – Renewal of timber cladding	-	90	-	-	-	-	90	(90)	-
	Windsor Avenue Playing Fields – Roof replacement	-	40	-	-	-	-	40	(40)	-
	Wolverhampton Art Gallery – Chiller unit replacement	130	-	-	-	-	-	130	(130)	-
	Central Baths - Hot water system replacement	15	-	-	-	-	-	15	(15)	-
	Wcistop - Boiler replacement	16	-	-	-	-	-	16	(16)	-
	Ernest Bold Centre - FRA works	19	-	-	-	-	-	19	(19)	-
	- 18/19 Queen Square - Airtech control system	15	-	-	-	-	-	15	(15)	-
	Aldersley Leisure Village – perimeter fencing required	20	-	-	-	-	-	20	(20)	-
	Bantock House - Conservatory external stonework and timber replacement	-	55	-	-	-	-	55	(55)	-
	I10 - monitoring system for alarm	16	-	-	-	-	-	16	(16)	-
	Landport Road Industrial Estate - electric gate installation	26	-	-	-	-	-	26	(26)	-
	Maltings - Fire Alarm System	-	40	-	-	-	-	40	(40)	-
	Maltings - roof replacement	-	40	-	-	-	-	40	(40)	-
	Tettenhall Library - Fire Alarm System	25	-	-	-	-	-	25	(25)	-
	Upper Pendeford Farm - plant upgrade works	-	150	-	-	-	-	150	(150)	-
	Whitmore Reans Strengthening Family Hub - fencing replacement	20	-	-	-	-	-	20	(20)	-
	Civic Centre - safety fencing	4	-	-	-	-	-	4	(4)	-
	Bradley Resource Centre - New shower facilities	-	280	-	-	-	-	280	(280)	-
	Dunstall Community Centre - new boiler flu and burners	15	-	-	-	-	-	15	(15)	-
	1-2 Worcester Road - roof replacement	20	-	-	-	-	-	20	(20)	-
	3 Worcester Road - roof replacement	10	-	-	-	-	-	10	(10)	-
	Civic Centre - rainwater pumping system	35	-	-	-	-	-	35	(35)	-
	Adult Education Centre (Old Hall Street) - Electrical supply replacement	10	-	-	-	-	-	10	(10)	-
	Civic Centre - Humidification System	40	-	-	-	-	-	40	(40)	-
	Civic Centre - roof upgrade works	-	450	-	-	-	-	450	(450)	-
	Oxley Health and Wellbeing Facility and Residential Accommodation	269	6,310	10,630	599	-	-	17,808	(15,760)	(2,048)
	One Public Estate - Asset Transformation Programme	-	5,668	6,622	560	-	-	12,850	(3,640)	(9,210)
	i11 Building, 4-5 Victoria Square - Investing in the City's Offer	516	344	-	-	-	-	860	(860)	-
	Bilston Health & Wellbeing Facility	134	6,050	13,731	937	-	-	20,852	(4,013)	(16,839)
	Chubb Cinema	700	800	-	-	-	-	1,500	(1,500)	-
Resident Services	Disabled Facilities Grants	-	-	-	-	-	-	-	-	-
	Mandatory Disabled Facilities Grants	2,000	2,000	-	-	-	-	4,000	-	(4,000)
	Small Adaptations Grants	2,100	1,500	-	-	-	-	3,600	-	(3,600)
	Stair Lift Maintenance	25	-	-	-	-	-	25	-	(25)
	Social Care Minor Adaptations	90	-	-	-	-	-	90	-	(90)
	Discretionary Bathrooms Adaptations Grant	513	-	-	-	-	-	513	-	(513)
	Discretionary Top Up Grants	140	-	-	-	-	-	140	-	(140)
	Contribution assistance grants	20	-	-	-	-	-	20	-	(20)
	Living well grant	20	-	-	-	-	-	20	-	(20)
	Home Not Hospital	50	-	-	-	-	-	50	-	(50)
	Relocation grant	10	-	-	-	-	-	10	-	(10)
	DFG Capitalised Salaries	1,100	1,000	-	-	-	-	2,100	-	(2,100)
	Rehabilitation Equipment	522	-	-	-	-	-	522	-	(522)
	Housing General Fund General Schemes - Small Works Assistance (SWA)	-	-	-	-	-	-	-	-	-
	Small Works Assistance	150	-	-	-	-	-	150	(150)	-
	Capitalised Salaries	60	-	-	-	-	-	60	(60)	-
	Housing General Fund General Schemes - Empty Properties Strategy	241	-	-	-	-	-	241	(241)	-
	Sustainable Warmth	-	-	-	-	-	-	-	-	-
	Local Authority Delivery 3 : Green Homes	352	-	-	-	-	-	352	-	(352)
	Home Upgrade Grant	1,000	1,478	-	-	-	-	2,478	-	(2,478)
	Maintenance of classified roads	250	3,575	3,325	3,325	-	-	10,475	-	(10,475)
	Transport Structural Maintenance - Street Lighting	100	125	-	-	-	-	225	(125)	(100)
	Response patching	100	-	-	-	-	-	100	-	(100)
	Specialist Surface Treatments	-	89	-	-	-	-	89	(80)	(9)
	Replacement of non-compliant safety fencing	-	50	-	-	-	-	50	(25)	(25)
	Development of the Highway Asset Management Plan and Strategy	-	168	-	-	-	-	168	(168)	-
	Purbrook Road	65	-	-	-	-	-	65	(65)	-
	Stafford Street Reinstatement	163	-	-	-	-	-	163	(43)	(120)
	Deans Road - Entirety	406	-	-	-	-	-	406	(77)	(329)
	School Road (Phase 2)	200	-	-	-	-	-	200	(200)	-
	Bushbury Road	330	-	-	-	-	-	330	(160)	(170)
	Jeffcock Road	80	-	-	-	-	-	80	(80)	-
	Stafford Street (Inbound, Cannock Road to Ring Road including Ring Road junction)	340	-	-	-	-	-	340	(325)	(15)
	Ring Road - Waterloo Road Junction	200	-	-	-	-	-	200	(190)	(10)
	Finchfield Hill	63	-	-	-	-	-	63	(43)	(20)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
Resident Services	Development of Highway Maintenance Schemes and Future Programmes	-	100	-	-	-	-	100	(100)	-
	Scheme Preparation - Advance Works	73	-	-	-	-	-	73	-	(73)
	Neachells Lane (Roundabout Wednesfield Way)	90	-	-	-	-	-	90	-	(90)
	Castlecroft Lane - Windmill Lane to Castlecroft Road	150	-	-	-	-	-	150	-	(150)
	Wergs Road	241	-	-	-	-	-	241	(6)	(235)
	Lower Horseley Fields	25	-	-	-	-	-	25	-	(25)
	Oxford Street Footway Works	60	-	-	-	-	-	60	-	(60)
	Rookery Road	47	-	-	-	-	-	47	-	(47)
	Bridgnorth Road	40	-	-	-	-	-	40	-	(40)
	Stafford Road (SB roundabout Three Tuns Lane - Greenwood Road)	30	-	-	-	-	-	30	-	(30)
	Stafford Road - (NB roundabout Three Tuns Lane - Wobaston Road)	30	-	-	-	-	-	30	-	(30)
	Oxford Street	125	-	-	-	-	-	125	-	(125)
	Stafford Road (Roundabout Three Tuns Lane - North)	6	-	-	-	-	-	6	(6)	-
	Ettingshall Road (Parkfield Road roundabout Bilston Road)	19	-	-	-	-	-	19	(19)	-
	Penn Road (WB Pennhouse Avenue to Springhill Lane)	71	-	-	-	-	-	71	(36)	(35)
	Rookery Road Footway Works	20	-	-	-	-	-	20	-	(20)
	Broad Lane Footway Works	8	-	-	-	-	-	8	-	(8)
	Highway Improvement Programme	-	1,441	1,441	1,441	-	-	4,323	-	(4,323)
	Integrated Transport - Advance Design	140	-	-	-	-	-	140	-	(140)
	UTC - Wireless Communications	87	-	-	-	-	-	87	-	(87)
	Ring Road & City Centre Signage	300	-	-	-	-	-	300	-	(300)
	Bus infrastructure improvements	-	10	-	-	-	-	10	-	(10)
	UTC Expansion ITS/CCTV/Driver Information/ANPR	145	-	-	-	-	-	145	-	(145)
	Lyndale Drive Culvert - Highways Improvement	155	-	-	-	-	-	155	(2)	(153)
	Willenhall Road Culvert - Highways Improvement	5	-	-	-	-	-	5	-	(5)
	UTC Expansion CCTV	100	-	-	-	-	-	100	-	(100)
	ITS Improvements	70	-	-	-	-	-	70	-	(70)
	Development of Network Management Plan Inc Route Analysis and Traffic Counts	-	5	-	-	-	-	5	(5)	-
	Development of ITS - Schemes - Future Programmes and Asset Management	-	80	-	-	-	-	80	(80)	-
	Vehicles (Procurement)	3,219	2,789	514	-	-	-	6,522	(6,522)	-
	Parks Strategy and Open Space	-	175	-	-	-	-	175	(175)	-
	Heath Town Park	45	-	-	-	-	-	45	-	(45)
	Spring Road - (Taylor Road / Hilton PF)	-	34	-	-	-	-	34	(34)	-
	Fowlers Park	10	-	-	-	-	-	10	-	(10)
	Land North East of 72 Church Street, Bilston	3	-	-	-	-	-	3	-	(3)
	Ward Street Neighbourhood Park	93	-	-	-	-	-	93	-	(93)
	Penk Rise - refurbishment of Open Space	10	-	-	-	-	-	10	-	(10)
	Bushbury Recreation Ground - open space improvements	101	-	-	-	-	-	101	-	(101)
	Kingsclere Walk - refurbishment of existing play area	51	-	-	-	-	-	51	-	(51)
	Northwood Park - refurbishment of existing play area	-	345	-	-	-	-	345	-	(345)
	Ashmore Park, Wednesfield - open space improvements	47	46	-	-	-	-	93	-	(93)
	Ward Street railway cutting – gas main diversion works for new open space	-	17	-	-	-	-	17	-	(17)
	Prouds Lane Open Space Improvements	73	-	-	-	-	-	73	-	(73)
	Wednesfield Link Open Space Improvements	-	72	-	-	-	-	72	-	(72)
	Smestow Valley Local Nature Reserve Open Space	-	16	-	-	-	-	16	-	(16)
	Prouds Lane Playing Field - Open Space Improvements	299	-	-	-	-	-	299	(276)	(23)
	Wednesfield / Coleman Avenue Open Space - Play Area	57	-	-	-	-	-	57	-	(57)
	Bantock Park - Offsite Open Space Improvements	1	-	-	-	-	-	1	-	(1)
	Peascroft Wood - Open Space Improvements	-	3	-	-	-	-	3	-	(3)
	East Park Improvements	630	-	-	-	-	-	630	(587)	(43)
	Hickman Park Improvements	67	-	-	-	-	-	67	-	(67)
	Black Country Blue Network Phase 2	-	-	-	-	-	-	-	-	-
	Ward Street Railway Cutting	4	-	-	-	-	-	4	-	(4)
	Pendeford Park Open Space	46	-	-	-	-	-	46	-	(46)
	Fowlers Park	2	-	-	-	-	-	2	-	(2)
	Walsall MBC Parks and Open Space	4	-	-	-	-	-	4	-	(4)
	Dudley MBC Open Space	240	-	-	-	-	-	240	-	(240)
	Severn Rivers Trust Cradley Projects	57	-	-	-	-	-	57	-	(57)
	Bereavement Services	-	-	-	-	-	-	-	-	-
	Bereavement Services Improvement Programme at Bushbury Crematorium site (drainage, pavements)	4	-	-	-	-	-	4	(4)	-
	Bushbury Crematorium	186	-	-	-	-	-	186	(186)	-
	Safety Programme	-	-	-	-	-	-	-	-	-
	Local Safety Schemes - TROs/ Signs&Guardrails / Road Markings	200	-	-	-	-	-	200	-	(200)
	Vehicle actuated speed warning signs	12	-	-	-	-	-	12	(8)	(4)
	Newhampton Road East & West - local safety improvement	157	-	-	-	-	-	157	(50)	(107)
	Ettingshall Road/Manor Road	40	-	-	-	-	-	40	(26)	(14)
	Old Heath Road Area Local Safety Scheme	-	105	-	-	-	-	105	(105)	-
	SRTS - 20's Plenty Roll Out	15	-	-	-	-	-	15	-	(15)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	
General Fund capital programme										
Resident Services	Development of Road Safety Schemes and Future Programmes	-	80	-	-	-	-	80	(80)	-
	BCR Lunt Island	40	-	-	-	-	-	40	-	(40)
	Oxford Street/Hare Street	53	-	-	-	-	-	53	-	(53)
	Bushbury Road/Thornycroft Road	5	-	-	-	-	-	5	-	(5)
	Bushbury Lane/Showell Road	29	-	-	-	-	-	29	-	(29)
	Tettenhall Road/Henwood Road	51	-	-	-	-	-	51	(11)	(40)
	Compton Road near Linden Lea - Crossing Upgrade	60	-	-	-	-	-	60	-	(60)
	Stowlawn Primary School	70	-	-	-	-	-	70	-	(70)
	Bhylls Acre Primary School	41	-	-	-	-	-	41	-	(41)
	Casatlecroft Road Zebra Crossing	31	-	-	-	-	-	31	-	(31)
	Network Development - Safer Routes to School	-	-	-	-	-	-	-	-	-
	School Gate Parking	10	-	-	-	-	-	10	-	(10)
	Active Travel Programme	161	1,449	-	-	-	-	1,610	-	(1,610)
	Wednesfield Road - footway widening and introducing shared cycle route	77	-	-	-	-	-	77	(34)	(43)
	National Cycle Routes	-	-	-	-	-	-	-	(17)	17
	Noose Lane to School Street Active Travel Route - Wolverhampton	255	1,151	-	-	-	-	1,406	-	(1,406)
	Noose Lane to School Street Active Travel Route - Walsall	-	500	-	-	-	-	500	-	(500)
	Walsall BC Active Travel Route	57	-	-	-	-	-	57	-	(57)
	A461 Walk, Cycle and Bus Corridor - Dudley	500	-	-	-	-	-	500	-	(500)
	A461 Walk, Cycle and Bus Corridor - Sandwell	350	150	-	-	-	-	500	-	(500)
	Major Roads Network	240	200	-	-	-	-	440	(40)	(400)
	A4123 Corridor - A4150 Ring Road to A456 Hagley Road	182	-	-	-	-	-	182	-	(182)
	A454 Wolverhampton to Neachells Lane, Phases 1,2 and 3	421	-	-	-	-	-	421	-	(421)
	A449 Stafford Road North Only	118	-	-	-	-	-	118	-	(118)
	A461 Dudley	62	-	-	-	-	-	62	-	(62)
	A461 Sandwell	215	-	-	-	-	-	215	-	(215)
	A461 Rushall Junction Walsall	116	-	-	-	-	-	116	-	(116)
	A456 Dudley	100	-	-	-	-	-	100	-	(100)
	A41 Sandwell	150	-	-	-	-	-	150	-	(150)
	M5, J1 Sandwell	263	-	-	-	-	-	263	-	(263)
	WBHE Sustainable Access Measures - Dudley	516	-	-	-	-	-	516	-	(516)
	WBHE Sustainable Access Measures - Sandwell	195	-	-	-	-	-	195	-	(195)
	A457 between Oldbury town centre and Smethwick Galton Bridge station	58	-	-	-	-	-	58	-	(58)
	BCT Walk/Cycle and Bus Priority Improvement Measures - A4123	500	-	-	-	-	-	500	-	(500)
	Black Country ULEV - Development	114	-	-	-	-	-	114	-	(114)
	Street Lighting	-	-	-	-	-	-	-	-	-
	Street Lighting replacement programme (Invest to Save)	43	1,294	-	-	-	-	1,337	(1,337)	-
	Disabled Access (rolling programme)	-	-	-	-	-	-	-	-	-
	Disabled Access (rolling programme)	-	25	-	-	-	-	25	(25)	-
	Highway Structures (bridges, subways, retaining walls)	-	-	-	-	-	-	-	-	-
	Moathouse Lane Bridge	26	-	-	-	-	-	26	-	(26)
	Emergency Structural Maintenance repairs	75	-	-	-	-	-	75	-	(75)
	Wightwick County Bridge Works	85	-	-	-	-	-	85	-	(85)
	Structural Reviews of Priority Weight Restricted Bridges	40	-	-	-	-	-	40	-	(40)
	Moseley Road Retaining Wall	30	-	-	-	-	-	30	-	(30)
	Maintenance of unclassified roads	-	-	-	-	-	-	-	-	-
	Public Rights of way improvements	5	25	-	-	-	-	30	(25)	(5)
	Public Realm Dudley Street	1,000	-	-	-	-	-	1,000	(1,000)	-
	Ashland Street	55	-	-	-	-	-	55	(8)	(47)
	Needwood Drive	45	-	-	-	-	-	45	-	(45)
	Fitzmaurice Road	23	-	-	-	-	-	23	-	(23)
	Gatis Street	19	-	-	-	-	-	19	(1)	(18)
	Ornes Lane	26	-	-	-	-	-	26	-	(26)
	Bradley Lane	66	-	-	-	-	-	66	(1)	(65)
	Hickman Avenue	-	90	-	-	-	-	90	-	(90)
	Sutherland Avenue	-	58	-	-	-	-	58	-	(58)
	Lambert Road	25	-	-	-	-	-	25	-	(25)
	Bayliss Avenue	16	-	-	-	-	-	16	-	(16)
	Bidding Lane	46	-	-	-	-	-	46	-	(46)
	Bank Street	26	-	-	-	-	-	26	-	(26)
	Mandale Road	25	-	-	-	-	-	25	-	(25)
	Mill Lane	45	-	-	-	-	-	45	-	(45)
	Wightwick Bank	96	-	-	-	-	-	96	(53)	(43)
	Tinacre Hill	73	-	-	-	-	-	73	(45)	(28)
	Windmill Lane	55	-	-	-	-	-	55	(55)	-
	Earlswood Close	50	-	-	-	-	-	50	(50)	-
	Alderford Close	16	-	-	-	-	-	16	(16)	-
	Patshull Avenue and Marsh Lane (inc Whitney Grove, Patshull Grove and Slade Road)	80	-	-	-	-	-	80	(11)	(69)
	Third Avenue	70	-	-	-	-	-	70	(48)	(22)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total £000	Internal resources £000	External resources £000
		2023- 2024 £000	2024- 2025 £000	2025- 2026 £000	2026- 2027 £000	2027- 2028 £000	2028- 2029 £000			
General Fund capital programme										
Resident Services	Wright Avenue estate (inc Day Avenue, Pritchard Avenue and Davenport Road)	350	-	-	-	-	-	350	(60)	(290)
	Lambert Road Footway Works	16	-	-	-	-	-	16	-	(16)
	Mill Lane Footway Works	60	-	-	-	-	-	60	-	(60)
	Powell Street Footway Works	20	-	-	-	-	-	20	-	(20)
	Ashland Street Footway Works	6	-	-	-	-	-	6	-	(6)
	Bank Street Footway Works	8	-	-	-	-	-	8	-	(8)
	Mandale Road Footway Works	14	-	-	-	-	-	14	-	(14)
	Bidding Lane Footway Works	10	-	-	-	-	-	10	-	(10)
	Prestwood Road Footway Works	27	-	-	-	-	-	27	-	(27)
	Bayliss Avenue Footway Works	3	-	-	-	-	-	3	-	(3)
	Butts Road Footway Works	6	-	-	-	-	-	6	-	(6)
	Gatis Street Footway Works	2	-	-	-	-	-	2	-	(2)
	Future High Street Fund	-	-	-	-	-	-	-	-	-
	Victoria Street Public Realm (Westside Link Phase 1)	1,796	-	-	-	-	-	1,796	(897)	(899)
	Civic Halls Public Realm (Westside Link Phase 3)	150	-	-	-	-	-	150	-	(150)
	Security Enhancement works	-	-	-	-	-	-	-	-	-
	Improving Pedestrian Safety	12	-	-	-	-	-	12	(12)	-
	Waste & Recycling Strategy	-	-	-	-	-	-	-	-	-
	Garden waste bins	74	-	-	-	-	-	74	(74)	-
	Commercial Waste Services Bins	233	50	-	-	-	-	283	(283)	-
	Paladin Bins	17	-	-	-	-	-	17	(17)	-
	Domestic Bins	203	30	-	-	-	-	233	(233)	-
	Dust Suppression Skips	93	-	-	-	-	-	93	(93)	-
	Smart and Accessible City	-	-	-	-	-	-	-	-	-
	Ultra Low Emission Bus (ULEB) Pantograph	143	-	-	-	-	-	143	-	(143)
	ORCS Bid Local Contribution	308	-	-	-	-	-	308	-	(308)
	SupaTrak system and in-cab Garmin devices	10	-	-	-	-	-	10	(10)	-
	Flood Defence and Land Drainage	-	-	-	-	-	-	-	-	-
	Waterhead Brook Flood Defence Works - Primrose Avenue	103	-	-	-	-	-	103	-	(103)
	Storm Water Retention Structure	-	-	-	-	-	-	-	-	-
	Energy from Waste (EFW)	-	-	-	-	-	-	-	-	-
	EFW plant - enhancement works	527	-	-	-	-	-	527	(527)	-
	EFW plant - Plant & Equipment upgrades	1,700	-	-	-	-	-	1,700	(1,700)	-
	Brewer's Yard - Phase 1	1,779	9,887	3,941	168	-	-	15,775	(6,050)	(9,725)
	Towns Fund Phase 2 - Markets	-	-	-	-	-	-	-	-	-
	Bilston Market Redevelopment	435	5,913	-	-	-	-	6,348	-	(6,348)
	Towns Fund Phase 2 - Transportation	-	-	-	-	-	-	-	-	-
	Wednesfield High Street Redevelopment Public Realm Works	300	2,559	-	-	-	-	2,859	-	(2,859)
	Public Realm Improvements on Lichfield St/Queens Square and Darlington Street	679	2,242	-	-	-	-	2,921	-	(2,921)
	Environmental crime enforcement	-	-	-	-	-	-	-	-	-
	AI Enabled SMART Cameras	22	-	-	-	-	-	22	(22)	-
	UKSPF - Vibrant High Street	-	-	-	-	-	-	-	-	-
	UKSPF - Wednesfield Public Realm	35	-	-	-	-	-	35	-	(35)
	UKSPF - City Centre Public Realm	86	-	-	-	-	-	86	-	(86)
Regeneration	i54 Access and Infrastructure	648	17	-	-	-	-	665	1,317	(1,982)
	Targeted Disposals Programme	-	-	-	-	-	-	-	-	-
	Disposal of Heath Town Baths	-	3	-	-	-	-	3	(3)	-
	Targeted Disposals - Hoardings	-	36	-	-	-	-	36	(36)	-
	Bilston Urban Village	36	-	-	-	-	-	36	(36)	-
	Black Country Growth Deal – Cultural Programme	-	-	-	-	-	-	-	-	-
	Civic Halls Improvements	7,470	-	-	-	-	-	7,470	(4,041)	(3,429)
	Interchange - Ph2 Train Station/MSCP/Metro Extension	687	1,869	-	-	-	-	2,556	(2,157)	(399)
	i54 Western Extension	3,018	261	4,605	-	-	-	7,884	(7,884)	-
	City Learning Quarter	8,775	37,944	12,381	-	-	-	59,100	(2,469)	(56,631)
	Strategic Land Acquisitions	-	310	-	-	-	-	310	(310)	-
	AIM for GOLD - ERDF	-	-	-	-	-	-	-	-	-
	AIM for GOLD - ERDF	320	-	-	-	-	-	320	-	(320)
	Towns Fund Phase 2 - Regeneration	-	-	-	-	-	-	-	-	-
	Newhampton Arts Park	1,053	447	-	-	-	-	1,500	-	(1,500)
	Bilston Public Realm Improvements	20	1,761	-	-	-	-	1,781	-	(1,781)
	UK Shared Prosperity Fund - Regional Fund	-	-	-	-	-	-	-	-	-
	UK Shared Prosperity Fund - Net Zero Grants	151	-	-	-	-	-	151	-	(151)
	UK Shared Prosperity Fund - Support to SMEs	244	-	-	-	-	-	244	-	(244)
Children's Services	Co-Location Programme	-	-	-	-	-	-	-	-	-
	Children's Transformation - Bingley	-	8	-	-	-	-	8	(8)	-
	Children and young people in care - extensions/vehicles	-	3	-	-	-	-	3	(3)	-
	Extensions Mrs C	75	-	-	-	-	-	75	(75)	-
	Children's Residential Homes	1,370	-	-	-	-	-	1,370	(1,135)	(235)
	Family Hubs Capital	-	77	-	-	-	-	77	-	(77)
	Childrens Village CC - Reception works	66	-	-	-	-	-	66	-	(66)
Public Health	Sports Investment Strategy	16	-	-	-	-	-	16	(14)	(2)
	Synthetic Pitch at Our Lady & St Chad's School	203	-	-	-	-	-	203	(203)	-
	Peace Green sport facilities	3	-	-	-	-	-	3	(3)	-
	Leisure Centres Enhancement	-	-	-	-	-	-	-	-	-
	WV Active - Aldersley Leisure Village Enhancement	58	-	-	-	-	-	58	(58)	-
	Bowling provision	102	-	-	-	-	-	102	-	(102)
	Grants to other organisations	-	-	-	-	-	-	-	-	-
	NACRO Premises Refurbishment	8	-	-	-	-	-	8	-	(8)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
Education and Skills	Primary Expansion Programme	-	2,839	2,750	2,750	-	-	8,339	-	(8,339)
	Loxdale Primary Phase 4	35	-	-	-	-	-	35	-	(35)
	Stowlawn Primary Phase 4	38	-	-	-	-	-	38	-	(38)
	St Bartholomew's Church of England Primary School - phase 4	319	-	-	-	-	-	319	-	(319)
	Hill Avenue Academy - phase 4	1,415	-	-	-	-	-	1,415	-	(1,415)
	Westacre Infants Nursery - Accomodation	25	325	-	-	-	-	350	-	(350)
	Schools Devolved Formula Capital	560	700	375	-	-	-	1,635	-	(1,635)
	Primary Schools ICT	100	-	-	-	-	-	100	-	(100)
	Nursery Schools ICT	40	-	-	-	-	-	40	-	(40)
	Asbestos Removal	-	-	-	-	-	-	-	-	-
	Dovecotes Primary - asbestos flooring removal	3	-	-	-	-	-	3	-	(3)
	Colton Hills Community School - asbestos removal to pool plant room	12	-	-	-	-	-	12	-	(12)
	Castlecroft Primary - asbestos removal to plant room	9	-	-	-	-	-	9	-	(9)
	Stow Heath Primary - asbestos removal to plant room	10	-	-	-	-	-	10	-	(10)
	Uplands Junior - asbestos removal to plant room	11	-	-	-	-	-	11	-	(11)
	Whitgreave Primary - asbestos removal to plant room	5	-	-	-	-	-	5	-	(5)
	St Andrews Church of England Primary - asbestos removal	8	-	-	-	-	-	8	-	(8)
	Graiseley Primary - asbestos containment to plant room	20	-	-	-	-	-	20	-	(20)
	Fallings Park Primary - asbestos containment	17	-	-	-	-	-	17	-	(17)
	Springdale Primary - asbestos containment	5	-	-	-	-	-	5	-	(5)
	Electrical Works	-	-	-	-	-	-	-	-	-
	Christ Church Junior - replacement lighting Phase 1	8	-	-	-	-	-	8	-	(8)
	Midpoint PRU - new fire alarm	60	-	-	-	-	-	60	-	(60)
	Dovecotes Primary - replacement lighting	54	-	-	-	-	-	54	-	(54)
	Christ Church Nursery - replacement lighting	13	-	-	-	-	-	13	-	(13)
	Ashmore Park Nursery - replacement emergency lighting	30	-	-	-	-	-	30	-	(30)
	Bushbury Nursery - replacement lighting	38	-	-	-	-	-	38	-	(38)
	Bushbury Hill Primary - replacement lighting	-	50	-	-	-	-	50	-	(50)
	Colton Hills Secondary - replacement lighting to activity studio	53	-	-	-	-	-	53	-	(53)
	Graiseley Primary - replacement lighting and distribution boards	50	-	-	-	-	-	50	-	(50)
	Lanesfield Primary - replacement lighting	113	-	-	-	-	-	113	-	(113)
	Phoenix Nursery - replacement lighting	25	-	-	-	-	-	25	-	(25)
	St Andrews Church of England Primary - replace fire alarm	98	-	-	-	-	-	98	-	(98)
	Warstones Primary - replacement lighting	106	-	-	-	-	-	106	-	(106)
	Wodensfield Primary - replace intruder alarm	30	-	-	-	-	-	30	-	(30)
	West Park Primary - replacement intruder alarm	24	-	-	-	-	-	24	(14)	(10)
	Contingency for Emergency Works	288	500	-	-	-	-	788	-	(788)
	Building Schools for Future ICT Infrastructure	-	112	-	-	-	-	112	(112)	-
	Post BSF infrastructure upgrades	155	-	-	-	-	-	155	(155)	-
	ICT Equipment - The Kings, Church of England Academy	50	-	-	-	-	-	50	(50)	-
	ICT Equipment - Lawnswood Campus	20	-	-	-	-	-	20	(20)	-
	Capital Maintenance - Fire Safety	-	-	-	-	-	-	-	-	-
	St Andrews, Church of England Primary - Fire Safety Work	10	-	-	-	-	-	10	-	(10)
	Uplands Junior - replacement fire doors	4	-	-	-	-	-	4	(4)	-
	Castlecroft Primary - kitchen fire shutters	18	-	-	-	-	-	18	-	(18)
	Westacre Infants - replacement fire doors	21	-	-	-	-	-	21	-	(21)
	Low Hill Nursery - fire safety work	15	-	-	-	-	-	15	-	(15)
	Castlecroft Primary - replacement fire doors	132	-	-	-	-	-	132	-	(132)
	Midpoint PRU - replacement fire doors	40	-	-	-	-	-	40	-	(40)
	Capital Maintenance - heating pipework upgrades	-	-	-	-	-	-	-	-	-
	Springdale Junior - replacement heating pipework	2	-	-	-	-	-	2	-	(2)
	Colton Hills Secondary - replacement boilers	260	-	-	-	-	-	260	-	(260)
	Bilston Church of England Primary - boiler plant upgrade	2	-	-	-	-	-	2	-	(2)
	Claregate Primary - boiler plant upgrade	118	-	-	-	-	-	118	-	(118)
	Graiseley Primary - Upgrade BMS	27	-	-	-	-	-	27	-	(27)
	Lanesfield Primary - Upgrade BMS	15	-	-	-	-	-	15	-	(15)
	Phoenix Nursery - replacement boilers	15	-	-	-	-	-	15	-	(15)
	Uplands Junior - 1st floor ventilation	14	-	-	-	-	-	14	-	(14)
	Warstones Primary - upgrade hot water and BMS	100	-	-	-	-	-	100	-	(100)
	Capital Maintenance - roof / ceilings replacements	-	-	-	-	-	-	-	-	-
	Green Park Special School - flat roof	25	-	-	-	-	-	25	-	(25)
	Spring Vale Primary - flat roof	72	-	-	-	-	-	72	-	(72)
	Merridale Primary - replacement roof covering phase 1	4	-	-	-	-	-	4	-	(4)
	Fallings Park Primary - replacement roof covering phase 1	82	56	-	-	-	-	138	(7)	(131)
	Colton Hills Secondary - flat roofing	9	-	-	-	-	-	9	-	(9)
	Eastfield Primary - corridor roofing	85	-	-	-	-	-	85	-	(85)
	Lanesfield Primary - replacement hall roof	191	-	-	-	-	-	191	-	(191)
	Wodensfield Primary - replace roof to KS2	22	-	-	-	-	-	22	-	(22)
	Stowlawn Primary - Sedum roof	-	25	-	-	-	-	25	-	(25)
	Low Hill Nursery - roofing work	12	-	-	-	-	-	12	-	(12)
	Christ Church Infants - nursery roofing	8	-	-	-	-	-	8	-	(8)
	Uplands Junior - replacement roof covering	30	-	-	-	-	-	30	-	(30)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
Education and Skills	Capital Maintenance - Structural Works	-	-	-	-	-	-	-	-	-
	Wood End Primary - boundary fence replacement	12	-	-	-	-	-	12	-	(12)
	Kings CE School Priority Remedial Works	800	-	-	-	-	-	800	-	(800)
	Dovecotes Primary - replace fascias	26	12	-	-	-	-	38	-	(38)
	Dovecotes Primary - replace floors	12	-	-	-	-	-	12	-	(12)
	Midpoint PRU - fencing	5	-	-	-	-	-	5	-	(5)
	Claregate Primary - resurface paving	79	-	-	-	-	-	79	-	(79)
	Long Knowle Primary - replace fences Phase 1	70	-	-	-	-	-	70	-	(70)
	Springdale Primary - toilets refurbishment	120	-	-	-	-	-	120	-	(120)
	Uplands Junior - toilets refurbishment	3	-	-	-	-	-	3	-	(3)
	Dovecotes Primary - perimeter fencing	58	-	-	-	-	-	58	-	(58)
	Phoenix Nursery - replacement fencing and gates	4	6	-	-	-	-	10	-	(10)
	Bantock Primary - toilet refurbishment	80	-	-	-	-	-	80	-	(80)
	Uplands Junior - resurface playground	75	-	-	-	-	-	75	(7)	(68)
	Warstones Primary - replacement water goods	24	-	-	-	-	-	24	-	(24)
	Warstones Primary - repointing brickwork	25	-	-	-	-	-	25	-	(25)
	Wodensfield Primary - refurbish KS2 toilets	140	-	-	-	-	-	140	-	(140)
	Christ Church Nursery - replace gates and entry system	15	-	-	-	-	-	15	-	(15)
	Lanesfield Primary - resurface playground	-	40	-	-	-	-	40	-	(40)
	Lanesfield Primary - replacement fencing	10	-	-	-	-	-	10	-	(10)
	Claregate Primary - replacement fencing and gates	18	-	-	-	-	-	18	-	(18)
	Claregate Primary - toilet refurbishment	10	-	-	-	-	-	10	-	(10)
	Green Park Special - car park drainage and tarmac	11	-	-	-	-	-	11	-	(11)
	Christ Church Junior - security gates and entry system	15	-	-	-	-	-	15	-	(15)
	Midpoint PRU - access controls and gates	45	-	-	-	-	-	45	-	(45)
	Christ Church Infants - replacement floor covering	7	-	-	-	-	-	7	-	(7)
	Springdale Primary - fire exit pathways	15	-	-	-	-	-	15	-	(15)
	Castlecroft Primary - conversion of KS1 cloakrooms	20	-	-	-	-	-	20	-	(20)
	Perry Hall Primary - fencing	15	-	-	-	-	-	15	(15)	-
	Kings Church of England School - fencing	60	-	-	-	-	-	60	(60)	-
	Capital Maintenance - Window Upgrade	-	-	-	-	-	-	-	-	-
	Wodensfield Primary - replacement windows and doors to KS1	1	-	-	-	-	-	1	-	(1)
	Christ Church Infants - replacement windows	53	-	-	-	-	-	53	-	(53)
	Springdale Primary - replacement doors and windows	85	-	-	-	-	-	85	-	(85)
	St Andrews Church of England Primary - replacement windows to quadrangle	75	-	-	-	-	-	75	-	(75)
	Castlecroft Primary - replacement fascias and doors	50	-	-	-	-	-	50	-	(50)
	Graiseley Primary - replacement windows and doors	60	-	-	-	-	-	60	-	(60)
	West Park Primary - replacement windows and fascias	120	-	-	-	-	-	120	-	(120)
	Spring Vale Primary - replacement kitchen windows	16	-	-	-	-	-	16	-	(16)
	Orchard PRU - replacement windows and fascias	21	-	-	-	-	-	21	-	(21)
	Secondary School Expansion Programme	-	1,275	2,500	2,500	-	-	6,275	-	(6,275)
	St Edmund's Catholic Academy	404	-	-	-	-	-	404	-	(404)
	Colton Hills Secondary - Dining Hall Extension	542	-	-	-	-	-	542	-	(542)
	Schools ICT & equipment RCCO funded	-	-	-	-	-	-	-	-	-
	Stow Heath Primary - Minibus	35	-	-	-	-	-	35	(35)	-
	SPCF Special Provision Capital Fund	-	251	-	-	-	-	251	-	(251)
	SPCF Resource base St Michaels Church of England Primary	3	-	-	-	-	-	3	-	(3)
	St Andrews Church of England Primary - create sensory and SEN rooms	75	-	-	-	-	-	75	-	(75)
	High Needs Capital Programme - Future Schemes	272	2,000	2,200	2,563	-	-	7,035	-	(7,035)
	Aldersley High School - Resource Base	150	-	-	-	-	-	150	-	(150)
	Penn Hall School - Building Alterations	478	47	-	-	-	-	525	-	(525)
	Stow Heath Primary - Resource Base	-	1,200	-	-	-	-	1,200	-	(1,200)
	Broadmeadow Special School Expansion Phase 1	850	-	-	-	-	-	850	-	(850)
	Childcare Expansion Programme	-	333	-	-	-	-	333	-	(333)
Total General Fund - existing and new projects		85,901	155,284	98,655	27,843	6,000	-	373,683	(174,992)	(198,691)

Detailed projected budget

Appendix 2

Division	Project	Projected budget						Total	Internal resources	External resources
		2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029			
		£000	£000	£000	£000	£000	£000	£000	£000	£000
Housing Revenue Account capital programme										
Housing Revenue Account	Decent Homes - Stock Improvements	-	-	-	-	-	-	-	-	-
	High Rise M&E Infrastructure Refurbishment	22,700	12,000	9,000	6,500	4,000	-	54,200	(54,200)	-
	Heath Town Refurbishment of Retained Properties	14,400	16,500	8,400	2,200	-	-	41,500	(41,500)	-
	Internal Decency Works	12,300	10,600	10,000	9,400	7,500	5,700	55,500	(55,500)	-
	Bushbury Improvement Programme	158	-	-	-	-	-	158	(158)	-
	Mid Rise Infrastructure	3,300	10,500	4,200	4,700	5,500	5,500	33,700	(31,600)	(2,100)
	Minor Works/Door Entry Rolling Programme	-	-	-	-	-	-	-	-	-
	Door Entry	910	410	250	250	300	300	2,420	(2,420)	-
	Pathway Improvement and Safety Programme	-	-	-	-	-	-	-	-	-
	Repairs - Pathways/Unadopted Roads	210	220	220	230	230	230	1,340	(1,340)	-
	Adaptations for People with Disabilities	2,600	2,600	2,600	2,600	2,600	2,000	15,000	(15,000)	-
	WH Service Sales Admin & Capitalised Salaries	-	-	-	-	-	-	-	-	-
	Sale of Council Houses Admin	60	60	60	60	60	60	360	(360)	-
	Wolverhampton Homes - Capitalised Salaries	2,100	2,100	2,100	2,100	2,100	2,100	12,600	(12,600)	-
	Housing services capitalised salaries	-	-	-	-	-	-	-	-	-
	Housing Services Capitalised Salaries	800	1,000	1,000	1,000	1,000	1,000	5,800	(5,800)	-
	Refurbishment of Voids	-	-	-	-	-	-	-	-	-
	Refurbishment of Voids to Decent Homes Standard	13,400	15,000	10,500	9,500	8,500	8,500	65,400	(64,650)	(750)
	Boiler Replacement Programme	-	-	-	-	-	-	-	-	-
	Boiler Replacement	1,000	820	810	830	860	860	5,180	(5,180)	-
	Heath Town	-	-	-	-	-	-	-	-	-
	Heath Town	30	-	-	-	-	-	30	(30)	-
	Structural works	-	-	-	-	-	-	-	-	-
	Structural works	1,851	1,140	1,140	1,140	1,140	1,140	7,551	(7,551)	-
	Remedial Works to non-traditional properties	16,100	13,600	8,200	3,000	2,800	2,000	45,700	(45,700)	-
	Lift and DDA Improvements	-	-	-	-	-	-	-	-	-
	Lift Improvements	500	460	460	460	460	400	2,740	(2,740)	-
	Fire Safety Improvements	-	-	-	-	-	-	-	-	-
	Fire Safety Improvements - Medium and Low Rise	3,600	-	-	-	-	-	3,600	(3,600)	-
	Roof Refurbishment Programme	-	-	-	-	-	-	-	-	-
	Roofing Refurbishment Programme - City wide	7,020	3,916	3,400	3,400	2,900	2,900	23,536	(23,536)	-
	New Build Programme	-	3,000	10,162	10,000	10,000	10,492	43,654	(43,654)	-
	Old Fallings Crescent	100	2,700	2,700	-	-	-	5,500	(5,500)	-
	Sustainable Estates Programme	-	-	-	-	-	-	-	-	-
	Sustainable Estates Programme	130	300	300	300	300	300	1,630	(1,630)	-
	Non Trad Surveys	-	-	-	-	-	-	-	-	-
	Non Traditional Surveys	550	300	50	50	300	300	1,550	(1,550)	-
	Commercial Conversions	-	-	-	-	-	-	-	-	-
	Bond House conversion to residential	200	-	-	-	-	-	200	(200)	-
	Heath Town New Build Programme	-	-	-	-	-	-	-	-	-
	Heath Town New Build Phase 1	1,350	-	-	-	-	-	1,350	(1,350)	-
	Heath Town New Build Phase 2	50	500	11,000	7,500	5,000	2,500	26,550	(26,550)	-
	WVL Units	-	-	-	-	-	-	-	-	-
	WVL Units - Wednesfield	100	-	-	-	-	-	100	(100)	-
	WVL Units - Northcote	3,051	1,334	107	-	-	-	4,492	(4,492)	-
	Medium Sites	-	-	-	-	-	-	-	-	-
	Medium Sites	50	5,500	1,150	-	-	-	6,700	(6,700)	-
	High Rise External Works	-	-	-	-	-	-	-	-	-
	High Rise External Works	1,300	17,900	16,500	17,000	17,000	17,000	86,700	(86,700)	-
	Reedham Gardens	-	-	-	-	-	-	-	-	-
	Reedham Gardens	100	1,500	2,150	-	-	-	3,750	(3,750)	-
	Additional Social Housing	-	-	-	-	-	-	-	-	-
	Additional Social Housing	3,541	2,000	2,500	2,500	2,500	-	13,041	(12,216)	(825)
	Small Sites Programme	-	-	-	-	-	-	-	-	-
	Bushbury Hill Community Housing	92	1,600	-	-	-	-	1,692	(1,692)	-
	Inkerman Street Community Housing	91	1,500	-	-	-	-	1,591	(1,591)	-
	Small Sites 5	1,463	-	-	-	-	-	1,463	(1,463)	-
	Estate Remodelling	-	-	-	-	-	-	-	-	-
	Estate remodelling - New Park Village	1,000	5,000	12,000	12,000	11,223	-	41,223	(41,223)	-
	City Wide Non traditional structural repairs	2,484	8,000	8,000	7,200	-	-	25,684	(25,684)	-
Total Housing Revenue Account - existing projects		118,691	142,060	128,959	103,920	86,273	63,282	643,185	(639,510)	(3,675)

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Detailed forecast change

Appendix 3

Division	Project	Approved budget £000	Proposed budget £000	Total change £000	Comments
General Fund capital programme					
Finance	Corporate Provision and Contingency for Future Programmes	32,963	52,362	19,399	The Corporate Provision and Contingency for Future Programmes have been revised upwards by £15.8 million over the medium term capital programme, to ensure sufficient contingency is in place for the future budget requirements and to support Council priorities. Budget provision has been incorporated into the Corporate Provision and Contingency for Future Programmes in order to be prudent at this stage and will be allocated to individual projects using appropriate delegations. Allocations will be reported at each Quarterly Review. Future requirements across the capital programme remain under review. Further change in this budget reflects net virements as detailed in Appendix 5.
	Capitalisation Directives	4,000	4,000	-	
	WV Living	29,900	29,900	-	
Governance	Governance Initiatives	129	130	1	The change in this budget reflects virement as detailed in Appendix 5.
Communications and Visitor Experience	Bell Street Box Space	5,178	5,178	-	
Strategy	ICT General Programme	2,272	2,103	(169)	The change in this budget reflects virement as detailed in Appendix 5.
	ICT Disaster Recovery	50	50	-	
	ICT Desktop Refresh	721	921	200	The change in this budget reflects virement as detailed in Appendix 5.
	Service Led ICT Projects	1,414	1,383	(31)	The change in this budget reflects virement as detailed in Appendix 5.
	Full Fibre Network	149	149	-	
	Digital Innovation Services	250	250	-	
City Assets	Corporate Asset Management	13,261	13,768	507	The change in this budget reflects virements to existing projects as detailed in Appendix 5 and to new project for which approval is now sought in Appendix 4.
	Oxley Health and Wellbeing Facility and Residential Accommodation	17,808	17,808	-	
	One Public Estate - Asset Transformation Programme	12,850	12,850	-	
	i11 Building, 4-5 Victoria Square - Investing in the City's Offer	860	860	-	
	Bilston Health & Wellbeing Facility	20,852	20,852	-	
	Chubb Cinema	1,500	1,500	-	
Resident Services	Disabled Facilities Grants	6,590	11,090	4,500	The change in this budget reflects new grant allocation from Department for Levelling Up, Housing and Communities.
	Housing General Fund General Schemes - Small Works Assistance (SWA)	150	150	-	
	Housing General Fund General Schemes - Capitalised Salaries	60	60	-	
	Housing General Fund General Schemes - Empty Properties Strategy	241	241	-	
	Sustainable Warmth	3,830	2,830	(1,000)	The change in this budget reflects revised downwards budget requirement due to time constraints of grant.
	Maintenance of classified roads	14,065	14,089	24	The change in this budget reflects virements as detailed in Appendix 5.
	Highway Improvement Programme	5,345	5,420	75	The change in this budget reflects virements as detailed in Appendix 5.
	Vehicles (Procurement)	6,522	6,522	-	
	Bowman's Harbour - Former Landfill Sites	5	-	(5)	The change in this budget reflects virement as detailed in Appendix 5.
	Parks Strategy and Open Space	2,195	2,195	-	

Detailed forecast change

Appendix 3

Division	Project	Approved budget £000	Proposed budget £000	Total change £000	Comments
General Fund capital programme					
Resident Services	Bereavement Services	190	190	-	
	Safety Programme	994	989	(5)	The change in this budget reflects virements as detailed in Appendix 5.
	Active Travel Programme	4,607	4,650	43	The change in this budget reflects virements as detailed in Appendix 5.
	Network Development - Safer Routes to School	5	10	5	The change in this budget reflects virements as detailed in Appendix 5.
	Major Roads Network	3,450	3,450	-	
	Street Lighting	1,337	1,337	-	
	Disabled Access (rolling programme)	25	25	-	
	Highway Structures (bridges, subways, retaining walls)	331	256	(75)	The change in this budget reflects virements as detailed in Appendix 5.
	Maintenance of unclassified roads	4,377	4,353	(24)	The change in this budget reflects virements as detailed in Appendix 5.
	Security Enhancement works	12	12	-	
	Waste & Recycling Strategy	607	700	93	The change in this budget reflects virement to support new project for which approval is now sought in Appendix 4.
	Smart and Accessible City	494	451	(43)	The change in this budget reflects virements as detailed in Appendix 5.
	General Waste Service Improvement	10	10	-	
	Energy from Waste (EFW)	2,227	2,227	-	
	Future High Street Fund	162	162	-	
	Black Country Blue Network Phase 2	353	353	-	
	Flood Defence and Land Drainage	103	103	-	
	Brewer's Yard - Phase 1	15,775	15,775	-	
	Towns Fund Phase 2 - Regeneration	1,500	1,500	-	
	Towns Fund Phase 2 - Transportation	5,780	5,780	-	
	Towns Fund Phase 2 - Markets	6,348	6,348	-	
	UKSPF - Vibrant High Streets	121	121	-	
	Bilston Public Realm Improvements	1,781	1,781	-	
Environmental crime enforcement	22	22	-		
Regeneration	i54 Access and Infrastructure	665	665	-	
	Targeted Disposals Programme	39	39	-	
	Bilston Urban Village	36	36	-	
	Black Country Growth Deal – Cultural Programme	7,470	7,470	-	
	Interchange - Ph2 Train Station/MSCP/Metro Extension	2,556	2,556	-	
	i54 Western Extension	16,994	7,884	(9,110)	The change in this budget reflects the revised budget requirement and the projected underspend. This consists of a reduction of external resources of £4,885k, and a virement of £4,225k as detailed in Appendix 5.
	City Learning Quarter	59,100	59,100	-	
	War Memorial Restoration	5	-	(5)	The change in this budget reflects revised budget requirement, project complete.
	Strategic Land Acquisitions	310	310	-	
	AIM for GOLD - ERDF	365	320	(45)	The change in this budget reflects revised budget requirement, project complete.
	UK Shared Prosperity Fund - Regional Fund	381	395	14	The change in this budget reflects grant allocation from UK Shared Prosperity Fund.
	Children's Services	Co-Location Programme	8	8	-
Children and young people in care - extensions/vehicles		78	78	-	
Children's Residential Homes		1,370	1,370	-	
Family Hubs Capital		143	143	-	
Education and Skills	Primary Expansion Programme	10,496	10,496	-	
	Schools Devolved Formula Capital	1,775	1,775	-	
	Asbestos Removal	106	100	(6)	The change in this budget reflects virements as detailed in Appendix 5.
	Electrical Works	720	752	32	The change in this budget reflects virements as detailed in Appendix 5.
	Contingency for Emergency Works	847	788	(59)	The change in this budget reflects virements as detailed in Appendix 5.

Detailed forecast change

Appendix 3

Division	Project	Approved budget £000	Proposed budget £000	Total change £000	Comments
General Fund capital programme					
Education and Skills	Building Schools for Future ICT Infrastructure	337	337	-	
	Capital Maintenance - Fire Safety	202	240	38	The change in this budget reflects virements as detailed in Appendix 5 and new project for which approval is now sought in Appendix 4.
	Capital Maintenance - Heating Pipework Upgrades	548	553	5	The change in this budget reflects virements as detailed in Appendix 5.
	Capital Maintenance - Roof / Ceilings Replacements	606	621	15	The change in this budget reflects virements as detailed in Appendix 5 and new project for which approval is now sought in Appendix 4.
	Capital Maintenance - Structural Works	1,815	1,832	17	The change in this budget reflects virements as detailed in Appendix 5.
	Capital Maintenance - Window Upgrade	506	481	(25)	The change in this budget reflects virements as detailed in Appendix 5.
	Secondary School Expansion Programme	7,221	7,221	-	
	Schools ICT & equipment RCCO funded	35	35	-	
	SPCF Special Provision Capital Fund	329	329	-	
	Healthy Pupil Capital Fund	12	-	(12)	The change in this budget reflects virements as detailed in Appendix 5.
	High Needs Capital Programme - Future Schemes	9,760	9,760	-	
Childcare Expansion Programme	-	333	333	The change in this budget reflects new project for which approval is now sought in Appendix 4.	
Public Health	Sports Investment Strategy	292	222	(70)	The change in this budget reflects virements as detailed in Appendix 5.
	Leisure Centres Enhancement	58	58	-	
	Bowling provision	102	102	-	
	Grants to other organisations	8	8	-	
Total General Fund capital programme - existing and new projects		359,066	373,683	14,617	

Division	Project	Approved budget £000	Proposed budget £000	Total change £000	Comments
Housing Revenue Account					
Housing Revenue Account	Decent Homes - Stock Improvements	185,058	185,058	-	
	Minor Works/Door Entry Rolling Programme	2,420	2,420	-	
	Pathway Improvement and Safety Programme	1,340	1,340	-	
	Adaptations for People with Disabilities	15,000	15,000	-	
	WH Service Sales Admin & Capitalised Salaries	12,960	12,960	-	
	Housing services capitalised salaries	5,800	5,800	-	
	Refurbishment of Voids	65,400	65,400	-	
	Boiler Replacement Programme	5,180	5,180	-	
	Heath Town	30	30	-	
	Structural works	53,251	53,251	-	
	Lift and DDA Improvements	2,740	2,740	-	
	Fire Safety Improvements	3,600	3,600	-	
	Roof Refurbishment Programme	23,536	23,536	-	
	New Build Programme	49,154	49,154	-	
	Sustainable Estates Programme	1,630	1,630	-	
	Non Trad Surveys	1,550	1,550	-	
	Commercial Conversions	200	200	-	
	Heath Town New Build Programme	27,900	27,900	-	
	WVL Units	4,592	4,592	-	
	Medium Sites	6,700	6,700	-	
High Rise External Works	86,700	86,700	-		
Reedham Gardens	3,750	3,750	-		
Additional Social Housing	13,041	13,041	-		
Small Sites Programme	4,746	4,746	-		
Estate Remodelling	66,907	66,907	-		
Total Housing Revenue Account - existing projects		643,185	643,185	-	

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Projects requiring approval

Appendix 4

New projects created from virements and additional resources	2023 -	2024 -	2025 -	2026 -	2027 -	2028 -	Total	Virement	Additional resources	
	2024	2025	2026	2027	2028	2029			Internal	External
A full set of virements can be found in Appendix 5	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
General Fund capital programme										
Schools Capital Maintenance Programme										
Approval is sought for capital maintenance works across the following schools:										
Springdale Primary - asbestos containment	5	-	-	-	-	-	5	5	-	-
Uplands Junior - replacement roof covering	30	-	-	-	-	-	30	30	-	-
Midpoint PRU - replacement fire doors	40	-	-	-	-	-	40	40	-	-
St Andrews Church of England Primary - create sensory and SEN rooms	75	-	-	-	-	-	75	75	-	-
Schools Devolved Formula Capital Programme										
Approval is sought for ICT enhancement works in Nurseries and Primary schools:										
Primary Schools ICT	100	-	-	-	-	-	100	100	-	-
Nursery Schools ICT	40	-	-	-	-	-	40	40	-	-
Childcare Expansion Programme										
Approval is sought for new capital project within the Education, fully funded by grant to support provision of new early years entitlement and wraparound places:										
Childcare Expansion Programme	-	333	-	-	-	-	333	-	-	333
Corporate Asset Management Fund										
Approval is sought for the following project to ensure council assets are statutory compliant and fit for purpose:										
Civic Centre - roof upgrade works	-	450	-	-	-	-	450	450	-	-
Waste & Recycling Strategy										
Approval is sought for acquisition of dust suppression skips to enable compaction of Persistent Organic Pollutants waste (soft furnishings) to meet the Health, Safety and Environment requirements:										
Dust Suppression Skips	93	-	-	-	-	-	93	93	-	-
Total General Fund capital programme new projects	383	783	-	-	-	-	1,166	833	-	333
Financing										
Internal resources	93	450	-	-	-	-	543	543	-	-
External resources	290	333	-	-	-	-	623	290	-	333
Grand total financing	383	783	-	-	-	-	1,166	833	-	333

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Virements for approval

Appendix 5

Capital project	Virement		Comments
	Existing project £000	New project £000	
General Fund			
Re-allocation virements to new projects			
SEN Special Provision Capital Fund			
Provision for future programmes	(75)	-	
St Andrews Church of England Primary - create sensory & SEN rooms	-	75	
Schools Devolved Formula Capital			
Provision for future programmes	(140)	-	
Primary Schools ICT	-	100	
Nursery Schools ICT	-	40	Virements are proposed to allocate resources to new projects to facilitate various works across schools in the City.
Contingency for Emergency Works			
Provision for future programmes	(59)	-	
Schools Capital Maintenance - Roof / Ceilings Replacements			
Colton Hills Secondary - flat roofing	(16)	-	
Uplands Junior - replacement roof covering	-	30	
Schools Capital Maintenance - Asbestos Removal			
Springdale Primary - asbestos containment	-	5	
Schools Capital Maintenance - Fire Safety			
Midpoint PRU - replacement fire doors	-	40	
Corporate Provision and Contingency for Future Programmes	(543)	-	
Corporate Asset Management Fund			
Civic Centre - roof upgrade works	-	450	Virements are proposed to allocate resources to new projects to ensure council assets are statutory compliant and fit for purpose.
Waste & Recycling Strategy			
Dust Suppression Skips	-	93	
Re-allocation virements to existing projects			
Schools Primary Expansion Programme			
Provision for future programmes	(8)	-	
Stowlawn Primary Phase 4	8	-	Virements are proposed to reallocate resources to individual projects within the Education capital programme.
Healthy Pupil Capital Fund			
Provision for future programmes	(12)	-	
Schools Capital Maintenance - Structural Works			
Uplands Junior - resurface playground	12	-	
Corporate Provision and Contingency for Future Programmes	(58)	-	
Schools Capital Maintenance - Structural Works			
Perry Hall Primary - fencing	5	-	
Corporate Asset Management Fund			
Provision for future programmes	50	-	Virements are proposed to reallocate resources to individual projects across capital programme.
St Chads Community Centre - replacement of Flue & Boilers	3	-	
Civic Centre – upgrade of CCTV to Ceremonial Car Park	4	-	
Bowman's Harbour - Former Landfill Sites			
Bowman's Harbour Repository - Tech Investigation	(5)	-	
Governance Initiatives			
Webcasting Infrastructure	1	-	
Sports Investment Strategy			
Provision for future programmes	(70)	-	Virement is proposed to reallocate resources to support Prouds Lane Playing Field - Open Space Improvements project.
Parks Strategy and Open Space			
Prouds Lane Playing Field - Open Space Improvements	70	-	
Family Hubs Capital Programme			
Provision for future programmes	(66)	-	Virement is proposed to reallocate resources to individual project within the Family Hubs Capital Programme.
Childrens Village CC - Reception works	66	-	
Project to project virements			
Corporate Asset Management Fund			
Bingley Enterprise Centre - replace roof and insulate and replace 11 windows	(125)	-	
Central Baths - Hot water system replacement	(1)	-	
Action 4 Independence – Refurbishment works	50	-	
Bingley Enterprise Centre – door and window replacements	21	-	
The Avenues Family Resource Centre (Low Hill SFH) – replacement of doors	20	-	Virements are proposed to reallocate resources across projects within the Corporate Asset Management capital programme to ensure that current corporate priorities are met and reflected.
Lawnswood Campus - entrance refurbishment and securing void area	10	-	
Graiseley Music School – Internal refurbishment to entrance and offices	10	-	
Civic Centre - reconfiguration of Customer Services area	8	-	
Hickman Avenue Depot - Dry rot removal and new replacement in the old School building	5	-	
Wolverhampton Contact Centre - fencing replacement	1	-	
Ernest Bold Centre - FRA works	1	-	

Virements for approval

Appendix 5

Capital project	Virement		Comments
	Existing project £000	New project £000	
General Fund			
Project to project virements			
Accessing Growth Fund			
A461 Rushall Junction (Walsall)	(113)	-	
A454 Wolverhampton to Neachells Lane, Phases 1,2 and 3	57	-	
M5, J1 (Sandwell)	32	-	
A4123 Corridor - A4150 Ring Road to A456 Hagley Road	24	-	
Maintenance of unclassified roads			
Lambert Road	(10)	-	
Sweetman Place	(8)	-	
Fitzmaurice Road	(7)	-	
Earlswood Close	(6)	-	
Mandale Road	(6)	-	
Mill Lane	(5)	-	
Bradley Lane	4	-	
Patshull Avenue and Marsh Lane (inc Whitney Grove, Patshull Grove and Slade Road)	4	-	
Third Avenue	4	-	
Wightwick Bank	3	-	
Tinacre Hill	2	-	
Bank Street	1	-	
Maintenance of classified roads			
Jeffcock Road	(70)	-	
Oxford Street Footway Works	(65)	-	
Specialist Surface Treatments	(17)	-	
Bushbury Road	70	-	
Oxford Street	65	-	
Stafford Street (Inbound, Cannock Road to Ring Road inc Ring Road junction)	15	-	Virements are proposed to reallocate resources across the projects within the Transportation capital programme to ensure that priorities are met and reflected.
Ring Road - Waterloo Road Junction	10	-	
Castlecroft Lane - Windmill Lane to Castlecroft Road	10	-	
Wergs Road	5	-	
Finchfield Hill	1	-	
Active Travel Programme			
Wednesfield Road - footway widening and introducing shared cycle route	43	-	
Highway Structures (bridges, subways, retaining walls)			
Emergency Structural Maintenance repairs	40	-	
Meadow View Terrace Bridge Works	(100)	-	
Wightwick County Bridge Works	(15)	-	
Smart and Accessible City			
ORCS Bid Local Contribution	(43)	-	
Highway Improvement Programme			
Lyndale Drive Culvert - Highways Improvement	75	-	
Network Development - Safer Routes to School			
School Gate Parking	5	-	
Safety Programme			
Vehicle actuated speed warning signs	(26)	-	
Newhampton Road East & West - local safety improvement	7	-	
GF - Old Heath Road Area Local Safety Scheme	(11)	-	
BCR Lunt Island	(10)	-	
Bhylls Acre Primary School	6	-	
Bushbury Lane/Showell Road	9	-	
Casatlecroft Road Zebra Crossing	16	-	
Oxford Street/Hare Street	(27)	-	
Stowlawn Primary School	20	-	
Tettenhall Road/Henwood Road	11	-	
Black Country Blue Network Phase 2			
Walsall MBC Parks and Open Space	(6)	-	Virements are proposed to reallocate resources within the Black Country Blue Network Phase 2 capital programme.
Severn Rivers Trust Cradley Projects	3	-	
Fowlers Park	2	-	
Dudley MBC Open Space	1	-	

Virements for approval

Appendix 5

Capital project	Virement		Comments
	Existing project £000	New project £000	
General Fund			
Project to project virements			
Service Led ICTS Projects			
Fleet management system	(31)	-	
ICT General Programme			
Future Developments	(200)	-	Virements are proposed to reallocate resources to individual projects within the ICT capital programme.
Security Enhancement (ICT Main Prog)	31	-	
ICT Desktop Refresh			
Desktop Refresh	200	-	
Disabled Facilities Grants			
Discretionary Bathrooms Adaptations Grant	(710)	-	Virements are proposed to reallocate resources across projects within the Disabled Facilities Grants capital programme.
Care & Repair Fees	(80)	-	
Dual Residency Grant	(50)	-	
Technology Enabled Care	(30)	-	
Relocation Grant	(20)	-	
Small Adaptations Grants	600	-	
Mandatory Disabled Facilities Grants	200	-	
Discretionary Top Up Grants	90	-	
Schools Capital Maintenance - Asbestos Removal			
Colton Hills Community School - asbestos removal to pool plant room	(8)	-	Virements are proposed to reallocate resources within the Schools Capital Maintenance programme to enable works within the various schools by utilising savings within the programme.
Fallings Park Primary - asbestos containment	(3)	-	
Schools Capital Maintenance - Fire Safety			
Castlecroft Primary - kitchen fire shutters	(2)	-	
Schools Capital Maintenance - Heating Pipework Upgrades			
Uplands Junior - 1st floor ventilation	(2)	-	
Graiseley Primary - Upgrade BMS	7	-	
Schools Capital Maintenance - Roof / Ceilings Replacements			
Colton Hills Secondary - flat roofing	(35)	-	
Eastfield Primary - corridor roofing	30	-	
Spring Vale Primary - flat roof	4	-	
Lanesfield Primary - replacement hall roof	1	-	
Low Hill Nursery - roofing work	1	-	
Schools Capital Maintenance - Structural Works			
Springdale Primary - toilets refurbishment	(38)	-	
Uplands Junior - resurface playground	(12)	-	
Claregate Primary - replacement fencing and gates	(7)	-	
Claregate Primary - resurface paving	35	-	
Wood End Primary - boundary fence replacement	12	-	
Springdale Primary - fire exit pathways	5	-	
Warstones Primary - replacement water goods	4	-	
Green Park Special - car park drainage and tarmac	1	-	
Schools Capital Maintenance - Window Upgrade			
Springdale Primary - replacement doors & windows	(25)	-	
Schools Capital Maintenance - Electrical Works			
Lanesfield Primary - replacement lighting	21	-	
Warstones Primary - replacement lighting	11	-	
Parks Strategy and Open Space			
Prouds Lane Playing Field - Open Space Improvements	(2)	-	Virement is proposed to reallocate resources within the Parks Strategy and Open Space capital programme.
Prouds Lane Open Space Improvements	2	-	
i54 Western Extension			
i54 Western Extension - Site Preparation Works	(4,221)	-	Virements are proposed to reallocate resources to the Corporate Provision and Contingency for Future Programmes to be made available to support Council capital priorities.
i54 Western Extension - Southern Plot Access Road	(4)	-	
Corporate Provision and Contingency for Future Programmes	4,225		
Total General Fund capital programme	(833)	833	

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Virements to note

Appendix 6

Capital project	Virement to note Existing project £000	Comments
General Fund		
Corporate Asset Management Fund		
Provision for future projects	(50)	Virements to individual project to support urgent works approved through delegated authority.
Adult Education Centre (Old Hall Street) - electrical supply replacement	10	
Civic Centre - Humidification System	40	
Total General Fund virements to note	-	

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CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Treasury Management Strategy 2024-2025	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Louise Miles Resources	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Tim Johnson, Chief Executive	
Originating service	Strategic Finance	
Accountable employee	James Howse Tel Email	Interim Director of Finance 01902 556710 James.Howse@wolverhampton.gov.uk
Report to be/has been considered by	Strategic Executive Board Council Resources and Equality Scrutiny Panel	6 February 2024 28 February 2024 12 March 2024

Recommendations for decision:

The Cabinet recommends that Council approves:

1. The authorised borrowing limit for 2024-2025 to support the capital strategy as required under Section 3(1) of the Local Government Act 2003 to be set at £1,261.30 million (Reference PI 3, Appendix 3 to this report). The forecast borrowing is below the authorised borrowing limit.
2. The Treasury Management Strategy Statement 2024-2025 as set out in Appendix 1 to this report.
3. The Annual Investment Strategy 2024-2025 as set out in Appendix 2 to this report.
4. The Prudential and Treasury Management Indicators as set out in Appendix 3 to this report.
5. The Annual Minimum Revenue Provision (MRP) Statement setting out the method used to calculate MRP for 2024-2025 as set out in Appendix 4 to this report.

6. The Treasury Management Policy Statement and Treasury Management Practices as set out in Appendix 6 to this report.
7. That authority continues to be delegated to the Interim Director of Finance to amend the Treasury Management Policy and Practices and any corresponding changes required to the Treasury Management Strategy, the Prudential and Treasury Management Indicators, the Investment Strategy and the Annual MRP Statement to ensure they remain aligned. Any amendments will be reported to the Cabinet Member for Resources and Cabinet (Resources) Panel as appropriate.
8. That authority continues to be delegated to the Interim Director of Finance to lower the minimum sovereign rating in the Annual Investment Strategy, in the event of the UK's credit rating being downgraded by the third credit rating agency, due to the current economic climate.
9. That authority is delegated to the Cabinet Member for Resources, in consultation with the Interim Director of Finance, to amend the MRP statement should this be required following the outcome of the consultation.

Recommendations for noting:

The Cabinet recommends that Council is asked to note:

1. That the MRP charge for the financial year 2024-2025 will be £20.8 million; it is forecast to increase to £23.2 million in 2025-2026 (paragraph 2.13 of the report).
2. That Cabinet or Cabinet (Resources) Panel and Council will receive regular Treasury Management reports during 2024-2025 on performance against the key targets and Prudential and Treasury Management Indicators in the Treasury Management Strategy and Investment Strategy, as set out in the paragraph 2.11 and Appendices 2 and 3 to this report.

1.0 Purpose

1.1 This report sets out the Council's Treasury Management Strategy for 2024-2025 for approval by Full Council. The report incorporates six elements, which are detailed in separate documents, appended to this report. These documents are:

- The Treasury Management Strategy
- The Annual Investment Strategy
- The Prudential and Treasury Management Indicators
- Minimum Revenue Provision (MRP) Statement
- The Disclosure for Certainty Rate
- The Treasury Management Policy Statement and Practices

2.0 Background

2.1 The treasury management activities of the Council are underpinned by The Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management. For further information on the requirements of the Code please refer to the Treasury Management Policy Statement and Treasury Management Practices which are appended to this report.

2.2 Treasury management is defined as:

"The management of the local authority's borrowing, investments and cash flows, including its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

2.3 The system of controls on local authority capital investment is based largely on self-regulation by local authorities themselves. At its heart is CIPFA's Prudential Code for Capital Finance.

2.4 For the financial year 2024-2025 the Council needs to comply with a new accounting standard for leases. Under the current guidance there are two forms of lease, a finance lease (on balance sheet) and an operating lease (off balance sheet). On balance sheet leases are classified as 'Other Long Term Liabilities' and are treated as a form of debt which must count towards the authorised borrowing limit required by statute.

2.5 With effect from 1 April 2024, where the Council is the lessee, almost all lease contracts will become on balance sheet, the only exemptions being for short term leases and low value assets, these exemptions being optional. The Council is reviewing all of its lease contracts to establish the impact of this accounting rule change. As this work is continuing an estimate of £5.7 million has currently been included in the authorised borrowing limit.

2.6 The Council's Treasury Management Strategy will continue to be approved annually by Council and there will also be a mid-year report to Council. In addition, there will be

quarterly monitoring reports and regular review by Councillors in both Executive and Scrutiny functions.

- 2.7 This Council will adopt the following reporting arrangements in accordance with the requirements of the Code.

Area of Responsibility	Council / Committee / Employee	Frequency of Update and Approval
Treasury Management Policy Statement and Treasury Management Practices	Director of Finance	As required
Treasury Management Strategy / Annual Investment Strategy / MRP policy	Cabinet (Feb) & Full Council (March)	Annually before the start of the year
Treasury Management Strategy / Annual Investment Strategy / MRP policy – mid-year report	Full Council	Mid-year
Treasury Management Strategy / Annual Investment Strategy / MRP policy – updates or revisions at other times	Full Council	As required
Annual Treasury Outturn Report	Cabinet and Full Council	Annually by 30 September after the end of the year
Treasury Management Monitoring Reports	Cabinet (Resources) Panel	Quarterly
Scrutiny and review of treasury management strategy	Resources and Equality Scrutiny Panel	Annually before the start of the year
Scrutiny and review of treasury management performance	Resources and Equality Scrutiny Panel	Quarterly

The treasury management role of the Director of Finance

- 2.8 The following are the key duties of the Director of Finance under the Code:

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance.
- submitting regular treasury management policy reports.
- submitting budgets and budget variations.
- receiving and reviewing management information reports.
- reviewing the performance of the treasury management function.
- ensuring the adequacy of treasury management resources and skills and the effective division of responsibilities within the treasury management function.
- ensuring the adequacy of internal audit and liaising with external audit.
- recommending the appointment of external service providers.

- 2.9 With regards the Practices for non-treasury investments, the main focus is that these types of investment should be of benefit to the economic, social or environmental wellbeing of the area served by City of Wolverhampton Council and/or the West Midlands Combined Authority, as detailed in the Council's Capital Strategy.

Treasury Management Strategy (Appendix 1)

- 2.10 Attached at Appendix 1 to the report is the recommended Treasury Management Strategy for 2024-2025. It summarises in strategic terms the approach the Council will take in performing its treasury management activities during 2024-2025. It also highlights some of the key current risks and issues relating to treasury management that will be monitored over the course of the year.

Annual Investment Strategy (Appendix 2)

- 2.11 The recommended Annual Investment Strategy for 2024-2025 is attached at Appendix 2 to the report. This builds on the Treasury Management Strategy by focussing in greater detail on investment activities. It sets out the conditions under which the Council will place treasury management investments. This represents the Council's approach to managing a number of risks inherently associated with investment. These are discussed in greater detail in the Strategy itself.

Prudential and Treasury Management Indicators (Appendix 3)

- 2.12 Attached at Appendix 3 to the report are the recommended prudential indicators for the Council for 2024-2025. The Prudential Code requires authorities to set and observe a range of prudential and treasury management indicators, and to keep these under review. Non-treasury management investment indicators required by the statutory guidance on local government investments are also included in this Appendix.

Minimum Revenue Provision (MRP) Statement (Appendix 4)

- 2.13 The recommended MRP statement for 2024-2025 is attached at Appendix 4 to the report. The formula for calculating MRP is slightly changed from the annuity basis used in 2023-2024.
- 2.14 As mentioned in the Treasury Management Strategy 2023-2024, the Government were consulting on the statutory guidance with regards MRP. The main change known at that time was an amendment which removed the ability to use future capital receipts to reduce the MRP charged in relation to the acquisition of share capital. Under this proposal, MRP would be charged on all borrowings.
- 2.15 This change would impact on the financial position that was outlined when the Help To Own Scheme was approved in March 2021. The financial strategy, at the time of writing the business case, recognised that the future return of investment through a capital receipt would be used to repay the borrowing and therefore this mitigated the need to set aside MRP. An annual review was going to be undertaken to assess any risk to the

return of investment and a provision through MRP would have been made if it was determined as necessary. Whilst in practical terms the financial strategy is still correct the Council would need to set aside funds through MRP throughout the life of the business plan if the change were to be implemented. This is a very prudent approach and fully mitigates any future risk of impairment of the equity investment from the start of the programme. The Government have recently published draft wording of the revised guidance which does require MRP to be charged on all borrowings with an implementation date of 1 April 2024. Therefore, in anticipation of the revised guidance being formally issued the MRP calculations and policy reflect the current draft guidance and MRP will be charged with regards Help To Own Scheme.

- 2.16 The MRP statement also reflects other elements of the guidance with regards the detail required to now be included in the statement. As at the time of writing this report the guidance is in draft version, it is proposed that authority be delegated to the Cabinet Member for Resources, in consultation with the Interim Director of Finance, to amend the MRP statement should this be required following the outcome of the consultation.
- 2.17 The forecast MRP charge would be £20.8 million for 2024-2025, increasing to £23.2 million in 2025-2026. This allowance has been incorporated into the Treasury Management budget and the Council's Section 151 Officer considers that this approach is prudent.

Certainty Rate (Appendix 5)

- 2.18 The certainty rate enables eligible councils to access cheaper borrowing rates of 20 basis points (bps) below the standard rate across all loan types and maturities from the Public Works Loan Board. In exchange for the reduced rate, councils must complete an annual return to Department for Levelling Up, Housing and Communities (DLUHC) detailing their budgeted plans for capital expenditure and borrowing requirements. Appendix 5 to the report details the main information that will be required to enable the Council to submit a return for 2024-2025.

Treasury Management Policy Statement and Practices (Appendix 6)

- 2.19 Attached at Appendix 6 to the report is an updated version of the Council's treasury management policy statement and practices.

Allocation of net interest payable

- 2.20 The Council is required to determine a method of splitting its interest costs between the Housing Revenue Account (HRA) and the General Fund in a way which is fair and reasonable. The method of splitting interest is unchanged from that used in 2023-2024 (the inferred net cash balance of each fund). It should be noted that the underlying basis of this calculation is the Council's balance sheet position at 31 March 2023. As the final balance sheet position for 2022-2023 is awaiting the final sign off by the Council's external auditors, the proportion split used to calculate the figure for each fund could potentially change, however, the method used is unaltered.

3.0 Evaluation of alternative options

- 3.1 The Treasury Management Strategy 2024-2025 outlined reflect the requirements of CIPFA's Code of Practice on Treasury Management and the Prudential Code for Capital Finance along with the DLUHC's Guidance on Local Government Investments and Minimum Revenue Provision.
- 3.2 The DLUHC guidance defines a prudent investment policy as having two objectives, security which must be achieved first, followed by liquidity. Only after these have been met should yield be considered. The criteria included in this report are that which meet all the above guidance.

4.0 Reasons for decision

- 4.1 To seek approval of the Treasury Management Strategy 2024-2025 in accordance with both government guidance and Codes of Practice.

5.0 Financial implications

- 5.1 These are detailed within the report.
[SH/08022024/Q]

6.0 Legal implications

- 6.1 The Council's Treasury Management activity must be carried out in accordance with the requirements of the Local Government Act 2003. In addition, the Local Government and Housing Act 1989 sets out requirements for local authorities in respect of capital controls, borrowing and credit arrangements. The Council is also required to comply with the relevant secondary legislation including the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (as amended).
- 6.2 Treasury Management relates to the management of the Council's cash flow, borrowing and cash investments. This involves seeking the best rates of interest for borrowing, earning interest on investments, whilst managing risk in making financial decisions and adopting proper accounting practice.
- 6.3 The area is heavily regulated. The Local Government and Housing Act 1989 regulates the operation of the Housing Revenue Account. The 'CIPFA Code of Practice for Treasury Management in the Public Services', contains Treasury Management indicators and advice on Treasury Management Strategy. Investment strategy is regulated by 'DLUHC Guidance on Local Government Investments' issued initially in 2004 and reissued in 2010 and 2018. This guidance includes statutory guidance.
- 6.4 The aim of the reporting arrangements as detailed above are to ensure that those with ultimate responsibility for the treasury management function are fully aware of the implications of treasury management policies and activities, and that those implementing

policies and executing transactions have properly fulfilled their responsibilities with regard to delegation and reporting.

[TC/08022024/B]

7.0 Equalities implications

7.1 Whilst there are no direct equalities implications arising from treasury management activity, the Council's capital programme of individual projects can have significant impact on specific groups and equality implications. These implications are considered when the individual capital projects are being developed.

8.0 All other implications

8.1 There are no other implications arising from this report.

9.0 Schedule of background papers

9.1 Cabinet, 21 February 2024 – [2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027](#)

9.2 Cabinet, 21 February 2024 – [Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy](#).

10.0 Appendices

10.1 Appendix 1 - Treasury Management Strategy Statement 2024-2025

10.2 Appendix 2 – Annual Investment Strategy 2024-2025

10.3 Appendix 3 – Prudential and Treasury Management Indicators 2024-2025

10.4 Appendix 4 – Annual MRP Statement 2024-2025

10.5 Appendix 5 – Disclosure for Certainty Rate

10.6 Appendix 6 – Treasury Management Policy Statement and Treasury Management Practices February 2024

Treasury Management Strategy Statement 2024-2025

1.0 Introduction

- 1.1 The Local Government Act 2003 (the Act) and supporting regulations require the Council to 'have regard to' the CIPFA Prudential Code and the CIPFA Treasury Management Code of Practice, and to set Prudential and Treasury Indicators for the next three years to ensure that the Council's capital investment plans are affordable, prudent and sustainable.
- 1.2 The Act therefore requires the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy (as required by Investment Guidance issued subsequent to the Act) (included as Appendix 2 of this report), which sets out the Council's policies for managing its investments and in particular for giving priority to the security and liquidity of those investments.
- 1.3 Part of the treasury management operation is to ensure that the Council's cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's approach to risk management, providing adequate liquidity initially before considering investment return.
- 1.4 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. On occasion, when it is prudent and economic, any debt previously drawn may be restructured to meet Council risk or cost objectives.
- 1.5 The contribution the treasury management function makes to the authority is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund balance.
- 1.6 Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

CIPFA defines treasury management as:

"The management of the local authority's borrowing, investments and cash flows, including its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

1.7 In 2019-2020 a new requirement for a capital strategy was introduced. The capital strategy provides a longer-term focus to the capital plans, and greater reporting requirements surrounding any commercial activity undertaken under the Localism Act 2011. The capital strategy is reported separately.

1.8 The capital strategy provides the following:

- a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed.
- the implications for future financial sustainability

1.9 The aim of the capital strategy is to ensure that all elected councillors fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

1.10 The capital strategy is reported separately from the Treasury Management Strategy Statement; non-treasury investments will be reported through the former. This ensures the separation of the core treasury function under security, liquidity and yield principles, and the policy and commercialism investments usually driven by expenditure on an asset. The capital strategy shows:

- the corporate governance arrangements for these types of activities
- any service objectives relating to the investments
- the expected income, costs and resulting contribution
- the debt related to the activity and the associated interest costs

1.11 The recommended strategy for 2024-2025 in respect of the following aspects of the treasury management function is based upon the Director of Finance's views on interest rates, supplemented with leading market forecasts provided by the Council's treasury adviser, Link Group.

The strategy covers:

- treasury limits in force which will limit the treasury risk and activities of the Council
- Prudential and Treasury Indicators
- the current treasury position
- the borrowing requirement
- prospects for interest rates
- the borrowing strategy
- policy on borrowing in advance of need
- debt rescheduling
- the investment strategy
- creditworthiness policy
- policy on use of external service providers
- the Minimum Revenue Provision (MRP) strategy

1.12 Balanced budget requirement

It is a statutory requirement under Section 33 of the Local Government Finance Act 1992, for the Council to produce a balanced budget. In particular, Section 32 requires a local authority, when calculating its budget requirement for the forthcoming financial year, to include the revenue costs that result from capital financing decisions. This means that increases in capital expenditure must be limited to a level whereby increases in interest charges, MRP and other costs associated with borrowing to finance capital expenditure, as well as any increases in running costs from new capital projects, are limited to a level which is affordable within the projected income of the Council for the foreseeable future.

1.13 Training

The CIPFA Code requires the Director of Finance to ensure that councillors with responsibility for treasury management receive adequate training in treasury management. This especially applies to councillors responsible for scrutiny.

The training needs of councillors and treasury management employees are periodically reviewed to ensure that they have the appropriate level of knowledge for their roles in respect of treasury management. Any identified shortfalls in knowledge are then addressed by the identifying the most suitable form of training.

Treasury management is covered in the councillor's induction programme along with financial training. In addition, on an annual basis, the Resources and Equality Scrutiny Panel will receive a presentation on the Treasury Management Strategy by Strategic Finance.

A formal record of the training received by employees central to the treasury function will be maintained in Strategic Finance. Similarly, training received by councillors is maintained by Organisational Development.

1.14 Treasury management consultants

The Council uses Link Group, Link Treasury Services Limited as its external treasury management advisors.

The Council recognises that responsibility for treasury management decisions remains with the Council at all times and will ensure that undue reliance is not placed upon the external service providers.

It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

The scope of investments within the Council's operations includes both conventional treasury investments, (the placing of residual cash from the Council's functions), and more service and commercial type investments, such as investment properties, property funds and equity investments. The service and commercial type investments require specialist advisers, and the Council uses a range of consultants with relevant

industry knowledge, dependant on the specific aspects of the project, in relation to this activity.

2.0 Treasury limits for 2024-2025 to 2026-2027

- 2.1 It is a statutory duty under Section 3 of the Act and supporting regulations, for the Council to determine and keep under review how much it can afford to borrow. The amount so determined is termed the “Affordable Borrowing Limit”. In England and Wales, the Authorised Limit represents the legislative limit specified in the Act.
- 2.2 The Council must have regard to the Prudential Code when setting the Authorised Limit, which essentially requires it to ensure that total capital investment remains within sustainable limits and, in particular, that the impact upon its future Council tax and Council housing rent levels is ‘acceptable’.
- 2.3 Whilst termed an “Affordable Borrowing Limit”, the capital plans to be considered for inclusion incorporate financing by both external borrowing and other forms of financing such as credit arrangements. The Authorised Limit is to be set, on a rolling basis, for the forthcoming financial year and two successive financial years. Details of the Authorised Limit can be found in Appendix 3 of this report.
- 2.4 The revised Treasury Management Code of Practice has removed the interest rate exposure indicator from a formal indicator to a narrative in the Treasury Management Strategy. The Council will continue to manage and monitor its interest rate exposure against the limits set previously:

Upper limit for fixed rate	100%
Upper limit for variable rate	20%

3.0 Current portfolio position

- 3.1 The Council’s forecast treasury portfolio position at 31 March 2024 is shown below:

	Forecast £000	Average Rate %
External Debt		
Fixed rate borrowing - PWLB / Local Authorities	727,309	3.6438
Fixed rate borrowing - Market	55,800	4.4700
Variable rate borrowing - Market	37,000	4.2365
Total Gross Borrowing	820,109	3.7435
Other Long Term Liabilities*	73,960	-
Total External Debt	894,069	-
Total Investments **	5,000	4.6798

*Other long term liabilities are finance leases and Private Finance Initiatives (PFIs), an average rate is not applicable as the forecast reflects the underlying liability attached to the financial models.

**It is the policy to use cash balances to fund capital expenditure to avoid the need for borrowing, therefore, the level of cash investments is forecast to be minimal.

4.0 Borrowing requirement

4.1 The Council's forecast borrowing requirement is summarised below. The table shows the forecast external debt against the underlying capital borrowing need (the Capital Financing Requirement), highlighting any over or under borrowing:

External Debt	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast £000	Forecast £000	Forecast £000	Forecast £000
Borrowing at 1 April	710,248	820,109	967,398	1,078,236
Expected change in borrowing	109,861	147,289	110,838	58,594
Other long term liabilities at 1 April	76,928	73,960	74,416	70,939
Expected change in other long term liabilities	(2,968)	456	(3,477)	(3,630)
Forecast debt at 31 March	894,069	1,041,814	1,149,175	1,204,139
Capital Financing Requirement	1,043,488	1,175,233	1,279,595	1,324,559
Under / (over) borrowing	149,419	133,419	130,420	120,420
External debt for service investments *				
Forecast debt at 31 March	44,319	47,968	48,046	49,187
Percentage of total external debt	5%	5%	4%	4%

* These relate to areas such as capital expenditure on investment properties and loans to third parties etc. for service and regeneration delivery purposes.

5.0 Prospects for interest rates

5.1 The Council has appointed Link Group as treasury advisor to the Council and part of their service is to assist the Council to formulate a view on interest rates. Link Group provided the following forecasts on 8 January 2024. These are forecasts for Bank Rate, average earnings and PWLB certainty rates, gilt yields plus 80 bps.

Link Group Interest Rate View 08.01.24													
	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27
BANK RATE	5.25	5.25	4.75	4.25	3.75	3.25	3.00	3.00	3.00	3.00	3.00	3.00	3.00
3 month ave earnings	5.30	5.30	4.80	4.30	3.80	3.30	3.00	3.00	3.00	3.00	3.00	3.00	3.00
6 month ave earnings	5.20	5.10	4.60	4.10	3.70	3.30	3.10	3.10	3.10	3.10	3.10	3.10	3.10
12 month ave earnings	5.00	4.90	4.40	3.90	3.60	3.20	3.10	3.10	3.10	3.10	3.10	3.20	3.20
5 yr PWLB	4.50	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.60	3.50	3.50	3.50
10 yr PWLB	4.70	4.50	4.40	4.30	4.20	4.10	4.00	3.90	3.80	3.70	3.70	3.70	3.70
25 yr PWLB	5.20	5.10	4.90	4.80	4.60	4.40	4.30	4.20	4.20	4.10	4.10	4.10	4.10
50 yr PWLB	5.00	4.90	4.70	4.60	4.40	4.20	4.10	4.00	4.00	3.90	3.90	3.90	3.90

6.0 Borrowing strategy

6.1 Borrowing considerations

When undertaking any new borrowing the Director of Finance will give consideration to the following to ensure the best deal is obtained for the Council:

1. Internal / external borrowing.
2. Temporary borrowing (less than 1 year).
3. Variable / fixed rate.
4. Short / long term borrowing.
5. PWLB / market debt.

When considering the above, the balance and spread of debt in the Council's portfolio will be taken into account along with the financial implications for the medium term financial strategy.

The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as medium and longer dated borrowing rates are expected to fall from their current levels once prevailing inflation concerns are addressed by tighter near-term monetary policy. That is, Bank Rate remains elevated through to the second half of 2024, however the Director of Finance will keep this strategy under review and consider opportunities to secure higher returns on investment where the balance of risk, return, security and liquidity are considered acceptable.

6.2 Sensitivity of the forecast – In normal circumstances the main sensitivities of the forecast are likely to be the two scenarios noted below. Council employees, in conjunction with the treasury advisers, will continually monitor both the prevailing interest rates and the market forecasts, adopting the following responses to a change of sentiment:

- if it was felt that there was a significant risk of a sharp fall in borrowing rates, then borrowing will be postponed.
- if it was felt that there was a significant risk of a much sharper rise in borrowing rates than that currently forecast, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

6.3 External versus internal borrowing

The general aim of this treasury management strategy is to maintain cash balances at a reduced level, keeping under review the level of forecast reserves and therefore anticipated cash balances and opportunities for longer term investment, whilst maintaining an appropriate level of risk; therefore keeping to a minimum the credit risk incurred by holding investments. Measures taken over the last few years have already reduced the level of credit risk and the difference between borrowing rates and

investment rates has been carefully considered to ensure the Council obtains value for money once an appropriate level of risk management has been attained to ensure the security of its investments.

Where investment rates are below long term borrowing rates, the Council can minimise its overall net treasury costs in the short term by continuing to avoid new external borrowing and by using internal cash balances to finance new capital expenditure or to replace maturing external debt (this is referred to as internal borrowing).

However, short term savings by avoiding new long term external borrowing will also be weighed against the potential for incurring additional long term extra costs by delaying unavoidable new external borrowing until later years when PWLB long term rates are forecast to be higher.

6.4 Policy on borrowing in advance of need

The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within approved Capital Financing Requirement estimates, will be considered carefully to ensure value for money can be demonstrated and that the Council can ensure the security of such funds.

In determining whether borrowing will be undertaken in advance of need the Council will:

- ensure that there is a clear link between the capital programme and maturity profile of the existing debt portfolio which supports the need to take funding in advance of need
- ensure the ongoing revenue costs created, and the implications for the future plans and budgets have been considered
- evaluate the economic and market factors that might influence the manner and timing of any decision to borrow
- consider the merits and demerits of alternative forms of funding
- consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use
- consider the impact of borrowing in advance on temporarily increasing investment cash balances and the consequent increase in exposure to counterparty risk, and other risks, having regard to the controls in place to minimise such risks.

7.0 Debt rescheduling

- 7.1 The spread between the rates applied to new borrowing and repayment of debt has meant that PWLB to PWLB debt restructuring is now much less attractive than it was.

In particular, consideration would have to be given to the large premiums which would be incurred by prematurely repaying existing PWLB loans and it is very unlikely that these could be justified on value for money grounds in using replacement PWLB refinancing. Therefore, rescheduling of current borrowing in the Council's debt portfolio is unlikely to occur.

- 7.2 If rescheduling was done, it will be reported to the Cabinet (Resources) Panel, at the earliest meeting following its action.

Annual Investment Strategy 2024-2025

1.0 Annual Investment Strategy

1.1 Investment policy

The Department of Levelling Up, Housing and Communities (DLUHC), formerly the Ministry of Housing, Communities and Local Government (MHCLG), and CIPFA have extended the meaning of 'investments' to include both financial and non-financial investments. This report deals solely with treasury financial investments, as managed by the Treasury Management team. Non-financial investments, essentially the purchase of income yielding assets and service investments, are covered in the separate Capital Strategy report.

The Council's investment policy has regard to the following:

- DLUHC's Guidance on Local Government Investments ("the Guidance")
- the Audit Commission's report on Icelandic investments
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ("the TM Code")
- CIPFA Treasury Management Guidance Notes 2021.

The Council's investment priorities are:

- (a) firstly, the security of capital and
- (b) secondly, the liquidity of its investments
- (c) finally, the yield or return.

The Council will also aim to achieve the optimum yield/return on its investments commensurate with proper levels of security and liquidity. In relation to treasury management investments, the risk appetite of this Council is low in order to give priority to the security of its investments. In the current economic climate it is considered appropriate to keep investments short term to cover cash flow needs. However, where appropriate (from an internal as well as external perspective), the Council will also consider the value available in periods up to 12 months with high credit rated financial institutions, as well as wider range fund options.

The borrowing of monies purely to invest or on-lend and make a return is unlawful and the Council will not engage in such activity.

The above guidance place a high priority on the management of risk. The Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means:

1. Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the Short Term and Long Term ratings.

2. However, ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as 'credit default swaps' and overlay that information on top of the credit ratings. A credit default swap (CDS) is a financial derivative that allows an investor to swap or offset their credit risk with that of another investor. To swap the risk of default, the lender buys a CDS from another investor who agrees to reimburse them if the borrower defaults. Most CDS contracts are maintained via an ongoing premium payment similar to the regular premiums due on an insurance policy. A lender who is worried about a borrower defaulting on a loan often uses a CDS to offset or swap that risk. CDS data is used to better understand market sentiment and to supplement the more backward-looking rating agencies' credit rating assessment of a counterparty.
3. Other information sources used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
4. Investment instruments identified for use in the financial year are listed under the 'Specified' and 'Non-Specified' Investments categories. Counterparty limits will be as set through the Council's Treasury Management Practices – Schedules.
 - Specified investments are those with a high level of credit quality and subject to a maturity limit of one year, or have less than a year left to run to maturity, if they were originally classified as being non-specified investments solely due to the maturity period exceeding one year.
 - Non-specified investments are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by Councillors and officers before being authorised for use.
5. Non-specified investments limit: the Council has determined that it will limit the maximum total exposure to non-specified investments as being 50% of total investments with a cap of £35.0 million.
6. Lending limits, amounts and maturity, for each counterparty will be set through applying the methodology in the following section.
7. Transaction limits are set for each type of investment.
8. The Council will set a limit for the amount of its investments which are invested for longer than 365 days.
9. Investments will only be placed with counterparties from countries with a specified minimum sovereign rating.

10. The Council has engaged external consultants to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
11. All investments will be denominated in sterling.
12. As a result of the change in accounting standards for 2023-2024 under IFRS 9, the Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. In November 2018, DLUHC concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31 March 2023. More recently, a further extension to the override to 31 March 2025 has been agreed by Government.

However, the Council will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance. Regular monitoring of investment performance will be carried out during the year.

Changes in risk management policy from last year

The above criteria are unchanged from last year.

1.2 Creditworthiness policy

This Council applies the creditworthiness service provided by Link Group. This service employs a sophisticated modelling approach using credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- credit watches and credit outlooks from credit rating agencies;
- Credit Default Swap (CDS) spreads to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The table below details Link's recommendations of bands and durations along with the more prudent parameters that the Council will apply:

	Link	Wolverhampton
Yellow (is for UK Government debt or equivalent, money market funds and collateralised deposits where the collateral is UK Government debt)	5 years	-
Dark Pink (for Ultra-Short Dated Bond Funds with a credit score of 1.25)	5 years	-
Light Pink (for Ultra-Short Dated Bond Funds with a credit score of 1.5)	5 years	-
Purple	2 years	1 year
Blue (only applies to nationalised or semi nationalised UK Banks)	1 year	3 months
Orange	1 year	6 months
Red	6 months	3 months
Green	100 days	50 days
No Colour	Not to be used	Not to be used

This list will be reviewed on any changes to the methodology used by Link and the Council may revert back to using Link's recommended durations if or when investment balances are at higher levels and longer deposits are possible without significantly increased risk to liquidity.

The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically, the minimum credit ratings criteria the Council use will be a Short Term rating (Fitch or equivalents) of F1+ and a Long Term rating of AA-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances, consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored each time the Council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.

- If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately. A severe downgrade may prompt the Director of Finance to instruct treasury management employees to take steps to withdraw any investment considered to be at risk. The potential penalties for such an action would need to be assessed.
- In addition to the use of Credit Ratings the Council will be advised of information in movements in Credit Default Swap spreads against the iTraxx European Financials benchmark and other market data on a daily basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

Sole reliance will not be placed on the use of this bought-in service. In addition, the Council will also use market data and market information, information on any external support for banks to help support its decision making process.

1.3 Creditworthiness

Significant levels of downgrades to short and long-term credit ratings have not materialised since the crisis in March 2020. In the main, where they did change, any alterations were limited to Outlooks.

1.4 CDS prices

Although bank CDS prices, (these are market indicators of credit risk), spiked upwards following changes in government policy in the autumn of 2022, they have returned to more average levels since then. However, market view can change, so it will remain important to undertake continual monitoring of all aspects of risk and return in the current circumstances. Link monitor CDS prices as part of their creditworthiness service to local authorities and the Council has access to this information.

1.5 Country limits

Due care will be taken to consider the exposure of the Council's total investment portfolio to non-specified investments, countries, groups and sectors.

- **Non-specified investment limit.** The Council has determined that it will limit the maximum total exposure to non-specified investments as being 50% of the total investment portfolio with a cap of £35.0 million.
- **Country limit.** The Council has determined that it will only use approved counterparties from the UK and from countries with a minimum sovereign credit rating of AA from Fitch Ratings (or equivalent from other agencies if Fitch does not provide). The list of countries that qualify using this credit criteria as at the date of this report is shown below. This list will be amended by employees should ratings change in accordance with this policy.
- **Other limits.** In addition:
 - No more than 20% will be placed with any non-UK country at any time;
 - Limits in place above will apply to a group of companies;
 - Sector limits will be monitored regularly for appropriateness.

Approved countries for investments

AAA

- Australia
- Denmark
- Germany
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

AA+

- Canada
- Finland
- U.S.A.

AA

- Abu Dhabi (UAE)

AA-

- Belgium
- France
- Qatar
- U.K.

The above ratings are those used by Fitch. During 2020-2021 Fitch and Moody's both downgraded the UK's sovereign rating from AA to AA-, or equivalent, due to the unprecedented impact of the Covid-19 pandemic on the economy. However, as Standard & Poors rating is still the equivalent of AA the Council has kept this as the sovereign limit. The Director of Finance has delegated authority to lower the minimum sovereign rating in the Annual Investment Strategy in the event that this position changes.

1.6 **Specified investments**

All such investments will be sterling denominated, with maturities up to a maximum of one year, meeting the minimum 'high' rating criteria where applicable.

Non-specified investments which would be specified investments apart from originally being for a period longer than 12 months, will be classified as being specified once the remaining period to maturity falls to under 12 months.

	Minimum 'High' Credit Criteria
Debt Management Agency Deposit Facility	Government backed
Money Market Funds CNAV > LVNAV	AAAmmf / Aaa-mf
Term deposits - UK Government	Government backed
Term deposits - Local Authorities	High Security
Term deposits - Banks & Building Societies	Short-term F1+, Long-term AA-

1.7 **Non-specified investments**

These are any investments which do not meet the specified investment criteria. A maximum of 50% of total investments with a cap of £35.0 million can be held in aggregate in non-specified investments.

	Minimum Credit Criteria	Max Limit	Max Maturity Period
Term deposits - UK Government (with maturities in excess of 1 year)	Government Backed	£10.0 million	5 years
Term deposits - Local Authorities (with maturities in excess of 1 year)	High Security	£10.0 million per LA	5 years
Term deposits - Banks & Building Societies (with maturities in excess of 1 year)	Short-term F1+ Long-term AA-	£10.0 million per Bank	5 years

1.8 Accounting treatment of investments

The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by the Council. To ensure that the Council is protected from any adverse revenue implications, which may arise from these differences, the accounting implications of new transactions will be thoroughly reviewed before they are undertaken.

1.9 Investment strategy

In-house funds: All of the Council's funds are managed in-house. Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. The current shape of the yield curve suggests that is the case at present, but there is the prospect of Bank Rate having peaked in the second half of 2023 and possibly reducing as early as the second half of 2024 so an agile investment strategy would be appropriate to optimise returns. Accordingly, while most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed.

Interest rate outlook: Link have indicated that Bank Rate could have peaked at 5.25%. The table below has been provided by Link and shows their forecast view, PWLB forecasts take into account the 20 basis point certainty rate reduction.

Link Group Interest Rate View 08.01.24													
	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26	Mar-27
BANK RATE	5.25	5.25	4.75	4.25	3.75	3.25	3.00	3.00	3.00	3.00	3.00	3.00	3.00
3 month ave earnings	5.30	5.30	4.80	4.30	3.80	3.30	3.00	3.00	3.00	3.00	3.00	3.00	3.00
6 month ave earnings	5.20	5.10	4.60	4.10	3.70	3.30	3.10	3.10	3.10	3.10	3.10	3.10	3.10
12 month ave earnings	5.00	4.90	4.40	3.90	3.60	3.20	3.10	3.10	3.10	3.10	3.10	3.20	3.20
5 yr PWLB	4.50	4.40	4.30	4.20	4.10	4.00	3.80	3.70	3.60	3.60	3.50	3.50	3.50
10 yr PWLB	4.70	4.50	4.40	4.30	4.20	4.10	4.00	3.90	3.80	3.70	3.70	3.70	3.70
25 yr PWLB	5.20	5.10	4.90	4.80	4.60	4.40	4.30	4.20	4.20	4.10	4.10	4.10	4.10
50 yr PWLB	5.00	4.90	4.70	4.60	4.40	4.20	4.10	4.00	4.00	3.90	3.90	3.90	3.90

The Council will avoid locking into longer term deals unless exceptionally attractive rates are available which make longer term deals worthwhile, within the risk parameters set by this Council.

In order to be prudent, for 2024-2025 the Council will budget for an investment return of 2.30% on investments placed during the financial year. This rate reflects the Council's short term nature of investment of surplus cash, whereas, the Link forecasts are based on investments placed for periods up to twelve months. In addition, an upper limit for long term treasury management investments (previously called 'upper limit for principal sums invested for longer than 365 days') of £35.0 million is asked to be approved as can be seen in Appendix 3 Prudential and Treasury Indicators 2024-2025.

For its cash flow generated balances, the Council will seek to use its money market funds, business reserve accounts and short-dated deposits (overnight to 100 days) in order to benefit from the compounding of interest, whilst maintaining liquidity.

1.10 End of year investment report

At the end of the financial year, a report will be submitted to the Cabinet and full Council on the Council's investment activity as part of its Annual Treasury Report.

1.11 Combined Authority

The Council will be prepared to lend to the Combined Authority. Such lending may be as part of arrangements agreed with the Combined Authority and other constituent authorities.

1.12 Council Owned Companies

The Council will be prepared to lend or invest in companies which are wholly or partly owned by the Council. In doing this, consideration will be given to the benefits and risks to the Council.

City of Wolverhampton Council
Specified Investments Lending List

Institution	Country (Sovereign Rating)	Limit £000	Term Limit
Bank Netherlandse Gemeenten	Netherlands (AAA)	20,000	12 mths
Bank of Montreal	Canada (AA+)	10,000	6 mths
Bank of Nova Scotia	Canada (AA+)	10,000	6 mths
Canadian Imperial Bank of Commerce	Canada (AA+)	10,000	6 mths
DBS Bank Ltd	Singapore (AAA)	10,000	6 mths
HSBC Bank plc	UK (AA-)	5,000	3 mths
Landwirtschaftliche Rentenbank	Germany (AAA)	20,000	12 mths
National Bank of Abu Dhabi	Abu Dhabi (U.A.E) (AA)	5,000	3 mths
Nordea Bank Abp	Finland (AA+)	10,000	6 mths
NRW.BANK	Germany (AAA)	20,000	12 mths
Oversea Chinese Banking Corporation Ltd	Singapore (AAA)	10,000	6 mths
Royal Bank of Canada	Canada (AA+)	10,000	6 mths
Skandinaviska Enskilda Banken AB	Sweden (AAA)	10,000	6 mths
Svenska Handelsbanken AB	Sweden (AAA)	20,000	12 mths
Swedbank AB	Sweden (AAA)	10,000	6 mths
Toronto Dominion Bank	Canada (AA+)	10,000	6 mths
United Overseas Bank Ltd	Singapore (AAA)	10,000	6 mths
Wells Fargo Bank NA	USA (AA+)	10,000	6 mths
Nationalised Banks			
Royal Bank of Scotland Group plc			
National Westminster Bank plc	UK (AA-)	10,000	3 mths
The Royal Bank of Scotland plc	UK (AA-)	10,000	3 mths
AAA Rated and Government Backed Securities			
Debt Management Office	UK (AA-)	20,000	30 mths
Money Market Funds			
Fund Rating			
Invesco STIC Account	Fitch AAmmf	20,000	Instant Access
Aberdeen Liquidity Fund (LUX) Class 2	Fitch AAmmf	20,000	Instant Access
Federated Short-Term Sterling Prime Fund	Fitch AAmmf	20,000	Instant Access
Black Rock Sterling Liquidity Fund	Moody's Aaa-mf	20,000	Instant Access

Non-rated Institutions

County Councils, London Boroughs, Metropolitan Districts and Unitary Authorities - limits £6m and 12 months.
Shire District Councils, Fire and Civil Defence Authorities, Passenger Transport Authorities and Police
Authorities - limits £3m and 12 months.

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Prudential Indicators (PI) required by The Prudential Code

PI for Prudence - Ensuring that external debt is sustainable and compliance with good professional practice are essential features of prudence.

PI 1 - Estimates and actual capital expenditure.

Full details of capital expenditure plans and funding can be found in the quarter three capital budget monitoring 2023-2024 report.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast £000	Forecast £000	Forecast £000	Forecast £000
General Fund *	85,901	155,284	98,655	27,843
HRA	118,691	142,060	128,959	103,920
	204,592	297,344	227,614	131,763
* Service investments included in General Fund figure. These relate to areas such as capital expenditure on investment properties and loans to third parties etc. for service and regeneration delivery purposes.	2,609	6,344	6,940	9,000

PI 2 - Estimates and actual capital financing requirement General and HRA.

The capital financing requirement measures the authority's underlying need to borrow for a capital purpose.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast £000	Forecast £000	Forecast £000	Forecast £000
General Fund *	672,037	703,861	719,479	700,699
HRA	371,451	471,372	560,116	623,860
Total capital financing requirement	1,043,488	1,175,233	1,279,595	1,324,559
* Service investments included in General Fund figure. These relate to areas such as capital expenditure on investment properties and loans to third parties etc. for service and regeneration delivery purposes.	34,436	38,086	38,163	39,304
Movement in capital financing requirement represented by:				
New borrowing for capital expenditure	109,818	169,950	141,883	82,672
Less minimum revenue provision/voluntary minimum revenue provision	(35,925)	(38,205)	(37,521)	(37,708)
Movement in capital financing requirement	73,893	131,745	104,362	44,964

PI 3 - Authorised limit for external debt.

These limits apply to the total external debt gross of investments and separately identify borrowing from other long term liabilities such as finance leases including Private Finance Initiatives (PFI). This is a self determined level reviewed and set each budget setting cycle.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Limit £000	Limit £000	Limit £000	Limit £000
Borrowing	1,137,035	1,184,887	1,324,196	1,400,635
Other Long Term Liabilities	75,960	76,416	72,939	69,309
Total Authorised Limit	1,212,995	1,261,303	1,397,135	1,469,944
Forecast External Debt as at 21 February 2024:				
Borrowing	820,109	967,398	1,078,236	1,136,830
Other Long Term Liabilities	73,960	74,416	70,939	67,309
	894,069	1,041,814	1,149,175	1,204,139
Variance (Under) / Over Authorised limit	(318,926)	(219,489)	(247,960)	(265,805)
Authorised limit for service investments included in the above figures				
Authorised Limit	57,928	49,064	48,281	49,702
Forecast External Debt as at 21 February 2024:				
	44,319	47,968	48,046	49,187
Variance (Under) / Over Authorised limit	(13,609)	(1,096)	(235)	(515)

Prudential Indicators (PI) required by The Prudential Code

PI 4 - Operational boundary for external debt.				
This is based on the same estimates as the authorised limit but directly reflects the Director of Finance's estimate of the most likely, prudent but not worst case scenario, without the additional headroom included. This is a self determined level reviewed and set each budget setting cycle.				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Limit	Limit	Limit	Limit
	£000	£000	£000	£000
Borrowing	1,098,093	1,168,280	1,310,022	1,392,398
Other Long Term Liabilities	73,960	74,416	70,939	67,309
Total Operational Boundary Limit	1,172,053	1,242,696	1,380,961	1,459,707
Forecast External Debt as at 21 February 2024:				
Borrowing	820,109	967,398	1,078,236	1,136,830
Other Long Term Liabilities	73,960	74,416	70,939	67,309
	894,069	1,041,814	1,149,175	1,204,139
Variance (Under) / Over Operational Boundary Limit	(277,984)	(200,882)	(231,786)	(255,568)
Operational boundary for service investments included in the above figures				
Operational Boundary Limit	54,678	47,968	48,046	49,187
Forecast External Debt as at 21 February 2024:	44,319	47,968	48,046	49,187
Variance (Under) / Over Operational Boundary Limit	(10,359)	0	0	0

PI 5 - Gross debt and the capital financing requirement.				
"In order to ensure that over the medium term debt will only be for a capital purpose, the local authority should ensure that debt does not, except in the short term, exceed the total of capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years".				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
Forecast Capital Financing Requirement at end of Second Year	1,279,592	1,324,557	1,338,736	1,338,736
Gross Debt	894,069	1,041,814	1,149,175	1,204,139
Capital Financing Requirement Greater than Gross Debt	Yes	Yes	Yes	Yes

PI for Affordability - These indicators are used to ensure the total capital investment of the Council is within a sustainable limit and the

PI 6 - Estimates and actual ratio of financing costs to net revenue stream.				
This represents the cost of financing capital expenditure as a % of net revenue for both the General and HRA.				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
General Fund *	14.7%	14.7%	15.0%	14.0%
HRA	31.8%	35.9%	38.5%	40.6%
* Service investments included in General Fund figure. These relate to areas such as capital expenditure on investment properties and loans to third parties etc. for service and regeneration delivery purposes.	0.7%	0.7%	0.8%	0.8%

PI 7 - Estimates and actual ratio of net income from commercial and service investments to net revenue stream.				
This represents the financial exposure of the Council to the loss of income from commercial and service investments. Only costs directly attributable to the investments are netted off, so unlike PI 6, the costs of borrowing (interest and MRP) cannot be deducted as they are not directly attributable to managing the investments and will continue regardless of the existence or performance of the investments.				
	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
Commercial	-	-	-	-
Service	0.5%	0.9%	1.2%	1.3%

Treasury Management Indicators (TMI) required by The Treasury Management Code

TMI 1 - Upper limits for long-term treasury management investments (previously called 'upper limits to the total of principal sums invested over 365 days').

This details the maximum amount which can be invested for up to 5 years (as per paragraph 1.5 of the Annual Investment Strategy). It has been determined that a maximum of 50% of total investments with a cap of £35.0 million could be prudently committed to long term investments should the Director of Finance decide it is appropriate to.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Limit £000	Limit £000	Limit £000	Limit £000
Upper limit for long-term treasury management investments	35,000	35,000	35,000	35,000
Actual and Forecast Invested at 21 February 2024	-	-	-	-
Variance (Under) / Over Limit	(35,000)	(35,000)	(35,000)	(35,000)

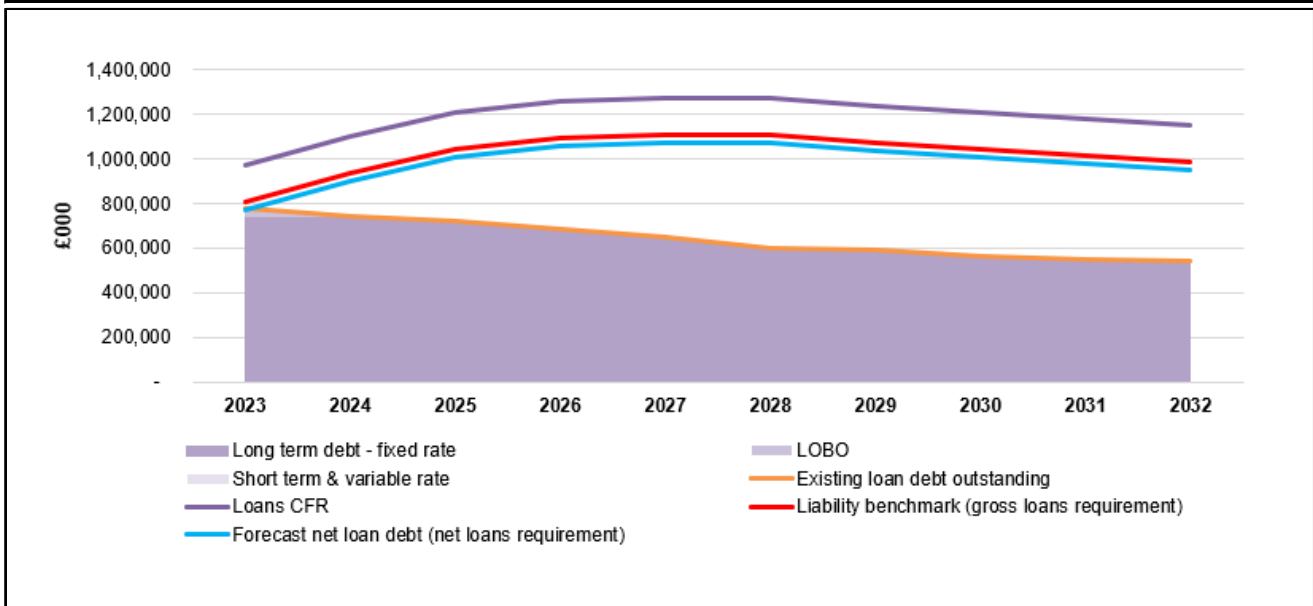
TMI 2 - Upper and lower limits to the maturity structure of its borrowing.

These limits relate to the % of fixed and variable rate debt maturing.

	As at 21 February 2024		
	Upper Limit	Lower Limit	March 2024 Forecast
Under 12 months	25%	0%	3.66%
12 months and within 24 months	25%	0%	3.08%
24 months and within 5 years	40%	0%	14.41%
5 years and within 10 years	50%	0%	9.86%
10 years and within 20 years	50%	0%	15.17%
20 years and within 30 years	50%	0%	26.95%
30 years and within 40 years	50%	0%	17.02%
40 years and within 50 years	50%	0%	9.85%
50 years and within 60 years	50%	0%	-

TMI 3 - Liability benchmark

A liability benchmark is a measure of how well the Council's existing loans portfolio matches its planned borrowing needs. It is a projection of the amount of loan debt outstanding that the Council needs each year into the future to fund its existing debt liabilities, planned prudential borrowing and other cash flows. This indicator highlights any mismatches between actual loan debt outstanding and the planned borrowing needs. Where actual loans are less than the benchmark, this is an indication of a future borrowing requirement. Whereas actual loans exceeding the benchmark indicate an overborrowed position which will result in excess cash balances requiring investment



Non-treasury management investment indicators

The statutory guidance on local government investments encourages local authorities to develop qualitative indicators that allow the reader to assess the Council's total risk exposure as a result of commercial investment decisions.

NTM 1 - Estimates and actual non-treasury management investment expenditure.

This identifies the level of any non-treasury management investments (e.g. service and commercial investments).

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
Service investments	2,609	6,344	6,940	9,000
Commercial investments	-	-	-	-
	2,609	6,344	6,940	9,000

NTM 2 - Estimates and actual net debt for service and commercial investment to net service expenditure ratio.

This indicator measures the level of net debt for service and commercial investments in comparison to the Council's forecast net service expenditure, where net service expenditure is a proxy for the size and financial strength of a local authority.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
Net debt for service and commercial investments	34,436	38,086	38,163	39,304
Net service expenditure	306,414	332,024	338,041	348,354
Debt to net service expenditure ratio	11.2%	11.5%	11.3%	11.3%

NTM 3 - Estimates and actual service and commercial income to net service expenditure ratio.

This indicator measures the level of service and commercial investment generated income in comparison to the Council's net service expenditure, where net service expenditure is a proxy for the size and financial strength of a local authority. The % indicates the Council's financial resilience and how reliant on the service/commercial investment income it is. A low % indicates the Council is not heavily reliant on service/commercial investment income.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
	£000	£000	£000	£000
Service and commercial investment income	1,685	3,191	4,105	4,659
Net service expenditure	306,414	332,024	338,041	348,354
Service and commercial income to net service expenditure ratio	0.6%	1.0%	1.2%	1.3%

NTM 4 - Estimates and actual loan to value ratio

This indicator measures the net debt for service and commercial investments compared to the forecast total asset value. A decrease in the ratio over the medium term indicates a reducing level of borrowing due to repayments, whereas an increase indicates an increase in the level of borrowing due to new loans being issued.

	As at 21 February 2024			
	2023-2024	2024-2025	2025-2026	2026-2027
	Forecast	Forecast	Forecast	Forecast
Loan to value ratio	59.9%	61.9%	61.1%	60.9%

Annual MRP Statement 2024-2025

Minimum Revenue Provision – an introduction

1. What is Minimum Revenue Provision?

Capital expenditure is generally expenditure on assets which have a life expectancy of more than one year e.g. buildings, vehicles, machinery etc. In accordance with proper practice, the financing of such expenditure is spread over several years in order to try to match the years over which such assets benefit the local community through their useful life. The manner of spreading these costs is through an annual charge known as Minimum Revenue Provision (MRP), which is determined by the Council under guidance.

2. Statutory duty

The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (as amended by Statutory Instrument 2008 no. 414 s4) lay down that:

“A local authority shall determine for the current financial year an amount of minimum revenue provision that it considers to be prudent.”

3. Government guidance

Along with the above duty, the Government issued guidance which came into force on 31 March 2008 which requires that a Statement on the Council’s policy for its annual MRP should be submitted to the Full Council for approval before the start of the financial year to which the provision will relate. On 2 February 2018 the Department for Levelling Up, Housing and Communities (DLUHC) issued its new Statutory Guidance on Minimum Revenue Provision which is effective from 1 April 2019, except for the elements ‘Changing Methods for Calculating MRP’ which applied from 1 April 2018. This new guidance supersedes the previous versions. The main changes of the guidance are the introduction of a maximum useful economic life which should normally not exceed 50 years, MRP to be charged for all borrowings and defining what can be classed as an ‘overpayment’ thereby removing the option to retrospectively change the method of calculating MRP in prior years.

The Council is legally obliged to “have regard” to the guidance, which is intended to enable a more flexible approach to assessing the amount of annual provision than was required under the previous statutory requirements. Although it is up to each Council to determine for itself how to calculate its MRP, the guidance suggests four methodologies, with an overriding recommendation that the Council should make prudent provision to redeem its debt liability over a period which is reasonably commensurate with that over which the capital expenditure is estimated to provide benefits. The requirement to ‘have regard’ to the guidance therefore means that:

1. Although four main options are recommended in the guidance, there is no intention to be prescriptive by making these the only methods of charge under which a local authority may consider its MRP to be prudent.
2. It is the responsibility of each authority to decide upon the most appropriate method of making a prudent provision, after having had regard to the guidance.

In December 2023 DLUHC issued a 'Consultation on changes to statutory guidance and regulations: Minimum Revenue Provision' which detailed the proposed wording of its new statutory guidance, which is the outcome of various earlier consultations dating back to November 2021. The purpose of the new guidance is to make the regulations more explicit with regards not being able to exclude a proportion of debt from the MRP calculation and the use of capital receipts in place of the MRP charge to the revenue account. With a consultation closing date of 16 February 2024, the new guidance is effective from 1 April 2024.

In addition to the explicit wording, the consultation also detailed what should be covered in the MRP Statement as a minimum, in order to provide transparency and accountability. It also stipulated how the four options (mentioned in the paragraph above) should be applied to supported borrowing and prudential borrowing. This is a change from guidance previously issued. The four options are:

- Option 1: Regulatory Method – the MRP is determined in accordance with the former regulations before the 2008 amendments.
- Option 2: CFR Method – MRP is equal to 4% of the General Fund capital financing requirement at the end of the preceding financial year.
- Option 3: Asset Life Method – MRP is determined by reference to the useful life of the asset. There are two main methods of achieving this: using an equal instalment method or the annuity method.
- Option 4: Depreciation Method – MRP is equal to the provision required in accordance with depreciation accounting in respect of the asset.

The guidance now proposes that options one and two can only be used in relation to capital expenditure incurred before 1 April 2008 funded by supported borrowing, with options three and four being for expenditure incurred on or after 1 April 2008 i.e. funded by prudential borrowing. Any departure from the guidance requires an explanation in the MRP statement as to why the adopted approach results in a more prudent charge.

Information from Link Group highlights that many local authorities use option three or four for supported borrowing. The Council currently applies the option three, Asset Life - Annuity Method, to calculate its MRP charge and doesn't differentiate between its supported and prudential borrowing.

4. Timing

This statement shall take effect from 1 April 2024, unless an alternative date is stated below, and shall take precedence over any statements previously approved.

5. Calculation

MRP shall be calculated by adding together the amount calculated using the method as stated below i.e. asset life, annuity method as in previous years.

Method

To be used for all capital expenditure taking into account only capital expenditure and financing decisions, and the classification of fixed assets, reflected in the Council's accounts for the preceding year.

With the variations set out below, MRP will be calculated, on an individual fixed asset basis (unless they are land or community assets (no depreciation), where it is capitalised under statute/direction (equal pay, REFCUS etc.) or when one grouped "asset" is created for MRP calculation purposes for each category for individual years), in accordance with the annuity method, whereby MRP for each year will be the amount presumed to be the principal element of the equal amounts that would be payable each year in respect of a loan at the specified rate of interest that would reduce the outstanding principal amount to zero at the end of the estimated useful life.

The specified rate of interest will be the average interest rate of the Council's debt as at the end of the year preceding the first year in which the annuity rate is to be applied. Where the interest rate on debt is variable, the rate to be used in calculating the average shall be the interest rate on the debt at 31 March of the year for which the average is being calculated.

MRP will thus be calculated in accordance with the following formula:

$$\text{PPMT (A, B, C, D) + E}$$

Where

PPMT is the PPMT financial function in Microsoft Excel 2010

A is the specified interest rate

B is the number of years (including the current year) for which MRP has been charged on an annuity basis

C is the useful economic life (UEL) of the asset as at the start of the year for which MRP is first charged on an annuity basis. C shall be equal to the useful life of the fixed asset in question, as estimated by the Council but in accordance with the new maximum UEL in the Guidance. C shall not be varied for changes in the useful life of the asset unless the Council considers that special circumstances apply that would mean that a change would result in MRP being more reasonably calculated on a prudent basis.

D is the total need to borrow for capital purposes (resulting from capital expenditure).

E is an amount determined by the Section 151 Officer. The cumulative total of E, taken across all past and current years, shall never be less than zero. The choice to make an overpayment of MRP requires a separate disclosure in the MRP Statement presented to full Council detailing the in year and cumulative amount. Subsequently, any offsetting of an overpayment also requires disclosure in the MRP Statement along with any remaining cumulative amount to full Council.

The Method shall be varied in the following circumstances:

1. Where an asset is under construction, the method above will commence once the asset becomes operational.
2. For historical Magistrates' Courts Loan Charges, 4% charge will be made.
3. With regard to PFI and leases the MRP will be charged in accordance with the financial model imbedded in the legal agreements.
4. For capitalised expenditure, the variable "C" should be given the maximum values as set out below in accordance with the Guidance. This is based on the principle that where the capitalised expenditure can be indirectly linked to an asset the estimated UEL should be used, however, where this is not the case a default of 25 years will apply.

Expenditure type	Maximum value of "C" in initial year
Expenditure capitalised by virtue of a direction under s.16(2)(b)	"C" equals 20 years.
Regulation 25(1)(a) Expenditure on computer programmes	"C" equals the shorter of the UEL of the hardware or the length of the software license.
Regulation 25(1)(b) Loans and grants towards capital expenditure by third parties	"C" equals the UEL of the assets for in relation to which the third party expenditure is incurred.
Regulation 25(1)(c) Repayment of grants and loans for capital expenditure	"C" equals 25 years or the period of the loan if longer.
Regulation 25(1)(d) Acquisition of share capital	"C" equals 20 years.
Regulation 25(1)(e) Expenditure on works to assets not owned by the authority	"C" equals UEL of the assets.
Regulation 25(1)(ea) Expenditure on assets for use by others.	"C" equals UEL of the assets.
Regulation 25(1)(f) Payment of levy on large scale voluntary transfers (LSVT) of dwellings	"C" equals 25 years.

In the event that the Council has an opinion from an appropriately qualified professional advisor that an asset will deliver service functionality for more than 50 years, it will use the life suggested by the professional advisor.

6. Conclusion

The methodology is mainly the same as in previous years with slight amendments to reflect the removal of the capital receipt element (which was available and only used with regard to Help To Own) and the annual assessment of security for capital expenditure on acquisition of share capital to inform whether MRP will be charged. The latter related to only the Help To Own scheme and MRP will now be charged annually, in accordance with the new guidance (approximately £200,000 per annum).

MRP is being charged on all borrowing applied to fund capital expenditure.

The Council will continue to use option three for supported borrowing, it is felt using the life of asset results in a more prudent charge and reflects the 'usage' of the asset and provides an official end date for MRP charges. The options stipulated by the guidance result in MRP for an excessive number of years and surpass the life of the asset.

As in previous years, capital receipts are directly applied to fund capital expenditure and therefore there is no allowance in the MRP calculations for receipts being used to repay debt.

There is no voluntary overpayment of MRP proposed for 2024-2025.

At the time of writing the MRP Statement 2024-2025, the outcome of the consultation was not known, therefore, once the guidance has been officially released the statement will be reviewed to ensure it is still appropriate and prudent.

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Disclosure for Certainty Rate

Certainty Rate				
This table details the information that is required to enable the Council to submit a return for 2024-2025				
	As at 21 February 2024			
	2023-2024 Forecast £000	2024-2025 Forecast £000	2025-2026 Forecast £000	2026-2027 Forecast £000
Net Borrowing Requirement:				
Borrowing to finance planned capital expenditure	109,539	166,074	141,742	82,376
Existing maturity loans to be replaced during the year	56,095	46,000	75,264	91,208
Less:				
Minimum Revenue Provision for debt repayment	(20,436)	(20,845)	(23,157)	(22,849)
Voluntary debt repayment	(12,242)	(13,940)	(10,747)	(10,933)
	(32,678)	(34,785)	(33,904)	(33,782)
Loans replaced less debt repayment	23,417	11,215	41,360	57,426
Net Advance Requirement	132,956	177,289	183,102	139,802
Analysed by:				
Service delivery	21,543	31,136	23,894	3,996
Housing	83,389	117,901	100,431	76,737
Regeneration	4,607	17,037	17,417	1,643
Preventative action	-	-	-	-
Treasury Management	23,417	11,215	41,360	57,426
Primarily for yield	-	-	-	-
Total	132,956	177,289	183,102	139,802

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Treasury Management Policy Statement and Treasury Management Practices February 2024

1.0 Introduction

- 1.1 In December 2021 CIPFA issued a revised Code of Practice on Treasury Management with strengthened requirements for skills and training, and for investments which are not specifically for treasury management purposes. It is a requirement of the Code that the Council should formally adopt the Code.
- 1.2 The Code seeks to satisfy nine main purposes:
1. To assist public service organisations in the development and maintenance of firm foundations and clear objectives for their treasury management activities, thereby adding to their credibility in the public eye.
 2. To emphasise the overriding importance of effective risk management as the foundation for treasury management in all public service bodies.
 3. To provide transparency for treasury management decisions including the use of counterparties and financial instruments that individual public service organisations intend to use for the prudent management of their financial affairs.
 4. To encourage the pursuit of value for money in treasury management, and to promote the reasoned use, development and appreciation of appropriate and practical measures of performance.
 5. To enable CIPFA members to fulfil their professional and contractual responsibilities to the organisations they serve and to maintain and develop the professional competence of both themselves and those they supervise.
 6. To help facilitate a standardisation and codification of treasury management policies and practices in the public services.
 7. To assist those involved in the regulation and review of treasury management in the public services, particularly those charged with the audit of the same.
 8. To foster a continuing debate on the relevance and currency of the statutory and regulatory regimes under which treasury management in the various parts of the public services operates.
 9. To further the understanding and confidence of, and to act as a reference work for, financial and other institutions whose businesses bring them into contact with the treasury management activities of public service organisations.
- 1.3 The approved activities cover borrowing arrangements for funding capital expenditure, debt repayment and rescheduling, managing cash flow and investment of surplus balances, non-treasury management investments e.g. service and commercial investments and monitoring the underlying risks associated with the Authority's activities.

- 1.4 Arrangements made for the control and operation of bank accounts operated by schools come within this definition but day-to-day management of funds is the responsibility of the Head Teachers and the Governors under arrangements for the local management of schools. Banking arrangements for schools with their own cheque accounts are closely monitored by the Director of Finance.
- 1.5 Management of the West Midlands Pension Fund is not included as part of Wolverhampton Council's treasury management activities. The West Midlands Pension Fund has adopted its own Treasury Management Policy which is overseen by its in-house Finance Team.
- 1.6 Subject to the above, the Council's cash is aggregated for the purposes of treasury management and is under the control of the Director of Finance in accordance with Section 151 of the Local Government Act 1972. The executive control and administration of financial policy is under the direction of the Cabinet (Resources) Panel.
- 1.7 All external investments of surplus internal balances (investments for treasury management purposes) are restricted to authorised investments in accordance with the Local Authorities (Capital Finance and Approved Investments) (Amendment) Regulations 1996. The Director of Finance is responsible for making any investments, subject to the guidelines agreed by the Council or subsequently amended by the Cabinet (Resources) Panel.
- 1.8 The new Code introduces definitions for non-treasury management investments:
- Investments for commercial purposes (commercial investments)** – these are taken or held primarily for financial return and not linked to treasury management activity or directly part of delivering services.
- This includes non-financial assets such as commercial property, where they are held primarily for financial return.
 - This type of investment will usually constitute capital expenditure.
- Investments for service purposes (service investments)** – these are taken or held primarily and for the purposes of delivering public services (including housing, regeneration and local infrastructure), or in support of joint working with others to deliver such services.
- Service investments may or may not involve commercial returns; however, obtaining those returns will not be the primary purpose of the investment.
 - Service investments will normally constitute capital expenditure and it may be appropriate to borrow to finance these investments.

2.0 Adoption of the code

2.1 The revised 2021 Code identifies three key principles:

Key Principle 1

The Council puts in place formal and comprehensive objectives, policies and practices, strategies and reporting arrangements for the effective management and control of its treasury management activities.

Key Principle 2

That these policies and practices make clear that the effective management and control of risk are prime objectives of its treasury management activities and the responsibility for these lie clearly within the Council. The Council's appetite for risk should form part of its annual strategy, including any use of financial instruments for the prudent management of those risks, and should ensure that priority is given to security and liquidity when investing treasury management funds.

Key Principle 3

To acknowledge that the pursuit of value for money in treasury management and the use of suitable performance measures are valid and important tools to employ in support of the Council's business and service objectives; and that within the context of effective risk management, its treasury management policies and practices reflect this.

2.2 In order to achieve the above, the Council will adopt the following four clauses:

1. The Council will create and maintain, as the cornerstones for effective treasury and investment management:
 - a treasury management policy statement, stating the policies, objectives and approach to risk management of its treasury management activities;
 - suitable treasury management practices (TMPs), setting out the manner in which the organisation will seek to achieve those policies and objectives, and prescribing how it will manage and control those activities.
 - Investment management practices (IMPs) for investments that are not for treasury management purposes.

The content of the policy statement, TMPs and IMPs will follow the recommendations contained in Sections 6, 7 and 8 of the TM Code, subject only to amendment where necessary to reflect the particular circumstances of the Council. Such amendments will not result in the Council materially deviating from the TM Code's key principles.

2. Full Council will receive reports on its treasury and investment management policies, practices and activities, including, as a minimum, an annual strategy and plan in advance of the year, a mid-year review and an annual report after its close, in the form prescribed in the TMPs and IMPs.

3. Full Council delegates responsibility for the implementation and regular monitoring of its treasury management policies and practices to the Cabinet (Resources) Panel, and for the execution and administration of treasury management decisions to the Director of Finance, who will act in accordance with the Council's policy statement, TMPs and IMPs and if they are a CIPFA member, CIPFA's Standard of Professional Practice on Treasury Management.
4. The Council nominates Resources and Equality Scrutiny Panel to be responsible for ensuring effective scrutiny of the treasury management strategy and policies.

3.0 Treasury Management Policy Statement

3.1 The Council's treasury management policy statement defines the policies and objectives of its treasury management activities, as follows:

1. Treasury management activities are defined as:

"The management of the Council's borrowing, investments and cash flows, including its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

2. The Council regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on their risk implications for the Council, and any financial instruments entered into to manage these risks.
3. The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving value for money in treasury management, and to employing suitable comprehensive performance measurement techniques, within the context of effective risk management.

4.0 Treasury Management Practices (TMPs) – Main principles

4.1 The Council's Treasury Management Practices (TMPs) set out the manner in which the Council will seek to achieve its treasury management policies and objectives and how it will manage and control those activities. The main principles are below with more detailed explanations in the attached schedules; these follow the TM Code and have been suitably amended where necessary to reflect the Council's particular needs and circumstances.

4.2 TMP 1 – Risk management

The Council regards a key objective of its treasury management activities to be the security of the principal sums it invests. Accordingly, it will ensure that robust due diligence procedures cover all external investment.

The Director of Finance will design, implement and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the Council's objectives in this respect, all in accordance with the procedures set out in TMP6 Reporting requirements and management information arrangements.

In respect of each of the following risks, the arrangements which seek to ensure compliance with these objectives are set out in Schedule 1 to this document.

[1] Credit and counterparty risk management

The Council will ensure that its counterparty lists and limits reflect a prudent attitude towards organisations with whom funds may be deposited or investments made, and it will limit its treasury management investment activities to the instruments, methods and techniques referred to in TMP4 Approved instruments, methods and techniques and listed in the schedule to this document.

It also recognises the need to have, and will therefore maintain, a formal counterparty policy in respect of those organisations from which it may borrow, or with whom it may enter into other financing or derivative arrangements.

The Council's credit and counterparty policies set out its policy and practices relating to environmental, social and governance (ESG) investment considerations. This is a developing area, and it is not implied that the Council's ESG policy will currently include ESG scoring or other real time ESG criteria at individual investment level.

[2] Liquidity risk management

The Council will ensure it has adequate though not excessive cash resources, borrowing arrangements and overdraft or standby facilities to enable it at all times to have the level of funds available to it that are necessary for the achievement of its business/service objectives.

The Council will not borrow earlier than required to meet cash flow needs unless there is a clear business case for doing so and will only do so for the current capital programme, to fund future debt maturities, or to ensure an adequate level of short-term investments to provide liquidity for the Council.

[3] Interest rate risk management

The Council will manage its exposure to fluctuations in interest rates with a view to containing its net interest costs or revenues, in accordance with its treasury management policy and strategy and in accordance with TMP6 Reporting requirements and management information arrangements.

It will achieve this by the prudent use of its approved instruments, methods and techniques, primarily to create stability and certainty of costs and revenues, but at the same time retaining a sufficient degree of flexibility to take advantage of unexpected, potentially advantageous changes in the level or structure of interest rates. This should

be subject to the consideration and, if required, approval of any policy or budgetary implications.

It will ensure that any hedging tools such as derivatives are only used for the management of risk and the prudent management of financial affairs and that the policy for the use of derivatives is clearly detailed in the annual strategy.

[4] Exchange rate risk management

The Council will manage its exposure to fluctuations in exchange rates so as to minimise any detrimental impact on its budgeted income/expenditure levels.

[5] Inflation risk management

The Council will keep under review the sensitivity of its treasury assets and liabilities to inflation, and will seek to manage the risk accordingly in the context of the whole organisation's inflation exposures.

[6] Refinancing risk management

The Council will ensure that its borrowing and other long-term liabilities are negotiated, structured and documented, and the maturity profile of the monies so raised is managed, with a view to obtaining offer terms for renewal or refinancing, if required, that are competitive and as favourable to the Council as can reasonably be achieved in light of market conditions prevailing at the time.

It will actively manage its relationships with its counterparties in these transactions in such a manner as to secure this objective and will avoid over-reliance on any one source of funding if this might jeopardise achievement of the above.

[7] Legal and regulatory risk management

The Council will ensure that all of its treasury management activities comply with its statutory powers and regulatory requirements. It will demonstrate such compliance, if required to do so, to all parties with whom it deals in such activities. In framing its credit and counterparty policy under TMP1[1] Credit and counterparty risk management, it will ensure that there is evidence of counterparties' powers, authority and compliance in respect of the transactions they may effect with the Council, particularly with regard to duty of care and fees charged.

The Council recognises that future legislative or regulatory changes may impact on its treasury management activities and, so far as it is reasonably able to do so, will seek to manage the risk of these impacting adversely on the Council.

[8] Operational risk, including fraud, error and corruption

The Council will ensure that it has identified the circumstances that may expose it to the risk of loss through inadequate or failed internal processes, people and systems from external events. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements to these ends.

[9] Price risk management

The Council will seek to ensure that its stated treasury management policies and objectives will not be compromised by adverse market fluctuations in the value of the sums it invests and will accordingly seek to protect itself from the effects of such fluctuations.

4.3 TMP 2 – Performance measurement

The Council is committed to the pursuit of value for money in its treasury management activities, and to the use of performance methodology in support of that aim, within the framework set out in its treasury management policy statement.

Accordingly, the treasury management function will be the subject of on-going analysis of the value it adds in support of the Council's stated business or service objectives. It will be the subject of regular examination of alternative methods of service delivery, of the availability of fiscal or other grant or subsidy incentives, and of the scope for other potential improvements. The performance of the treasury management function will be measured using the criteria set out in Schedule 2 to this document. The criteria will include measures of effective treasury risk management and not only measures of financial performance (income or savings).

4.4 TMP 3 – Decision making and analysis

The Council will maintain full records of its treasury management decisions, and of the processes and practices applied in reaching those decisions, both for the purposes of learning from the past and for accountability, e.g. demonstrating that reasonable steps were taken to ensure that all issues relevant to those decisions were taken into account at the time. The issues to be addressed and processes and practices to be pursued in reaching decisions are detailed in Schedule 3 to this document.

4.5 TMP 4 – Approved instruments, methods and techniques

The Council will undertake its treasury management activities by employing only those instruments, methods and techniques detailed in Schedule 4 to this document, and within the limits and parameters defined in TMP1 Risk management.

Where the Council intends to use derivative instruments for the management of risks, these will be limited to those set out in its annual treasury strategy. The Council will seek proper advice and will consider that advice when entering into arrangements to use such products to ensure that it fully understands those products.

The Council has reviewed its classification with financial institutions under MIFID II and has set out in Schedule 4 to this document those organisations with which it is registered as a professional client and those with which it has an application outstanding to register as a professional client.

4.6 **TMP 5 – Organisation, clarity and segregation of responsibilities, and dealing arrangements**

The Council considers it essential, for the purposes of the effective control and monitoring of its treasury management activities, for the reduction of the risk of fraud or error, and for the pursuit of optimum performance, that these activities are structured and managed in a fully integrated manner, and that there is at all times a clarity of treasury management responsibilities.

The principle on which this will be based is a clear distinction between those charged with setting treasury management policies and those charged with implementing and controlling these policies, particularly with regard to the execution and transmission of funds, the recording and administering of treasury management decisions, and the audit and review of the treasury management function.

If and when the Council intends, as a result of lack of resources or other circumstances, to depart from these principles, the Director of Finance will ensure that the reasons are properly reported in accordance with TMP 6 Reporting requirements and management information arrangements, and the implications properly considered and evaluated.

The Director of Finance will ensure that there are clear written statements of the responsibilities for each post engaged in treasury management, and the arrangement for absence cover. The Director of Finance will also ensure that at all times those engaged in treasury management will follow the policies and procedures set out. The present arrangements are detailed in Schedule 5 to this document.

The Director of Finance will ensure there is proper documentation for all deals and transactions, and that procedures exist for the effective transmission of funds. The present arrangements are detailed in Schedule 5 to this document.

The delegations to the Director of Finance in respect of treasury management are set out in Schedule 5 to this document. The Director of Finance will fulfil all such responsibilities in accordance with the Council's policy statement and TMPs and, if a CIPFA member, the Standard of Professional Practice on Treasury Management.

4.7 **TMP 6 – Reporting requirements and management information arrangements**

The Council will ensure that regular reports are prepared and considered on the implementation of its treasury management policies; on the effects of decisions taken and transactions executed in pursuit of those policies; the implications of changes, particularly budgetary, resulting from regulatory, economic, market or other factors affecting its treasury management activities; and the performance of the treasury management function.

As a minimum:

Council will receive:

- an annual report on the strategy and plan to be pursued in the coming year
- a mid-year review

- an annual report on the performance of the treasury management function, the effects of the decisions taken and the transactions executed in the past year, and any circumstances of non-compliance with the organisation's treasury management policy statement and TMPs.

Cabinet (Resources) Panel will receive regular monitoring reports on treasury management activities and risks including the treasury management indicators and any other investment indicators required by regulation as detailed in their sector-specific guidance notes.

Resources and Equality Scrutiny Panel will have responsibility for the scrutiny of treasury management policies and practices.

The present arrangements and the form of these reports are detailed in Schedule 6 to this document.

4.8 TMP 7 – Budgeting, accounting and audit arrangements

The Director of Finance will prepare, and Council will approve and, if necessary, from time to time will amend, an annual budget for treasury management, which will bring together all of the costs involved in running the treasury management function, together with associated income. The matters to be included in the budget will at minimum be those required by statute or regulation, together with such information as will demonstrate compliance with TMP 1 Risk management, TMP 2 Performance measurement, and TMP 4 Approved instruments, methods and techniques. The Director of Finance will exercise effective controls over this budget and will report upon and recommend any changes required in accordance with TMP 6 Reporting requirements and management information arrangements.

The Council will account for its treasury management activities, for decisions made and transactions executed, in accordance with appropriate accounting practices and standards, and with statutory and regulatory requirements in force for the time being.

4.9 TMP 8 – Cash and cash flow management

Unless statutory or regulatory requirements demand otherwise, all monies in the hands of the Council will be under the control of the Director of Finance and will be aggregated for cash flow and investment management purposes. Cash flow projections will be prepared on a regular and timely basis, and the Director of Finance will ensure that these are adequate for the purposes of monitoring compliance with TMP1[2] Liquidity risk management, and for the purpose of identifying future borrowing needs. The present arrangements for preparing cash flow projections, and their form, are set out in Schedule 8 of this document.

4.10 TMP 9 – Money laundering

The Council is alert to the possibility that it may become the subject of an attempt to involve it in a transaction involving the laundering of money. Accordingly, it will maintain procedures for verifying and recording the identity of counterparties and reporting

suspensions and will ensure that staff involved in this are properly trained. The present arrangements, including the name of the officer to whom reports should be made, are detailed in Schedule 9 to this document.

4.11 TMP 10 – Training and qualifications

The Council recognises the importance of ensuring that all staff involved in the treasury management function are fully equipped to undertake the duties and responsibilities allocated to them. It will therefore seek to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills. The Director of Finance will recommend and implement the necessary arrangements, including the specification of the expertise, knowledge and skills required by each role or member of staff.

The Director of Finance will ensure that councillors tasked with treasury management responsibilities, including those responsible for scrutiny, have access to training relevant to their needs and those responsibilities.

Those charged with governance recognise their individual responsibility to ensure that they have the necessary skills to complete their role effectively.

The present arrangements are detailed in Schedule 10 to this document.

4.12 TMP 11 – Use of external service providers

The Council recognises that responsibility for treasury management decisions remains with the Council at all times. It recognises that there may be potential value in employing external providers of treasury management services, in order to acquire access to specialist skills and resources. When it employs such service providers, it will ensure it does so for reasons that have been submitted to a full evaluation of the costs and benefits. It will also ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review. It will ensure, where feasible and necessary, that a spread of service providers is used, to avoid over-reliance on one or a small number of companies. Where services are subject to formal tender or re-tender arrangements, legislative requirements will always be observed.

The monitoring of such arrangements rests with the Director of Finance, and details of the current arrangements are set out in Schedule 11 to this document.

4.13 TMP 12 – Corporate governance

The Council is committed to the pursuit of proper corporate governance throughout its businesses and services, and to establishing the principles and practices by which this can be achieved. Accordingly, the treasury management function and its treasury management activities will be undertaken with openness and transparency, honesty, integrity and accountability.

The Council has adopted and has implemented the key principles of the TM Code.

This, together with the other arrangements detailed in Schedule 12 to this document, is considered vital to the achievement of proper corporate governance in treasury management, and the Director of Finance will monitor and, if and when necessary, report upon the effectiveness of these arrangements.

5.0 Investments that are not part of treasury management activity

5.1 The definition of treasury management in section 3 above includes all the investments of the Council. This may include investments that are outside the purposes of normal treasury management and that may be managed elsewhere in the organisation. Investments may be held for various purposes as detailed below.

5.2 Investments for treasury management purposes (or treasury management investments)

These are investments that arise from the Council's cash flows or treasury risk management activity and ultimately represent balances that need to be invested until the cash is required for use in the course of business.

- Treasury investments may include an allowance for a reasonable level of short-term investments to provide access to liquidity.
- This may also include the investment of borrowing proceeds where it has been prudent for the Council to borrow in advance of the need for cash, e.g. in order to reduce financing and interest rate risks.
- Treasury investments may also arise from other treasury risk management activity that seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.
- Treasury management investments should always be on commercial terms and will rarely constitute capital expenditure for the Council.
- For those organisations with long-term surplus cash, this category may include long-term investments such as equities, bonds and property, whether accessed through a fund or directly, but unless there is a link to cash flow management or treasury risk management activity, it is likely that such investments would be for commercial purposes, i.e. primarily for financial return.

5.3 Investments for commercial purposes (or commercial investments)

These are taken or held primarily for financial return and are not linked to treasury management activity or directly part of delivering services.

- This includes non-financial assets such as commercial property, where they are held primarily for financial return.
- Investments of this type will usually constitute capital expenditure.
- 'Commercial' in this context refers to the purpose of the investment. Commercial investments are not taken to meet treasury management cash flow needs and do not result from treasury risk management activity to prudently manage the risks, costs or income from existing or forecast debt or treasury investments. They are

additional investments voluntarily taken primarily to generate net financial return or profit.

The Council will not undertake any investments of this nature.

5.4 Investments for service purposes (or service investments)

These are taken or held primarily for the provision and for the purposes of delivering public services (including housing, regeneration and local infrastructure), or in support of joint working with others to deliver such services.

- Service investments may or may not involve commercial returns; however, obtaining those returns will not be the primary purpose of the investment.
- Service investments will normally constitute capital expenditure, and it may be appropriate to borrow to finance service investments.

5.5 TM Code requirements

For the purposes of reporting under the TM Code, any investments that are not taken or held for treasury management purposes described above should be clearly identified and reported in appropriate categories reflecting their service or commercial purposes. For each category, the various purposes, objectives and management arrangements of the investments should be described. The level of risk and arrangements for managing it should be set out.

Treasury management policy statements, treasury and investment strategies, half-year reports and year-end reports will address all the Council's financial investments, including those that are not treasury management investments, as well as any non-financial assets held primarily for financial return (such as commercial property). The Council can choose to create a separate investment strategy for its service and commercial investments in order to maintain their separateness from treasury management investments.

The Council will apply an appropriate investment risk management approach across all non-treasury management investments (taking account of any differing purposes and objectives of individual portfolios). The investment management practices below set out a framework to be applied to all non-treasury investments.

Where, in addition to treasury management investment activity, the Council makes investments for service or commercial purposes including property or other financial assets primarily for financial return, the risks associated with investment should be proportionate to the Council's financial capacity – ie that plausible losses could be absorbed in budgets or reserves without unmanageable detriment to local services. The Council will ensure that the same robust procedures for the consideration of risk and return are applied to these decisions.

The Council must not borrow to invest for the primary purpose of financial return.

5.6 Investment Management Practices (IMPs) for investments that are not part of treasury management activity

The Director of Finance will categorise any non-treasury management investments and plans into appropriate portfolios (or individual major investments) reflecting the different purposes, objectives and management arrangements of the investments and covering all the Council's financial investments, together with any non-financial assets that are held primarily for financial return (such as commercial property).

For each such portfolio, a schedule to this IMP sets out the investment objectives, investment criteria, risk management arrangements, decision-making and reporting arrangements, performance measurement and management, and arrangements for training and qualifications.

It is recognised that the risk appetite for these activities may differ from that for treasury management.

Treasury management schedules

Schedule 1 : TMP 1 – Risk management

1.1 Credit and counterparty risk

This is the risk of failure by a counterparty to meet its contractual obligations to the Council under an investment, borrowing, derivative instrument, or capital, project or partnership financing, particularly as a result of the counterparty's diminished creditworthiness, and the resulting detrimental effect on the Council's capital or current (revenue) resources.

Creditworthiness policy

The Council will use credit criteria in order to select creditworthy counterparties for placing investments with.

This Council applies the creditworthiness service provided by Link Group. This service employs a sophisticated modelling approach using credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- credit watches and credit outlooks from credit rating agencies;
- Credit Default Swap (CDS) spreads to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the duration for investments. The table below details Link's recommendations of bands and durations along with the more prudent parameters that the Council will apply:

	Link	Wolverhampton
Yellow (is for UK Government debt or equivalent, money market funds and collateralised deposits where the collateral is UK Government debt)	5 years	-
Dark Pink (for Ultra-Short Dated Bond Funds with a credit score of 1.25)	5 years	-
Light Pink (for Ultra-Short Dated Bond Funds with a credit score of 1.5)	5 years	-
Purple	2 years	1 year
Blue (only applies to nationalised or semi nationalised UK Banks)	1 year	3 months
Orange	1 year	6 months
Red	6 months	3 months
Green	100 days	50 days
No Colour	Not to be used	Not to be used

This list will be reviewed on any changes to the methodology used by Link and the Council may revert back to using Link's recommended durations if or when investment

balances are at higher levels and longer deposits are possible without significantly increased risk to liquidity.

The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

Typically the minimum credit ratings criteria the Council use will be a Short Term rating (Fitch or equivalents) of F1+ and a Long Term rating AA-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use.

All credit ratings will be monitored each time the Council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.

- If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately. A severe downgrade may prompt the Director of Finance to instruct treasury management employees to take steps to withdraw any investment considered to be at risk. The potential penalties for such an action would need to be assessed.
- In addition to the use of Credit Ratings the Council will be advised of information in movements in Credit Default Swap against the iTraxx European Financials benchmark and other market data on a daily basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

Sole reliance will not be placed on the use of this bought-in service. In addition the Council will also use market data and market information, information on any external support for banks to help support its decision making process.

Country limits

The Council has determined that it will only use approved counterparties from the UK and from countries with a minimum sovereign credit rating of AA from Fitch Ratings (or equivalent from other agencies if Fitch does not provide).

Approved counterparties

The complete list of approved counterparties is included in the Treasury Management Strategy and in each quarterly monitoring report. The Finance Manager will add or delete counterparties to/from the approved counterparty list in line with the policy on criteria for selection.

Investment Strategy

The Council will have regard to the DLUHC's Guidance on Local Government Investments, the Audit Commission's report on Icelandic investments and the 2021 revised CIPFA Treasury Management in the Public Services: Code of Practice and Cross Sectoral Guidance Notes ("TM Code").

This Investment Strategy states which investments the Council may use for the prudent management of its treasury balances during the financial year under the heading Specified investments and Non-specified investments. These are listed below:

Specified investments - all investments listed below must be sterling-denominated.

Investment	Minimum 'High' Credit Criteria	Maximum Period
Debt Management Agency Deposit Facility	Government backed	6 months
Money Market Funds CNAV > LVNAV	AAAmmf / Aaa-mf	Period of investment may not be determined at outset but will be subject to cash flow and liquidity
Term deposits - UK Government	Government backed	12 months
Term deposits - Local Authorities	High Security	12 months
Term deposits - Banks & Building Societies	Short-term F1+, Long-term AA-	12 months

Non-specified investments – a maximum of 50% of total investments with a cap of £35.0 million will be held in aggregate

	Minimum Credit Criteria	Max Limit	Max Maturity Period
Term deposits - UK Government (with maturities in excess of 1 year)	Government Backed	£10.0 million	5 years
Term deposits - Local Authorities (with maturities in excess of 1 year)	High Security	£10.0 million per LA	5 years
Term deposits - Banks & Building Societies (with maturities in excess of 1 year)	Short-term F1+ Long-term AA-	£10.0 million per Bank	5 years

Accounting treatment of investments

The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by the Council. To ensure that the Council is protected from any adverse revenue implications, which may arise from these differences, the accounting implications of new transactions will be thoroughly reviewed before they are undertaken.

Policy on environmental, social and governance (ESG) considerations

The Council is supportive of the Principles for Responsible Investment (www.unpri.org) and will seek to bring ESG factors into the decision-making process for investments. Within this, the Council is also appreciative of the Statement on ESG in Credit Risk and Ratings which commits signatories to incorporating ESG into credit ratings and analysis in a systemic and transparent way. The three rating agencies, Fitch, Moody's and Standard & Poor's are all signatories of this statement, and the Council uses ratings from these organisations to support its assessment of suitable counterparties.

For short term investments with counterparties, the Council utilises the ratings provided by Fitch, Moody's and Standard & Poor's to assess creditworthiness, which do include analysis of ESG factors when assigning ratings. The Council will continue to evaluate

additional ESG related metrics and assessment processes that it could incorporate into its investment process, as this new area develops, and will provide updates accordingly.

1.2 Liquidity risk

This is the risk that cash will not be available when it is needed, that ineffective management of liquidity creates additional unbudgeted costs, compromising the Council's business/service objectives.

Cash Balances

Cash balances are derived from reserves, surpluses, provisions and any capital receipts held pending future use. These are invested externally with approved institutions. The Treasury Management team shall seek to minimise the balance held in the Council's main bank accounts at the close of each working day. The aim is to leave approximately £200,000 balance in the account, wherever possible, to cover any unforeseen payments, that may need to be urgently paid after treasury deals are completed in the morning. In addition, the Council should aim to have a minimum of £10.0 million surplus cash in totality each day to enable sufficient liquidity. If it is forecast to fall below this level for three consecutive days, the Treasury Management team will notify the Director of Finance so liquidity levels can be addressed. Borrowing or lending shall be arranged in order to achieve these aims.

Investment of surplus funds

After the aggregation of all internal balances, surplus funds will be invested externally to earn interest and returned to the Council in order to meet projected future shortfalls in cash flow.

The Council's aggregate daily internal balances can vary quite markedly from day-to-day. Active cash flow management is essential to ensure that sufficient cash balances are available to meet commitments on pay days and creditor and other payment days.

Standby facilities

At the end of each financial day any unexpected surplus funds are automatically transferred via a banking sweep to the Business Reserve Account which is available from the Council's banking provider. The balance on this account is instantly accessible if any of the group of core main bank accounts become overdrawn.

Temporary loans (maximum of 364 days)

Temporary loans can be obtained within the borrowing limits to provide short term finance or to match any cash flow shortfall pending receipt of other revenues or longer term loans.

Banking facilities and limits

An overdraft facility is provided on a net balance and on the aggregate of the core main account balances.

As some of the accounts may be in debit whilst others may be in credit, the net balance of each account will be maintained within the net limit. The aggregate of all balances will be maintained within the gross limit.

Net Limit: £500,000
Gross limit: £9,000,000

Core main bank accounts:

- WCC Current Account
- WCC Automated Income Account
- WCC Payments Account
- WCC Local Taxes Account

Overdraft pricing is based on base rate + 1% with an annual fee of £2,500.

There is an additional group of Imprest bank accounts whose balances are pooled for interest purposes, these do not have an authorised overdraft facility.

Gross limit: £1,000,000

If an individual account does go overdrawn, the interest charged is base rate + 3%.

Bankers' Automated Clearing Services (BACS) - the following service credit limits are in place:

993695	Payroll	£25,000,000
972860	Payments	£20,000,000
971926	Council Tax	£1,250,000
920046	NNDR	£2,500,000
973636	Housing Benefit	£4,000,000
973531	Electoral	£150,000

Clearing House Automated Payments System (CHAPS) - CHAPS are able to be made when insufficient funds are held on the bank balance.

The bank will make payment in anticipation of receiving covering funds by the end of the business day. This risk is called the intraday limit which is set at £40,000,000.

The bank reserves the right to refuse any payment in excess of this limit.

The bank may review the risk it is willing to take on this limit with the Council at its discretion.

These transactions are completed using online banking and are done in accordance with the Council's procedures.

Policy in terms of borrowing in advance of need

The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will

be within approved Capital Financing Requirement estimates, and will be considered carefully to ensure value for money can be demonstrated and that the Council can ensure the security of such funds.

In determining whether borrowing will be undertaken in advance of need the Council will:

- ensure that there is a clear link between the capital programme and maturity profile of the existing debt portfolio which supports the need to take funding in advance of need
- ensure the ongoing revenue costs created, and the implications for the future plans and budgets have been considered
- evaluate the economic and market factors that might influence the manner and timing of any decision to borrow
- consider the merits and demerits of alternative forms of funding
- consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use.
- consider the impact of borrowing in advance on temporarily increasing investment cash balances and the consequent increase in exposure to counterparty risk, and other risks, having regard to the controls in place to minimise such risks.

1.3 **Interest rate risk**

This is the risk that fluctuations in the levels of interest rates create an unexpected or unbudgeted burden on the Council's finances against which the Council has failed to adequately protect itself.

Maximum proportions of variable rate debt/interest

The Council will continue to manage and monitor its upper limits on variable interest rate exposure against the limit previously set of:

Upper limit for variable rate 20%

Maximum proportions of fixed rate debt/interest

The Council will continue to manage and monitor its upper limits on fixed interest rate exposure against the limit previously set of:

Upper limit for fixed rate 100%

Policies concerning the use of financial derivatives for interest rate risk management

Financial derivatives are not an approved instrument and will therefore not be used.

1.4 **Exchange rate risk**

This is the risk that fluctuations in foreign exchange rates creates an unexpected or unbudgeted burden on the Council's finances against which the Council has failed to adequately protect itself.

Details of approved exchange rate exposure limits for cash investments/debt

It is Council policy to undertake transactions in pounds sterling only and therefore, the exposure to fluctuations in exchange rates is limited to grants or payments from a third party that may be received in a foreign currency. Accordingly, there are no approved exchange rate exposure limits.

Approved criteria for managing changes in exchange rate levels

In respect of any sums received in a foreign currency, steps will be taken to convert to sterling as soon as practicable to minimise the risk. In respect of third party payments, the third party carries this risk.

Policies concerning the use of financial derivatives for exchange rate risk management

Financial derivatives are not an approved instrument and will therefore not be used.

1.5 Inflation risk

Inflation risk, also called purchasing power risk, is the chance that the cash flows from treasury instruments (such as investments) won't be worth as much in the future because of changes in purchasing power due to inflation.

The Council will keep under review inflation exposures and how these will impact on its treasury assets and liabilities comparable to assumptions in the MTF5.

1.6 Refinancing risk

This is the risk that maturing borrowings, capital, project or partnership financings cannot be refinanced on terms that reflect the provisions made by the Council for those refinancing's, both capital and current (revenue), and/or that the terms are inconsistent with prevailing market conditions at the time.

Debt/other capital financing, maturity profiling, policies and practices

The Council will establish through its Prudential and Treasury Indicators the amount of debt maturing in any year/period.

Any debt rescheduling will be considered when the difference between the refinancing rate and the redemption rate is most advantageous, and the situation will be continually monitored in order to take advantage of any perceived anomalies in the yield curve. The reasons for any rescheduling to take place will include:

- the generation of cash savings at minimum risk
- to reduce the average interest rate
- to amend the maturity profile and/or the balance of volatility of the debt portfolio

Rescheduling will be reported to the Cabinet (Resources) Panel at the meeting immediately following its action.

Projected capital investment requirements

The Director of Finance will prepare a three year plan for capital expenditure for the Council. The capital plan will be used to prepare a three year revenue budget for all forms of financing charges.

In addition, the Director of Finance will draw up a capital strategy report which will give a longer-term view.

The definition of capital expenditure and long-term liabilities used in the Code will follow recommended accounting practice as per the Code of Practice on Local Authority Accounting.

Policy concerning limits on affordability and revenue consequences of capital financing

In considering the affordability of its capital plans, the Council will consider all the resources currently available/estimated for the future together with the totality of its capital plans, revenue income and revenue expenditure forecasts for the forthcoming year and the two following years and the impact these will have on council tax and housing rent levels.

It will also consider affordability in the longer term beyond this three year period and assess the risks and rewards of significant investments to ensure the long-term financial sustainability of the Council.

The Council will not undertake commercial investments, that is those held primarily for financial return.

The Council will always keep revenue implications of capital financing under review to ensure they continue to be affordable and sustainable in the context of the Medium Term Financial Strategy.

The Council will use the definitions provided in the Prudential Code for borrowing (88), capital expenditure (89), capital financing requirement (90), commercial property (91), debt (92), financing costs (93), investments (95), net revenue stream (96), other long term liabilities (97), treasury management (98) and transferred debt (99).

1.7 Legal and regulatory risk

This is the risk that the Council itself, or an organisation with which it is dealing in its treasury management activities, fails to act in accordance with its legal powers or regulatory requirements and that the Council suffers losses accordingly.

References to relevant statutes and regulations

The Council's treasury management activities are prescribed by statute, in England the source of the Council's power is the Local Government Act 2003. The Council can borrow or invest for any purpose relevant to its functions, under any enactment, or "for the purpose of the prudent management of its financial affairs". The above requires the Council to have regard to the CIPFA 'Treasury Management in the Public Services Code of Practice and Cross-sectoral Guidance Notes.'

In addition, investments are constrained by the statutory 'Guidance on Local Government Investments.'

Statutes:

- Local Government Finance Act 1988 section 114 – duty on the responsible officer to issue a report if the Council is likely to get into a financially unviable position.
- Requirement to set a balanced budget - Local Government Finance Act 1992 section 32 for billing authorities and section 43 for major precepting authorities.
- Local Government Act 2003
- S.I. 2003 No.2938 Local Government Act 2003 (Commencement No.1 and Transitional Provisions and Savings) Order 2003 – 13 November 2003
- S.I. 2003 No.3146 Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 and associated commentary – 10 December 2003
- S.I. 2004 No.533 Local Authorities (Capital Finance) (Consequential, Transitional and Savings Provisions) Order 2004 – 8 March 2004
- S.I. 2004 No.534 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2004 – 8 March 2004
- S.I. 2004 no. 3055 The Local Authorities (Capital Finance and Accounting) (Amendment) (England) (No. 2) Regulations 2004
- S.I. 2006 no. 521 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2006
- S.I. 2007 no. 573 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2007
- Local Government and Public Involvement in Health Act 2007 s238(2) – power to issue guidance; to be used re: MRP
- S.I. 2008 no. 414 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2008
- S.I. 2009 no. 321 Local Authorities (Capital Finance and Accounting) (Amendment) (England) Regulations 2009
- S.I. 2009 no. 2272 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No.2) Regulations 2009
- S.I. 2009 no. 3093 The Local Government Pension Fund Scheme (Management and Investment of Funds) Regulations 2009
- S.I. 2010 no. 454 (Capital Finance and Accounting) (Amendment) (England) Regulations 2010
- Localism Act 2011

- S.I. 2012 no. 265 Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2012
- S.I. 2012 No. 711 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No. 2) Regulations 2012
- S.I. 2012 No. 1324 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No.3) Regulations 2012
- S.I. 2012 No. 2269 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No. 4) Regulations 2012
- S.I. 2013 no. 476 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2013
- S.I. 2015 no. 234 Accounts and Audit Regulations 2015
- There has not been an issue of a Local Authorities (Capital Finance and Accounting) (England) Regulations statutory instrument in 2005, 2011 and 2016
- S.I. 2017 no. 536 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2017
- S.I. 2018 no. 1207 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2018
- Statutory Guidance on Investments 2018
- Statutory Guidance on MRP 2018
- 2019 No. 394 Exiting the European Union financial services: The Money Market Funds (Amendment) (EU Exit) Regulations 2019
- S.I. 2019 no. 396 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2019
- S.I. 2020 no. 1212 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2020
- S.I. 2021 no. 611 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2021

Guidance and codes of practice:

- CIPFA Local Authority Capital Accounting - a reference manual for practitioners' latest year Edition
- CIPFA Guide for Chief Financial Officers on Treasury Management in Local Authorities 1996
- CIPFA Standard of Professional Practice on Treasury Management 2002
- CIPFA Standard of Professional Practice on Continuous professional Development 2005

- CIPFA Standard of Professional Practice on Ethics 2006
- The Good Governance Standard for Public Services 2004
- CIPFA's Treasury Management Codes of Practice and Guidance Notes 2021,
- CIPFA Prudential Code for Capital Finance in Local Authorities and Guidance Notes revised 2021
- LAAP Bulletins
- IFRS - Code of Practice on Local Authority Accounting in the United Kingdom: A Statement of recommended Practice
- PWLB circulars on Lending Policy
- The UK Money Markets Code (issued by the Bank of England – it was formerly known as the Code of Market Conduct issued by the Financial Conduct Authority)
- The Council's Standing Orders relating to Contracts
- The Council's Financial Regulations
- The Council's Scheme of Delegated Functions

Procedures for evidencing the organisations powers/authorities to counterparties

The Council's powers to borrow and invest are contained in legislation:

Investing – Local Government Act 2003, section 12

Borrowing – Local Government Act 2003, section 1.

The Local Government Act 2003 states a lender to local authorities in England “shall not be bound to enquire whether a local authority has power to borrow money and shall not be prejudiced by the absence of any such power.”

The treasury management delegations to the Director of Finance (E1 and E10) can be found in the Council's Constitution using the following link:

[Part 3e - Delegations to the Director of Finance.pdf \(modern.gov.co.uk\)](#)

The list of authorised signatories for investing are:

Position
Director of Finance
Deputy Director of Finance
Finance Business Partner

The list of authorised signatories for borrowing are:

Position
Director of Finance
Deputy Director of Finance
Head of the Hub
Head of Revenue and Benefits

The above will be made available on request.

Required information on counterparties

Lending shall only be made to counterparties on the Approved Lending List. This list has been compiled using advice from the Council's treasury advisers based upon credit ratings supplied by Fitch, Moody's and Standard & Poors.

Statement on the organisation's policy management of risks

The Council will assess the risks that might materialise as a result of changes to Government policy including future legislative or regulatory changes and will provide regular updates to councillors on potential risks in quarterly monitoring reports.

1.8 Operational risk, including fraud, error and corruption, and contingency management

This is the risk of direct or indirect loss resulting from inadequate or failed internal processes, people and systems or from external events. This includes the risk of fraud, error, corruption or other eventualities in treasury management dealings.

Details of systems and procedures to be followed including internet services

In all the services the Council undertakes, it is committed to acting at all times with integrity and in an open and honest manner.

The Council will not accept any level of fraud or corruption and will vigorously investigate all allegations of fraud or corruption.

The Council is committed to having in place procedures and systems so as to limit as far as possible the opportunities for fraudulent acts or enable their early detection, together with procedures to ensure such acts are promptly and thoroughly investigated. The Council will:

- Seek to ensure an adequate division of responsibilities and maintenance at all times of an adequate level of internal check which minimises such risks.
- Fully document all its treasury management activities so that there can be no possible confusion as to what proper procedures are.
- Staff will not be allowed to take up treasury management activities until they have had proper training in procedures and are then subject to an adequate and appropriate level of supervision.

- Records will be maintained of all treasury management transactions so that there is a full audit trail and evidence of the appropriate checks being carried out.

The practices and procedures outlined in the Treasury Management Practices are designed to fully document all transactions and to clearly demonstrate that the highest standards have been adhered to.

Authority

The Council's Constitution details the delegations of duties to the Director of Finance and further requirements relating to treasury management are detailed in Part 4i – Financial Procedure Rules.

All loan and investment deals must be undertaken by only authorised signatories detailed in paragraph 1.6 above.

TMP 5 – Organisation, clarity and segregation of responsibilities and dealing arrangements sets out the responsibilities of each role in respect of treasury management.

Procedures

All electronic banking procedures detailed by Banking Services must be adhered to and complied with.

Procedures set by Banking Services for requesting CHAPS payments must be followed.

Investment and borrowing transactions

A detailed register of all loans and investments is maintained by the treasury management team.

A written acknowledgement of each deal is sent promptly to the lending or borrowing institution where transactions are done directly with the organisation. The exception being deals with Money Market Funds where staff are working flexibly and therefore, the deals will be called through by an authorised dealer.

Written confirmation is received and checked against the dealer's records for the transaction.

Any discrepancies are immediately reported to the S151/Deputy S151 Officer for resolution.

All transactions placed through brokers are confirmed by a broker note showing details of the loan arranged. Written confirmation is received and checked against the dealer's records for the transaction. Any discrepancies are immediately reported to the S151/Deputy S151 Officer for resolution.

Regularity and security

Lending is only made to institutions on the Approved List of Counterparties.

Records are maintained by Strategic Finance of when money borrowed or lent is due to be repaid.

All loans raised and repayments made go directly to and from the bank account of approved counterparties.

Counterparty limits are set for every institution that the Council invests with.

Brokers have a list of named officials authorised to agree deals.

There is a separation of duties in the section between Finance Officer/Finance Manager who propose investment decisions (based on the strategy in place and rates on offer) and the Finance Business Partner who authorises and places the deal.

The Council's bank holds a list of Council officials who are authorised signatories for banking transactions.

No member of the treasury management team is an authorised signatory.

Payments can only be authorised under the scheme of delegation and/or under delegated powers from the Section 151 Officer. A list of delegated signatories is agreed under bank mandate with the current bank contract provider.

There is adequate insurance cover for employees involved in loans management and accounting.

Checks

The bank reconciliation is carried out monthly from the bank statement to the financial ledger.

The records are proved to the balance sheet ledger codes at the end of each month and at the financial year end.

A debt charge/investment income listing is produced every quarter and year end when a review is undertaken against the budget for interest earnings and debt costs.

Calculations

The calculation of repayment of principal and interest notified by the lender or borrower is checked for accuracy against the amount calculated in the Council's records.

The treasury management team calculates the interest payments of PWLB and other long term loans. This is used to check the amount paid to lenders.

Average weighted capital loans fund interest rates and debt management expenses are calculated as required, with a minimum being quarterly for the monitoring reports, using information held.

Emergency and contingency planning arrangements

The Council has a Business Continuity Plan for performing the cash flow as part of its service resilience. In the event of an emergency or other event which prevent this plan

being used, the bank account structure allows any balances at the end of the working day be transferred to a Business Reserve account to accrue interest.

Insurance cover details

It is normal practice in the private and public sector for employing bodies to indemnify their employees. Employees are currently covered by a Finance and General Purposes Committee Resolution of 13 April 1987:

"That the Council shall indemnify in perpetuity all employees and former employees of the Council against all liability, professional or otherwise for negligence or negligent omission or breach of contractual or statutory duty arising out of the employee's employment with the Council and that such indemnity shall extend to any such liability arising out of the employee's engagement of duties undertaken by the Council on behalf of any other authority or body.

Provided that such indemnity shall not extend to any liability arising as a result of fraud, dishonesty or other criminal activity or of wilful misconduct, gross negligence or gross dereliction of duty on the part of the employee".

The indemnity will not apply if any employee, without the written authority of the Authority, admits liability or negotiates or attempts to negotiate a settlement of any claim falling within the scope of this Resolution.

The indemnity does not extend to loss or damage directly or indirectly caused by or arising from:

- Fraud, dishonesty or any other criminal act on the part of the employee;
- Actions outside his/her normal duties;
- Wilful misconduct, gross negligence or gross dereliction of duty, including liability in respect of surcharges made by the External Auditor.

Insurance cover for employees is as follows:

- Public and employers' liability
- Officers' indemnity (financial loss to third parties)
- Libel and slander
- Fidelity guarantee and special contingency for cheques
- Cash in transit
- Personal accident (assault)
- Travel cover on request for official journeys outside the U.K.

1.9 Price risk/Market value of investments

This is the risk that through adverse market fluctuations in the value of the principal sums the Council borrows and invests, its stated treasury management policies and objectives are compromised, against which effects it has failed to adequately protect itself.

Details of approved procedures and limits for controlling exposure to investments whose capital value may fluctuate (gilts, CDS, etc.)

In the event that opportunities for making such investments appear to the Director of Finance to be in the Council's financial interests, a report will be submitted to the Cabinet (Resources) Panel setting out the costs, benefits and potential risks.

Schedule 2 : TMP 2 – Performance measurement

2.1 Evaluation and review of treasury management decisions

The Council has a number of approaches to evaluating treasury management decisions:

- the treasury management team will carry out ongoing reviews of its activities
- reviews will be undertaken with its treasury management consultants
- annual review after the end of the year is reported to full council
- quarterly reports to Cabinet (Resources) Panel
- comparative reviews with other local authorities
- strategic, scrutiny and efficiency value for money reviews

Ongoing periodic reviews during the financial year

The Director of Finance regularly reviews the actual activity against the Treasury Management Strategy Statement and cash flow forecasts. This includes monitoring debt including average rate, maturity profile and the Council's borrowing strategy; and investments including average rate, maturity profile and changes to the above from the previous review and against the Treasury Management Strategy (Annual Investment Strategy). The Council's credit rating methodology and current counterparty list is also reviewed regularly.

Reviews with the Council's treasury management consultants

The treasury management team holds reviews with the Council's treasury management consultants to review the performance of its investments and debt portfolios. The Council's borrowing strategy and counterparty risk strategy are also reviewed at these meetings, which are held periodically, usually to coincide with a specific need (e.g. the imminent need to borrow, or following a significant change in the market/economy). At least one review meeting is held during each financial year.

Review reports on treasury management

An Annual Treasury Report is submitted to the Council each year after the end of the financial year which reviews the performance of the debt/investment portfolios. This report covers the following:

- total external debt (gross external borrowing plus other long term liabilities such as finance leases) and average interest rates at the beginning and close of the financial year compared to the Capital Financing Requirement
- borrowing strategy for the year compared to actual strategy
- whether or not a decision was made to defer borrowing or to borrow in advance
- comment on the level of internal borrowing and how it has changed during the year
- assumptions made about interest rates
- investment strategy for the year compared to actual strategy
- explanations for variance between original borrowing and investment strategies and actual

- debt rescheduling done in the year
- actual borrowing and investment rates available through the year
- the performance and return of all investments by type of investment, evaluated against the stated investment objectives
- the report shall identify investments where any specific risks have materialised during the year and report on any financial consequences of that risk; together with details of any remedial action taken. This includes reporting any short term borrowing costs incurred to remediate any liquidity problem
- the report shall include details of any review of long term investments, held by the Council, which was undertaken in the year in accordance with the Annual Investment Strategy
- compliance with Prudential and Treasury Indicators
- any other relevant information

In addition, quarterly / half yearly reports will be submitted to Council each year to provide updates on the above.

Comparative reviews

When data becomes available, comparative reviews are undertaken to see how the performance of the authority on debt and investments compares to other authorities with similar size portfolios, (but allowing for the fact that Prudential and Treasury Indicators are locally set). Data will be sourced from relevant professional bodies e.g. CIPFA.

2.2 Benchmarks and calculation methodology

Debt management

- Average rate on all external debt
- Average rate on external debt borrowed in previous financial year
- Average rate on internal borrowing
- Average period to maturity of external debt
- Average period to maturity of new loans in previous year

Investment

Where applicable, the performance of investment earnings will be measured against the following benchmarks:

Bank of England Base Lending Rate; 7 day SONIA; 1 month SONIA; 3 month SONIA

2.3 Policy concerning methods for testing value for money in treasury management

Frequency and processes of tendering

These will be determined in accordance with the Council's Constitution.

Banking services

Banking services will be re-tendered every five years to ensure that the level of prices reflect efficiency savings achieved by the supplier and current pricing trends.

Money-broking services

Money market brokers are used for placing surplus internal funds with approved financial institutions on a short term basis as part of the Council's cash flow management. Surplus internal funds are invested in the money markets in accordance with the guidelines set out in Section 1.1. Money market brokers are also used to assist the Council in meeting any temporary borrowing requirements. The current panel of brokers used by the Council are as follows:

- ICAP (part of the TPICAP Group)
- Martin Brokers (UK) plc
- Tradition UK Limited
- Tullett Prebon (Europe) Limited

Consultants'/advisers' services

The Council has appointed Link Group as its professional treasury management advisers.

Policy on external managers (other than relating to pension funds)

The Council's current policy is not to appoint external investment fund managers. The reasons for this are:

- the estimated level of surplus funds likely to be available over the medium term can be adequately managed by the Director of Finance;
- In light of this appointment of external fund managers would not be cost effective.

Schedule 3 : TMP 3 – Decision-making and analysis

3.1 Funding, borrowing, lending and new instruments/techniques

Records to be kept

The Director of Finance shall be the Council's registrar of stocks, bonds and mortgages and shall maintain records of all borrowings and investments of money by the Council. All records and documents shall be available for inspection by internal audit and the Council's external auditors. All borrowings and investments of money under the Council's control shall be made in the name of the Council.

Processes to be pursued

The Deputy Director of Finance shall document for the approval of the Director of Finance the systems, procedures and processes which deliver the approved Treasury Management Policies and Practices. The documentation will be kept up-to-date. The aim will be to provide a treasury management systems document which has day to day relevance and within which all treasury management staff are aware of their duties and responsibilities.

Issues to be addressed

In respect of every treasury management decision made, the Council will:

- above all be clear about the nature and extent of the risks to which the Council may become exposed;
- be certain about the legality of the decision reached and the nature of the transaction, and that all authorities to proceed have been obtained;
- be content that the documentation is adequate both to deliver the Council's objectives and protect the Council's interests, and to deliver good housekeeping;
- ensure that third parties are judged satisfactory in the context of the Council's creditworthiness policies, and that limits have not been exceeded;
- be content that the terms of any transactions have been fully checked against the market and have been found to be competitive.

In respect of borrowing and other funding decisions, the Council will:

- consider the ongoing revenue liabilities created, and the implications for the Council's future plans and budgets to ensure that its capital plans and investment plans are affordable, proportionate to the Council's overall financial capacity, and are within prudent and sustainable levels. This evaluation will be carried out in detail for three budget years ahead.
- Less detailed evaluation will also be carried out over a longer period of years to ensure that plans continue to be affordable, proportionate, prudent and sustainable in the longer term.
- Not borrow to invest primarily for financial return.
- Not borrow earlier than required to meet cash flow needs unless there is a clear business case for doing so.

- Not borrow unless it is to finance the current capital programme or to fund future debt maturities, or to ensure an adequate level of short-term investments to provide liquidity for the Council
- Increase its CFR and borrowing solely for purposes directly and primarily related to the functions of the Council and where any financial returns are either related to the financial viability of the project in question or otherwise incidental to the primary purpose.
- evaluate the economic and market factors that might influence the manner and timing of any decision to fund;
- consider the merits and demerits of alternative forms of funding, including funding from revenue, leasing and private partnerships;
- consider the alternative interest rate bases available, the most appropriate periods to fund and repayment profiles to use
- Ensure that treasury management decisions are made in accordance with good professional practice.

In respect of investment decisions, the Council will:

- consider the optimum period, in the light of cash flow availability and prevailing market conditions;
- consider the alternative investment products and techniques available, especially the implications of using any which may expose the Council to changes in the value of its capital;
- Ensure that any long term treasury investment is supported by a business case.

Schedule 4 : TMP 4 – Approved instruments, methods and techniques

4.1 Approved activities of the treasury management operation

- Borrowing
- Lending
- debt repayment and rescheduling
- consideration, approval and use of new financial instruments and treasury management techniques
- managing the underlying risk associated with the Council's capital financing and surplus funds activities
- managing cash flow
- banking activities
- leasing
- the use of external fund managers (other than in respect of the Pension Fund)

4.2 Approved instruments for investments

In accordance with The Local Authorities (Capital Finance and Approved Investments) (Amendment) Regulations 1996, the instruments approved for investment and commonly used by local councils are:

- Gilts
- Treasury Bills
- Deposits with banks, building societies or local organisations (and certain other bodies) for up to 364 days
- Certificates of deposits with banks or building societies for up to 364 days
- Euro-Sterling issues by certain Supra-national bodies listed on the London and Dublin Stock Exchanges
- Triple A rated money market funds
- Debt Management Account (run by DMO/PWLB)

4.3 Implementation of Markets in Financial Instruments Directive II (MIFID II) requirements

Since 3 January 2018, UK public sector bodies have been defaulted to 'retail' status under the requirements of MIFID II. However, for each counterparty it is looking to transact with (e.g. financial institution, fund management operator, broker), there remains the option to opt up to 'professional' status, subject to meeting certain requirements specified by MIFID II and that it has the appropriate level of knowledge and experience and decision making processes in place in order to use regulated investment products.

MIFID II does not cover term deposits so local authorities should not be required to opt up to professional status. However, some non-UK banks do not have the necessary regulatory permissions to deal with retail clients, so opting up to professional status would be required.

For investing in negotiable investment instruments (e.g. certificates of deposit, gilts, corporate bonds), money market funds and other types of investment funds, which are covered by MIFID II, a schedule is maintained of all counterparties that the treasury management team are authorised to place investments with. This specifies for each investment instrument and for each counterparty, whether the Council has been opted to professional status. It should be noted some money market funds will deal with both retail and professional clients.

A file is maintained for all permissions applied for and received for opt ups to professional status specifying name of the institution, instrument, date applied for and date received. It also includes confirmations where there is an exemption from having to opt up to professional status for a regulated investment, e.g. to use a money market fund which will deal with retail clients. A summary is provided below.

Professional client status under MIFID II

The following is a list of institutions where the Council has opted up to professional client status under MIFID II.

Confirmed professional client status:

Money Market Funds

- Federated Hermes (UK) LLP
- Invesco Global Asset Management Limited
- Aberdeen Liquidity Fund (LUX)

External treasury management advisors

- Link Group

Money-broking services

- ICAP (part of the TPICAP Group)
- Martin Brokers (UK) plc
- Tradition UK Limited
- Tullet Prebon (Europe) Limited

Application outstanding:

None.

No requirement to opt up

Money Market Funds

- Black Rock Institutional Sterling Liquidity Fund

4.4 Approved techniques

The following are approved techniques:

- Forward dealing up to 5 years
- A limit of £35.0 million for deposits over 1 year and up to 5 years.

The following may be used by organisations which are not local authorities:

- Swaps
- Caps
- Collars
- Options

The Council will not use any of the above techniques.

4.5 Approved methods and sources of raising capital finance

Finance will only be raised in accordance with statute, and within this limit the Council has a number of approved methods and sources of raising capital finance. These are:

On balance sheet

- PWLB
- Municipal bond agency
- Local authorities
- Banks
- Pension funds
- Insurance companies
- UK Infrastructure Bank
- Finance Leases
- Market (long term)
- Market (temporary)
- Market (LOBOs)
- Stock issues
- Local Temporary
- Local Bonds
- Local authority bills
- Overdraft
- Negotiable Bonds
- Internal (capital receipts and revenue balances)
- Commercial Paper
- Medium Term Notes
- Deferred Purchase
- PFI / PPP

Other methods of financing

- Government and EC Capital Grants
- Lottery monies

Borrowing will only be done in Sterling. All forms of funding will be considered by the Director of Finance taking into consideration the prevailing economic climate, regulations and local considerations. The Director of Finance has delegated powers through this Policy and the Strategy to take the most appropriate form of borrowing from the approved sources.

All borrowing transactions entered into by the Director of Finance will be reported to the Cabinet (Resources) Panel.

4.6 Investment limits

The Annual Investment Strategy sets out the limits and the guidelines for use of each type of investment instrument.

4.7 Borrowing limits

See the Treasury Management Strategy Statement and Prudential and Treasury Indicators.

Schedule 5 : TMP 5 – Organisation, clarity and segregation of responsibilities, and dealing arrangements

5.1 Limits to responsibilities/discretion at Council and Cabinet (Resources) Panel

Council

- Approving the annual report on treasury management policies, practices and activities.
- Approving the Treasury Management Strategy Statement/Annual Investment Strategy/MRP Policy, including a mid-year review and any other revisions/updates.
- Approving the Annual Treasury Report
- Approval of Treasury Management budgets

Cabinet

- Recommending the Annual Treasury Report to Council.

Cabinet (Resources) Panel

- Receiving and reviewing the quarterly Treasury Management Monitoring reports.
- Monitoring performance against budgets.
- Approval of the division of responsibilities.
- Receiving and reviewing external audit reports and acting on recommendations.
- Approving the selection of external service providers and agreeing terms of appointment.

Resources and Equality Scrutiny Panel

- Review the treasury management policy and procedures and make recommendations to Cabinet / Cabinet (Resources) Panel

5.2 Principles and practices concerning segregation of duties

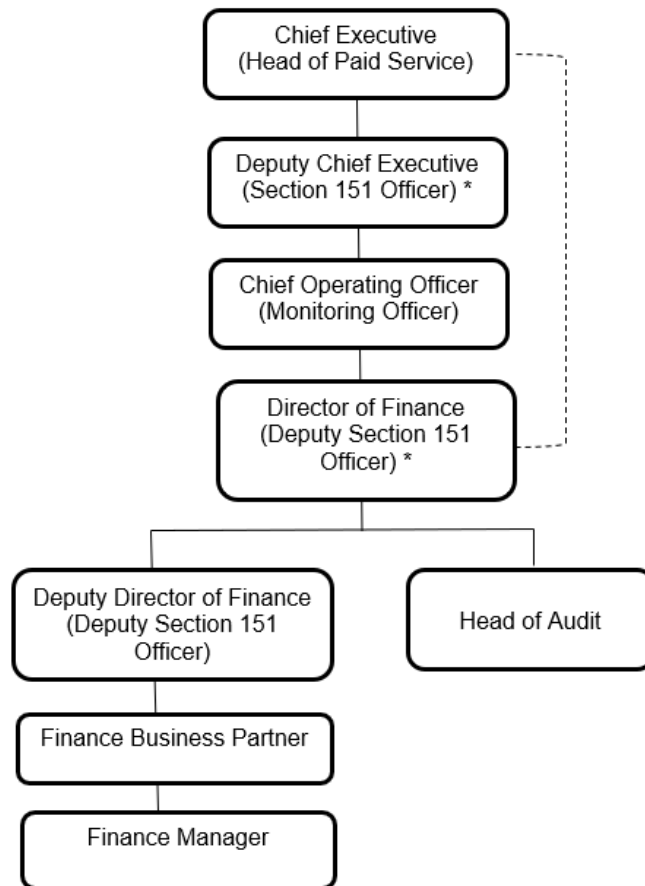
The varied aspects of treasury management and the large volume of funds involved require a clear segregation of duties. The Council's Treasury Management Practices reflect the separation of duties, namely:

- Policy formulation - approved by Council and monitored/amended by Cabinet (Resources) Panel.
- Treasury advice - the Director of Finance is the responsible officer for advising Council and Cabinet (Resources) Panel. The recommendations made to Councillors will also reflect the advice provided to the Director of Finance by specialist external advisors.
- Dealing in the Market - undertaken by rotating use of one of four approved brokers based on best rates on offer.
- Recording, administration and recommendations to the Director of Finance on treasury activity is carried out by the Finance Manager (Treasury Management).
- All transactions are subject to both internal and external audit.

- The Chief Executive has responsibility for ensuring that a specified system is implemented.
- The Chief Operating Officer has responsibility for ensuring compliance with the law.

5.3 Treasury management organisation chart

The treasury management organisation chart as at February 2024 is as follows:



* The Deputy Chief Executive is the Section 151 Officer on a temporary basis due to the Director of Finance being an interim appointment. Once the Director of Finance position has been filled on a permanent basis, the Section 151 role will revert to the Director of Finance.

5.4 Statement of duties/responsibilities of each treasury post

Director of Finance (Section 151 Officer)

1. The Director of Finance will:

- Recommend clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance.
- Submit regular treasury management policy reports to Cabinet (Resources) Panel.
- Submit reports on performance against budgets to Cabinet (Resources) Panel.
- Receive and review management information reports.

- Review the performance of the treasury management function and promote best value reviews.
 - Ensure the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function.
 - Ensure the adequacy of internal audit.
 - Liaising with external audit.
 - Recommend the appointment of external service providers.
2. The Director of Finance has delegated powers to take the most appropriate form of borrowing from the approved sources, and to take the most appropriate form of investments in approved instruments.
 3. The Director of Finance may delegate their power to borrow and invest to members of their staff. The Director of Finance, Deputy Section 151 Officer, Finance Business Partner or any other officer nominated by the Director of Finance must conduct all dealing transactions, or staff authorised by the Director of Finance to act as temporary cover for leave/sickness. All transactions must be authorised by at least one of the named officers above.
 4. The Director of Finance and the Chief Operating Officer will ensure that the treasury management policy is adhered to, and if not, will bring the matter to the attention of elected councillors as soon as possible.
 5. Prior to entering into any capital financing, lending or investment transaction, it is the responsibility of the Director of Finance to be satisfied, by reference if appropriate to the Chief Operating Officer, and external advisors as appropriate, that the proposed transaction does not breach any statute, external regulation or the Council's Financial Regulations.
 6. It is also the responsibility of the Director of Finance to ensure that the Council complies with the requirements of the UK Money Markets Code (which supersedes The Non Investment Products Code, formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets.

Finance Manager

Under the direction and supervision of either the Director of Finance or, in their absence, the Deputy Section 151 Officer, the Finance Manager will be responsible for:

- Execution of transactions
- Adherence to agreed policies and practices on a day-to-day basis
- Ensuring that adequate records are maintained and procedures are fully documented
- Maintaining cash flow projections
- Maintaining relationships with third parties and external service providers
- Supervising treasury management staff
- Monitoring performance on a day-to-day basis
- Submitting regular management information reports to the Director of Finance

- Informing treasury management activity, including borrowing options
- Identifying and recommending opportunities for improved practices
- Reporting any actual or potential variations to agreed policies and procedures as they arise.

Chief Executive (Head of the Paid Service)

The responsibilities of this post will be:

- Ensuring that the treasury management system is specified and implemented
- Ensuring that the Director of Finance reports regularly to the Council and Cabinet (Resources) Panel on treasury policy, activity and performance.

Chief Operating Officer (Monitoring Officer)

The responsibilities of this post will be:

- Ensuring compliance by the Director of Finance with the treasury management policy statement and treasury management practices and that they comply with the law.
- Being satisfied that any proposal to vary treasury policy or practice complies with law or any code of practice.
- Giving advice to the Director of Finance when advice is sought.

Internal Audit

The responsibilities of Internal Audit will be:

- Reviewing compliance with approved policy and treasury management practices.
- Reviewing division of duties and operational practice.
- Assessing value for money from treasury activities.
- Undertaking probity audit of treasury function.

5.5 Absence cover arrangements

The Deputy Section 151 Officer will ensure that other staff within Strategic Finance who do not deal with treasury management activities on a daily basis are sufficiently trained so that they can provide absence cover. Such cover will be limited to dealing with the production of daily up-dates of the Council's cash flow statements and, in exceptional circumstances, communicating deals through to the Council's brokers and bank once instructions have been received from either the Director of Finance or the Deputy Section 151 Officer.

5.6 Dealing Limits

The following posts are authorised to deal with Money Market Funds and the Debt Management Account Deposit Facility (DMADF):

- Finance Business Partner
- Deputy Director of Finance

- Director of Finance

There are no dealing limits for the individual posts.

5.7 List of approved brokers

ICAP (part of the TPICAP Group)
Martin Brokers (UK) plc
Tradition UK Limited
Tullett Prebon (Europe) Limited

5.8 Policy on brokers' services

To avoid an over-reliance on a single broker and thereby enhance objective dealings, deals will be spread amongst brokers on a rotation basis. The exception being when undertaking temporary borrowing in which case all brokers will be approached to obtain the best rate available.

5.9 Policy on taping of conversations

Taping of conversations with the Council's brokers and bank is not normally carried out by the Director of Finance or their staff.

5.10 Direct dealing practices

Direct dealing with counterparties by the Director of Finance or their staff is undertaken with the following, in order to achieve higher rates than dealing with them via our brokers and to maintain adequate levels of liquidity:

- The Council's bankers (National Westminster Bank plc, trading as RBS Commercial & Private Banking) - overnight deposits only
- Invesco Global Asset Management Limited (previously Aim Global Ltd and STIC) - Money Market Fund
- Black Rock Institutional Sterling Liquidity Fund – Money Market Fund
- Aberdeen Liquidity Fund (LUX) (previously called Standard Life Investments Liquidity Fund and Ignis Sterling Liquidity Fund) – Money Market Fund
- Federated Hermes (UK) LLP (previously Prime Rate Sterling Liquidity Fund) - Money Market Fund
- Natwest - Call Account
- Debt Management Account Deposit Facility – Debt Management Office (DMO)

In the event that any of these counterparties fall below the Council's minimum lending criteria, activity in that account will temporarily cease and any balance withdrawn immediately. However, the accounts will remain open for future dealings if or when their credit ratings recover.

5.11 Settlement transmission procedures

Deals will normally be made by telephone and/or confirmed by fax, with payments being made and sums being received by telephonic transfer.

5.12 Documentation requirements

Every deal will be fully documented showing the name of the broker used, amount, period, counterparty, interest rate, date, commission and transmission arrangements. All documentation will be available for inspection by internal and external audit. All documentation will be retained for six years.

5.13 Arrangements concerning the management of third party funds

The Council holds a number of trust funds. The cash in respect of these funds is held in the Council's bank account but transactions are separately coded. Interest is given on credit balances at the average rate for internal balances for the year.

Schedule 6 : TMP 6 – Reporting requirements and management information arrangements

6.1 Annual programme of reporting

Annual reporting requirements before the start of the year:

- Review of the Council's approved clauses, treasury management policy statement and practices
- Treasury management strategy report on proposed treasury management activities for the year comprising of the Treasury Management Strategy Statement, Annual Investment Strategy and Minimum Revenue Provision Policy Statement
- Capital strategy (reported with the capital monitoring report) to cover the following:
 - Give a long term view of the capital programme and treasury management implications thereof beyond the three year time horizon for detailed planning.
 - An overview of treasury and non-treasury investments to highlight the risks and returns involved in each and the balance, (proportionality), between both types of investments.
 - The Council's risk appetite and specific policies and arrangements for non-treasury investments.
 - Schedule of non-treasury investments.

Mid year review.

Quarterly monitoring or review.

Annual review report after the end of the year.

6.2 Annual Treasury Management Strategy Statement

The Treasury Management Strategy Statement sets out the specific expected treasury activities for the forthcoming financial year. This strategy will be submitted to the Council for approval as part of the overall budget and council tax determination process prior to the commencement of each financial year.

The formulation of the annual Treasury Management Strategy Statement involves determining the appropriate borrowing and investment decisions in light of the anticipated movement in both fixed and shorter-term variable interest rates. For instance, the Director of Finance may decide to postpone borrowing if fixed interest rates are expected to fall, or borrow early (subject to borrowing in advance of need) if fixed interest rates are expected to rise.

The Treasury Management Strategy Statement is concerned with the following elements:

- Prudential and Treasury Indicators
- current treasury portfolio positions
- borrowing requirement
- prospects for interest rates
- borrowing strategy

- policy on borrowing in advance of need
- debt rescheduling
- investment strategy
- creditworthiness policy
- policy on the use of external service providers
- any extraordinary treasury issues
- the Council's MRP policy

The Treasury Management Strategy Statement will establish the expected move in interest rates against alternatives (using all available information such as published interest rate forecasts where applicable) and highlight sensitivities to different scenarios.

6.3 Annual Investment Strategy

At the same time that the Council receives the Treasury Management Strategy Statement it will also receive a report on the Annual Investment Strategy which will set out the following:

- the Council's risk appetite in respect of security, liquidity and optimum performance
- the definition of high credit quality to determine what are specified investments as distinct from non-specified investments
- which specified and non-specified instruments that the Council will use
- whether they will be used by the in-house team, external managers or both
- the Council's policy on the use of credit ratings and other credit risk analysis techniques to determine creditworthy counterparties for its approved lending list
- which credit rating agencies the Council will use
- how the Council will deal with changes in rating, rating watches and rating outlooks
- limits of value and time for individual counterparties and groups
- country limits
- maximum value and maximum periods for which funds may be prudently invested
- levels of cash balances and investments over the same time period (as a minimum) as the Council's capital investment plans and how the use of internal borrowing and borrowing in advance will influence those levels
- interest rate outlook
- budget for investment earnings
- a review of the holding of longer-term investments
- Use of a cash fund manager
- policy on the use of external service providers

6.4 Annual Minimum Revenue Provisions Statement

This will set out how the Council will make revenue provision for repayment of its borrowing and will be submitted at the same time as the Annual Treasury Management Strategy Statement and Annual Investment Strategy Statement.

6.5 Policy on Prudential and Treasury Indicators

The Council will approve before the beginning of each financial year a number of treasury limits which are set through Prudential and Treasury Indicators.

The Director of Finance is responsible for incorporating these limits into the Annual Treasury Management Strategy Statement and for ensuring compliance with the limits. Should it prove necessary to amend these limits, the Director of Finance shall submit the changes for approval to full Council.

6.6 Quarterly and Mid-year reviews

The Council will review its treasury management activities and strategy on a quarterly and six monthly basis. The mid-year review will go to Full Council. This review will consider the following:

- activities undertaken
- variations, if any, from agreed policies/practices
- interim performance report
- regular monitoring
- monitoring of treasury management and prudential indicators

6.7 Annual report on treasury management activity

An annual report will be presented to the Cabinet and to Council, at the earliest practicable meeting after the end of the financial year, but in any case, by the end of September. This report will include the following:

- transactions executed and their revenue effects
- report on risk implications of decisions taken and transactions executed
- compliance report on agreed policies and practices, and on statutory/regulatory requirements
- performance report
- report on compliance with CIPFA Code recommendations, approved policies and practices, the Councillor approved treasury management strategy and on statutory/regulatory requirements
- monitoring of treasury management indicators

6.8 Management information reports

Management information reports will be prepared regularly by the Finance Manager and will be presented to the Director of Finance.

These reports will contain the following information:

- a summary of transactions executed and their revenue effects
- measurements of performance including effect on loan charges/investment income
- degree of compliance with original strategy and explanation of variances
- any non-compliance with Prudential limits or other treasury management limits

6.9 Publication of treasury management reports

All reports to Cabinet (Resources) Panel, Cabinet, Council and Scrutiny Panel are available to the public via the Council's website.

Schedule 7 : TMP 7 – Budgeting, accounting and audit arrangements

7.1 Statutory/regulatory requirements

The accounts are drawn up in accordance with the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom which is recognised by statute as representing proper accounting practices. The Council has also adopted in full the principles set out in CIPFA's Treasury Management in the Public Services – Code of Practice (the CIPFA Code), together with those of its specific recommendations that are relevant to this Council's treasury management activities.

7.2 Sample budgets / accounts / prudential and treasury indicators

The Director of Finance will prepare a three year medium term financial plan with Prudential and Treasury Indicators for treasury management which will incorporate the budget for the forthcoming year and provisional estimates for the following two years. This will bring together all the costs involved in running the function, together with associated income. The Director of Finance will exercise effective controls over this budget and monitoring of performance against Prudential and Treasury Indicators and will report upon and recommend any changes required in accordance with TMP6.

7.3 List of information requirements of external auditors

- Reconciliation of loans outstanding in the financial ledger to treasury management records
- Maturity analysis of loans outstanding
- Certificates for new long term loans taken out in the year
- Reconciliation of loan interest, discounts received and premiums paid to financial ledger by loan type
- Calculation of loans fund interest and debt management expenses
- Details of interest rates applied to internal investments
- Calculation of interest on working balances
- Interest accrual calculation
- Principal and interest charges reports
- Analysis of any deferred charges
- Calculation of loans fund creditors and debtors
- Annual Treasury Report
- Treasury Management Strategy Statement and Prudential and Treasury Indicators
- Review of observance of limits set by Prudential and Treasury Indicators
- Calculation of the Minimum Revenue Provision
- If used, external fund manager(s) valuations including investment income schedules and movement in capital values.

The Council will ensure that its auditors, and those charged with regulatory review, have access to all information and papers supporting the activities of the treasury management function as are necessary for the proper fulfilment of their roles, and that such information and papers demonstrate compliance with external and internal policies and approved practices.

7.4 Treasury Management activity reports

Weekly activity reports are produced summarising the investment / borrowing activities / balances along with PWLB interest rates and the revenue implications of the activity as reported in the quarterly monitoring to Councillors. This report is circulated to the following:

- Leader of the Council
- Cabinet Member with lead responsibility for Resources
- Leader of the Opposition
- Chief Executive
- Director of Finance
- Chief Operating Officer (the Monitoring Officer)
- Deputy Director of Finance

In addition, quarterly reports are submitted to Cabinet (Resources) Panel / Cabinet / Full Council (as required) and Scrutiny Panel. The report is intended to highlight any variances between budget and spend in order that the Council can assess its financial position. Details of treasury management activities are included within this report.

Schedule 8 : TMP 8 – Cash and cash flow management

8.1 Arrangements for preparing/submitting short-term cash flow statements

The Finance Manager prior to the start of a new financial year will prepare a cash flow statement showing the Council's expected payments and income over that forthcoming financial year. These projections are prepared from the previous years' cash flow records, adjusted for known changes in levels of income and expenditure and also changes in payments and receipt dates. This will be updated daily by no later than 11.00 a.m. to form rolling cash flow forecasts. The cash flow forecast will be monitored on a regular basis by the Director of Finance or, in their absence, the Deputy Section 151 Officer.

The cash flow forecast will identify the following factors:

- Payments
 - Repayment of maturity and instalment loans
 - Profile of salary payments
 - Profile of payments to HMRC for income tax and national insurance
 - Profile of payments to precepting authorities
 - Profile of creditor payments
 - CHAPS and Telephone Transfer payments to be identified in advance
- Income
 - Profile of Government Grants
 - Profile of Dedicated Schools Grant
 - Profile of other Grants
 - Profile of daily cash income
 - Profile of VAT reimbursements
 - Profile of weekly Collection Fund income
 - Large capital receipts to be identified

The cash flow forecast for the financial year will be updated on a daily basis. In addition, a forecast for the following financial year will be created 3 months prior to the start of that year. Forecasts will be monitored against daily bankings and clearings.

The estimated daily bank overdraft is not to exceed £500,000.

8.2 Arrangements for preparing/submitting medium to long-term forecasts of the Council's net debt (or net investment) requirements consistent with its approved plans, e.g. through development of a liability benchmark.

The Council will develop a debt liability benchmark as a minimum for the forthcoming financial year and the following two financial years. The liability benchmark will then be reported each quarter along with the other required indicators. The benchmark will be analysed as part of the annual treasury management strategy and any substantial mismatches between actual loan debt outstanding and the liability benchmark will be explained.

8.3 Bank statement procedures

Daily bank statements for all accounts are available through online banking which are reconciled to all income and expenditure. Bank reconciliation is the responsibility of the Banking Team.

8.4 Payment scheduling and agreed terms of trade with creditors

All contracts for the supply of goods or services must be subject to the Council's standard payment terms – monthly in arrears. Any contracts which require special financing arrangements must be agreed by the Director of Finance.

Where a contract provides for payments to be made by instalments following the delivery of services or completion of work, a cost plan must be prepared for such contracts and payments monitored against that plan by the service.

Work carried out by 'statutory undertakings' is excluded from the Competition Requirements of the Contracts Procedure Rules and payment in advance of the works being carried out is considered to be acceptable.

The standard method of payment of creditors is by BACS, 30 days from date of invoice unless the invoice is in dispute. However, due to the Covid 19 pandemic, to assist the local economy the 30 days terms have temporarily been suspended so payments are made quicker.

8.5 Arrangements for monitoring debtor/creditor levels

With regards debtors, the levels of credits and debits held are regularly analysed by Revenues and Benefits to identify action required.

The Hub Payments Team carry out regular analysis of creditor levels.

8.6 Procedures for banking of funds

The Director of Finance shall approve the arrangements for the collection and banking of all money due to the Council.

Each officer shall ensure the prompt raising of debtor invoices for the recovery of income due.

All stationery used in connection with the collection and allocation of income shall be held and distributed under approval from the Director of Finance.

On receipt of income the employee shall; immediately record the transaction, provide the customer with verification of payment and subsequently bank the monies in accordance with Council procedure rules.

No deduction may be made from any income receipted without approval from the Director of Finance.

In accordance with the Accounts and Audit Regulations 2015, the amount of each cheque shall be recorded on either the bank paying in slip or an attached cheque listing detailing; the amount, the receipt number or reconciling information.

Personal cheques shall not be cashed through the Council's bank accounts.

Any transfer of physical money from one employee to another will be evidenced in the records of the responsible service.

The Council has established an Anti-Money Laundering Policy to ensure it is compliant with the requirements of the current Money Laundering Regulations.

Therefore, all employees receiving cash on behalf of the Council should ensure that they comply with this policy.

To help prevent money laundering, cash payments (including notes, coin or travellers cheques in any currency) above £5,000 will not be accepted for any Council service.

All income streams in excess of £25,000 that were not included in the approved budget shall be reported to the Director of Finance at the earliest opportunity.

Schedule 9 : TMP 9 – Money laundering

The Council last updated its anti-money laundering policy and procedure in 2017, below is a copy of this policy approved by Audit and Risk Committee. The policy is currently being updated to reflect the recent Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations. Once updated it will be taken back to the Audit and Risk Committee for approval.

9.1 Introduction

Money laundering is any process whereby funds derived from criminal activity are given the appearance of being legitimate. The Council must be alert to the possibility that attempts could be made to utilise funds obtained from criminal activity to pay for Council services.

The Council is committed to preventing money laundering by having anti-money laundering systems in place to establish the legitimacy of the sources of income.

This Anti-Money Laundering Policy makes it clear that it is extremely important that all employees are familiar with:

- the legal responsibilities;
- the criminal sanctions that may be imposed for breaches of the money laundering legislation;
- the need to be vigilant and take appropriate steps to reduce the opportunities for breaches of the Money Laundering Regulations;
- The key requirement to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer.

9.2 Legal requirements

The Money Laundering Regulations 2007

These regulations set out detailed requirements for organisations to establish procedures to prevent its services being utilised for the purposes of money laundering.

While public authorities are not legally obliged to apply the provisions of the regulations as they do not fall under the term 'regulated activity'. Certain public authorities must, if they know or suspect or have reasonable grounds for knowing or suspecting, that a person is or has engaged in money laundering or terrorist financing, as soon as reasonably practical inform the National Crime Agency. The Council is not one of the certain public authorities, but it will nonetheless inform the National Crime Agency in the same way.

Therefore, as a responsible public body the Council is employing policies and procedures which embrace the UK's anti-terrorist financing, and anti-money laundering requirements, with a particular focus on CIPFA's "Combatting Financial Crime – Further Guidance on Anti-money Laundering for Public Service Organisations".

The Terrorism Act 2000

This applies to all individuals and businesses in the UK and therefore all employees and councillors within the Council have an obligation to report knowledge, reasonable grounds for belief or suspicion about the proceeds from, or finance likely to be used for terrorism or its laundering where it relates to information that comes to them in the course of their business or employment. The primary offence states a person commits an offence if he enters into or becomes concerned in an arrangement which facilitates the retention or control by or on behalf of another person of terrorist property by concealment, by removal from the jurisdiction, by transfer to nominees, or in any other way.

The Proceeds of Crime Act (POCA) 2002

This Act applies to all individuals and organisations and further defines the offences of money laundering and creates mechanisms for investigating and recovering the proceeds of crime as well as placing an obligation on the Council, employees and councillors to report suspected money laundering activities. The primary offences are:

- Section 327 - concealing, disguising, converting, transferring or removing criminal property from the UK;
- Section 328 - entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
- Section 329 - acquiring, using or possessing criminal property.

9.3 Which service areas may be affected by money laundering?

Examples of how the Council may be exposed to money laundering include accepting large cash amounts, the involvement of third parties, the request of a large refund and property investment or purchases.

Also, the Money Laundering legislation defines 'regulated activity' as the provision 'by way of business' of advice about tax affairs, accounting services, treasury management, investment or other financial services, audit services, legal services, estate agency, services involving the formation, operation or arrangement of a company or trust or, dealing in goods wherever a transaction involves a payment of €15,000 (approx. £12,500) or more.

To help prevent money laundering, cash payments (including notes, coin or travellers cheques in any currency) above £5,000 will not be accepted for any Council service.

9.4 Establishing the identity of a new business relationship

As a responsible Council, we should be aware of any suspicions arising out of funds received from a source from which we are unfamiliar. If the Council forms a new business relationship (including a significant one-off transaction) care should be taken to ensure that the client is identifiable by making basic checks on their credentials, along with confirmation of where funds are coming from. This should not be an onerous task, but,

we should ensure that we are clear about whom we are conducting business with. This will be especially important if the parties concerned are not physically present for identification purposes and to situations where someone may be acting for absent third parties. This is known as due diligence and must be carried out before any such business is entered into with the customer. If there is uncertainty whether such due diligence is required then advice must be obtained from the Money Laundering Reporting Officer.

Due diligence can be used to evidence a customer's identity by, for example:

- checking with the customer's website to confirm their business address
- conducting an on-line search via Companies House to confirm the nature and business of the customer and confirm the identities of any directors
- Conducting personal identity checks for example, requesting that the customer provide their current passport/driving licence, birth certificates

In certain circumstances enhanced customer due diligence may need to be carried out, for example, where:

- the customer has not been physically present for identification
- the customer is a politically exposed person
- there is a beneficial owner who is not the customer – a beneficial owner is any individual who holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.

If it is believed that enhanced customer due diligence is required then the Money Laundering Reporting Officer should be consulted prior to carrying it out. Customer due diligence should be completed for all relevant new customers and for existing customers, during the life of a business relationship, proportionate to the risk of money laundering and terrorist funding.

9.5 Reporting suspected cases of Money Laundering

Where an employee or Councillor knows or suspects that money laundering activity is taking/has taken place, or becomes concerned that their involvement in a matter may amount to a prohibited act under sections 327 to 329 of POCA, they must disclose this without delay or as soon as reasonably practicable to the Money Laundering Reporting Officer. Failure to report such activity may render the employee subject to prosecution and/or disciplinary action in accordance with the Council's disciplinary policy. The procedure for disclosure is:

- to complete a 'Disclosure Report to the Money Laundering Reporting Officer Form' and to include as much detail as possible e.g. name, date of birth, address, company names, directorships, phone numbers, nature of the activity etc;

The Council has appointed the following employee as the Money Laundering Reporting Officer (MLRO):

Ian Cotterill - Head of Internal Audit

Tel: (01902) 554475

e-mail: ian.cotterill@wolverhampton.gov.uk

In the absence of the MLRO listed above, the following employee is authorised to deputise:

Mark Wilkes, Client Lead Auditor

Tel: (01902) 554462

e-mail: mark.wilkes@wolverhampton.gov.uk

Further advice on money laundering matters can also be obtained from:

David Pattison – Chief Operating Officer/Monitoring Officer

Tel: (01902) 553840

e-mail: david.pattison@wolverhampton.gov.uk

9.6 Investigating and Reporting Money Laundering

How will the Money Laundering Reporting Officer investigate a disclosure?

The Money Laundering Reporting Officer will:

- acknowledge receipt of the disclosure report;
- assess the information provided to make a judgment as to whether there are reasonable grounds for knowledge or suspicion of money laundering activities and;
- prepare a Suspicious Activity Report (SAR) to the National Crime Agency (NCA), where appropriate;
- The employee or councillor must follow any directions given by the Money Laundering Reporting Officer
- The employee or councillor must cease all involvement in the transaction (not make any further enquiries into the matter themselves) unless or until consent is provided by the NCA.
- The employee or councillor must specify in the disclosure report if such consent is required to comply with any transaction deadlines.
- Any necessary investigation will be undertaken by the NCA. Employees and councillors will be required to co-operate with any subsequent money laundering investigation.
- At no time and under no circumstances should the employee or councillor voice any suspicions to the person(s) suspected of money laundering, even if the NCA has given consent to a particular transaction proceeding, without the specific consent of the Money Laundering Reporting Officer.
- Where the Money Laundering Reporting Officer concludes that there are no reasonable grounds to suspect money laundering then they shall mark the disclosure report accordingly and give their consent for any ongoing or imminent transaction(s) to proceed.
- All in-house disclosure reports and NCA Suspicious Activity Reports will be retained for a minimum of five years after the business relationship ends or an occasional transaction is completed.

9.7 Record Keeping

Each area of the Council which conducts relevant business must maintain suitable records of any completed due diligence checks and details of relevant transactions must be maintained for at least five years. This provides an audit trail and evidence for any subsequent investigation into money laundering, for example, distinguishing the client and the relevant transaction and recording in what form any funds were received or paid. In practice, the Council will be routinely making records of work carried out for clients in the course of normal business and these should suffice in this regard.

9.8 Review of the Money Laundering Policy

The Money Laundering Policy will be reviewed on an annual basis by the Head of Audit and the Audit and Risk Committee to ensure that it remains up to date, fit for purpose and represents generally acceptable good practice.

Schedule 10 : TMP 10 – Training and qualifications

All treasury management staff should receive appropriate training relevant to the requirements of their duties at the appropriate time. The Council operates a Professional Conversation review system which identifies the training requirements of individual members of staff engaged on treasury related activities.

Additionally, training may also be provided on the job, and it will be the responsibility of the Director of Finance to ensure that all staff under their authority receive the level of training appropriate to their duties. This will also apply to those staff who from time to time cover for absences from the treasury management team.

10.1 Details of approved training courses, etc.

Treasury management staff and Councillors will undertake training, principally using seminars and training, where appropriate, provided by the Council's external treasury management advisors, CIPFA, money brokers etc.:

- bi-annual seminars, including workshops
- regional training
- specific training or individual briefing sessions

10.2 Records of training received by treasury staff

A record will be maintained of all training courses and seminars attended by staff engaged in treasury management activities.

10.3 Experience and approved qualifications for treasury staff and Councillors

All staff engaged on treasury management activities will undergo regular management development reviews to assist in career development.

The Deputy Section 151 Officer, Finance Business Partner and Finance Manager will be professionally qualified accountants, preferably CIPFA.

10.4 Standards of professional practice (SOPP)

The Council's Director of Finance is a member of CIPFA. The postholder is committed to professional responsibilities through both personal compliance and by ensuring that relevant staff are appropriately trained. Other senior staff involved in treasury management activities who are members of CIPFA will also comply with the SOPP.

10.5 Councillor training records

Records will be kept by Organisational Development of all training in treasury management provided to Councillors.

10.6 Councillors charged with governance

Councillors charged with diligence also have a personal responsibility to ensure that they have the appropriate skills and training for their role.

Schedule 11 : TMP 11 – Use of external service providers

11.1 Details of contracts with service providers, including bankers, brokers, consultants, advisers and details of services provided

The Council will employ the services of other organisations to assist it in the field of treasury management. In particular, it will use external consultants to provide specialist advice in this ever more complex area. However, it will ensure that it fully understands what services are being provided and that they meet the needs of the Council, especially in terms of being objective and free from conflicts of interest.

It will also ensure that the skills of the in house treasury management team are maintained to a high enough level whereby they can provide the appropriate challenge to external advice and can avoid undue reliance on such advice.

Treasury management staff and their senior management will therefore be required to allocate appropriate levels of time to using the following sources of information so that they are able to develop suitable levels of understanding to carry out their duties, especially in challenge and avoiding of undue reliance:

- quality financial press
- market data
- information on government support for banks
- the credit ratings of that government support

Core Banking Services

Name of supplier of service - National Westminster Bank plc, trading as RBS Commercial & Private Banking.

Contract commenced 1 April 2022 and runs for two years with two options to extend for a further three and two years respectively.

The above contract was awarded by Cabinet (Resources) Panel on 20 October 2021.

Merchant Acquiring Services (Card Acquiring Services)

Name of supplier service – Lloyds Banking Group.

Contract commenced 1 August 2022 and runs for one year with three options to extend for a further one year each.

The above contract was awarded by Cabinet (Resources) Panel on 27 July 2022.

Money-broking services

The Council may use money brokers for temporary borrowing and investment and long term borrowing. It will seek to give an even spread of business amongst the approved brokers.

ICAP (part of the TPICAP Group)

Martin Brokers (UK) plc

Tradition UK Limited

Tullett Prebon (Europe) Limited

Consultants'/advisers' services:

Treasury consultancy services

Name of supplier of service – Link Group

Contract commenced 1 January 2023 for three years until 31 December 2025 with a possibility of two extensions of twelve months each.

Service provided - treasury management specialist advice

Cash/fund management services

No external suppliers are used to provide these services.

Credit rating agency

The Council receives a credit rating service through its treasury management consultants, the costs of which is included in the consultant's annual fee.

11.2 Procedures and frequency for tendering services

See Schedule 2 : TMP 2 Performance measurement.

Schedule 12 : TMP 12 – Corporate governance

12.1 List of documents to be made available for public inspection

The Council is committed to the principle of openness and transparency in its treasury management function and in all its functions.

It has adopted the CIPFA Code of Practice on Treasury Management and implemented key recommendations on developing Treasury Management Practices, formulating a Treasury Management Policy Statement and implementing the other principles of the Code.

The following documents are available for public inspection:

- Treasury Management Policy and Practices Statement
- Treasury Management Strategy Statement
- Annual Investment Strategy
- Minimum Revenue Provision policy statement
- Annual Treasury Report
- Treasury Management monitoring reports (e.g. half yearly, quarterly)
- Annual Statement of Accounts and financial instruments disclosure note
- Annual budget and Medium Term Financial Strategy
- HRA Business Plan
- Approved Capital Programme
- Capital Strategy
- Minutes of Council/Cabinet/Scrutiny meetings

12.2 Procedures for consultation with stakeholders

Stakeholders have an opportunity to comment on the Council's Treasury Management activities as part of the overall annual budget consultation process and to inspect any transactions when the Council's accounts are placed on deposit for inspection each year.

12.3 List of external funds managed on behalf of others and the basis of attributing interest earned and costs to these investments

The Council does not manage funds on behalf of other organisations.

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	2024-2025 Budget and Medium-Term Financial Strategy 2024-2025 to 2026-2027	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Louise Miles Resources	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Tim Johnson, Chief Executive	
Originating service	Strategic Finance	
Accountable employee	James Howse Tel Email	Interim Director of Finance 01902 556710 James.howse@wolverhampton.gov.uk
Report to be/has been considered by	Strategic Executive Board Council	23 January 2024 28 February 2024

Recommendations for decision:

The Cabinet recommends that Council approves:

1. The net budget requirements for 2024-2025 of £332.0 million for General Fund services.
2. The Medium Term Financial Strategy (MTFS) 2024-2025 to 2026-2027 as detailed in Section 9 and the key assumptions underpinning the MTFS as detailed in Appendices 1, 2 and 3 of this report.
3. A Council Tax for Council services in 2024-2025 of £2,004.27 (Council element) for a Band D property, being an increase of 4.99% on 2023-2024 levels, which incorporates 2% in relation to Adult Social Care.
4. The refreshed Reserves Strategy as detailed in Appendix 8.

The Cabinet are recommended to approve:

1. The updated assumptions used in the Budget 2024-2025 and the MTFS 2024-2025 to 2026-2027 as detailed in this report.
2. That £1.7 million is transferred from the Sustainable MTFS Reserve (formally named the Transformation Reserve) and Re-organisation Reserve to the General Fund Reserve in order that it can be maintained at approximately 5% of net budget over the medium term, which is in line with the Reserves Strategy.
3. That authority is delegated to the Director of Finance, to approve the calculation and allocation of growth in the central share of business rates for 2024-2025 and future years to be passported to the West Midlands Combined Authority (WMCA).
4. That authority be delegated to the Cabinet Member for Resources, in consultation with the Director of Finance to allocate budgets from the Corporate Contingency for Budget Growth / Emerging pressures once business cases have been completed.
5. That the Council enter into the Better Care Fund Section 75 Agreement along with the necessary ancillary agreements from the main agreement for 2024-2025 with the Black Country Integrated Care Board, and delegate authority to the Cabinet Member for Resources, Cabinet Member for Adults and Wellbeing, in consultation with the Director of Adult Social Care and the Director of Finance to approve the final terms of the agreement.

Recommendations for noting:

The Cabinet are recommended to note:

1. The significance of the financial distress in the sector as summarised in Section 3.
2. That the budget for 2024-2025 is in balance without the use of General Fund Reserves.
3. That, in the opinion of the Interim Director of Finance (Deputy Section 151 Officer), the budget estimates and assumptions included in the 24/25 budget (and MTFS) are robust.
4. That, in the opinion of the Interim Director of Finance (Deputy Section 151 Officer), the proposed levels of reserves are adequate in respect of the forthcoming financial year.
5. That, in the opinion of the Interim Director of Finance (Deputy Section 151 Officer), the proposed use of earmarked reserves during 2024-2025 is prudent and proportionate for 2024-2025, but that this is not a sustainable solution to the Council's underlying medium term financial gap.
6. That it is estimated that a further £27.1 million of budget reductions need to be identified for 2025-2026, rising to £32.6 million over the medium term to 2026-2027 in order to address the projected budget deficit.
7. That, due to external factors, in particular the impact of the increasing demand for services, cost of living and inflationary pressures, budget assumptions remain subject to significant change, which could therefore result in alterations to the financial position facing the Council.
8. That there continues to be considerable amount of uncertainty with regards to future funding streams for local authorities over the medium term. At the point that further information is known it will be incorporated into future reports to Councillors. Any reduction in the Government's allocation of funding to the Council would have a significant detrimental impact and further increase the budget deficit forecast over the medium term.
9. That, in recognition of the financial challenges highlighted, and as part of the development of this Medium-Term Financial Strategy, a rigorous programme of work designed to identify and deliver further recurring budget reduction and income generation proposals will be put in place during 2024-2025. Progress against which will be reported back to Councillors.
10. That Councillors must have due regard to the public sector equality duty (Section 149 of the Equality Act 2010) when making budget reduction decisions.
11. That the Council continues to engage with residents, businesses and other key stakeholders throughout the year which focuses on understanding people's priorities for Wolverhampton.
12. That, the overall level of risk associated with the Medium Term Financial Strategy to 2026-2027 is assessed as Red
13. The impact of related parties on the Medium Term Financial Strategy.

1.0 Purpose

- 1.1 The purpose of this report is to present a balanced revenue budget for 2024-2025 aligned to the Our City: Our Plan and an update on the Medium Term Financial Strategy (MTFS) for the period 2024-2025 to 2026-2027, for recommendation to Council.

2.0 Executive Summary

- 2.1 The City of Wolverhampton Council has a strong track record of managing its finances and is in a comparably strong financial position (*see Section 3: Background*).
- 2.2 This 2024-2025 Budget and MTFS has been developed against a background of unprecedented levels of financial distress, uncertainty and challenge in the sector where demand for services and inflationary pressures are driving up costs (*see Section 3: Background*).
- 2.3 The Council's strategic approach to the budget is to align resources to 'Our City: Our Plan' which has been refreshed and developed alongside the MTFS. Despite the challenges in the sector, the Council is determined to deliver the priorities that matter most to local people. This includes continuing to be ambitious, creative and innovative about the transformation and regeneration of the city to the benefit of local people (*see Section 4: Our City: Our Plan*).
- 2.4 However, the Council is not immune from the challenges in the sector. Pressures on the Council's 2024-2025 Budget and MTFS are significant and include pay and other inflation related pressures – increases in costs within children's social care being a particular challenge. In addition, there are also cost pressures from the increased demand for services – especially with regard to adults social care and temporary accommodation (*see Section 5: 2024-2025 Budget and Medium Term Financial Strategy - Key Assumptions*).
- 2.5 The Council's net revenue budget for 2024-2025 is £332.0 million (*see Section 6: 2024-2025 Net Budget Requirements*).
- 2.6 The Government's local government financial settlement (announced provisionally on 18 December 2023 and 25 January 2024 and confirmed on 5 February 2024) increased what it refers to as the 'core spending power' for Wolverhampton by 7.2%. The national average increase was 7.5% for the sector. This assumes that we increase our Council Tax to the maximum allowable without a referendum which was confirmed as 4.99% (inclusive of a 2% social care precept) for 2024-2025. This settlement was for one year only and there remains no multi-year settlement (*see Section 7: Local Government Financial Settlement*).
- 2.7 To be able set a balanced budget this report proposes to increase Council Tax for 2024-2025 by a total of 4.99%. It is proposed that up to £300,000 is made available in 2024-2025 to provide a Council Tax Hardship Fund payment support for residents (*see Section 8: Corporate Resources*).

- 2.8 The Council has a balanced budget for 2024-2025, without the need to use General Fund reserves. The Council is required however to use £6.0 million of earmarked reserves to balance the budget and to support corporate priorities in 2024-2025 (see *Section 11: Update on Reserves*).
- 2.9 There is a significant financial challenge over the medium term. The projected deficit for 2025-2026 is £27.1 million, rising to £32.6 million in 2026-2027 (see *section 9: Draft Medium Term Financial Strategy*).
- 2.10 The proposed use of earmarked reserves during 2024-2025 is prudent and proportionate for 2024-2025, but this is not a sustainable solution to the Council's underlying medium term financial gap (see *Section 11: Update on Reserves*).
- 2.11 The overall level of risk associated with the Medium Term Financial Strategy to 2026-2027 is assessed as Red. Further action is required to reduce costs. A rigorous programme of work designed to identify and deliver further recurring savings will therefore be put in place during 2024-2025. Progress against which will be reported back to Councillors (see *Section 10: Budget Risks*).

3.0 Background

- 3.1 The City of Wolverhampton Council has a strong track record of managing its finances well and consistently setting a balanced budget despite reductions in funding. Since 2011 the Council has identified budget reductions of circa £240 million. This representing the aggregate of the budget reduction and income generation targets identified in each of these budget reports over that period. Sound financial management, the alignment of budgets to service priorities, and investing in transformation, has put the Council in a comparably strong financial position.
- 3.2 On 1 March 2023, the Council approved a balanced revenue budget with a net requirement for 2023-2024 of £306.4 million for General Fund services. Council also approved an updated Medium Term Financial Strategy (for the period 2023-2024 to 2025-2026) which at that time noted that the “*extent of the financial challenge over the medium term continues to represent the most significant that the Council has ever faced.*”
- 3.3 Last year the MTFs identified local government funding (in terms of quantum but also levels of uncertainty), inflationary pressures (including energy costs) and demand driven pressures (particularly in relation to social care) as significant issues, across the sector generally and the Council specifically. As a consequence, the MTFs updated and approved last year, projected that the Council would have a budget deficit of £16.4 million in 2024-2025 and £23.1 million in 2025-2026.

- 3.4 The current outlook remains challenging with the level of financial distress across the local government sector continuing to increase:
- Financial pressures in the sector continue – particularly in relation to increasing demand for services and inflationary pressures driving up costs.
 - The Local Government Association (LGA) has estimated that councils in England face a £4 billion funding gap over the next two years.
 - Recent highly publicised cases bring the total number of ‘Section 114’ reports being issued (in the past six years) by local authorities to eight. (Noting that a ‘Section 114 report’ is issued by a council’s Chief Finance Officer in circumstances where expenditure in a financial year will exceed available resources.)
 - A recent survey by the LGA reported that one in five Council Leaders and Chief Executives in England think it is “very or fairly likely” their council will need to issue a ‘Section 114 report’ this year or next.
 - A recent report by the Levelling Up, Housing and Communities (House of Commons) Committee on ‘Financial distress in Local Authorities’ stated that “*local authorities are increasingly reporting concerns about their financial positions and their ability to maintain delivery of their services.*”
- 3.5 Against this challenging context, work has continued on the Council’s budget and MTFS during the past year. In October 2023, it was reported to Cabinet that the underlying deficit for 2024-2025 (including corporately held efficiency targets) was estimated at £9.4 million. Since October, further work has been undertaken to balance the 2024-2025 budget. This includes updating assumptions on budget pressures, particularly in relation to inflation and increased service demand. In addition, budget reduction and income generation opportunities have been identified and validated. The implications of the local government funding settlement (announcements being made on 18 December 2023, 25 January 2024 and 5 February 2024) have also been modelled and incorporated into this Budget and MTFS. The Council’s reserves position (both in terms of its general fund reserve and earmarked reserves) has also been reviewed.
- 3.6 Reserves play a vital role in the financial sustainability of the Council. Section 11 considers reserves further and Appendix 8 provides the refreshed Reserves Strategy. It is important to note that the Council receives assurance from its Director of Finance (Deputy) Section 151 officer with regard to reserves, they having a duty to report on the adequacy of reserves when the Council sets its budget.

4.0 Our City: Our Plan

- 4.1 The Council's strategic approach to the budget is to align resources to Our City: Our Plan which was first approved by Council on 2 March 2022. To ensure that the Council's resources continue to be aligned to the needs and priorities of local people the plan has been refreshed and developed alongside the MTFS.
- 4.2 The refreshed Our City: Our Plan is also scheduled to be considered by Cabinet on 21 February 2024 and Council on 28 February 2024. Despite the challenges in the sector, the Council is determined to deliver the priorities that matter most to local people. This includes continuing to be ambitious, creative and innovative about the transformation and regeneration of the city to the benefit of local people.
- 4.3 Our City: Our Plan sets out how the Council will continue to work alongside its local, regional, and national partners to improve outcomes for local people and is our strategic framework for levelling up.
- 4.4 The plan continues to identify an overarching ambition that 'Wulfrunians will live longer healthier lives' delivered through six overarching priorities:
- Strong families where children grow up well and achieve their full potential
 - Fulfilled lives for all with quality care for those that need it
 - Healthy, inclusive communities
 - Good homes in well-connected neighbourhoods
 - More local people into good jobs and training
 - Thriving economy in all parts of the city
- 4.5 These priorities together with the associated key outcomes, objectives and activity form a framework to improve outcomes for local people and deliver our levelling up ambitions.
- 4.6 Supporting the six overarching priorities are four cross cutting principles.
- Climate Conscious
 - Driven by Digital
 - Fair and Equal
 - Wolverhampton Pound
- 4.7 The refreshed Our City: Our Plan includes the addition of the Wolverhampton Pound as one of our cross-cutting principles. Through the Wolverhampton Pound we want to retain and grow as much local wealth increasing local economic resilience, creating new jobs and opportunities.

5.0 2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027 (MTFS) – Key Assumptions

- 5.1 The assumptions used in the preparation of the 2024-2025 Budget and MTFS remain under constant review.
- 5.2 The budget assumptions used in the preparation of the budget and MTFS are detailed in Appendix 1 to 3 and relate to inflation, demand, budget reduction, income, efficiencies, and corporate resources. These are recommended for inclusion in the 2024-2025 Budget and MTFS.
- 5.3 The financial settlement announced on 5 February 2024 was again for one-year only. It is important to therefore note that whilst this provides some clarity for the forthcoming financial year, the Council continues to face significant uncertainty over the medium term which makes forecasting beyond 2024-2025 particularly challenging.
- 5.4 In order to project the potential budget deficit, a number of assumptions have been made on the level of resources that will be available to the Council, as detailed in this report and Appendix 2. It is important to note that at the point more information becomes available in relation to these assumptions, the financial position facing the Council could be subject to change.
- 5.5 The overall impact of the revisions to the 2024-2025 Budget and MTFS are detailed in Table 6 (Section 9). A full list of all budget reduction, income generation and efficiency targets incorporated in the MTFS are detailed in Appendix 4.
- 5.6 In the opinion of the Interim Director of Finance (Deputy Section 151 Officer), the budget estimates and assumptions included in the 24/25 budget (and MTFS) are robust.

Pay Related Pressures

- 5.7 At the time of writing this report, the pay award for 2024-2025 is not known. The draft budget report presented to Cabinet in October 2023, increase the provision from 2% to 3% in order to be prudent. In the event that the pay award is in excess of the provision built into the budget, and in-year efficiencies cannot be identified in 2024-2025, the Re-organisation Reserve will be called upon to fund the shortfall and the recurrent impact will be built into the MTFS and reported back to Councillors in future reports. Any increase above the 3% currently built into the MTFS could increase the current projected deficit. For every 1% increase in pay award costs is circa £1.8 million.
- 5.8 In March 2019, Full Council approved changes to the Terms and Conditions offer in order to reduce the Council's pay bill. This resulted in the introduction of three days mandatory unpaid leave (MUL) equating to a reduction of 1.15% from employee salaries.

- 5.9 It was reported to Cabinet in December 2023, that the removal of MUL would:
- Ensure fairness and equity for our employees as a response to the Management of Equal Pay Risks Audit Report (2023-2024) as not all employees can access MUL
 - Support our employees with cost of living challenges
 - Respond to a request from Unison for the removal of MUL, following a Unison survey to members.
 - Further support our ‘employee offer’ for recruitment and retention purposes by removing the mandatory deduction applied as part of employee terms and conditions.
- 5.10 The proposed removal of MUL will mean employee’s pay will increase by 1.15% per annum – for some of our lowest paid employees this equates to an additional £257.00 (gross) in their pay packet.
- 5.11 Formal discussions on this proposal have commenced with both the Trade Unions and our employees. The total projected cost of this proposal is in the region of £1.8 million, however, there will still be the option for employees to continue to purchase annual leave.
- 5.12 The projected budget adjustments arising from the combined pay related pressures is detailed in Appendix 1.

Budget Pressures

- 5.13 A number of emerging pressures have been identified throughout the current financial year and in order to be prudent those pressures have been recognised in the 2024-2025 budget and MTFs. The key budget pressures reflected are detailed in the paragraphs below whilst a full list of budget pressures incorporated into the budget and MTFs can be found at Appendix 1.
- 5.14 The Council continues to see significant increases in demand for services as well as increasing costs. As a result, the Council is required to build in £14.1 million into the budget for 2024-2025 rising to £40.7 million over the medium term to address these pressures. The table below summarises the total inflation, demand and development cost. Further detail can be found in the paragraphs below and also in Appendix 1.

Table 1 – Total Inflation, demand and development

	2024-2025	2025-2026	2026-2027
	£000	£000	£000
Inflation*	(3,560)	3,022	916
Demand*	15,099	10,538	10,000
Development	2,565	839	1,283
Total	14,104	14,399	12,199

*some growth relates to both inflationary pressures and increases in demand for these areas – see Appendix 1 for more information.

- 5.15 A recent report by the Levelling Up, Housing and Communities (House of Commons) Committee on 'Financial distress in Local Authorities' summarised the pressures we and others are facing as follows:
- *“For children’s social care, rising demand for residential care placements combined with a poorly functioning market for provision of those placements, has driven significant cost increases.”*
 - *“For adults’ social care, demand has been driven by a changing population with increasingly complex needs – alongside long-term workforce shortages and inflationary pressures – which contributed to unmanageable bills for some local authorities”*
- 5.16 During 2023-2024 the Council has reported budget pressures due to increasing demand and costs for social care. The MTFs reported to Council in February 2023, incorporated significant growth in 2024-2025 totalling £11.7 million for Adult Services. It was reported in October that this growth was considered sufficient but would be kept under review. Current projections indicate that this growth can now be reduced by £1.0 million.
- 5.17 It was also reported that in terms of Children’ Services, the transformation projects and programmes have achieved significant and positive changes to children and young people living and learning in Wolverhampton. For many years, the Council has not built in any significant growth into this Directorate, however, it was reported to Cabinet in November 2023, that the Council was seeing increasing costs of residential placements which is a national trend, resulting from inflation and increasing demand in a provider led market. In addition, the Fostering Services: National Minimum Standards, issued by the Secretary of State under the Care Standards Act 2000, set out the expectations that are placed on foster parents and their fostering service providers. This includes the expectation that foster parents should not be financially disadvantaged because of their fostering role, and they expect that all foster parents receive at least the weekly National Minimum Allowance (NMA), in addition to any agreed expenses. In a letter from the Minister of Children, Families and Wellbeing, local authorities were informed that NMA had been uplifted to 6.88% and that Councils were expected to raise their rates accordingly. It was also stated that funding for fostering services is made available to local authorities through the social care grants (see section 7). The draft budget 2024-2025 reported to Cabinet in October included growth of £1.0 million but stated that this would be kept under review. Updated assumptions now indicate this growth should be increased to £2.5 million.
- 5.18 Cost pressures are also being seen nationally and locally in relation to homelessness. The Kerslake Commission reported in September 2023, that *“the number of households who are homeless and living in temporary accommodation is the highest since records began.”*
- 5.19 As previously reported to Cabinet, the Council is also seeing significant cost pressures due to increased demand for temporary and supported accommodation. In response to

the projected cost pressures for the Council, the budget and MTFs includes budget growth of £1.9 million from 2024-2025.

- 5.20 During 2023-2024, as reported in the Performance and Budget Monitoring reports, additional pressures (due to rising cost and demand) have also emerged across a number of services within the Resident Directorate, such as home to school transport, waste disposal, and Fleet services. The 2024-2025 budget includes growth to support these pressures. Some of this growth will be held corporately, as work is ongoing to fully understand the full financial risk. The associated budget will therefore be released subject to business cases in these areas.
- 5.21 A number of corporate priorities have been identified including Yo! (Youth Opportunities - which provides access to events and services for children and young people), the roll out of the Hydrotreated Vegetable Oil (HVO) pilot project into 2024-2025, and the Events Strategy (reported to Cabinet in October 2023). It is proposed that subject to business cases, these be funded from Our City, Our Plan reserves in 2024-2025, and the continuation of these projects into future years be considered as part of MTFs going forward.
- 5.22 The Council recognises that residents are impacted significantly by increases in the cost of living. It is therefore proposed that up to £300,000 is incorporated into the Council Tax Hardship Fund budget, under the Council Tax Discretionary Discount Scheme. This being funded from Our City, Our Plan reserve.
- 5.23 In order to address the budget challenge over the medium term, all growth currently built into the budget (as set out in Appendix 1) will continue to be reviewed to ensure it is required in full, and where appropriate will be subject to business cases before the growth is released to services. This report therefore seeks approval to delegate authority to the Cabinet Member for Resources, in consultation with the Director of Finance to allocate these funds as more information becomes available. In the event that this growth is not required in full, the Director of Finance will seek to utilise any underspend to reducing the level of capital receipts flexibility utilised in 2024-2025, and / or transfer funds to the Future Years Budget Strategy, in order to support the projected budget deficit over the medium term.

Revisions to Budget Reduction Targets

- 5.24 Work has continued to review existing budget reduction proposals to ensure they are deliverable over the medium term. This has been particularly important in light of rising inflation and changes to the environment in which we currently operate. It was reported in October 2023, that it has been determined that £393,000 of savings will not be delivered as originally planned.
- 5.25 As recently reported by our External Auditors "*the Council has a strong history of delivering savings*". However, it is recognised that in more recent years it is becoming more and more difficult to identify and deliver savings on a recurring (as opposed to one-off) basis without impacting services and residents. The distinction is important from a

budgeting perspective as recurring savings reduce budget pressures permanently, while one-off savings do so only temporarily for one year (the underlying budget pressure being built back into future years budgets). It is therefore an important part of accurately identifying the size of the financial challenge over the medium term.

- 5.26 As part of setting this budget and MTFs, budget reduction targets have been reviewed to ensure that a prudent approach is maintained. Budget Reduction targets will be assumed to be one-off in budgetary terms until such time detailed 'delivery plans' are evidenced and corroborated. This will form an important control within the rigorous programme of work to identify and deliver budget reduction targets referenced elsewhere in this report.
- 5.27 It was reported to Cabinet in October 2023, that work had progressed to understand the performance against the £6.2 million efficiency target held corporately for 2023-2024. It was reported that £2.0 million had been allocated on a recurrent basis and £4.2 million on a one-off basis only. In addition, it was reported that the draft budget 2024-2025 and MTFs (at that time) included a further £2.6 million efficiency target for 2024-2025 (making the total for 2024-2025, £6.8 million) and £4.8 million for 2025-2026. In order to be prudent, and in recognition of the cost pressures now facing a number of services across the Council, it is proposed that the £6.8 million is built back into the budget for 2024-2025 and £4.8 million for 2025-2026.
- 5.28 Further detail can be found in Appendix 3 along with a full list of Budget Reduction and Income Generation proposals.

Budget Reduction and Income Generation Proposals

- 5.29 The budget and MTFs incorporates a number of recurrent budget reduction and income generation proposals. The following paragraphs provide detail of some of these proposals, with a full list at Appendix 4.
- 5.30 As reported to Cabinet in October, additional income is projected within Waste Services, as a result £1.0 million was built into the Budget and MTFs as a working assumption. Following capital investment in the plant, this assumption has been reviewed and as a result increased to £1.5 million.
- 5.31 A number of income generation opportunities have also been explored and in response income targets have been incorporated into the budget for WV Active, events and advertising, and e-services to schools.
- 5.32 In addition, a number of budget efficiencies have also been identified from across services, including reduction to the budget held for furniture replacement, cancelling of subscriptions, and training budgets.

6.0 2024-2025 Net Budget Requirements

- 6.1 The net revenue budget requirement for 2024-2025 for General Fund Services is £332.0 million. In the opinion of the Interim Director of Finance (Deputy Section 151 Officer) the 2024-2025 budget estimates are robust. The Council's proposed budget for 2024-2025 does not require the use of general fund reserves in order set a balanced budget. However, earmarked reserves are required to support both corporate priorities and balance the overall budget deficit.
- 6.2 We will continue to monitor the risks associated with the budget, detailed in Table 7, and provide updates to Councillors as part of the quarterly Performance and Budget Monitoring reports.
- 6.3 The Council's budget requirement for 2024-2025 is shown at Table 2. Further details showing the forecast movement between years can be found at Appendix 5.

Table 2 – 2024-2025 – Net Controllable Draft Budget Requirements

Directorate	2023-2024 Revised Net Controllable Budget £000	2024-2025 Net Controllable Budget £000
Adult Services	92,100	104,433
Children's Services	51,753	53,509
City Assets	14,830	13,409
City Development	2,163	2,133
Commissioning and Transformation	5,018	4,918
Communications and Visitor Experience	2,585	2,552
Education and Skills	2,882	3,481
Finance	17,650	18,205
Governance	15,646	17,965
Public Health & Wellbeing	6,604	6,546
Resident Services	35,033	35,560
Strategy	13,059	13,326
Corporate Accounts	47,091	55,987
Total Net Budget Requirement	306,414	332,024

7.0 Local Government Financial Settlement

- 7.1 The Government announced its provisional local government financial settlement on 18 December 2023. This was followed by additional announcements on 25 January 2024.
- 7.2 On the 5 February 2024, the Secretary of State for Levelling Up, Housing and Communities published a written statement on the final local government financial settlement for 2024-2025. The final settlement is broadly in line with the provisional settlement announcements, referred to herein as the funding settlement. Details are provided in the following paragraphs and Appendix 2.
- 7.3 The funding settlement is for one year only. The details of which have been incorporated into the Budget and MTFs and are outlined in the paragraphs below.
- 7.4 On an annual basis Government calculates what it refers to as ‘the core spending power’ for local authorities. The core spending power is Government’s measure of the resources available to local authorities to fund service delivery, including council tax and locally retained business rates. The funding settlement for Wolverhampton showed an increase of 7.2% in core spending power (the national average was 7.5%). However, it should be noted that the core spending power assumes that Council Tax will increase by 4.99% and that there will also be an increase in the number of properties within Wolverhampton. It also includes social care grants, some of which have conditions attached to them. Social care grant funding is vital to support the increasing costs due to demand and inflationary pressures across both Adults and Children’s Social Care.
- 7.5 The table below summaries the increase in our Core Spending power between 2023-2024 and 2024-2025.

Table 3 – Core Spending Power

Core Spending Power	2023-2024	2024-2025	Change
	£000	£000	£000
Core Funding			
Settlement Funding Assessment – net business rates position including relevant grants	108,765	113,934	5,169
Compensation for under-indexing of business rates multiplier	14,080	16,874	2,794
New Homes Bonus	709	15	(694)
Services Grant	3,222	556	(2,666)
Grants rolled in			
Total of Core funding	126,776	131,379	4,603
Council Tax	125,983	133,303	7,320
Social Care Grants	46,887*	56,522	9,635
Total Core Spending Power	299,646	321,204	21,558

*includes Adult Social Care Market Sustainability and Improvement Fund – Workforce grant announced during 2023-2024 in order to give a year on year comparison

- 7.6 As previously announced, Government have kept the Council Tax referendum limit at the 2023-2024 levels, which is up to 3% for Council Tax and up to 2% adult social care precept for those local authorities with social care responsibilities. It should be noted that when Government publish what funding is available to councils, they include an assumption regarding the raising of council tax – which includes maximising the precept to fund adult social care.
- 7.7 In the Autumn Statement 2023, the Government announced that the small business rates multiplier will be frozen at 49.9p and there will be an increase to the standard rate multiplier of 6.7% (from 51.2p to 54.6p). The approach in applying inflation requires local authorities to be compensated for the inflation increase lost to the small business rates multiplier element to their taxbase through a section 31 grant.
- 7.8 The Council receives a top up grant to ‘top up’ funding as the business rates baseline funding level determined by Government for the Council is greater than the forecast level of business rates that the Council can collect. The funding settlement announced an allocation of £27.3 million, an increase of £1.3 million on the assumptions previously built into the budget and MTFS.
- 7.9 It was reported to Cabinet in July and October 2023, that a number of assumptions had been made with regards to the level of government funding that will be available to the Council. It was noted that a number of scenarios had been modelled reflecting different assumptions around inflationary uplifts on our grants, including the continuation of grants such as Services Grant, Social Care Grants and New Homes Bonus. The following paragraphs detail the announcements made in the funding settlement on these grants and what was confirmed in the final settlement.
- 7.10 It was confirmed that the New Homes Bonus scheme would continue for a further year with no legacy payments. The sum of the funding allocation for 2024-2025 is £15,000 (2023-2024 allocation was £709,000).
- 7.11 In 2022-2023, the Government announced the Services Grant. Nationally this grant has reduced from £483 million in 2023-2024 to £77 million in 2024-2025. The final settlement announced an increase to the national allocation taking it to £87 million. The 2024-2025 draft budget presented to Cabinet in October assumed that the grant would continue at the 2023-2024 level of £3.2 million. The final settlement confirmed that allocation for Wolverhampton would be £556,000, a reduction of over £2.6 million.
- 7.12 Local authorities receive a number of social care grants to support pressures across both Adults and Children’s Social Care, some of which have conditions attached to them. In the provisional settlement, the Governance announced a national increase across these grants of £1,380 million. In addition, as outlined in Appendix 2, additional funding totalling £500 million was further announced on 24 January 2024.

- 7.13 These grants help to mitigate the demand and inflationary pressures forecast across Adults and Children's Social Care. Adult Services are currently undertaking a fee review which was presented for pre-scrutiny decision on 16 February 2024 and is on the agenda for Cabinet (Resources) Panel on 21 February 2024. Current forecasts on potential growth have been required as part of this work. While these grants have helped, a more consistent and sustainable increase in funding is required over the long term to support the cost pressures within social care. The final funding settlement announced these grants at £56.2 million, an increase of £9.6 million from 2023-2024. This is an increase of £4.8 million when compared to the working assumptions built into the draft budget report to Cabinet in October.
- 7.14 On 24 January 2024, the Secretary of State for Levelling Up, Housing and Communities also announced a requirement for local authorities to produce 'productivity plans' setting out how local authorities will improve service performance and ensure every area is making best use of 'taxpayers' money.
- 7.15 The final settlement provided further information regarding the scope of local authority productivity plans, which are required to be published by July 2024.
- 7.16 The Council will produce a productivity plan detailing the positive work that it has undertaken to-date and will continue to be delivered to demonstrate how the Council continues to improve service performance, ensuring value for money in the services it delivers to its residents and businesses. Progress on this plan will be reported back to Councillors in future reports.

Improved Better Care Fund

- 7.17 In addition to the social care grants detail above, local authorities receive Improved Better Care funding (iBCF). Local authorities are required to pool the iBCF allocation in a 'pooled budget' with their Black Country Integrated Care Board (ICB) and have a Section 75 Agreement in place. The Section 75 agreement is a fundamental requirement of the Better Care Fund (BCF) and must be signed by both organisations in order for the pooled fund to be set up and the relevant funding to be received. BCF was first announced in June 2013 and came into effect in full in 2015-2016. The Section 75 Agreement details the level of funds to be pooled by each organisation and any risk sharing arrangements for any over / underspend within the pooled fund. The iBCF grant allocation for 2024-2025 is £14.8 million (no change from 2023-2024). The BCF pooled budget for 2023-2024 is £73.6 million, £27.6 million from the ICB and £46.0 million from the Council.
- 7.18 The details of the BCF pooled budget for 2024-2025 are still to be confirmed with the Black Country ICB. It is therefore proposed that authority be delegated to the Cabinet Member for Resources, Cabinet Member for Adults and Wellbeing, in consultation with the Director of Adult Social Care and the Director of Finance to approve to agree the final terms of the agreement.
- 7.19 Appendix 2 provides further details on forecast Council Resources (funding).

8.0 Corporate Resources (Funding)

8.1 Section 7 along with Appendix 2 provides details some of the grants announced in the funding settlement which form part of the Councils Corporate Resources (funding). The paragraphs below provide further detail in relation to the assumptions built into the budget and MTFs for Council Tax and Business Rates.

Collection Fund assumptions

8.2 On 17 January 2024, Cabinet received a report detailing the estimated outturn on the Collection Fund for 2023-2024 which consisted of a projected cumulative surplus in the region of £546,000 on Council Tax, and a projected cumulative surplus in the region of £3.3 million on Business Rates. It is important to note that both elements include the carry forward of the in-year 2020-2021 deficit, which the Government confirmed could be spread over 3 years from 2021-2022 to 2023-2024.

8.3 As previously reported, the Covid-19 pandemic and the cost of living crisis, has had a significant impact on the Wolverhampton community and economy, and therefore has impacted council tax and business rates collection. Whilst collection performance is now returning to pre-pandemic levels for business rates, partially due to the additional relief granted to certain businesses, collection levels for council tax remain at a lower level.

Business Rates

8.4 The National Non-Domestic Rates Return 1 (NNDR1) was compiled and returned to the Department of Levelling Up, Housing and Communities (DLUHC) by the deadline of 31 January 2024.

8.5 On 17 January 2024, Cabinet approved the Collection Fund Business Rates Net Yield for 2023-2024 at £78.6 million. Following revisions arising as a result of further data becoming available, the Cabinet Member for Resources, in consultation with the Director of Finance approved the revised Business Rates baseline net rate yield from £78.6 million to £79.3 million. Of the £79.3 million net rates yielded by business rates forecast to be collected in 2024-2025, the Council would retain in the region of £78.5 million under the 99% business rates retention scheme. The estimate of net rates payable in 2024-2025 assumes continued pressure on business rates collection, including the potential for further business rates appeals.

8.6 As detailed in Appendix 2, Wolverhampton is a constituent member of the West Midlands Combined Authority (WMCA). One part of the West Midlands Devolution Deal includes the WMCA receiving the real terms growth in the central share of business rates, this was the share that was previously held by central government.

8.7 The growth attributed to the WMCA, in line with the Investment Plan, has been apportioned for each authority pro rata to the aggregate Rateable Value at the start of the year. The 2024-2025 budget includes provision for this payment and is in line with previous years apportionment. However, the calculation of the growth and distribution for

2024-2025 has yet to be formally agreed. It is therefore proposed that authority is delegated to the Director of Finance, to approve the calculation and allocation of growth in the central share for 2024-2025 and future years to be passported to the WMCA.

Council Tax and Housing Benefits

- 8.8 The Council Tax Base and NDR (Business Rates) Net Rate Yield 2024-2025 report was presented to Cabinet on 17 January 2024. Cabinet approved the council tax base for 2024-2025 at 66,645.60 Band D equivalent properties.
- 8.9 As detailed in paragraph 7.4, Government announced that the referendum limit remains at up to 3% for Council Tax from April 2024. In addition, local authorities with Social Care responsibilities will be able raise the adult social care precept by up to 2%. This would therefore enable the Council to increase Council Tax by a maximum of 4.99% in 2024-2025 (the sum of 2.99% council tax plus the 2% adult social care precept). The 2.99% increase along with projected housing growth would levy on average additional income of approximately £4.9 million in 2024-2025. Taking both increases into account the additional income is around £7.6 million in 2024-2025.
- 8.10 Projections in the MTFs beyond 2024-2025 assume that Council Tax will continue to increase by 2.99%, whilst the tax base is anticipated to rise by 1% in each financial year, this generates in the region of £5.2 million per year. Furthermore, the MTFs assumes that the adult social care precept will continue to increase by 2% which generates in the region of £2.9 million per year. Any changes to these assumptions would impact on the projected deficit over the medium term.
- 8.11 The resulting forecast impact on the level of the Council element of Council Tax for a Band D property in 2024-2025 is detailed in the table below.

Table 4 – Council element of Council Tax for Band D Property in Wolverhampton

Band D	Draft £
2023-2024 Council Element of Council Tax (including adult social care)	1,909.01
2.99% increase	57.08
2% Adult Social Care Precept	38.18
	2,004.27

- 8.12 It is projected that income from Council Tax will rise in subsequent years, based upon the latest collection rates and tax base.

Council Tax

- 8.13 The net revenue budget, as detailed in this report, is forecast to be £332.0 million. In light of the significant financial pressures highlighted in this report, in order to ensure funding is available for essential services, and to be able set a balanced budget this report proposes to increase Council Tax for 2024-2025 by a total of 4.99%.

- 8.14 It should also be noted that because the Council is subject to referendum limits set by Government, and because the MTFs assumes that Council Tax is annually increased in line with these limits, the impact of not increasing council tax in any one year has a recurring (year in year out) impact on the Council's financial forecasts. Therefore, not increasing Council Tax in 2024-2025 would result in a £6.3 million plus recurring year on year reduction in funding for services (when excluding growth in the base) which would equate (after the compounding effect) to an aggregated reduction in funding for the Council of circa £20 million over three years and circa £79 million over ten years.
- 8.15 The Council recognises however that residents are impacted significantly by increasing costs of living, and through the Financial Wellbeing Strategy, the Council is doing everything it can to support people. The strategy sets out the city's long-term vision to improve lives of residents living in Wolverhampton. The strategy focuses on tackling poverty and improving the financial wellbeing of our residents and closely aligns to the priorities set out in Our City: Our Plan. The principles are to provide a range of support that is both necessary and effective, to always maximise opportunities to promote dignity, choice and autonomy, to utilise a diverse range of channels to reach households most in need, to prioritise equality and diversity ensuring no one is left behind, to incorporate evidence-based approaches to support the implementation of the strategy and to support households on a journey from reliance to resilience.
- 8.16 The Budget and MTFs currently assumes that a number of grants will continue into 2024-2025, including the Household Support Grant. The 2023-2024 allocation from the Household Support Fund was £5.2 million. However, at the time of writing this report no confirmation had been received on this funding continuing into 2024-2025. If this funding was not to continue, this would significantly impact on the Council's ability to provide these services, and therefore in these circumstances options will be reported back to Councillors.
- 8.17 In 2023-2024, Council approved funding to provide specific targeted support with Council Tax payments. It is proposed that this continues into 2024-2025 and approval is sought of up to £300,000 to fund this from Our City: Our Plan Reserve.

Local Council Tax Support Scheme

- 8.18 Since the abolition of the national council tax benefit scheme in 2013, the Council has been responsible for designing its own scheme of council tax support.
- 8.19 There are no changes proposed to the Council Tax Support scheme for 2024-2025, to the scheme agreed by Council 1 March 2023 for 2023-2024.
- 8.20 The full details of the scheme are published on our website, with the current scheme available at: [Council Tax Support Scheme | City Of Wolverhampton Council](#)

2024-2025 Budget

8.21 As outlined in paragraph 6.1 and Table 2, the revenue budget requirements for 2024-2025 is £332.0 million. The table details this against the forecast corporate resources (funding) when compared to 2023-2024.

Table 5 – Budget and Corporate Resources

Directorate	2023-2024 Revised Controllable Budget £000	2024-2025 Net Controllable Budget £000
Adult Services	92,100	104,433
Children's Services	51,753	53,509
City Assets	14,830	13,409
City Development	2,163	2,133
Commissioning and Transformation	5,018	4,918
Communications and Visitor Experience	2,585	2,552
Education and Skills	2,882	3,481
Finance	17,650	18,205
Governance	15,646	17,965
Public Health & Wellbeing	6,604	6,546
Resident Services	35,033	35,560
Strategy	13,059	13,326
Corporate Accounts	47,091	55,987
Total Net Budget Requirement	306,414	332,024
Corporate Resources		
Council Tax (including Adult Social Care Precept)	(125,983)	(133,575)
Business Rates and grants*	(128,454)	(138,185)
Collection Fund deficit / (surplus)	(3,253)	(3,171)
General Grants	(3,931)	(571)
Social Care Grants	(44,793)	(56,522)
Total Corporate Resources	(306,414)	(332,024)

*inclusive of Enterprise Zone business rates and section 31 grants and Top up Grant, and net of payment to WMCA

9.0 Draft Medium Term Financial Strategy 2024-2025 to 2026-2027

- 9.1 The financial projections from the draft MTFS are set out in Table 6 below. The MTFS as summarised at Table 6 models the impact of the above (in terms of the financial settlement, council tax, pressures, budget reduction and income generation proposals, other key assumptions etc), and as detailed in the appendices, for the period to 2026-27.
- 9.2 The table details incremental changes to forecast expenditure, starting from the base position of the 2023-2024 budget. The forecast expenditure is then compared with anticipated corporate resources (funding) available to arrive at the projected deficit.
- 9.3 Due to the uncertainty the Council currently faces, it is particularly challenging to establish a MTFS beyond 2024-2025. Expenditure forecasts include estimates of inflationary and demand pressures. These estimates will continue to be reviewed in light of the financial pressures on the council, the 2024-2025 pay award and the continuing uncertainty around future funding streams. Any change to these estimates could have a significant impact on the forecast budget deficit over the medium term.
- 9.4 A number of assumptions have been made with regards to the level of resources (funding) that will be available to the Council. It is important to note that there continues to be a considerable amount of uncertainty with regards to future funding streams for local authorities as the funding settlement was for one year only – 2024-2025. Appendix 2 provides details of the current assumptions.
- 9.5 Taking this into account, the Council is now faced with a projected budget deficit of £27.1 million in 2025-2026, rising to £32.6 million in 2026-2027.
- 9.6 Further action is therefore required to reduce costs. A rigorous programme of work designed to identify and deliver further recurring savings will therefore be put in place during 2024-2025. Progress against which will be reported back to Councillors.
- 9.7 As part of this Programme the approach to the projected budget deficit will be to continue to develop robust, evidenced-based budget reduction and income generation proposals for inclusion in the MTFS. Work will focus on a number of themes, including:
- Identify in-year efficiencies in 2024-2025 including a review of growth already built into the MTFS in order to identify opportunities to deliver efficiencies.
 - (Ongoing) review of Capital Programme and capital funding requirements
 - Procurement and contracts – particularly focused on the Wolverhampton Pound.
 - Income generation (including fees and charges strategy), debt management/recovery.
 - Cost avoidance strategies, e.g. prevention and demand management.
 - Digital and data, including exploring any opportunities of using Artificial Intelligence.

- 9.8 Having identified budget reductions in the region of £240 million since 2011, the extent of the financial challenge over the medium term continues to represent the most significant that the Council has ever faced.
- 9.9 It must therefore be emphasised that given the size of the challenge and the level of stress in the sector (as detailed in this report), it should therefore be expected that some tough decisions about relative levels of priority are inevitable if the Council is to balance its budgets over the medium term, and that service delivery will be impacted.
- 9.10 It is proposed an update on progress on tackling the projected deficit is reported to Councillors in future reports.

Table 6 – Draft Medium Term Financial Strategy 2024-2025 to 2026-2027

	2024-2025	2025-2026	2026-2027
	£000	£000	£000
Previous Years Net Budget brought forward	306,414	332,024	365,093
Increasing / (Decreasing) Cost Pressures			
- Pay Related Pressures	9,145	5,585	4,200
- Treasury Management	(1,028)	582	(554)
- Budget for Inflation, demand and development	14,104	14,399	12,199
- Budget Reduction, Income Generation & Efficiency targets	3,389	12,503	-
Net Budget (Before Use of Resources)	332,024	365,093	380,938
Projected Corporate Resources			
- Council Tax (including Adult Social Care precept)	(133,575)	(141,644)	(150,199)
- Business Rates (net of WMCA growth payment)	(77,418)	(78,870)	(80,352)
- Enterprise Zone Business Rates	(1,377)	(1,342)	(1,342)
- Section 31 Grant – business rates support	(32,117)	(32,117)	(32,117)
- Collection fund deficit/ (surplus)	(3,171)	-	-
- Top Up Grant	(27,273)	(27,546)	(27,822)
- New Homes Bonus	(15)	-	-
- Services Grant	(556)	-	-
- Improved Better Care Fund	(14,761)	(14,761)	(14,761)
- Social Care Grants	(41,761)	(41,761)	(41,761)
Total projected resources	(332,024)	(338,041)	(348,354)
Projected Budget Annual Change in Budget Deficit	-	27,052	5,532
Projected Cumulative Budget Deficit	-	27,052	32,584

- 9.11 The Interim Director of Finance recommends the MTFs to Cabinet as a reasonable forecast over the medium term but recognises that external factors detailed throughout this report could have a significant impact on these financial forecasts.

10.0 Budget Risk

- 10.1 The table below provides a summary of the risks associated with the MTFs, using the corporate risk management methodology. The overall level of risk associated with the MTFs to 2026-2027 is assessed as Red.
- 10.2 In addition to the General Fund Budget Risk detailed below, the Council's Strategic Risk Register also incorporates risks around the MTFs.

Table 7 – General Fund Budget Risks to 2026-2027

Risk	Description	Level of Risk
Medium Term Forecasting	Risks that might materialise as a result of the impact of interest rates, energy costs, non-pay inflation and pay awards, and National Living Wage.	Red
Service Demands	Risks that might materialise as a result of demands for statutory services outstretching the available resources. This particularly applies to adults and children's social care, and temporary accommodation	Red
	Risks that might materialise as a result of demands for non-statutory services outstretching the available resources.	Red
Identification of Budget Reductions	Risks that might materialise as a result of not identifying budget reductions due to limited opportunity to deliver efficiencies.	Amber
Budget Management	Risks that might materialise as a result of the robustness of financial planning and management, in addition to the consideration made with regards to the loss of key personnel or loss of ICTS facilities	Green
Transformation Programme	Risks that might materialise as a result of not delivering the reductions incorporated into the budget and not having sufficient sums available to fund the upfront and one-off costs associated with delivering budget reductions and downsizing the workforce.	Amber
Reduction in Income and Funding	Risks that might materialise as a result of a multi-year funding settlement and reforms to Business Rates Retention and the Fair Funding Review.	Red
	Risks that might materialise as a result of income being below budgeted levels, claw back of grant, or increased levels of bad debts.	Amber

	The risk of successful appeals against business rates.	
Third Parties	Risks that might materialise as a result of third parties and suppliers ceasing trading or withdrawing from the market.	Amber
Government Policy	Risks that might materialise due to structural uncertainties.	Amber
	Risk of cost pressures as a result of specific short term grant funding does not continue e.g. household support grant.	Red
	Risks that might materialise as a result of changes to Government policy including changes in VAT, taxation rules and economic measures.	Red

10.3 The overall level of risk associated with the Medium Term Financial Strategy to 2026-2027 is assessed as Red. The ongoing programme of work (referenced in this report) to identify and deliver recurring budget reductions proposals, being critical to the mitigation of this level of risk.

11.0 Update on Reserves

- 11.1 Reserves are resources that the Council has accumulated over time. They are an integral element of our budget setting process, medium-term financial plan. They play a vital role in the financial management and financial sustainability of the Council. We use reserves to help mitigate the risks that we face as well as to fund specific planned expenditure.
- 11.2 As detailed earlier in this report, the current financial challenges require the Council to use earmarked reserves up to £6.0 million in order to support some council priorities as well as to balance the overall budget for 2024-2025, however the use of reserves is not a sustainable solution. Hence, as reported above in Section 9, the need to identify and deliver further recurring budget reductions as part of the Council's MTFs.
- 11.3 The Reserves Strategy was approved by Full Council on 1 March 2023. The refreshed Reserves Strategy is provided at Appendix 8 detailing the purposes for which reserves are held and recommending specific reserves for approval. The following table summarises the revenue usable reserves which are the reserves particularly relevant to the budget and MTFs.

Table 8 - Reserves

	Balance at 1 April 2023 £000	Forecast balance as at 31 March 2024	Commitments already approved for future years £000	Approvals sought as part of this report £000	Forecast future balance £000
General Fund	(15,321)	(15,321)	-	(1,700)	(17,021)
Risk Management	(16,445)	(12,625)	-	899	(11,726)
Investment	(19,994)	(12,176)	3,000	2,902	(6,274)
Smoothing	(12,634)	(7,562)	-	6,464	(1,098)
Sub Total	(64,394)	(47,684)	3,000	8,565	(36,119)
Restricted	(22,751)	(13,139)	1,234	636	(11,269)
Restricted (Schools)	(15,154)	(13,606)	-	-	(13,606)
Grand Total	(102,299)	(74,429)	4,234	9,201*	(60,994)

*In addition to the £6.0 million outlined in this report to support the overall budget deficit and priority projects, the 2024-2025 budget also includes the planned use of reserves against services in line with the defined reserve purpose.

- 11.4 The strategy considers the Council's General Fund Balance which currently stands at £15.3 million, approximately 5% of the 2023-2024 net budget. As outlined in the Reserves Strategy, it is the recommendation of the Interim Director of Finance that a General Fund Balance of 5% of the net budget is sufficient for the next 12 months. In order to maintain the reserve at 5% of the net budget over the medium term, it is proposed that £1.7 million is transferred from the Re-organisation Reserve and Sustainable MTFs Reserve (formally the Transformation Reserve).
- 11.5 The 2024-2025 budget incorporates the continuation of the Council Tax Hardship Fund of up to £300,000 funded from Our City, Our Plan reserve in recognition of the significant impact the cost of living has had on our residents.
- 11.6 The Council holds other reserves in order to invest in council priorities and to support the delivery of Our City: Our Plan, such as Yo!, the roll out of HVO fuel and the event strategy. Indicative figures have been built into the budget, however, these will be subject to individual business cases before the reserves are released to support these projects.
- 11.7 The Interim Director of Finance (Deputy Section 151 Officer), is satisfied the proposed use of earmarked reserves during 2024-2025 is prudent and proportionate for 2024-2025, but that this is not a sustainable solution to the Council's underlying medium term financial gap.

11.8 Reserves will be continually monitored throughout the year and will form part of the Council's quarterly Performance and Budget Monitoring Report.

12.0 Budget Consultation and Scrutiny

12.1 The budget engagement process forms part of a continuous process of engagement with residents, businesses and other key stakeholders throughout the year which focuses on understanding people's priorities for Wolverhampton.

12.2 During November to December 2023, individual scrutiny panels were presented with draft budget 2024-2025, performance and strategic risk register for 2023-2024 for the services that fell under their remit. They were asked to scrutinise the budget and how it is aligned to the priorities of the Council. This outcome of this was reported back to Scrutiny Board on 6 February 2024.

12.3 In addition, the 'Your Priorities for Wolverhampton' survey was launched between the 13 December 2023 and 7 February 2024. It received 541 responses online and provided an opportunity for local people to tell us what is most important to them. Key themes from the survey included:

- When asked to select which of the six Our City: Our Plan priorities were most important to them, the top three priorities were:
 - Strong families where children grow up well and achieve their full potential
 - Fulfilled lives with quality care for those that need it
 - Thriving economy in all parts of the city
- When asked which of the three cross cutting principles in Our City: Our Plan was important to them 59.1% said Fair and Inclusive.
- When asked which public services were most important to them Adult Services was the most selected at 44.9%.

12.4 Feedback has been used to shape the refresh of Our City: Our Plan as well as the budget. In addition to this there was community engagement at libraries, community meetings and the city's art gallery.

12.5 We will continue to engage with communities and city partners as we deliver our Council Plan throughout 2024-2025. This will be taken forward as a continuous conversation with our communities and targeted opportunities to co-produce innovative solutions to the City's challenges.

13.0 Related Parties

13.1 The Council has a financial interest in a number of related parties. The financial position of each related party is monitored throughout year. At the end of the financial year the council undertakes a detailed review of each and considers the impact on the balance sheet, in particular in relation to the provision for future losses in respect of loan

repayments, probability of guarantees being called upon and the value of investments held.

- 13.2 During 2022-2023, the Council provided guarantees in respect to the City of Wolverhampton College, however from July 2023, this guarantee was no longer in place. The Council also provides guarantee in respect of the West Midlands Pension Fund.
- 13.3 Yoo Recruit Limited is a wholly owned company of the Council. At the time of writing this report, consideration is being given to if a dividend will be received in 2024-2025. The Budget and MTFs does not currently incorporate this, however, once agreed, updates will be provided future reports to Councillors.
- 13.4 Wolverhampton Homes is the Council's Arms Length Management Organisation. The Performance and Budget Monitoring Report to Cabinet in November 2023 provided an update on the forecast costs pressures in the region of £2.1 million in relation to inflationary and demand pressures. The council provides over 95% of the funding for Wolverhampton Homes through the management fees as reflected in the HRA Business Plan approved by Council on 24 January 2024.
- 13.5 WV Living is a wholly owned company. On 26 April 2023, Cabinet approved the updated business plan for WV living for 2023-2028. The company is currently updating the budget which underpins the business plan and this will be reported back to Cabinet in April 2024.
- 13.6 The Council has equity investment of £8 million in WV Living. There is currently no requirement to impair this investment. The position will be reviewed again at the end of the financial year. The Council also provides loans to WV Living. During 2023-2024, the company were awarded a new loan, all repayments are being made when they fall due.
- 13.7 The Council has an investment in Help to Own. The Treasury Management Strategy report on this agenda identifies the adjustment to the way that the Minimum Revenue Provision (MRP) is calculated in respect to this investment. This adjustment has been reflected in the Treasury management projections detailed in this report.

14.0 Evaluation of alternative options

- 14.1 In determining the proposed 2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027, consideration has been made to the deliverability of budget reduction and income generation proposals and budget pressures. If we were to not implement the budget strategy as proposed in this report, alternative options would need to be identified in order for the Council to set a balanced budget for 2024-2025.

15.0 Reasons for decisions

- 15.1 Section 25 of the Local Government Act 2003 requires the Chief Financial Officer to report to the Council when it is making the statutory calculations required to determine its Council Tax. The Council is required to take this report into account when making its budget decision. The Chief Financial Officer's report must deal with the robustness of the budget estimates and the adequacy of the reserves for which the budget provides.

16.0 Financial implications

- 16.1 The financial implications are discussed in the body of the report.
[AS/13022024/W]

17.0 Legal implications

- 17.1 The Council's revenue budgets make assumptions which must be based on realistic projections about available resources, the costs of pay, inflation and service priorities and the likelihood of achieving any budget reduction proposals.
- 17.2 The legal duty to spend with propriety falls under Section 151 Local Government Act 1972 and arrangements for proper administration of their affairs is secured by the Section 151 Officer as Chief Financial Officer.
- 17.3 This report also sets out the Council's Medium Term Financial Strategy. The Chief Financial officer has a statutory duty, under Section 151 of the Local Government Act 1972 and Section 73 of the Local Government Act 1985, to ensure that there are proper arrangements in place to administer the Council's financial affairs.
- 17.4 Section 25 of the Local Government Act 2003 requires the Chief Financial Officer to report to the Council when it is making the statutory calculations required to determine its Council Tax. The Council is required to take this report into account when making its budget decision. The Chief Financial Officer's report must deal with the robustness of the budget estimates and the adequacy of the reserves for which the budget provides. Both are connected with matters of risk and uncertainty. They are inter-dependent and need to be considered together. In particular, decisions on the appropriate level of reserves should be guided by advice based upon an assessment of all the circumstances considered likely to affect the Council.
- 17.5 The relevant guidance concerning reserves is issued by CIPFA in a number of documents including the Financial Management Code. Whilst the guidance does not prescribe an appropriate level of reserves, leaving this to the discretion of individual authorities, it does set out a number of important principles in determining the adequacy of reserves. It emphasises that decisions on the level of reserves must be consistent with the Council's MTFs, and have regard to the level of risk in budget plans, and the Council's financial management arrangements (including strategies to address risk).
- 17.6 In addition, Section 114 of the Local Government Finance Act 1988 requires the Chief Financial Officer to '...make a report ... if it appears to them that the Authority, a committee or officer of the Authority, or a joint committee on which the Authority is represented':
- (a) has made or is about to make a decision which involves or would involve the Authority incurring expenditure which is unlawful,

(b) has taken or is about to take a course of action which, if pursued to its conclusion, would be unlawful and likely to cause a loss or deficiency on the part of the Authority, or

(c) is about to enter an item of account the entry of which is unlawful.

- 17.7 The Chief Financial Officer of a relevant Authority shall make a report under this section if it appears to them that the expenditure of the Authority incurred (including expenditure it proposes to incur) in a financial year is likely to exceed the resources (including sums borrowed) available to it to meet that expenditure.
- 17.8 These statutory requirements will have to be taken into account when making final recommendations on the budget and council tax requirement for 2024-2025.
- 17.9 It is the responsibility of members to ensure the Council sets a balanced budget for the forthcoming year. In setting such a budget members and officers of the council have a legal requirement to ensure it is balanced in a manner which reflects the needs of both current and future taxpayers in discharging these responsibilities. In essence this is a direct reference to ensure that council sets a financially sustainable budget which is mindful of the long-term consequences of any short-term decisions.

[TC/13022024/A]

18.0 Equalities implications

- 18.1 The council's annual budget and medium term financial strategy supports a range of services designed to meet key equalities objectives.
- 18.2 It is important to note, that this report provides a cumulative equality analysis response to the council's efficiency proposals set out within this report.
- 18.3 In the body of the report, we refer to efficiency proposals that are being put forward for approval as part of the Council's MTFS. Those efficiency proposals are one-off and in the main linked to the one-off use of funding, including reserves and grants, or forecast in-year underspends, and therefore have no equality impact on citizens or the communities that the Council serves.
- 18.4 In conclusion, the council continues to make every effort to protect the most vulnerable as far as possible and respond to its duties under the Equality Act 2010. However, this strategic EIA recognises the significant challenge which the financial position presents for Wolverhampton. We will maintain a strong commitment to equality and ensure that EIA's undertaken at each savings proposal helps us to arrive at an informed decisions and to make the best judgement about how to target our resources effectively and fairly.
- 18.5 Councillors must continue to have due regard to the public sector equality duty (Section 149 of the Equality Act 2010) when making budget decisions. By considering the equalities evidence contained in the analysis above, in tandem with this report, Councillors will be in a position to comply with the requirements of the Duty and Act as well as their wider responsibilities in terms of setting a budget.

19.0 All other Implications

19.1 Any human resource implications will be managed in accordance with the Council's HR policies and processes.

20.0 Schedule of background papers

20.1 [2023-2024 Budget and Medium Term Financial Strategy 2023-2024 to 2025-2026](#), report to Cabinet on 23 February 2023 and Council 1 March 2023

20.2 [Performance and Budget Monitoring 2023-2024 and Budget Update 2024-2025](#), report to Cabinet on 26 July 2023.

20.3 [Draft Budget and Medium Term Financial Strategy 2024-2025 and Medium Term Financial Strategy](#), report to Cabinet on 18 October 2023

20.4 ['Events City' – a new five-year event strategy for Wolverhampton](#), report to Cabinet on 18 October 2023

20.5 [Removal of Mandatory Unpaid Leave](#), report to Cabinet on 13 December 2023

20.6 [Council Tax Base and Business Rates \(NDR\) Net Rate Yield 2024-2025 and Update on the Provisional Local Government Settlement](#), report to Cabinet on 17 January 2024

20.7 [Collection Fund Estimated Outturn 2023-2024](#), report to Cabinet on 17 January 2024

20.8 [Final Business Rates \(NDR\) Net Rate Yield 2024-2025, Individual Executive Decision Notice](#), 31 January 2024.

20.9 [Minutes of scrutiny panels](#)

21.0 Appendices

21.1 Appendix 1 - Key Assumptions for Budget Growth and Budget Reduction, Income Generation and Efficiency Targets

21.2 Appendix 2 - Key Assumptions on Corporate Resources

21.3 Appendix 3 - Budget Preparation Parameters

21.4 Appendix 4 - Budget Reduction, Income Generation and Efficiency Targets

21.5 Appendix 5 - Budget 2024-2025 by Service

21.6 Appendix 6 - Council Element of Council Tax for 2024-2025 per Band

21.7 Appendix 7 - Collection Fund Estimated Outturn 2023-2024

21.8 Appendix 8 - Reserves Strategy

Key Assumptions for Budget Pressures and Budget Reduction, Income Generation and Efficiency Targets

1.0 Introduction

1.1 The assumptions used in the preparation of the Budget and Medium-Term Financial Strategy (MTFS) remain under constant review and update. The body of the report highlights the main assumptions that underpin the MTFS. The following paragraphs provide further detail of updated assumptions in a number of areas.

Pay Related Pressures

1.2 Detailed work has been undertaken to assess the likely impact of increments, proposed levels of pay award, increases in employer's National Insurance contributions, and employer's pension contributions. The projected budget adjustments arising from the combined pay related pressures is detailed in Table 1, with further analysis provided in the paragraphs below and in the main report.

Table 1 – Pay Related Pressures

	2024-2025 £000	2025-2026 £000	2026-2027 £000
Pay Award, Employers Pension, National Insurance and Annual Increments	9,145	5,585	4,200

Pay Award

1.3 At the time of writing this report the pay award for 2024-2025 is not known. The budget includes a provision, held corporately of 3% for 2024-2025. In the event that the pay award is in excess of this, and in-year efficiencies cannot be identified in 2024-2025, the Re-organisation Reserve will be called upon to fund the shortfall and the recurrent impact will be built into the MTFS and reported back to Councillors in future reports. Any increase above the 3% currently built into the MTFS could increase the current projected deficit. For every 1% increase in pay award costs of circa £1.8 million.

1.4 As detailed in the main report, it was reported to Cabinet in December 2023, that due to the cost of living rise and subsequent financial pressures for employees, a review of mandatory unpaid leave (MUL) has been undertaken. It is proposed that MUL is removed to ensure fairness for our employees and support with the cost of living challenges. The proposed removal of MUL will mean employee's pay will increase by 1.15% per annum – for some of our lowest paid employees this equates to an additional £257.00 in their pay packet. The total projected cost of this proposal is in the region of £1.8 million.

1.5 The MTFS currently assumes a pay award of 2% for 2025-2026 and 2026-2027

Budget Pressures

- 1.6 Table 2 below details budget growth that has been incorporated into the MTFs.

Table 2 – Budget Pressures

	2024-2025 £000	2025-2026 £000	2026-2027 £000
Inflation	(3,560)	3,022	916
Demand	15,099	10,538	10,000
Development	2,565	839	1,283
Total	14,104	14,399	12,199

- 1.7 The main report discusses the main budget cost pressures; including demand and cost pressures across Adults and Children’s social care, temporary and supported accommodation, and pressures across Resident Services. In addition, it discusses a number of priority projects which are proposed to be funded from Our City, Our Plan reserve in 2024-2025, subject to businesses cases.
- 1.8 The 2023-2024 budget approved by Council on 1 March 2023, incorporated additional budget to support the costs pressures as a result of rising inflation, in particular around our energy costs. As a result, £5.7 million was built into the 2023-2024 budget to support increasing costs on both utility costs and street lighting. The Performance and Budget Monitoring reports presented to Cabinet throughout 2023-2024 have reported that costs have reduced, and as a result services are forecasting in-year underspends. As a result, this inflationary budget has been reduced accordingly in 2024-2025 to reflect this reduction.
- 1.9 The 2023-2024 budget incorporated a one-off budget of £450,000 to support pressures in relation to energy costs on the Leisure PFI. This growth has been reviewed and in order to be prudent has been rebuilt back into the budget for 2024-2025.
- 1.10 In addition, as previously reported to Cabinet in October 2023, that as a result of contract negotiations being more favourable regarding the Energy from Waste Plant (EfW), the growth built into 2023-2024 budget was no longer required. Therefore £3.6 million can be released from budgets held corporately of which £1.8 million is one-off for 2024-2025.
- 1.11 It is important to note that these cost pressures are subject to change. The current cost of living crisis has impacted the budget and MTFs and it is not known how long these cost pressures will go on for.
- 1.12 The Budget and MTFs reported to Full Council in March 2023, approved growth and inflation totalling £13.7 million for the period of 2024-2025 to 2025-2026. Additional inflationary pressures have been identified in 2024-2025 and over the medium term due to rising inflation and increasing demand on our services. This has resulted in the projected required growth increasing to £40.7 million over the medium term to 2026-2027 (this includes £12.2 million following the rolling forward of the MTFs into 2026-2027).

1.13 A full list of all budget growth and emerging budget pressures that have been reflected in the budget and MTF5 is provided in tables 3 to 5 below:

Table 3 – Budget Pressures – Inflationary

Directorate	Changes to inflationary pressures	2024-2025 £000	2025-2026 £000	2026-2027 £000
Resident Services	Waste services – contract inflation and disposal costs (part to be held corporately)	642	142	-
Corporate Accounts	Inflation – WMCA levy (to be held in corporate contingency)	370	222	226
Resident Services	Environmental Services – winter gritting	350	-	-
Governance	Rebasing of budget to reflect updated recharges	277	-	-
Corporate Accounts	Growth for inflation, energy, contracts and demography*	168	768	500
Resident Services	Environmental Services - reduction in income – rebasing budget	111	-	-
Public Health & Wellbeing	Leisure PFI – inflationary costs	90	90	90
Public Health & Wellbeing	Bert Williams – rebase budget	84	-	-
Resident Services	Cost pressures in Public Protection	56	-	-
Resident Services	Environmental Services – rebase budget for security costs within parks	43	-	-
Resident Services	Transport services – rebase of staffing budget	40	-	-
Resident Services	Highways – rebase budget to support waste disposal costs	36	-	-
Resident Services	Highways – rebase budget to support rental costs	30	-	-
City Assets	Revisions to prior year growth built in for energy costs	(640)	-	-
Resident Services	Revisions to prior year growth built in for Street lighting	(917)	-	-
Corporate Accounts	Revisions to growth built in prior years	(4,100)	1,800	-
Corporate Accounts	Adjustments to prior year growth for NNDR	(200)	-	100
Total		(3,560)	3,022	916

*growth relates to both inflationary pressures and increases in demand for these areas

Table 4 – Budget Pressures – Demand pressures

Directorate	Changes to demand pressures	2024-2025 £000	2025-2026 £000	2026-2027 £000
Adult Social Care	Adult social care inflation and demand pressures*	10,699	6,038	6,000
Children's Services	Children's Social Care – inflation and demand pressures*	2,500	2,250	2,000
Public Health and Finance	Temporary accommodation and Housing subsidy (held corporately)*	1,900	1,750	1,500
Resident Services	Home to School transport	500	500	500
Residents Services	Car Parking – adjustments to prior year growth	(300)	-	-
Corporate Accounts	Adjustments to bad debt provision	(200)	-	-
Total		15,099	10,538	10,000

*growth relates to both inflationary pressures and increases in demand for these areas

Table 5 – Budget Pressures – Development

Directorate	Changes to development pressures	2024-2025 £000	2025-2026 £000	2026-2027 £000
Corporate Accounts	Contingency for priorities and emerging pressures	2,011	629	-
Education	Rebasing of SEND budgets	700	300	-
Finance	Council Tax hardship Fund (2024-2025 only)	300	(300)	-
Strategy	ICT licencing costs	300	-	-
Resident Services	Rebase Fleet staff budgets	96	-	-
Resident Services	Rebase Travel Unit staff budgets	47	-	-
Resident Services	Rebase Waste staff budgets	40	-	-
Governance	Rebase Governance staff budgets	36	-	-
Regeneration	Wolverhampton Local Plan – rephasing of prior year growth	(110)	210	(275)
City Assets	Changes to income targets	(855)	-	1,558
Governance		2,565	839	1,283

- 1.14 The level of borrowing required to support the capital programme and treasury management activities has been reviewed and forecasts tested to ascertain the budget requirement for 2024-2025. The budget has been updated to reflect the latest projections which has resulted in decrease of £1.0 million on the 2023-2024 budget.
- 1.15 It is considered that the assumptions previously built into the budget and MTFs are still considered to be prudent for 2024-2025. This will be kept under review for future years and updates provided in future reports.

Budget Reduction, Income Generation and Efficiency Targets

One-off Opportunities

- 1.16 As detailed in the main report, a number of the budget reduction and income generation proposals are one-off in nature and as a result are built back into the budget in future years. Full Council in March 2023 approved the 2023-2024 Budget and MTFs 2023-2024 to 2025-2026. This incorporated £9.8 million of proposals which were one-off in nature for 2023-2024 and as such have been built back into the budget in 2024-2025.
- 1.17 The Reserves and Provisions report to Cabinet in July 2023, approved the use of £5.8 million from the Future Years Budget Strategy Reserve to fund either the 2023-2024 corporately held efficiency targets and / or support the projected budget deficit for 2024-2025. The Draft budget report to Cabinet in October reported that £3.2 million of the reserve could be used to support the projected budget deficit for 2024-2025, but this would be kept under review. This review has identified that a further £1.5 million can be released to support the 2024-2025 budget, taking the total £4.7 million.
- 1.18 As detailed in the main report, corporate priorities have been identified including Yo!, the roll out of the Hydrotreated Vegetable Oil (HVO) pilot project into 2024-2025, the Events Strategy (reported to Cabinet in October 2023), and the Council Tax Hardship Fund. It is proposed that subject to business cases (excluding Council Tax Hardship Fund), these be funded from Our City, Our Plan Reserve in 2024-2025, and the continuation of these projects into future years be considered as part of the Budget and MTFs. The projected total cost of these initiatives is £1.3 million.
- 1.19 In addition, a review has been undertaken on grants to identify if any grant can be released to support the budget strategy. As a result, it is proposed to release £230,000 for 2024-2025.

Capital Receipts Flexibilities

- 1.20 In 2016-2017 the Government provided additional flexibilities to councils to use capital receipts from April 2016 to March 2019 to pay for transformation work that is designed to make revenue savings. Since this date the use of capital receipts to fund revenue transformation has been extended a number of times. The latest announcement on 31 January 2024 extended this flexibility to the March 2030. In addition, Government have

consulted on a number of proposals as to what capital receipts can be used to support, including, extending the flexibility to include ‘wider set of eligible costs’; to allow authorities to capitalise general cost pressures, and allowing flexibility for the use of the proceeds of selling investment assets. At the time of writing this report the outcome of the consultation is unknown. Once this information becomes available updates will be provided in future reports.

- 1.21 The MTFs approved by Full Council on 1 March 2023, identified £2.0 million use of capital receipt flexibilities for 2024-2025. Following a review, it is now proposed to increase this by a further £2.0 million taking the total to £4.0 million in 2024-2025. The Council can be assured that any application of capital receipt flexibility will be fully documented and evidenced by the Council’s Section 151 Officer.
- 1.22 As previously stated to Councillors, capital receipts are reviewed and assessed by the Director of Finance to ensure they are applied in the most prudent and effective way.
- 1.23 The Capital Programme, as presented to Councillors for approval at this meeting, includes assumptions about the level of capital receipts to be generated in 2024-2025 and the use of capital receipts to pay for revenue costs. This is also reflected in the MTFs.
- 1.24 These one-off opportunities and their impact across financial years are also listed in full in the table below.

Table 6 –New One-off Opportunities included in the Budget and MTFs

	2024-2025	2025-2026	2026-2027
	£000	£000	£000
New one-off opportunities			
Use of Future Years Budget Strategy Reserve	(4,664)	4,664	-
Use of Our City, Our Plan Reserve to support council priorities	(1,342)	1,342	-
Use of one-off grants	(230)	230	-
Additional use of Capital Receipts flexibility	(2,000)	2,000	-
Total New one-off opportunities	(8,236)	8,236	-

Revisions to Budget Reduction Targets

- 1.25 As reported to Cabinet in October 2023, in depth reviews have been undertaken on existing budget reduction and income generation proposals. This has been particularly important in light of the increasing costs and changes to the environment in which we currently operate.
- 1.26 It was reported in October that budget reduction targets totalling £393,000 would not be delivered as originally planned, and therefore it was proposed to remove these from the MTFs. This target is within the Governance Directorate.

- 1.27 As detailed in the main report, the MTFS reported to Cabinet in October 2023, incorporates efficiency targets held corporately which were built into the budget in recognition of prior year underspends. The 2023-2024 budget incorporate a target of £6.2 million (of which £2.0 million has been delivered on a recurrent basis), with a further £2.6 million in 2024-2025, and £4.8 million in 2025-2026. These have been reviewed and due to the cost pressures facing a number of services, it is proposed these targets be built back it the budget and MTFS.
- 1.28 The table below provides a list of the proposed revisions.

Table 7 – Revisions to Budget Reduction proposals

Budget Reduction Proposal	2024-2025 £000	2025-2026 £000	2026-2027 £000
Prior Year Governance efficiency target	393	-	-
Revisions to efficiency targets held corporately for 2023-2024	4,225	-	-
Revisions to efficiency targets held for 2024-2025 and 2025-2026	2,600	4,850	-
Total	7,218	4,850	-

- 1.29 The 2023-2024 budget approved by Full Council in March 2023, reported that a total of £1.6 million had been vired from efficiencies across a number of services to Human Resources in order to support the Transforming People Services Programme. A number of these virements have been allocated against staff related budget, without impacting on service delivery or staff recruitment. It is proposed, that where appropriate these virements are reallocated against the vacancy factor, increasing the vacancy factor target from £1.2 million (already incorporated into the budget) to £1.5 million.

New Budget Reduction and Income Generation Proposals

- 1.30 The budget and MTFS incorporates a number of recurrent budget reduction, income generation and efficiency proposals, a full list of which can be found in Appendix 4.
- 1.31 As reported to Cabinet in October, additional income is projected within Waste Services, as a result £1.0 million was built into the Budget and MTFS as a working assumption. Following capital investment in the plant, this assumption has been reviewed and as a result increased to £1.5 million.
- 1.32 As detailed in the main report a number of income generation opportunities have also been explored and in response income targets have been incorporated into the budget for WV Active, events and advertising, and e-services to schools.
- 1.33 In addition, a number of efficiencies have also been identified from across services, including reduction to the budget held for furniture replacement, cancelling of subscriptions, and training budgets.

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Update on Key Assumptions on Corporate Resources

1.0 Introduction

- 1.1 The Council receives its core funding from Council Tax, Business Rates and Government Grants.
- 1.2 On 18 December 2023, the Government announced the Provisional Local Government Settlement, details of this are summarised in the main report. On 5 February 2024, the Secretary of State for Levelling Up, Housing and Communities published a written statement on the Final Local Government Finance Settlement 2024-2025. The changes in resource assumptions arising as a result of this announcement, and the detailed work that has been ongoing, are detailed in the paragraphs below.
- 1.3 The recent Government announcements have provided some clarity for the forthcoming financial year, however the Council continues to face significant uncertainty over its funding levels post 2024-2025. It is therefore particularly challenging to establish a medium-term financial strategy beyond 2024-2025 and a number of assumptions have had to be made on the level of resources that will be available to the Council.

Collection Fund Estimated Outturn 2023-2024

- 1.4 The table below provides details of the collection fund surplus that will be retained by the Council.

Table 1 – Retained Element of Collection Fund Surplus

Elements of Collection Fund	Surplus £000	Retained %	Retained £000
Council Tax	546	87.4%	477
Business Rates	3,265	99%	3,230*
	3,811	-	3,707

*the proportion to Wolverhampton includes a prior deficit which is attributed to Central Government of £261,000.

- 1.5 The estimate on the Collection Fund for 2023-2024 set out above includes assumptions about collection rates. It is forecast that there will be an accumulated surplus on both elements of the collection fund as at the 31 March 2024. It is important to note that this includes the carry forward of the in-year 2020-2021 deficit, which the Government confirmed could be spread over three years from 2021-2022 to 2023-2024. A detailed breakdown of the forecast outturn for the Collection Fund 2023-2024 can be found at Appendix 7.

Business Rates

- 1.6 The National Non-Domestic Rates Return 1 (NNDR1) was compiled and returned to the Department of Levelling Up, Housing and Communities (DLUHC) by the deadline of 31 January 2024.
- 1.7 On 17 January 2024, Cabinet approved the Collection Fund Business Rates Net Yield for 2023-2024 at £78.6 million. Following revisions arising as a result of further data becoming available, the Cabinet Member for Resources, in consultation with the Director of Finance approved the revised Business Rates baseline net rate yield from £78.6 million to £79.3 million. Of the £79.3 million net rates yielded by business rates forecast to be collected in 2024-2025, the Council would retain in the region of £78.5 million under the 99% business rates retention scheme. The estimate of net rates payable in 2024-2025 assumes continued pressure on business rates collection, including the potential for further business rates appeals.
- 1.8 There are a number of Business Rates policies that the Government have stipulated for which the Council is reimbursed through Section 31 of the Local Government Act 2003. This includes compensation for a freeze on the small business rates multiplier in 2024-2025 (as announced in the Autumn Statement 2023) and grant to compensate for business rates relief. Overall, the forecast Section 31 grant income for business rates policies totalling £32.1 million is projected for 2024-2025 and based upon the NNDR1 form returned to the Department for Levelling Up, Housing and Communities (DLUHC) on 31 January 2023.
- 1.9 In October 2016, Cabinet approved that the City of Wolverhampton Council, as one of the Constituent Members of the West Midlands Combined Authority (WMCA), will participate in a business rates retention pilot from April 2017, on a no financial detriment basis. One part of the West Midlands Devolution Deal includes the WMCA receiving the real terms growth in the central share of business rates, which came into effect from 1 April 2016 onwards. This was the share that was previously held by central government. As a result of entering into this pilot, the Council will retain 99% of the business rates but no longer receive Revenue Support Grant and instead receive a Top Up Grant adjustment to account for the net effect of the changes.
- 1.10 It was reported to Cabinet in October 2023, that Government are offering local authorities forming WMCA the ability to retain 100% business rates for a further ten-year period. Cabinet delegated authority to the Director of Finance to enter into a Memorandum of Understanding with Government for the ten-year, 100% Business Rates Retention for the West Midlands in accordance with the Trailblazing Devolution Deal.
- 1.11 There is some complexity in identifying the true business rates growth between years due to business rates appeals and the revaluation process, however an approach to allocate the growth in the central share for 2017-2018 to 2023-2024 has been agreed with the WMCA. The assumed growth of £12.0 million attributable to the WMCA in 2023-2024, in line with the Investment Plan assumptions, has been apportioned for each

authority pro rata to the aggregate Rateable Value at the start of the year, resulting in a contribution from Wolverhampton in the region of £940,000.

- 1.12 The 2024-2025 budget includes provision for this payment and is in line with previous years apportionment. However, the growth calculation and distribution for 2024-2025 has yet to be formally agreed. It will therefore be proposed to seek approval to delegate authority to the Director of Finance, to approve the calculation and allocation of growth in the central share for 2024-2025 and future years to be passported to the WMCA.
- 1.13 It is important to note, the MTFS assumes the Business Rates retention scheme continues at the current level of business rates retention (99%) over the medium term up to 2026-2027 with no detrimental impact of a Business Rates reset or the retention scheme. In addition, only inflationary growth in the business rates multiplier is assumed in the MTFS. Any amendments arising of funding reforms could impact on the MTFS.

Council Tax

- 1.14 On 17 January 2024, Cabinet approved the council tax base for 2024-2025 at 66,645.60 Band D equivalent properties. The report provides further details on Government announcements regarding council tax and the adult social care precept.
- 1.15 The report recommends an increase in Council Tax of 2.99%, in addition to the Government's social care precept of 2%, totalling 4.99%. This would result in a council tax for council services in 2024-2025 of £2,004.27 for a Band D property in Wolverhampton (council tax element only). When Government publish what funding is available to councils, they include an assumption regarding the raising of council tax – this also includes the levy to fund adult social care. Projections in the MTFS beyond 2024-2025 assume that Council Tax will continue to increase by the current referendum level of 2.99%, whilst the tax base is anticipated to rise by 1% in each financial year, this generates on in the region of £5.2 million per year. Furthermore, the MTFS assumes that the adult social care precept will continue to increase by 2% which generates in the region of £2.9 million per year. Any changes to these assumptions would impact on the projected deficit over the medium term.

Services Grant

- 1.16 It was reported to Cabinet in January 2024, that the provisional settlement announced the national allocation for the Services Grant allocation has reduced from £483 million in 2023-2024 to £77 million in 2024-2025, the final settlement increased the national allocation to £87 million. The 2024-2025 draft budget reported to Cabinet in October had assumed that this grant continued at the 2023-2024 level of £3.2 million. The final settlement announced the allocation for Wolverhampton is £556,000, a reduction of over £2.6 million on the 2023-2024 allocation.
- 1.17 In order to be prudent, MTFS assumes this grant will not continue beyond 2024-2025. However, if it was to do so, this would reduce the projected budget deficit for 2025-2026.

New Homes Bonus

- 1.18 The Government have announced the continuation of the New Homes Bonus scheme for a further year with no new legacy payments.
- 1.19 The Council's allocation for 2024-2025 has been announced at £15,000 (2023-2024 was £709,000). The MTFs does not assume the continuation of the grant beyond 2024-2025.

Top Up Grant

- 1.20 As detailed above, the Council is part of the West Midlands pilot for 100% business rates retention and will therefore no longer receive Revenue Support Grant but receive an amended Top Up Grant to reflect the business rates retention model. The Top Up Grant for 2024-2025 is £27.3 million (2023-2024 was £25.2 million). The MTFs assumes that this grant will be uplifted by 1% each year for future years.

Social Care Grants

- 1.21 As detailed in the main report, local authorities receive a number of social care grants to support pressures across adults and children's social care, some of these grants have conditions attached to them. In the provisional settlement the Government announced a national increase across these grants of £1,380 million.
- 1.22 On 24 January 2024, the Secretary of State for Levelling Up, Housing and Communities announced additional funding worth £600 million. This includes £500 million of new funding for councils with responsibility for adults and children's social care, which will be distributed through the Social Care Grant. A summary of the social care grants and assumptions going forward are detailed in the table below.

Table 2 – Social Care Grants – forecast assumptions

	2024-2025 Final £000	2025-2026 Draft £000	2026-2027 Draft £000
Improved Better Care Fund (iBCF)	(14,761)	(14,761)	(14,761)
Social Care Grant	(32,290)	(32,290)	(32,290)
ASC Market Sustainability and Improvement Fund	(6,022)	(6,022)	(6,022)
ASC Discharge Fund	(3,449)	(3,449)	(3,449)
Total	(56,522)	(56,522)	(56,522)

- 1.23 Current working assumptions assume these grants will continue at the same level over the medium term. However, if any of these grants were to cease or reduce, for instance the ASC Discharge Fund, this would increase the projected budget challenge going forward. These grants are vital to support the inflationary and demand pressures across social care.

1.24 A number of assumptions have been made with regards to the level of resources that will be available to the Council as detailed in the report and this appendix. It is important to note that there continues to be a considerable amount of uncertainty with regards to future funding streams for local authorities as the funding settlement for 2024-2025 was for one year only. The table below summaries the current forecast assumptions in the MTFS around our corporate resources.

Table 3 – MTFS – forecast assumptions

Grant	MTFS forecast assumptions (2025-2026 onwards)
Top-up Grant	Uplifted 1% per year after 2024-2025
Services Grant	Will not continue after 2024-2025
New Homes Bonus	Will not continue after 2024-2025.
Business Rates	Assumption that the business rates multiplier increases each year by 2%, whilst the business rates base remains static. Also, there is no detrimental impact of a Business Rates reset or the retention scheme
Council Tax	Assume that council tax will increase by 2.99%, whilst the tax base is anticipated to rise by 1% in each financial year. Furthermore, the MTFS assumes that the adult social care precept will increase by 2% in each financial year, in line with current referendum limits
Improved Better Care Fund	Will continue over the medium term at 2024-2025 level
Social Care Grants	Will continue over the medium term at 2024-2025 levels
Adult Social Care Market Sustainability and Improvement Fund	Will continue over the medium term at 2024-2025 levels
Adults Social Care Discharge Fund	Will continue over the medium term at 2024-2025 levels

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Budget Preparation Parameters

The following key parameters have been reflected in the budget and medium-term projections.

Table 1 – Budget parameters

	2024-2025 Forecast	2025-2026 Forecast	2026-2027 Forecast
Council Tax Annual Increase (Council element)	2.99%	2.99%	2.99%
Growth in Council Tax Base	1.0%	1.0%	1.0%
Adult Social Care Precept (Council element)	2.0%	2.0%	2.0%
Pay Award	3.0%	2.0%	2.0%
Price Inflation (Gas)*	14.7%	5.0%	2.0%
Price Inflation (Electricity)*	16.4%	5.0%	2.0%
Price Inflation (Water)	13.4%	5.0%	2.0%
Price Inflation (NNDR)	6.7%	2.0%	2.0%
Borrowing Interest Rate	5.07%	4.30%	4.10%
Return on Investment	2.30%	1.60%	1.50%
NNDR Income Annual Increase	0.0%	0.0%	0.0%
Growth in NNDR Tax Base	0.0%	0.0%	0.0%

*During 2023-2024, there has continued to be volatility in energy prices, resulting in increased gas and electricity costs for consumers. The original financial modelling undertaken to project the anticipated increases for 2023-2024, resulted in significant growth being incorporated into the 2023-2024 budget and MTFs. Financial modelling for 2024-2025 has resulted in assumptions of a 14.7% price increase in Gas before taking into account rebasing of previous growth and changes in consumption. Similarly, a 16.4% price increase assumption is included in Electricity for 2024-2025 before considering changes in previous growth and consumption for the budget.

Sensitivity Analysis for 2024-2025

As detailed in the main report, whilst detailed financial modelling has been undertaken to accurately forecast the Council's medium term financial position, there remains a significant level of uncertainty in the sector. Changes in circumstances therefore could change the forecast budget deficit in any one year.

The table below provides a sensitivity analysis of the main uncertainties and risks which underpin this Budget and MTFs, setting out the potential impact if some of these main cost pressures vary to that currently projected.

Table 2 – Sensitivity Analysis for 2024-2025

Growth item	Current Assumptions	Improved scenario	£000	Worsened scenario	£000
Pay Award	3% pay award	Pay award is 2%	(1,800)	Pay award is 6%	5,400
Inflation - Utilities	Based on forecast energy consumption and estimate of price increase	Based on a reduction of 5% in gas, electricity and water rates compared to current assumptions	(364)	Based on an additional 5% increase in gas, electricity and water rates compared to current assumptions	364
Adult Social Care	Based on current assumptions in growth for demand and proposed fees	Reduction in forecast in demand of 20% for care packages	(580)	Increase in demand for care packages by 20%	580
Childrens Social Care	Based on current assumptions in growth for demand and cost of care packages	Reduction in residential care placements by 10% and placement costs static.	(1,030)	Residential care placement numbers and cost per placement both increase by 20%	2,473
Temporary accommodation	Based on projected usage and costs	Reduction on 5% on current demand for bed and breakfast accommodation	(565)	Increase based on highest demand month in 2023-2024 multiplied up over 12	1,093

Growth item	Current Assumptions	Improved scenario	£000	Worsened scenario	£000
				months for bed and breakfast accommodation	
Fleet Hire	Based on projected usage	Hire demand decrease of 3 Waste vehicles at an average of £40,000 p.a. and new Travel Unit contract efficiencies reduce overall spend by £200,000.	(320)	Hire demand increases by 4 vans at an average of £27,000 p.a.	108
Transportation	Based on demand known at the time for SEND pupils to be transported both within and outside the City. Mitigations to find most efficient options to transport.	A reduction of 10 pupils on single occupancy transport at an average of £305 per day for an academic year. The cost savings would be less for pupils on shared vehicles.	(595)	An Additional 10 pupils on single occupancy transport at an average of £305 per day for an academic year. The cost pressure would be less for pupils on shared vehicles.	595

The above tables gives an indication of the risk inherent within any local government budget, but particularly so at the current time when they are significant pressures in terms of adults and children's social care, homelessness and inflation.

The corporate resources have been confirmed for 2024-2025, however for every 1% change in 'core spending power' for futures years is equivalent to circa £3.2 million

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Budget Reduction, Income Generation and Efficiency Targets

The table below provides a full list of all budget reduction, income generation and efficiency targets incorporated into the 2024-2025 budget and Medium Term Financial Strategy 2024-2025 to 2026-2027.

Table 1 - Budget Reduction, Income Generation and Efficiency Targets

Directorate	Reduction, income generation and efficiency target	2024-2025 £000	2025-2026 £000	2026-2027 £000
Resident Services	Waste services - income from energy	(1,500)	-	-
Education	Use of funding to support costs within Education	(500)	-	-
Public Health and Wellbeing	Income from WV Active	(200)	-	-
Education	One off use of grant funding to support activities within Skills and Enterprise	(150)	150	-
Communications and Visitor Experience	Income generation from events and advertising (ring road signs)	(85)	-	-
Regeneration	Efficiencies from contingency budget held within Regeneration	(70)	-	-
Finance	One-off savings from income in banking	(67)	67	-
City Assets	Reduction in furniture budget	(65)	-	-
Education	Income generation on e-services	(50)	-	-
Public Health and Wellbeing	Efficiencies from one-off use of grant to support job brokerage service	(50)	50	-
City Assets	Various efficiencies from budget held in City Assets	(30)	-	-
Governance	Savings from cancelling subscriptions no longer required	(20)	-	-
Adult Services	Reduction in non-staffing budgets held with Adults	(20)	-	-
Public Health and Wellbeing	Crowd Fund budget no longer required	(10)	-	-
Governance	Efficiencies from training budgets held in Health and Safety	(6)	-	-

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APPENDIX 4

Corporate Accounts	Use of one-off reserves, capital receipts and one off grants	(8,236)	8,236	-
Corporate Accounts	Reversal and revisions to prior year targets	14,448	4,000	-
Total		3,389	12,503	-

Budget 2024-2025 by Directorate and Service

Assumptions:

The net pay adjustments include forecast impact of increments, reduction to National Insurance and pension rates, but does not include any inflation for 2024-2025 pay award. Growth for the 2024-2025 pay award will be held corporately.

Savings includes all budget reduction and income generation targets which have been approved at Cabinet meeting as well as further proposed saving targets which will be subject to approval by Cabinet in February 2024.

As outlined in the main report and Appendix 1, some budgets to support cost pressures across is held corporately within Corporate Accounts and will be released subject to business cases throughout the year.

Virements includes virements and all other adjustments to budget between services.

Adult Services	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Adults Assessment & Care Management	5,777	327	-	-	-	6,104
Adults Safeguarding	954	47	39	-	(22)	1,018
Carer Support	885	43	-	-	-	928
Community Support	147	4	-	-	-	151
Director of Adults services and Additional Monies	(8,301)	23	597	-	(14)	(7,695)
Independent Living Service	1,853	132	-	-	257	2,242
Learning Disabilities Care Purchasing	33,464	-	3,317	-	116	36,897
Learning Disability Provider	5,295	482	14	-	25	5,816
Mental Health Assessment & Care Management	8,593	83	530	-	215	9,421
Older People Care Purchasing	32,968	(102)	3,258	(20)	242	36,346
Older People Provider Services	3,882	249	75	-	-	4,206
Physical Disabilities Care Purchasing	6,583	-	1,831	-	585	8,999
Total - Adult Services	92,100	1,288	9,661	(20)	1,404	104,433

Children's Services	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Children & Young People In Care	33,576	226	2,500	-	(1,133)	35,169
Director of Children's Services	548	(32)	-	-	2	518
Head of Children's Improvement	1,810	100	-	-	10	1,920
Regional Adoption Agency Consortium	-	-	-	-	-	-
Safeguarding	345	12	-	-	-	357
Specialist Support	4,075	73	-	-	9	4,157
Strengthening Families	10,111	125	-	-	(95)	10,141
Youth Offending	1,288	40	-	-	(81)	1,247
Total - Children's Services	51,753	544	2,500	-	(1,288)	53,509

City Assets	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Catering	119	61	-	-	(66)	114
Cleaning	1,935	94	-	-	(25)	2,004
Corporate Asset Management	13,069	9	(640)	(10)	(34)	12,394
Estates and Valuations	(5,045)	26	(855)	-	(55)	(5,929)
Facilities Management	1,569	9	-	(85)	110	1,603
Project and Works Team – Capital Programmes	224	(154)	-	-	147	217
Project and Works Team – Maintenance Programme	2,959	47	-	-	-	3,006
Total - City Assets	14,830	92	(1,495)	(95)	77	13,409

City Development	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
City Planning	961	43	-	-	(11)	993
City Development	525	9	-	-	(2)	532
Director of City Development	677	6	-	(70)	(5)	608
Total - City Development	2,163	58	-	(70)	(18)	2,133

Commissioning and Transformation	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Commissioning and Transformation	2,738	(31)	38	-	(280)	2,465
Community Financial Support	2,280	173	-	-	-	2,453
Total - Commissioning and Transformation	5,018	142	38	-	(280)	4,918

Communications and Visitor Experience	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Arts and Culture	921	12	-	-	-	933
Communications	701	15	-	(10)	-	706
City Events	795	19	-	(75)	-	739
Director of Communications and Visitor Experience	168	6	-	-	-	174
Total - Communications and Visitor Experience	2,585	52	-	(85)	-	2,552

Education and Skills	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Adult Education	(98)	-	-	-	2	(96)
Central Education	(703)	-	-	-	(129)	(832)
Director of Education	138	3	-	-	-	141
Early Years	252	13	-	(500)	-	(235)
Educational Excellence	688	53	-	-	(20)	721
Inclusion Support	1,045	26	-	-	35	1,106
Schools	-	-	-	-	-	-
School Business and Support Services	806	(3)	-	(50)	25	778
Skills	899	22	-	-	-	921
Special Educational Needs	(145)	43	700	-	379	977
Total - Education and Skills	2,882	157	700	(550)	292	3,481

Finance	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Audit Services	1,827	93	-	-	-	1,920
Central Corporate Budgets	3,356	-	-	-	1	3,357
Commercial Services	525	35	-	-	94	654
Council Tax Rebate and Discretionary Reductions Schemes *	500	-	(200)	(300)	-	-
Director of Finance	171	2	-	-	-	173
Housing Benefit Payments & Subsidy	1,948	-	-	-	-	1,948
Procurement Services	959	(45)	-	-	-	914
Revenues & Benefits	3,362	110	-	430	-	3,902
Strategic Finance	2,846	118	-	-	149	3,113
The Hub	2,156	78	-	(67)	57	2,224
Total - Finance	17,650	391	(200)	63	301	18,205

*2024-2025 budget is shown as £nil – as this is fully funded from reserves. The gross budget to support Council Tax Hardship Fund is £300,000

Governance	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Business Continuity & Emergency Planning	10	3	-	-	-	13
Chief Operating Officer	187	6	-	-	-	193
Deputy Director of People and Change	139	1	-	-	-	140
Equalities	191	-	99	-	-	290
Governance Services	3,255	111	43	373	34	3,816
Green Cities and Circular Economy	255	10	-	-	100	365
Health and Safety	327	17	131	(6)	-	469
Projects and Change	630	84	-	-	-	714
Legal Services	2,034	60	40	-	-	2,134
Organisational Development	1,283	6	-	-	-	1,289
People Services	2,481	15	-	-	962	3,458
Support Services	4,854	100	-	-	130	5,084
Total - Governance	15,646	413	313	367	1,226	17,965

Public Health & Wellbeing	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Community Safety & Community Cohesion	826	-	-	(60)	1	767
Health Protection and Healthcare Public Health	-	-	-	-	-	-
Healthy Life Expectancy	-	-	-	-	-	-
Homelessness and New Communities	2,592	-	-	-	1	2,593
Leisure Services	1,301	4	174	(200)	-	1,279
Libraries	1,685	22	-	-	-	1,707
Public Health Business Management	-	-	-	-	-	-
Starting and Developing Well	-	-	-	-	-	-
System Leadership	-	-	-	-	-	-
Ward Funds	200	-	-	-	-	200
West Midlands Strategic Migration Partnership	-	-	-	-	-	-
Total - Public Health & Wellbeing	6,604	26	174	(260)	2	6,546

Resident Services	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Black Country Transport	-	-	-	-	-	-
Bereavement Services	(2,049)	17	-	-	2	(2,030)
Coroners Service	448	-	-	-	-	448
Director Resident Services	212	-	-	-	(2)	210
Environmental Services	7,299	165	154	-	5	7,623
Fleet Services	2,327	22	96	-	-	2,445
Highways Maintenance	1,689	182	416	-	(10)	2,277
Housing	(380)	-	-	-	44	(336)
Landscaping	61	14	-	-	-	75
Licensing	-	-	-	-	-	-
Markets	(109)	18	-	-	20	(71)
Operation & Maintenance of Existing Network	677	153	-	-	-	830
Private Sector Housing	596	12	-	-	13	621
Parking Services	(1,593)	123	(300)	-	-	(1,770)
Public Protection	2,027	2	56	-	(16)	2,069
Street Lighting	5,160	(221)	(917)	-	-	4,022
Transportation	813	46	40	-	-	899
Travel Unit	6,631	36	547	-	-	7,214
Waste Services	11,224	478	182	(1,500)	650	11,034
Resident Services Total	35,033	1,047	274	(1,500)	706	35,560

Strategy	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Draft Budget £000
Archives Services	95	2	-	-	(2)	95
Customer Services	2,509	21	-	-	(86)	2,444
Digital and IT	8,037	17	-	-	(234)	7,820
Data and Analytics	1,113	228	-	-	215	1,556
Enterprise	560	29	-	(150)	(104)	335
External Funding and Digital Projects	293	11	-	-	(2)	302
Policy and Strategy	185	8	-	-	237	430
Register Office	10	78	-	-	-	88
Strategy	172	12	-	-	(13)	171
Wolverhampton Pound	85	-	-	-	-	85
Total - Strategy	13,059	406	-	(150)	11	13,326

Corporate Accounts	2023-2024 Revised £000	Net Pay Adjustments £000	Approved Growth £000	Savings £000	Virements £000	2024-2025 Budget £000
Corporate Accounts	46,683	5,463	111	5,689	(2,552)	55,394
Chief Executive	199	2	-	-	-	201
Deputy Chief Executive	209	-	-	-	-	209
Executive Director for Economy	-	-	-	-	183	183
Total - Corporate Accounts Total	47,091	5,465	111	5,689	(2,369)	55,987

Forecast Council Element of Council Tax for 2024-2025 per Band

Valuation Band (1 April 1991)	Values not exceeding £40,000	Values exceeding £40,000 but not exceeding £52,000	Values exceeding £52,000 but not exceeding £68,000	Values exceeding £68,000 but not exceeding £88,000	Values exceeding £88,000 but not exceeding £120,000	Values exceeding £120,000 but not exceeding £160,000	Values exceeding £160,000 but not exceeding £320,000	Values exceeding £320,000
	A 6/9	B 7/9	C 8/9	D 9/9	E 11/9	F 13/9	G 15/9	H 18/9
Council Tax 2023-2024 (Council element including 2023-2024 ASC precept)	1,272.67	1,484.78	1,696.90	1,909.01	2,333.24	2,757.46	3,181.68	3,818.02
2.99% increase in Council Tax	38.05	44.39	50.74	57.08	69.76	82.45	95.13	114.16
2% Adult Social Care Precept	25.45	29.70	33.94	38.18	46.66	55.15	63.63	76.36
Council Tax 2024-2025 (Council element)	1,336.17	1,558.87	1,781.58	2,004.27	2,449.66	2,895.06	3,340.44	4,008.54
Number of properties in each band	57,314	25,390	17,518	7,310	3,120	1,719	996	123

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Collection Fund Estimated Outturn 2023-2024

Forecast Council Tax Outturn 2023-2024

	City of Wolverhampton Council £000	West Midlands Police and Crime Commissioner £000	West Midlands Fire and Rescue Authority £000	Total £000
Actual accumulated deficit/(surplus) at 1 April 2023	(1,020)	(97)	(40)	(1,157)
Apportionment of 2022-2023 estimated deficit calculated January 2023 (payments made during 2023-2024):				
One third 2020-2021 estimated deficit	(1,971)	(190)	(72)	(2,233)
Adjustment to above deficit due to 2022-2023 estimated outturn	1,217	125	45	1,387
Total payments made during 2023-2024	(754)	(65)	(27)	(846)
Net accumulated deficit/(surplus) 2022-2023 to be apportioned in 2024-2025	(1,774)	(162)	(67)	(2,003)
Estimated income 2023-2024				
Income from Council Tax				(147,250)
Reimbursements from General Fund e.g. discretionary discounts etc.				(727)
Total estimated income				(147,977)
Estimated expenditure 2023-2024				
Demands on Collection Fund:				
City of Wolverhampton Council				125,983
West Midlands Police and Crime Commissioner				13,367
West Midlands Fire and Rescue Authority				4,819
Provision for non-collection of Council Tax				5,265
Total estimated expenditure				149,434
Net estimated deficit/(surplus) for 2023-2024				1,457
Apportionment of 2023-2024 estimated deficit/(surplus) calculated January 2024	1,297	111	49	1,457
Estimated accumulated deficit/(surplus) at 31 March 2024 (to be apportioned)	(477)	(51)	(18)	(546)

Forecast Business Rates Outturn 2023-2024

	City of Wolverhampton Council £000	West Midlands Fire and Rescue Authority £000	Central Government £000	Total £000
Actual accumulated deficit/(surplus) at 1 April 2023	(5,650)	(54)	261	(5,443)
Apportionment of 2022-2023 estimated deficit calculated January 2023 (payments made during 2023-2024):				
One third 2020-2021 estimated deficit	282	3	-	285
2022-2023 estimated deficit	1,524	15	-	1,539
Total payments made during 2023-2024	1,806	18	-	1,824
Net accumulated deficit/(surplus) 2022-2023 to be apportioned in 2024-2025	(3,844)	(36)	261	(3,619)
Estimated income 2023-2024				
Income from Business Rates (NDR)				(72,578)
Reimbursements from General Fund e.g. discretionary discounts etc.				(4)
Transitional payment				(9,032)
Reconciliation payment				700
Total estimated income				(80,914)
Estimated expenditure 2023-2024				
Demands on Collection Fund:				
City of Wolverhampton Council (including designated areas and renewable energy)				75,854
West Midlands Fire and Rescue Authority				758
Provision for non-collection of NDR (incl. appeals and interest)				4,320
Cost of collection allowance				336
Total estimated expenditure				81,268
Net estimated deficit/(surplus) for 2023-2024				354
Apportionment of 2023-2024 estimated deficit/(surplus) calculated January 2024	353	1	-	354
Estimated accumulated deficit/(surplus) at 31 March 2024 (to be apportioned)	(3,491)	(35)	261	(3,265)

Reserves Strategy

1.0 What Are Reserves?

1.1 Reserves are resources that the Council has accumulated over time. They are an integral element of our budget setting process, medium-term financial plan and financial management. We use reserves to help mitigate the risks that we face as well as to fund specific planned expenditure.

2.0 What the Law and the Chartered Institute of Public Finance and Accountancy (CIPFA) say:

2.1 The Local Government Act 2003 (section 25) requires local authorities, when setting their budgets and the level of Council tax, to have regard to the advice of the Chief Financial Officer, namely the officer appointed under s.151 of the Local Government Act 1972 (“the CFO”), on the adequacy of the proposed financial reserves.

2.2 The CIPFA Financial Management (FM) Code states that

- Local authorities are directed to have regard to the level of reserves when considering their budget requirement. Consequently, reserves are a recognised and intrinsic part of financial planning and budget setting. The assessment of ‘adequate’ and ‘necessary’ levels of reserves is a matter for local authorities to determine. It is the responsibility (with statutory backing in England and Wales) of the CFO to advise the local authority on the appropriate level of reserves and the robustness of the estimates.
- A well-managed authority, with a prudent approach to budgeting, should be able to operate with a level of general reserves appropriate for the risks (both internal and external) to which it is exposed.
- These should be maintained at a level appropriate for the profile of the authority’s cash flow and the prospect of having to meet unexpected events from within its own resources.
- The budget report should include details of the earmarked reserves held, and explain the purpose of each reserve, together with the estimated opening balances for the year, details of planned additions/withdrawals and the estimated closing balances.
- The budget report includes a statement by the chief finance officer on the robustness of the estimates and a statement on the adequacy of the proposed financial reserves.

3.0 Usable and Unusable Reserves

3.1 In accordance with the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom (the Code) our reserves are categorised in the Statement of Accounts as either usable or unusable.

3.2 The Code describes usable reserves as those that represent resources that the authority might use to support service delivery at the reporting date. Some usable reserves may have restrictions upon their use dependent upon the relevant legislative requirements.

3.3 Unusable reserves are not available to use to support service delivery at the reporting date. These reserves arise from either:

- a) statutory adjustments required to reconcile balances to the amounts chargeable to council tax (or rents) for the year, in order to comply with legislation, or
- b) accounting gains or losses recognised in other comprehensive income and expenditure in accordance with accounting standards adopted by the Code, rather than in the surplus or deficit on the provision of services.

3.4 This strategy relates to usable reserves only.

4.0 Capital Reserves

4.1 The Council has the following capital usable reserves:

- **Major Repairs Reserve:** The council is required to maintain the major repairs reserve, which controls the application of the Major Repairs Allowance (MRA). The MRA is restricted to being applied to new capital investment in HRA assets or the financing of historical capital expenditure by the HRA. The balance shows the MRA that has yet to be applied at the year end.
- **Capital Receipts Reserve:** This reserve holds the proceeds from the disposal of land or other assets, which are restricted by statute from being used other than to fund new capital expenditure or to be set aside to finance historical capital expenditure. The balance on the reserve shows the resources that have yet to be applied for these purposes at the year end.
- **Capital Grants unapplied Account:** This reserve holds the grants and contributions received towards capital projects for which the council has met the conditions that would otherwise require repayment of the monies, but which have yet to be applied to meet expenditure. The balance is restricted by grant terms as to the capital expenditure against which it can be applied and/or the financial year in which this can take place.

4.2 The use of these reserves is subject to the Capital Programme Funding Strategy and Treasury Management Strategy. These reserves do not form part of this strategy.

5.0 Housing Revenue Account (HRA)

5.1 The HRA balance acts as a corporate contingency for unexpected events and emergencies. The level of HRA balance is considered and approved as part of the annual HRA Business Plan report.

6.0 Types of Revenue Usable Reserves

6.1 We hold revenue reserves for different purposes:

- **Managing risks:** Our annual budget and MTFs is based on robust estimates of the resources available to us and the cost of delivering services and council priorities. However, like any large complex organisation we face risks and uncertainty. Inevitably there will be changes facing us including levels of demand, costs, funding streams and government policy. Therefore, we hold a number of reserves specifically to protect us against unforeseen expenditure or loss of income as a result of such risks materialising.
- **Investment Reserves:** Funds held to pump prime investment and activity to support the delivery of Our City: Our Plan and transformation.
- **Smoothing Reserves:** To manage areas where the expenditure or income is variable and unpredictable but where the annual fluctuations are averaged out over the medium term.
- **Restricted Reserves:** To manage external funding received for specific purposes where the decisions on how the funding is used is not wholly within the control of the Council. Restricted reserves include balances held on behalf of schools.

7.0 Governance

7.1 All reserves will be reviewed at year end as part of the preparation of the statement of accounts. A report on reserves will be presented to Cabinet following year end outlining the purpose of each reserve, any proposals for new reserves, the balance and any commitments against the reserve and plans for their use where appropriate. Governance arrangements for each reserve will be specified in this report.

7.2 In accordance with The Code, the Statement of Accounts provides a full breakdown of reserve balances on 31 March and the annual movement in reserves (usable and unusable, capital and revenue). The Statement of Accounts is subject to external audit.

7.3 The use of reserves during the year will be reported as part of quarterly Performance, Budget and Risk Reports to Cabinet.

7.4 As part of the budget setting process a scrutiny working group will review the Reserves Strategy and the use of reserves.

7.5 This reserves strategy will then be refreshed and presented to Cabinet as part of the suite of documents underpinning the budget and MTFs.

8.0 Our Strategy

8.1 The Council has the following set aside in usable revenue reserves:

	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
General Fund Balance	(15,321)	(15,321)	-	(1,700)	(17,021)
Risk Management	(16,445)	(12,625)	-	899	(11,726)
Investment	(19,994)	(12,176)	3,000	2,902	(6,274)
Smoothing	(12,634)	(7,562)	-	6,464	(1,098)
Sub Total	(64,394)	(47,684)	3,000	8,565	(36,119)
Restricted	(22,751)	(13,139)	1,234	636	(11,269)
Restricted (Schools)	(15,154)	(13,606)	-	-	(13,606)
Grand Total	(102,299)	(74,429)	4,234	9,201*	(60,994)

*In addition to the £6.0 million outlined in the main report to support the overall budget deficit and priority projects, the 2024-2025 budget also includes the planned use of reserves against services in line with the defined reserve purpose.

General Fund Balance Reserve

8.2 The General Fund Balance Reserve acts as a corporate contingency to cushion the impact of unexpected events or emergencies. It also provides a working balance to help cushion the impact of uneven cash flows and avoid unnecessary temporary borrowing.

8.3 There is no statutory minimum for the level of General Fund Balance to be held although it is considered that a minimum of 5% of net budget is good practice. In making a recommendation as to the level of General Fund Balance Reserve which should be maintained, the Section 151 Officer considers:

- **The overall financial position of the Council:** The budget proposed for 2024-2025 is balanced without the need to draw on the General Fund Balance Reserve and growth has been provided in response to significant increases in costs and demand. However, the Council is proposing to use earmarked reserves to fund Council priorities along with addressing the overall budget deficit. The budget

does not include significant savings programmes at service. It is projected that the medium term forecast budget deficit could be in the region of £27.0 million by 2025-2026, rising to £32.6 million by 2026-2027.

- **The Council's financial management arrangements and track record:** The Council has a good track record of managing finances well, setting robust budgets aligned to Our City: Our Plan. There is rigorous budget monitoring aligned to performance and risk management and a track record of delivering within budget despite emerging in year pressures.
- **The level of risk and uncertainty facing the council:** There are a number of significant risks and uncertainty including high levels of inflation, the impact of cost of living on residents and businesses, increasing interest costs, unknown pay award for 2024-2025 and uncertain government funding beyond 2024-2025.
- **The level of other risk management reserves:** There are a number of other reserves to manage risks: Budget Contingency Reserve, Re-organisation Reserve, and the Insurance Reserve. The total of these reserves, after approved commitments, is £11.7 million.
- **The level of specific contingencies within the annual budget to manage in year pressures.** The budget includes some contingencies for emerging pressures including inflationary pressures and increase in demand. These are held corporately to mitigate against cost pressures and will be passed out to services subject to business cases.

- 8.4 In summary, the Council faces significant financial challenges over the medium term and high levels of uncertainty over the next 12 months and over the medium term. However, the Council has robust financial management arrangements, a strong track record of managing in year pressures and a number of reserves to mitigate against specific risks. It is therefore recommended that a minimum level of 5% of net budget is currently sufficient as a General Fund Balance Reserve.
- 8.5 In order to maintain a General Fund Balance of 5% of the net budget over the medium term, it is proposed that £1.7 million is transferred from the Sustainable MTFS Reserve (formally the Transformation Reserve) and Re-organisation Reserve into the General Fund Reserve.
- 8.6 In addition, following a review of reserves, it is proposed to merge the Transformation Reserve and the Efficiency Reserve and rename it to the Sustainable MTFS Reserve.

Managing Risks: The following reserves have been created to manage risks.

At year-end the Section 151 Officer will consider if it is necessary to increase any of these reserves.

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Adults Social Care Reserve for Growth and Demand Pressures	This reserve is to support increases in growth and demand across adult social care.	(2,000)	-	The Budget and MTFS 2023-2024 to 2025-2026 reported to Full Council on 1 March 2023, incorporated the use of this reserve in 2023-2024.	-	-	-
Budget Contingency Reserve	Available to address in-year budget pressures that cannot be addressed from within existing service budgets.	(5,626)	(3,915)	Approved use of this reserves include supporting projects within Waste services, City Assets	-	-	(3,915)
Re-organisation Reserve	Funds in this reserve are available to address reorganisation costs as a result of the	(5,899)	(5,899)	There are currently no plans to use this reserve in 2023-2024.	-	899	(5,000)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	financial challenges faced by the Council over the medium term.						
Insurance Reserve	The Reserve is for unexpected insurance claim events that cannot be covered by Insurance Fund budgets. Insurance claims costs vary year to year and a contribution may be made to or from the Reserve dependent on the Fund outturn position.	(2,811)	(2,811)	There are currently no plans to use this reserve in 2023-2024	-	-	(2,811)
HRA Homelessness	Available to support initiatives that work to prevent homelessness. This reserve was set up due to the uncertain future of the grant. Homelessness is on	(109)	-	To support cost pressures within homelessness in 2023-2024	-	-	-

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	the increase and the Homelessness Reduction Act requires authorities to provide earlier interventions to prevent homelessness.						

Investment Reserves: These reserves have been created to enable investment to support Our City: Our Plan

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance – Future £000
Climate Change Reserve	Funds in this reserve are available for climate change feasibility works and will enable the Council to tackle climate change with a shift to net carbon zero by 2028.	(624)	(513)	This reserve will support projects and resources to support the Climate Change agenda.	226	-	(287)
Sustainable MTFS Reserve (formally Efficiency Reserve and Transformation Reserve)	To support transformation, and efficiencies projects, in order to ultimately deliver greater efficiencies so to contribute to the delivery of a sustainable MTFS	(8,309)	(6,560)	Examples of approved utilisation include supporting a new operating model in Waste Services, HR smart programme and the scanning project	219	1,184	(5,157)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance – Future £000
Youth Opportunities	For a programme of positive community-based activities to engage and develop young people.	(999)	(344)	To support youth opportunities during 2023-2024	-	344	-
Our City Our Plan Reserve	This reserve is to support Our City, Our Plan priorities.	(5,055)	(4,016)	Examples of approved utilisation include resources to support the Wolves at Work 18-24 – Youth Employment project.	2,555	1,374	(87)
Ward Funds Reserve	The Reserve is to carry forward unspent Ward Funds for future use to be determined in conjunction with Councillors.	(137)	-	Expenditure plans determined by Councillors in compliance with Ward Fund scheme governance. Any underspend funds at year	-	-	-

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance – Future £000
				end will be reviewed.			
Regeneration Reserve	To fund projects in support of corporate regeneration priorities and maintaining the city centre development.	(2,317)	(565)	Reserve will support various regeneration projects.	-	-	(565)
Adult Services Transformation Reserve	Over the next few years the Adult Service Transformation Programme will be refreshed and will prioritise a number of key projects, including the redesign of the operating model, associate structures, and	(2,478)	(106)	This reserve will be used to support the redesign of Adult services.	-	-	(106)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance – Future £000
	review of the practice model. This reserve will be used to support this transformation work and deal with the growing demand within Adult Social Care.						
Kickstart Loans	Recycling of funds secured following the repayment of Kickstart Loans into assistance for private sector housing improvements.	(72)	(72)	There are currently no plans to use this reserve in 2023-2024	-	-	(72)
Schools Arts Service Reserve	This reserve is made up of funds to support educational art projects in schools and the wider community, which may lead to	(3)	-	It is currently anticipated that this reserve will be used in full in 2023-2024	-	-	-

This report is PUBLIC
[NOT PROTECTIVELY MARKED]

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance – Future £000
	increased future income streams.						

Smoothing Reserves: The following reserves have been created to manage fluctuations which are balanced over the medium term.

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Future Years Budget Strategy Reserve	Funds have been transferred into this reserve to support the budget strategy in future years.	(11,535)	(6,464)	The Budget and MTFS assumes use of this reserve in full over the medium term.	-	6,464	-
Revenues and Benefits Strategy Reserve	Funds available to address changes in benefit distribution.	(1,058)	(1,058)	There is currently no planned use of this reserve in 2023-2024	-	-	(1,058)
Elections Reserve	The cost of running local elections to the Council in any year is dependent on whether they are standalone or combined elections.	(40)	(40)	There is currently no planned use of this reserve in 2023-2024	-	-	(40)

Restricted Reserves: These reserves have been created to manage ring-fenced funding.

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Safeguarding Partnership Board	To fund the Safeguarding Partnership Board expenditure in future years. This reserve is made up of contributions from our partners to support the running costs of the Safeguarding Partnership Board.	(212)	(191)	To support work of the Safeguarding partnership	-	21	(170)
Building Resilience Reserve	To continue activities under the preventing violent extremism work stream.	(4)	(4)	It is not currently anticipated that this reserve will be utilised in 2023-2024.	-	-	(4)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
The Education (Penalty Notices) Regulations 2007	This reserve is made up fines levied to parents where their children are taken out of school on holidays during term time. The fund can only be spent on issuing and enforcing penalty notices, and prosecuting recipients who do not pay.	(116)	(116)	It is not currently anticipated that this reserve will be utilised in 2023-2024.	-	-	(116)
Regional Adoption Agency (RAA)	As part of the funding agreement with partner Authorities in the Regional Adoption Agency it has been agreed that an overspend up to 5% of the approved budget will be held	(991)	(741)	Planned use for 2023-2024 is currently being reviewed and approval will be sought in the Performance and Budget	-	78	(663)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	in a reserve to be utilised in future years.			Monitoring reports to Cabinet.			
PFI surplus reserve	A reserve to allow in year PFI contract efficiencies to be utilised to meet future years expenditure.	(2,490)	(2,490)	There is no planned use of this reserve in 2023-2024.	-	-	(2,490)
Victoria Square Sinking Fund Reserve	Contributions made by tenants and set aside by the Council to meet future maintenance costs at Victoria Square commercial units.	(29)	(29)	It is not currently anticipated that this reserve will be utilised in 2023-2024.	-	-	(29)
Magistrates Court Reserve	Sinking fund to meet non recoverable refurbishment costs for buildings occupied by Magistrates Courts' staff.	(34)	(34)	There is no planned use of this reserve in 2023-2024.	-	-	(34)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Markets Reserve	To fund periodic repairs and maintenance at the wholesale market including, for example, internal and external redecoration. The Reserve has been established from market trader contributions (part of annual service charges).	(92)	(92)	There is no planned use of this reserve in 2023-2024.	-	-	(92)
Licensing Reserve	The Licensing service is not permitted to make a surplus over a three-year period. Against this background the reserve is used to minimise variations in fees imposed as	(2,651)	(1,582)	To support the costs of the licencing service	-	-	(1,582)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	costs and license volumes fluctuate between years.						
Wholesale Market Sinking Fund	Established to fund specific major replacement and refurbishment projects at the wholesale market including, for example, plant and equipment replacement or a roof replacement. This reserve has been established from market trader contributions (part of annual service charges).	(21)	(21)	There is no planned use of this reserve in 2023-2024.	-	-	(21)
Highway Management Reserve	Reinvestment of funds secured through Bus Lane	(1,022)	(738)	Funds will be reinvested into	-	-	(738)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	enforcement into Highway improvement.			Transportation projects and Highway Improvement works.			
Private Sector Housing - Civil Penalties	This reserve is made up of fines levied on private sector landlords under the Housing Planning Act 2016. As an alternative to prosecution landlords can be fined for breaches of the act for example breaches of an improvement notice or overcrowding in a property. Fines can be up to £30,000 and are ringfenced to provision of the service.	(124)	(71)	To provide support to aim the service in administration and enforcement	-	-	(71)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Private Sector Housing - Licencing Fees	Licencing fees are levied on all private sector properties that offer multiple occupancy. Each property is charged a set fee at the point of registration. Properties are then assessed against pre-defined criteria and are awarded a star rating. Depending upon the star rating awarded an amount of the licence fee is refunded up to a total of the original fee. This reserve is required in order to fund these refunds in future years.	(60)	(60)	It is not currently anticipated that this reserve will be utilised in 2023-2024.	-	-	(60)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Funds and Bequests Reserve (including Mary Ellen Bequest)	Trust funds administered by the authority with specific criteria for allocation.	(16)	(16)	It is not currently anticipated that this reserve will be utilised in 2023-2024.	-	-	(16)
Revenue Grants Unapplied (IFRS) Reserve	Established in accordance with the principles of IFRS in relation to the recognition of grants and contributions in the council's accounts. Approvals for the use of actual grants are made during the year according to the Council's constitution.	(4,826)	(4,826)	This reserve will be applied at year end in line with the accounting policies	-	-	(4,826)
Art Fund	Funds administered to support revenue expenditure against	(32)	(32)	There is no planned use	-	-	(32)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	criteria defined by the bequest.			of this reserve in 2023-2024.			
Mayors Award	Trust funds administered by the authority with specific criteria for allocation.	(2)	(2)	There is no planned use of this reserve in 2023-2024.	-	-	(2)
Covid Collection Fund tax income guarantee scheme reserve	In the Spending Review 2020, the Government announced funding to compensate 75% irrecoverable losses from council tax and business rates revenues in 2020-2021, that would otherwise need to be funded through local authority budgets in 2021-2022 and later years. The reserve has been	(2,458)	-	There was a deficit on the Collection Fund in 2020-2021, which due to Collection Fund accounting treatment will not be realised until 2021-2022 and later years. This reserve will be used in part in	-	-	-

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	established to hold the funds. Due to Collection Fund accounting treatment, the deficit on the Collection Fund in 2020-2021, to be offset in part by this funding, will not be realised until 2021-2022 and later years.			2023-2024 to offset one third of the deficit.			
Mediation Service	To provide a Mediation Service which is self-funded through annual contributions, mainly from Wolverhampton Homes and Cannock Chase District Council.	(1)	(1)	There is no planned use of this reserve in 2023-2024.	-	-	(1)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
Community Safety	To assist the Safer Wolverhampton Partnership to deliver the Community Safety and Harm Reduction Strategy and its annual Delivery Plan, as authorised by the Office of the Police and Crime Commissioner.	(22)	(22)	There is no planned use of this reserve in 2023-2024.	-	-	(22)
Public Health	This reserve has been established from ring fenced Public Health grant and is to fund one-off public health initiatives.	(7,306)	(1,861)	To support Public Health priorities	1,234	537	(90)
Building Control Service Improvements	Any surplus achieved on the Building Control Service is required	(186)	(154)	It is not currently anticipated that this	-	-	(154)

Specific Reserve	Description of Reserve	Balance at 1 April 2023 £000	Forecast Balance at 31 March 2024 £000	Areas of anticipated expenditure 2023-2024	Commitments already approved for future years £000	Approvals sought as part of this budget report for 2024-2025 £000	Forecast Balance - Future £000
	to be reinvested back into the service.			reserve will be utilised in 2023-2024.			
West Midlands Strategic Migration Partnership	To provide support the work of the partnership.	(56)	(56)	There is no planned use of this reserve in 2023-2024.	-	-	(56)
Schools Balances	Schools balances	(15,154)	(13,606)		-	-	(13,606)

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Wolverhampton Homes Business Plan 2024-2025	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Steve Evans Deputy Leader: City Housing	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	John Roseblade, Director of Resident Services	
Originating service	City Housing	
Accountable employee	Lynda Eyton	Client Relationship Manager
	Tel	01902 555706
	Email	Lynda.eyton@wolverhampton.gov.uk
Report to be/has been considered by	Directorate Leadership Team	16 January 2024
	Strategic Executive Board	16 January 2024
	Cabinet Member Briefing	26 January 2024

Recommendations for decision:

That Cabinet recommends that Council:

1. Approve the Wolverhampton Homes Business Plan 2024-2025.
2. Approve the Wolverhampton Homes Delivery Plan 2024-2025.
3. Approve the arrangements for monitoring the delivery of the Wolverhampton Homes Business plan and Delivery Plan.

Recommendation for noting:

That Cabinet is asked to:

1. Note that the governance and monitoring arrangements of Wolverhampton Homes are to be reviewed following the recommendations of Cabinet 18 October 2023 (Social Housing Regulation Act 2023 – Landlord Services Review).

1.0 Purpose

- 1.1 The purpose of this report is to seek Cabinet acceptance of the Wolverhampton Homes Annual Business Plan 2024-2025, the associated Delivery Plan 2024-2025 and its monitoring arrangements, and to recommend approval of the same by full Council.

2.0 Background

- 2.1 Under the terms of the management agreement between the City of Wolverhampton Council (CWC) and its arms length management organisation (ALMO) Wolverhampton Homes (WH), the Council is required to adopt an annual Delivery Plan.
- 2.2 The schedules to the management agreement were revised and adopted by Cabinet on 12 September 2018, with 'Schedule 3 - Annual Delivery Planning Process Timetable' amended in support of WH developing an overarching business plan allowing for longer term service and financial planning.
- 2.3 WH have this year developed an Annual Business Plan with an associated Annual Delivery Plan.
- 2.4 The WH Business Plan 2024-2025 sets out the strategic plan for how they will support CWC's priorities, Our City: Our Plan, regulatory requirements and WH's priorities to:
- Enhance our community and customer focus
 - Provide safe and secure homes
 - Support tenants to sustain their tenancies and homes
- 2.5 The Annual Delivery Plan demonstrates how the strategic priorities of the Business Plan will be operationalised over the coming year.

3.0 Monitoring

- 3.1 The Council currently maintains the WH Delivery Plan Quarterly Monitoring Group, chaired by the Deputy Leader: City Housing, it provides the opportunity to the Council (including officers from Housing and Finance) to have oversight and scrutiny of the progress WH are making in the achievement of the Delivery Plan.
- 3.2 In addition, CWC Landlord Services Officers, with WH Performance Team hold monthly Performance Officer Group meetings to provide ongoing oversight and monitoring of key performance indicators at appendix 3. The key performance indicators have been developed jointly by WH Senior Management Team and CWC City Housing to ensure compliance with regulatory requirements and the terms of the Management Agreement and that there are consistently high standards of services provided to tenants.
- 3.3 The Council has further oversight of the performance of WH through several means, including but not limited to:
- Asset Management Group

- Financial Issues Group
- Reporting to Fire Safety Compliance Scrutiny
- Councillor members of WH Board
- A quarterly Managing Agents Forum
- Client Relationship Manager attendance at board meetings, AGMs etc.
- Internal audits from the Council’s Audit team and governance audits from the City Housing team.

3.4 The Regulator of Social Housing (RSH) has set out the specific expectations and outcomes that all registered housing providers are expected to achieve through the Consumer Standards. The consumer standards are monitored through the performance monitoring regime. The RSH recently consulted on a new suite of consumer standards which are outlined in the table below:

<u>Current Consumer Standard</u>	<u>Proposed Consumer Standard</u>
Home Standard – sets requirements on the quality of accommodation and repairs and maintenance	The Safety and Quality Standard – requires landlords to provide safe and good quality homes and landlord services to tenants.
Tenant Involvement and Empowerment Standard – sets requirements on customer service and complaints, tenant rights and involvement.	The Transparency, Influence and Accountability Standard – requires landlords to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints when necessary, influence decision making and hold their landlord to account.
Neighbourhood and Community Standard – addresses issues around neighbourhood and communal areas and anti-social behaviour	The Neighbourhood and Community Standard – requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
Tenancy Standard - sets requirements for how properties are allocated/exchanged and terms around tenure.	The Tenancy Standard – sets requirements for the fair allocation and letting of homes and for how those tenancies are managed and ended by landlords.
Tenant Satisfaction Measures (TSMs)	No changes proposed

3.5 Tenant Satisfaction Measures (TSM) will be required to be reported to the RSH from April 2024 and comprise of 10 management measures monitored through key performance indicators whilst the 12 perception measures are gathered via surveys conducted by an external company contracted to carry out surveys of our tenants on our behalf. The

results of these surveys, and any recommendations resulting from them, are reported to the quarterly monitoring group meeting.

4.0 Review of governance and monitoring arrangements

4.1 In response to the changing regulatory landscape of social housing, which has included a new Social Housing (Regulation) Act 2023 (the Act), CWC City Housing carried out a review of its housing management services including a review of the governance, monitoring and the management agreement between CWC and WH.

4.2 A City Housing Improvement Programme (CHIP) has been established to deliver on the Cabinet endorsed mandate to achieve compliance with the Act, by reviewing the relationship with the ALMO, Wolverhampton Homes to include:

- The creation of an overarching Shareholder Board as a focus for housing governance.
- Amend the Management Agreement and Partnership Pledge to reflect the Regulatory landscape and strengthen City of Wolverhampton Council's (CWC's) ability to lead on improvements where necessary.
- Strengthen the clienting arrangements with defined roles and responsibilities, accountabilities for demonstrating assurance and re-assurance, and clear reporting structures.
- Develop a shared evidence base to demonstrate Regulatory compliance, to support re-assurance testing, a clear line of sight and single view of the truth. CWC will lead on creating a Data Process Strategy that ensures data is being recorded consistently across all teams with associated automated data quality and reporting.
- Align Wolverhampton Homes business planning cycles with those of CWC, including the objectives of the refreshed housing strategy.
- Review all Service Level Agreements and functions delivered to ensure services are fit for purpose, that adequate monitoring and oversight is in place across CWC which provides assurance to the Council and value for money for residents.

And, following the implementation of the recommended governance changes, City Housing will review the effectiveness of the new Management Agreement in strengthening CWC expectations, providing sufficient oversight and whether this has provided the direct line of sight required for Regulatory compliance.

4.3 As the expectations of the Social Housing (Regulation) Act and the Regulator of Social Housing become clearer, CWC need to continue to consider whether the ALMO remains the best operational model for our housing services to gain full assurance against Consumer Standards and the regulatory regime and to deliver the best services to the tenants of City of Wolverhampton Council.

4.4 A report on progress of the City Housing Improvement Programme (CHIP) will be presented to Scrutiny and Cabinet in October 2024.

5.0 Evaluation of alternative options

5.1 CWC could choose not to adopt the WH Business Plan and associated Delivery Plan. Where a delivery plan cannot be agreed, the management agreement sets out that it will be determined in accordance with its dispute resolution process.

6.0 Reasons for decision

6.1 It is recommended that the WH Business Plan at appendix 1 and the Delivery Plan at appendix 2 is adopted along with the additional appendices. The suite of key performance indicators (KPIs) are at Appendix 3. The KPIs, business plan and delivery plan have been developed in collaboration with the Council and assists the council to meet its priorities and regulatory requirements.

6.2 Appendix 4 sets out WH's procurement plan for 2024-2025 as required by the management agreement, appendix 5 are those contracts let in 2023-2024 and appendix 6 sets out the Housing Revenue Account (HRA) Capital Programme projects where management is delegated to WH.

7.0 Financial implications

7.1 There are no direct financial implications from this business plan. Wolverhampton Homes receive an annual management fee from the Housing Revenue Account as approved by Cabinet in the 'Housing Revenue Account Business Plan 2024-2025 including Rents and Service Charges', to deliver services as contracted in the Management Agreement and receive additional income from trading activities. A balanced budget to deliver the annual delivery plan is approved by the Wolverhampton Homes Board on an annual basis.

7.2 WH performance on rent collection and void management impacts on the income receivable in the HRA and is monitored throughout the year.

7.3 WH manages the majority of the HRA capital programme, including major refurbishment projects which are delivered by the Strategic Construction Partnership. This programme invests around 58% of HRA resources so it is important that it is managed efficiently and effectively.

[JM/10012024/M]

8.0 Legal implications

8.1 In accordance with the management agreement the Council's in-house Legal Services has provided legal support to Wolverhampton Homes with efficiencies for a considerable number of years. The arrangements for monitoring the delivery of the Wolverhampton Homes Business and Delivery Plans should be robust and ensure that there are good governance arrangements in place.

[CS/08012024/1]

9.0 Equalities implications

9.1 WH annual business plan has equalities implications in terms of the workstreams that the plan describes. Where appropriate any equalities implications have been or will be the subject of equality analysis within WH. This is governed through a schedule of equality analysis which is presented to WH Equality Circle Forum to inform the equality agenda, providing a platform to assess the impact of planned service delivery. As a result of these considerations and analyses Councillors can be assured that Wolverhampton Homes is fully committed to meeting the requirements of the General Equality Duty as created by Section 149 of the Equality Act 2010.

10.0 All other implications

10.1 There are no direct climate change or environmental implications for this report, however, the delivery of estate and property based programmes will contribute to the improvement of living conditions and enhance the visual appearance of neighbourhoods. WH will develop plans throughout the year to develop a strategic asset investment proposal for Housing in relation to achieving improved energy efficiency and carbon neutrality, which will contribute towards reducing carbon emissions over the course of the Business Plan.

10.2 There are no direct health and wellbeing implications for the report, however WH account for and work to improve the health and wellbeing of the tenants whose homes they manage, as part of their day-to-day delivery of housing management services and their interactions with the Council and other statutory organisations with whom they may work in partnership, make referrals to and signpost tenants to.

10.3 There are no direct digital implications for the report however WH are proactively working towards increased accessibility to their services through digital channels as well as improved digital inclusion for the tenants that they work with in the day-to-day delivery of housing management services.

11.0 Schedule of background papers

11.1 [18 October 2023, Social Housing Regulation Act 2023 – Landlord Services Review, Cabinet](#)

11.2 [12 September 2018, Wolverhampton Homes Management Agreement Update](#), Cabinet (exempt report)

11.3 [17 January 2024, Housing Revenue Business Account Business Plan 2024-2025](#), Cabinet

12.0 Appendices

12.1 Appendix 1: Wolverhampton Homes Business Plan 2024-2025

12.2 Appendix 2: Wolverhampton Homes Delivery Plan 2024-2025

12.3 Appendix 3: Wolverhampton Homes Key Performance Indicators Suite 2024-2025

- 12.4 Appendix 4: Wolverhampton Homes Procurement Plan 2024-2025
- 12.5 Appendix 5: Wolverhampton Homes Contracts Let 2023-2024
- 12.6 Appendix 6: Wolverhampton Homes Capital Programme 2024-2025

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Business Plan
2024-2025

Wolverhampton Homes



A message from the Chief Executive

Welcome to our business plan that will underpin our work through to 2025. This is our strategic roadmap that outlines our commitment to providing high quality services that meet the needs of our diverse customer population in accordance with the priorities of the city council.



The landscape of social housing is changing rapidly, with increased regulation that will help us to drive ever-higher standards for customers. By embracing the regulatory changes and listening and acting on customer feedback, we aim to deliver great services to our customers, while delivering against regulatory requirements.

Our business plan details our commitment to our customers, to compliance and to our aim of enhancing services to ensure we continue to work towards our vision of unlocking people's potential through housing, skills and technology.

Customers have told us they want us to be there when they need us, with access to high-quality digital services and the ability to speak to our teams if they need to. We have developed a new My Account app and enhanced our website to ensure easy online access to our services.

**We have a clear mission:
To help people get
on in life.**

In pursuit of this mission we will continue to focus our efforts around three key pillars, to support the City of Wolverhampton Council's strategy:

Enhance our community and customer focus – by working in communities to deliver high quality services which keep customers at the heart and meet their changing needs and preferences.

Provide safe and secure homes – by managing and maintaining homes and neighbourhoods to a high standard, adapting and improving the existing housing stock and actively contributing to the improved supply of sustainable accommodation options across the city.

Support people to sustain their tenancies and homes – through effective advice and support services that help residents to live independent, prosperous and fulfilling lives. We will continue to work collaboratively with stakeholders to promote independence and individual and community resilience while continuing to provide excellent housing services.

Through robust community engagement initiatives, transparent communication channels and a range of options for customers to provide feedback and be involved, we will continue to strive for high standards, with strong governance and support from Wolverhampton Homes' Board.

Shaun Aldis
Chief Executive of Wolverhampton Homes

Executive Summary

Wolverhampton Homes manages properties across the city on behalf of the City of Wolverhampton Council. We also provide a wide range of support services for customers and city-wide, tenure-neutral services including the Anti Social Behaviour team and the Wolverhampton Homes Improvement Agency.

We are governed by a Board of non-executive directors and led by a Senior Management team, with customer voice and influence on decision making embedded in our governance structures through the Board, our Committees and our Customer Involvement Panel.

We have a clear vision and plan, which has been developed through customer feedback, robust data and insights, and driven by the Charter for Social Housing Residents. We believe we're in a strong position to meet the demands ahead, with a sound track record of delivering services that meet customers' needs.

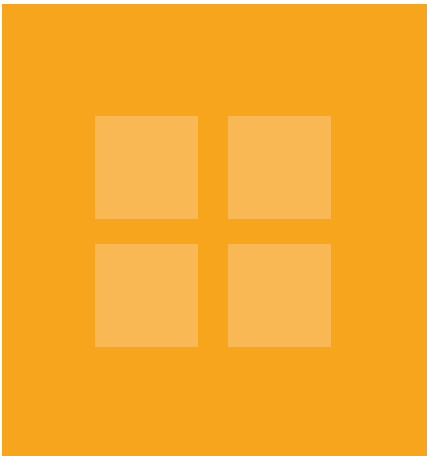
It's a challenging time for social housing, and this business plan outlines how we will continue to respond to the new legislation and regulation to improve standards for customers.

The plan will take us through a period of unparalleled change, and we anticipate that our role will develop and grow throughout this time, supporting the council to deliver on their priorities and creating positive change with longer, healthier lives for the residents of Wolverhampton.

CITY OF
WOLVERHAMPTON
COUNCIL

Our City, Our Plan

Wulfrunians will live longer, healthier lives.



Wolverhampton Homes Business Plan 2024/25

- Enhance our community and customer focus
- Provide safe and secure homes
- Support people to sustain their tenancies and homes



Our supporting strategies



Corporate Social Responsibility and Community Investment



People and Organisational Development



Customer Contact



Communication



Asset Management



Carbon Reduction

About Wolverhampton Homes

Wolverhampton Homes is an Arm's Length Management Organisation (ALMO) that manages around 21,000 properties on behalf of the City of Wolverhampton Council.

Wolverhampton is unique in its position of having an ALMO operating alongside three smaller tenant management organisations – Bushbury Hill Estate Management Board, Dovecotes Tenant Management Organisation and New Park Village Tenant Management Co-operative.

Wolverhampton Homes manages 19,548 tenanted properties, 2,274 leaseholds, 14 shared ownership homes, 200 shops and more than 3,500 garages. We deliver a wide range of services on behalf of the city council including retained responsibilities, regulatory and compliance activities for each of the tenant management organisations, ensuring all council-owned properties across the city are compliant with the highest safety standards.

We manage the city's capital programme for maintenance and regeneration and we are responsible for the delivery of the award-winning Heath Town regeneration programme – a £multi-million scheme to upgrade and enhance Health Town estate with a range of safety, security and environmental improvements.

There are more than 6,000 people currently on the council's housing register, with new applicants joining all the time, and around 800 properties a year coming available for letting. We are committed to supporting the council's Better Homes for All strategy to support those in need of a home to explore other housing options, which could see them move to a safe and secure home more quickly.

With circa 700 employees, we are one of Wolverhampton's biggest employers and we take our responsibility to the city seriously. We support the council in delivering a number of city-wide objectives such as our recently relaunched Early Careers programmes which provide young people with the opportunity to gain valuable skills and experience in the social housing sector combined with formal learning and qualifications that will help them to develop a long and rewarding career.

It is important that colleagues have access to a range of learning opportunities to help them to continually develop and grow – while being able to deliver professional services to our customers. This is done through in-person and online training, accredited courses and self-managed learning available 24/7 through our My Learning Hub virtual platform. We actively encourage managers in the business to achieve Member or Fellow qualifications from the Institute of Leadership and Management.



How we work:

Our ways of working are driven by our values, creating an enabling and engaging culture, inspiring innovation and excellence, and collaborating to deliver.



Working together

We work collaboratively with our customers and colleagues. We value each other's ideas and different skill-sets, and many hands make light work so we're more efficient when we work together.



Open to new ideas

We embrace change, look in different places, ask questions and try new things. We're curious and we look for a better way. We won't always find one but that's OK because we know that 'good enough' isn't the best we can be.



Respecting differences

We treat others as we would like to be treated and we value open and honest conversations. We are encouraging of other views and we know that our greatest strength comes from our differences, so we have created a supportive environment where we can all be ourselves.



Delivering our promises

We take personal responsibility for getting things done and we do what we say we will. We are committed to providing a great service to our customers and always act with integrity.



For the 2022/23 financial year, Wolverhampton Homes:

- Collected 97.32% of rent
- Handled 178,018 calls to our customer contact centre
- Responded to 46,594 Telecare calls, supporting some of the most vulnerable residents in Wolverhampton
- Made 3,744 befriending calls through our volunteers
- Supported 20 people in the city into work, work experience, training and volunteering
- Delivered savings of £118,000 for the local NHS Trust through quicker safe hospital discharge with home adaptations completed by our Home Improvement Agency
- Completed 320 home adaptations to support people to remain living independently in their homes for longer
- Helped 4,840 customers with financial support through our Money Smart team
- Accessed £440,000 of additional funding to support those customers in the greatest need
- Completed 17,634 gas safety checks
- Allocated 801 properties and 142 home exchanges
- Let empty properties, after repairs are completed, in an average of 26 days
- Spent almost £13 million on 64,980 repairs

Property Services

- Asset compliance management and assurance
- Capital programme management and delivery
- Stock condition, design, and investment planning
- Commercial services
- 24/7 response repair service
- Void property management
- Environmental management
- Retained responsibilities and support to TMOs and the EMB

Homes & Communities

- Tenancy and estate management
- Income and sundry debt management
- Money Smart
- Tenure neutral anti-social behaviour services
- Neighbourhood Services
- Home sales, shops, and leasehold management
- Lettings, allocations, and mutual exchanges
- Homeless services
- Safeguarding
- Domestic abuse
- Young persons service
- Housing Support and temporary accommodation management
- Home Improvement Agency

Corporate Services

- Customer contact centre
- Customer involvement and engagement
- Complaints and compliments
- CMC and Out of Hours service
- Governance, business assurance and business support
- Health and safety
- Human resources
- Learning and organisational development
- Communications
- Business improvement – system development and transformation

Governance

Over the last 18 years, Wolverhampton Homes has supported its shareholder the City of Wolverhampton Council to deliver housing management services as part of the Management Agreement.

Wolverhampton Homes Board

We are governed by a Board of 12 non-executive directors who work closely with our Senior Management team to support the strategic decision making process. Our Board is made up of four tenant Board members, four independent and four Wolverhampton councillors, who oversee the effective operation of the organisation and compliance with legal and regulatory requirements. Board and Committee meetings provide strategic direction, help to share business planning and objective setting, monitor performance, and ensure we work effectively with our customers, shareholder and other stakeholders.

Board members undertake an annual development plan, and receive bespoke training and development to ensure they are able to undertake their roles to a high standard. This includes external training to support their roles as company directors, and covers a number of key areas such as Equality and Diversity, Health and Safety, Finance and Audit.

Senior Management Team

Our Senior Management team is made up of the Chief Executive – Shaun Aldis and three directorate leads:



Shaun Aldis
Chief Executive



Julie Haydon
Director of Corporate Services



Angela Barnes
Director of Homes and Communities



Ian Gardner
Director of Property Services

Governance arrangements

To prepare for the housing sector's increase in regulation, a strategic housing review was completed. The review resulted in several recommendations that were supported by the Cabinet, and will see the following proposals implemented:

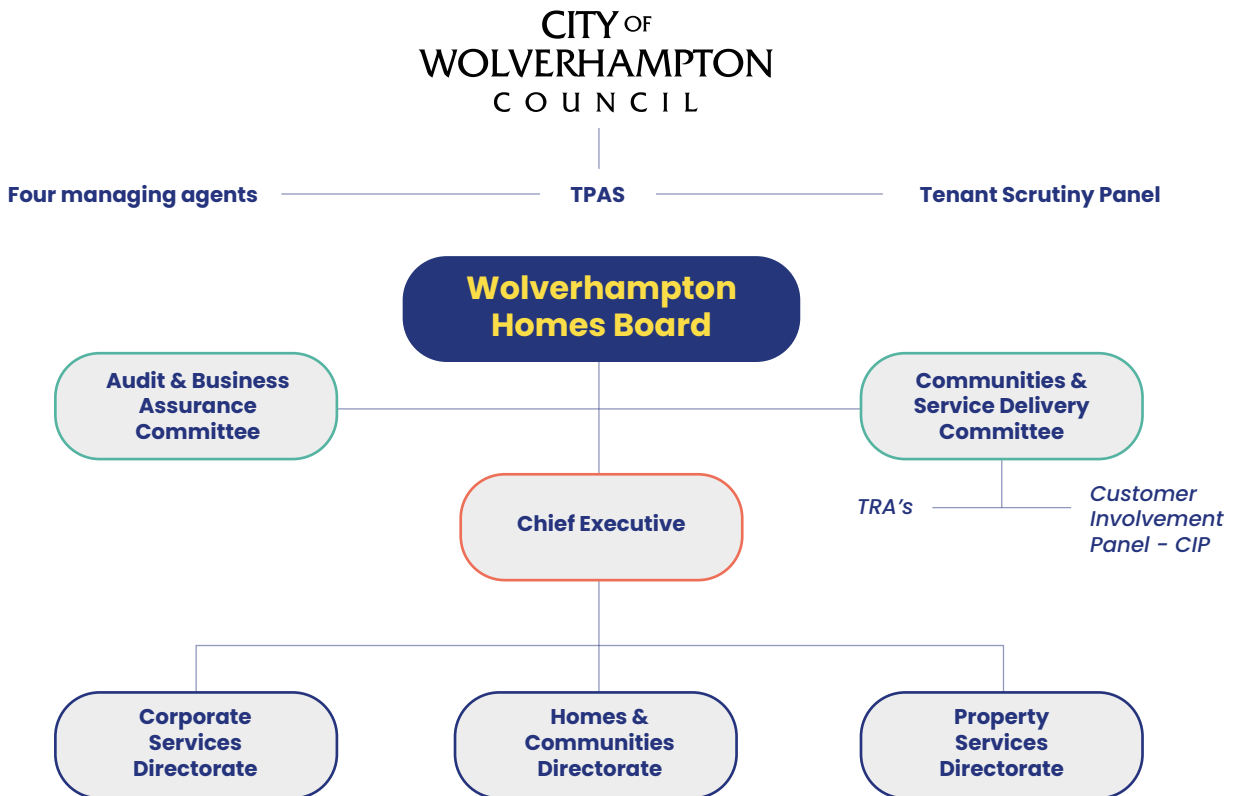
- Development of an overarching Shareholder Board as a focus for housing governance
- A review of the Management Agreement
- Creation of a shared evidence-base to ensure clarity of city-wide data
- A review of the Service Level Agreements in place between the city council and Wolverhampton Homes

Assurance is provided to the city council through robust governance structures that are continually reviewed. These governance arrangements ensure that we remain fit for purpose, continue to offer value for money to our customers, and that we meet and support the council's priorities.

Customer Involvement Panel

We have a newly established Customer Involvement Panel supported by tenants and leaseholders from across the city. The group meets quarterly and has responsibility for reviewing strategies and major service changes that could impact on customers, ensuring they are supporting us to listen and act on the customer voice. The panel also oversees the programme and delivery of our scrutiny activities and report on findings and outcomes to our Communities and Service Delivery committee.

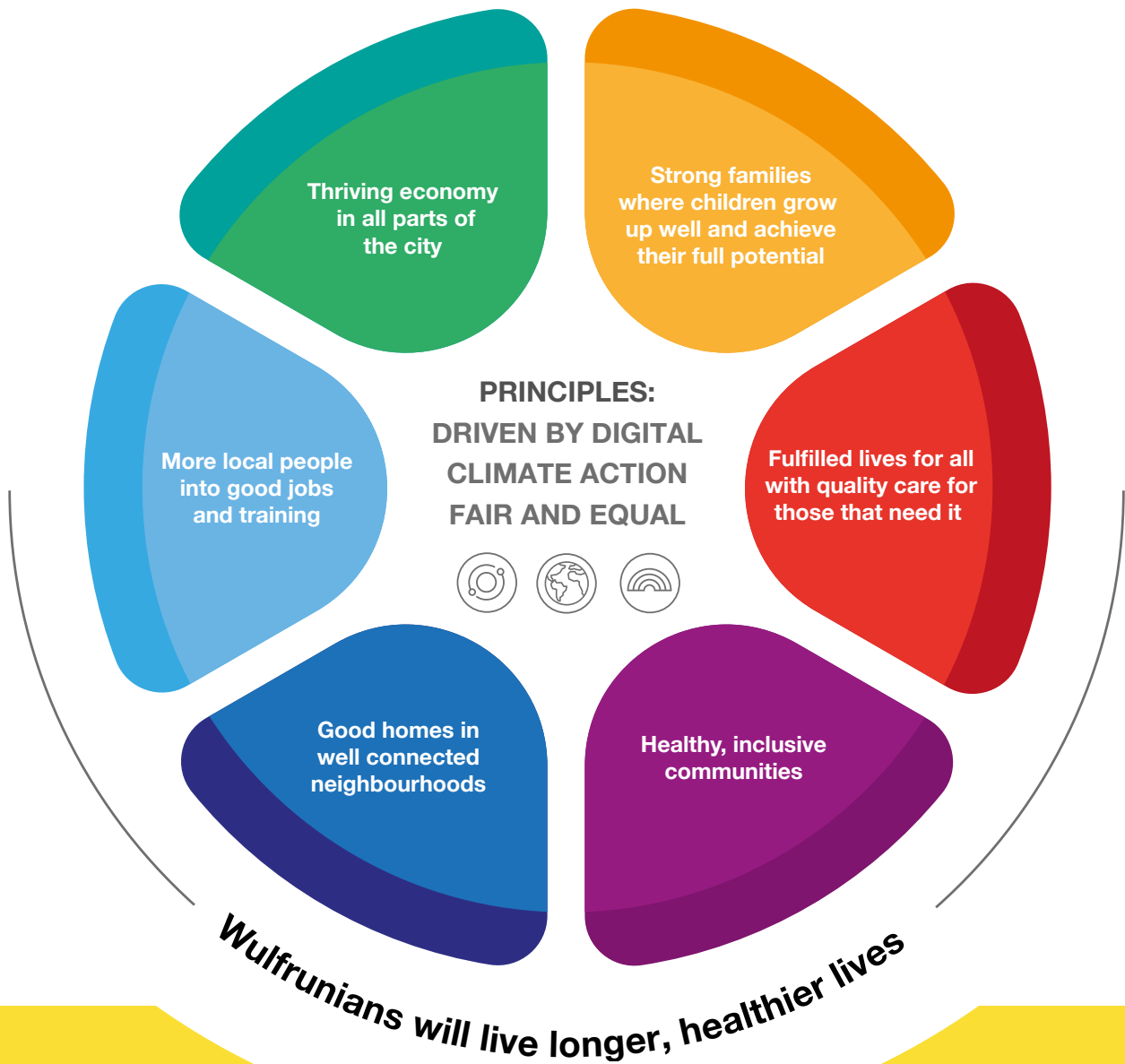
Our Customer Involvement Panel support us to listen and act on the customer voice



Supporting the city's priorities

As the largest housing management partner of the City of Wolverhampton Council we recognise the significant role and opportunity we have in supporting the council to achieve its goals.

Our business plan and key priorities are informed by Our City, Our Plan, as we deliver critical housing services in Wolverhampton.



Supporting the city's priorities *Continued*

A settled and secure home is the foundation for people and families to thrive. So alongside the standard housing management services, we provide a wide range of services to build healthy, safe and thriving neighbourhoods and communities.

We aim to tackle ASB through our dedicated, city-wide, tenure-neutral service and we strive to forge positive connections and to keep residents safe in their homes; our Money Smart team supports thousands of customers every year with the cost of living. We aim to help families with children who are attending school to ensure those children are ready to achieve their potential; and our Early Careers initiatives have supported unemployed 18-24s in the city into secure jobs with opportunities to learn and grow.

A committed supporter of the Wolverhampton Pound by way of joint procurement initiatives, and supporting the aims to help reduce youth unemployment by pledging our support to the city's Wolves At Work programme. We also deliver an apprenticeship scheme to help young people into work.



Supporting Principles



Climate Conscious

We have committed to the 'Net Zero' carbon target for 2028 to continually improve the properties we manage on behalf of the city council, with a focus on energy efficiency.



Driven By Digital

We are aligned with the council's aim to maximise how we use digital technologies to deliver better services and outcomes, encouraging customers to move to digital by choice.



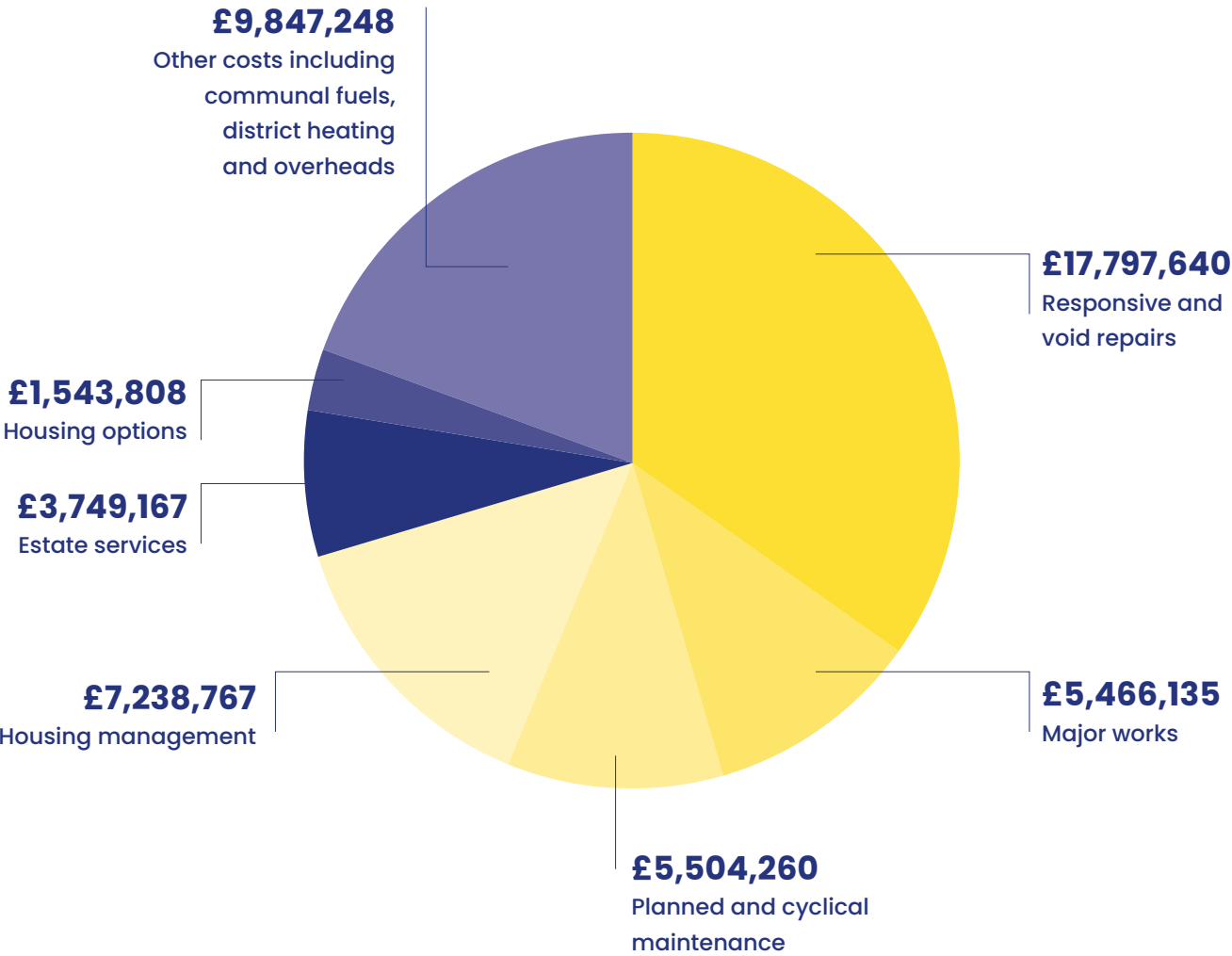
Fair And Equal

We are passionate that everyone should have fair and equal access to services and opportunities so that they can play a positive role in their community.

Our Finances

Wolverhampton Homes works effectively to deliver value for money services against the backdrop of the current economic pressures which are being experienced nationally.

Rent helps to pay for the delivery of our services and to support the maintenance of homes. For the 2022 - 2023 financial year, we collected **£90,385,209** in rent on behalf of the City of Wolverhampton Council, with 97.32% of rent collected.



Priorities for the year

As the largest housing management partner of the City of Wolverhampton Council we recognise the significant role and opportunity we have in supporting the council to achieve its goals.

The seven pillars of the Charter for Social Housing Residents sets out what our customers can expect from Wolverhampton Homes:

To be safe in your home.

The government will work with industry and landlords to ensure every home is safe and secure.



To have your **complaints dealt with promptly and fairly**, with access to a strong Ombudsman.



To know how your **landlord is performing** including on repairs, complaints and safety, and how it spends its money, so you can hold it to account.



To be treated with **respect**, backed by a strong consumer regulator and improved consumer standards.

To have a good **quality home and neighbourhood** to live in, with your landlord keeping your home in good repair.



To have your **voice heard** by your landlord, for example through regular meetings, scrutiny panels or being on its Board.



To be supported to **take your first step to ownership**, so it is a ladder to other opportunities, should your circumstances allow.



Priorities for the year *Continued*

Close performance monitoring ensures we are meeting consumer regulation through good quality, safe and secure accommodation and neighbourhoods. Our new Customer Involvement Panel and scrutiny groups will support regular, transparent performance reporting with the customer voice flowing through all our services, procedures and policies. We have redesigned our complaints process and increased resource to ensure we're responding and resolving complaints to customers' satisfaction, and that the learnings are captured and used to inform continual service improvements. Our annual 'Here when you need us' progress report will let you know how we're performing against these objectives.

Keeping customers safe, in a good quality home and neighbourhood

To ensure that estates are safe and clean, where people feel they belong and where anti-social behaviour is not tolerated

Access to suitable temporary accommodation, with B&B and hotel rooms used for short-term emergencies only

Homes and communal areas are compliant with all relevant Health & Safety requirements

Develop long term investment strategies to maintain decent homes and reduce carbon emissions



Providing robust and person centred domestic abuse support



Provide an efficient and customer focussed repairs service to keep customers safe

Delivering regeneration, refurbishment and building safety projects to enhance homes and neighbourhoods across the city

Priorities for the year *Continued*

Treating customers with respect and acting on their feedback

Delivering the Our Future transformation programme to ensure that everyone at Wolverhampton Homes is skilled, engaged and able to do a great job in an inclusive and open environment

Supporting customers to choose digital channels through providing high quality online services



Keeping customers at the heart of all decision-making, with a menu of involvement for customers to share their views in a way that suits them



Supporting customers to maintain their tenancies through providing relevant help, advice and information



Providing a people-focused adaptations service to enable elderly, vulnerable and disabled people to lead rich and fulfilling lives through living independently at home

Enablers

We are committed to developing our people, our systems and our processes to allow us to effectively deliver against these priorities in full support of the City of Wolverhampton Council and our customers.

We will attract and retain the best people through an inclusive and diverse company culture, excellent training and development opportunities and a first-class employee experience. High-quality digital solutions will ensure customers benefit from fast and efficient online services, freeing up resource for our teams to provide more dedicated support to those who need it most. And the customer voice will be heard, with our customer panel embedded in our governance process and enhanced understanding of customer needs and preferences driving our decisions.



Conclusion



This Business Plan will guide Wolverhampton Homes and underpin its work over the coming year. This comprehensive roadmap reflects the company's commitment to providing exceptional services aligned with the priorities of the City of Wolverhampton Council.

The social housing landscape is evolving, and Wolverhampton Homes, as an ALMO, is well-positioned to navigate these changes. By embracing regulatory reforms, fostering customer-centric practices and promoting innovation, we are confident in the company's ability to not only meet but exceed the expectations of their diverse customer base.

The priorities outlined in this plan, from enhancing community focus to delivering safe and secure homes, resonate with the council's broader objectives and corporate aim, for Wulfrunians to live longer, healthier lives. We are confident that Wolverhampton Homes' leadership, colleagues and governance structures have been designed and developed to deliver this business plan effectively. Through transparent communication, community engagement, and a commitment to high standards, we believe Wolverhampton Homes will continue to be a cornerstone in providing quality housing services and positively impacting the lives of Wolverhampton's residents.



"As the Chair of the Wolverhampton Homes Board, it has been welcoming to see the company's response to customer feedback, which is reflected in the Business Plan priorities, along with the joint aspirations of the City of Wolverhampton Council."

"With an ever-changing landscape in social housing, including increased regulation and legislation and the upcoming launch of the refreshed approach to Consumer Standards, this will help ensure that Wolverhampton Homes working together with the council, is able to deliver even greater services to our customers, with the aim of enhancing customer satisfaction."

"Wolverhampton Homes has created a Customer Involvement Panel providing opportunity for customers to be heard and are committed to working with partners to enhance community engagement across their estates."

Councillor Sue Roberts

Chair of the Wolverhampton Homes Board

A handwritten signature of Sue Roberts in black ink.



"One of our key priorities is for the city's social housing providers to provide good homes in well-connected neighbourhoods across the city."

"Part of that is about providing access to a safe and secure home for residents and changing the lives of families for the better. Wolverhampton Homes' Business Plan has been developed in collaboration with the City of Wolverhampton Council to ensure improvements are delivered that meet not only regulation and legislation, but the needs of our customers."

"The City of Wolverhampton Council are proud to be working with Wolverhampton Homes."

Councillor Steve Evans

Deputy Leader and Cabinet Member for City Housing

A handwritten signature of Steve Evans in black ink.

Wolverhampton Homes Annual Delivery Plan 2024 - 2025

The new Business Plan and associated delivery weaves in the golden thread of the organisation that runs through everything we do and supports the priorities in relation to the three pillars below which underpin this plan by way of:

- Enhancing our community and customer focus
- Providing safe and secure homes
- Supporting people to sustain their tenancies and homes

No.	Priority	Wolverhampton Homes will
1.	To be safe in your home. The government will work with industry landlords to ensure every home is safe and secure.	<ul style="list-style-type: none"> - Provide an efficient and customer focussed repairs service. - Be compliant with regulatory compliance with the “Big 7”. - Understand and know the stock condition of properties and identify any areas of concern.
2.	To have your complaints dealt with promptly and fairly, with access to a strong Ombudsman.	<ul style="list-style-type: none"> - Provide complaint responses within expected timescales. - Be open and transparent when investigating and responding to your complaints. - Ensure there is a fit for purpose complaints policy in place. - Use learning from complaints to inform service improvements and demonstrate how these have been implemented to both customers and through the business. - Integration of solution focussed outcomes into business delivery – ensuring learning from complaints is identified and addressed.
3.	To know how your landlord is performing including on repairs, complaints and safety and how it spends its money, so you can hold it to account.	<ul style="list-style-type: none"> - Provide performance data on a range of services and share this information with stakeholders and customers. - Analyse data collected to help support decision making and service improvements. - Produce regular reporting detailing performance and spend.
4.	To be treated with respect, backed by a strong consumer regulator and improved consumer standards.	<ul style="list-style-type: none"> - Support customers to choose digital channels through providing high quality online services. - Keep customers at the heart of decision-making, with a menu of involvement for customers to share their views in a way that suits them. - Ensure that customers are treated fairly and equitably in relation to their identified needs. - Support customer to maintain their tenancies through providing relevant help, advice and information. - Providing a people-focused adaptations service to meet people’s needs to lead rich and fulfilling lives through living independently at home.
5.	To have a good quality home and neighbourhood to live in, with your landlord keeping your home in good repair.	<ul style="list-style-type: none"> - Provide access to a range of suitable temporary accommodation, with B&B and hotel rooms used for short-term emergencies only. - Develop long term investment strategies to maintain decent homes and reduce carbon emissions. - Provide robust and person centred domestic abuse support. - Deliver regeneration, refurbishment and building safety projects to enhance homes and neighbourhoods across the city. - Estates are kept free of litter and fly tipping, with open spaces maintained. - Anti-social behaviour is dealt with promptly and effectively, to minimise the impact on individuals and the wider community.

6.	<p>To have your voice heard by your landlord, for example through regular meetings, scrutiny panels or being on its Board.</p>	<ul style="list-style-type: none"> - Support the delivery of the overarching customer experience strategy and associated action plans. - Ensure consistent advice is provided at all front-line touch points - Resident involvement, influence, and scrutiny. - Maintain effective and continuous conversation with all customers, with contact being appropriate to the individual and proportionate to the situation.
7.	<p>To be supported to take your first step to ownership, so it is a ladder to other opportunities, should your circumstances allow.</p>	<ul style="list-style-type: none"> - Delivery of a fit for purpose Right to Buy service. - Support customers into employment via our Reach programme.

PI Code	Performance Indicators
H-IM1b	% of Rent collected (WH Only)
H-IM2	% Rent arrears of current tenants as a proportion of rent roll (GNPI 29) (WH only)
H-IM3	% Rent arrears of former tenants as a proportion of rent roll
STATISTIC	Number of food bank referrals
STATISTIC	Number of Money Smart Team referrals
H-NS2	% of Waste removal / fly tipping jobs completed in time
STATISTIC	Number of waste tipping requests received this month
BS-HR1	Percentage of working days lost to sickness absence in month
H-HD1	Homes Direct - % of customers calls answered within 80 seconds
H-HD2	Homes Direct - % of customer calls answered
STATISTIC	Number of calls received
STATISTIC	Number of calls answered
STATISTIC	% of calls answered
STATISTIC	Number of calls abandoned
TSM NM01	Anti-Social Behaviour (ASB) cases relative to the size of the landlord (TSM)
TSM CF02a	% of Complaints responded to within Complaint Handling Code timescales (CH02) - Stage 1
TSM CF02b	% of Complaints responded to within Complaint Handling Code timescales (CH02) - Stage 2
TSM CH01a	Number of complaints, relative to the size of the landlord (TSM CH01) - Stage 1
TSM CH01b	Number of complaints, relative to the size of the landlord (TSM CH01) - Stage 2
BS-CF3	% of Members Enquiries responded to within timescales
STATISTIC	Number of Members Enquiries responded to
H-TM8	% of tenancies contacted with the last 12 months
STATISTIC	Number of current tenancies
STATISTIC	Number of tenancies not contacted
STATISTIC	Number of units in management (Total WH Stock)
HO-HS2	Average time spent in temp - no of days (across all forms)
STATISTIC	Number of customers owed a "Duty" as a percentage of overall demand
STATISTIC	Number of all presentations (Overall Demand/Total Customers)
CI-LT3	% Rent lost from empty properties
STATISTIC	Number of social housing lettings (void property lettings) completed in the month

STATISTIC	Number of new voids arising this month
STATISTIC	Number of current voids
STATISTIC	Number on the Waiting List (People Registered for Housing)
STATISTIC	Number of new Housing Applications received in the month
P-V1	Average time to repair voids, overall, (including TA)
P-V3	Key to key time for void properties (including TA properties)
CI-LT1	Average time taken to relet properties (ready to let to new Tenancy Start)
CI-LT4	% new tenants satisfied with the allocation & lettings process
TSM RP02a	% of Non-emergency repairs completed within target timescale (TSM RP02)
TSM RP02b	Emergency repairs completed within 24 Hours (TSM RP02)
RP3	Response repairs completed within timescales (HOUSEMARK)
P-R1	% Responsive repairs during period for which an appointment was made/kept
P-R2	% of Planned repairs completed within timescales
STATISTIC	Outstanding repairs (WH Only) - total
STATISTIC	Number of response repair requests received (WH Only)
STATISTIC	Number of response repairs completed (WH Only)
STATISTIC	Number of repairs where no access has been possible.
STATISTIC	Number of Section 11 claims received
TSM BS01	% of valid Landlord Gas Safety Records (LGSR) for tenanted properties (TSM BS01)
STATISTIC	Properties requiring a LGSR
STATISTIC	Number of LGSR cases overdue
STATISTIC	% outstanding that are compliant with the no access procedure
COM2	% of domestic properties with EICR certificates up to five years old.
STATISTIC	Number of EICR Cases over 5 years
STATISTIC	Electrical Installations with a valid certificate
DMC 1A	Total % of damp, condensation and /or mould related service requests inspected within target
DMC 1B	Total % of damp, condensation and /or mould related works orders completed within target
STATISTIC	DMC - New requests
STATISTIC	DMC - Inspected
STATISTIC	DMC - Cancelled
STATISTIC	DMC - Completed

STATISTIC	DMC - Work in progress
TSM BS05	% of Passenger lifts serviced within timescale (TSM BS05)
COM3	% of Passenger lifts availability
STATISTIC	Number of lift sites requiring service
TSM BS04	% of Sites where a risk assessment has been carried out for control of Legionella Bacteria in domestic water systems within a 2 year period (TMS BS04)
STATISTIC	Number of Sites requiring a Legionella Risk Assessment
TSM BS02	The management of Fire Risk Assessments (FRA's); the percentage re-inspected within timescale (Regulatory Reform (Fire Safety) Order 2005) (TSM BS02)
STATISTIC	Number of Fire Risk Assessments completed in the month
STATISTIC	Number of Fire Risk Assessments required in the month
STATISTIC	Total Properties requiring a FRA
STATISTIC	Total FRA's completed
TSM BS03	The Duty to Manage Asbestos – the percentage re-inspected within timescales (Regulation 4 - Non Domestic Premises - Control of Asbestos Regulations (CAR) 2012)
STATISTIC	The number of Asbestos sites requiring re-inspection in the month
TSM TP01	Overall Satisfaction
TSM TP02	Satisfaction with Repairs
TSM TP03	Satisfaction with time taken to complete the most recent repair
TSM TP04	Satisfaction that the home is well maintained
TSM TP05	Satisfaction that the home is safe
TSM TP06	Satisfaction that the landlord listens to tenant views and acts upon them
TSM TP07	Satisfaction that the landlord keeps tenants informed about things that matter to them
TSM TP08	Agreement that the landlord treats tenants fairly and with respect
TSM TP09	Satisfaction with the landlords approach to handling complaints
TSM TP10	Satisfaction that the landlord keeps communal areas clean and well maintained
TSM TP11	Satisfaction that the landlord makes a positive contribution to neighbourhoods
TSM TP12	Satisfaction with the landlords approach to handling anti-social behaviour
TSM RP01	Homes that do not meet the Decent Homes Standard (%) (ANNUAL INDICATOR)

 TSM Indicators



Additional WH Indicators
Supporting Stats

Procurement Plan 2024 - 2025 – Approval to Tender:

Contract Title	Boundary Fencing repairs & replacement
Contract Description	The fencing programme is currently delivered through the Strategic Construction Partnership. Fencing works are now typically a 'demand lead replacement' programme, with more estates having received replacement boundary fencing. This has increased the demands in the internal repairs team and in-house fencing team. Wolverhampton Homes is seeking to appoint a direct specialist fencing contractor to deliver repairs and replacement fencing to existing boundary lines and provide capacity support to the in-house team and seek to improve value for money in delivery.
Existing Contractor / Supplier / Service Provider	Delivered at present through the Strategic Construction Partnership (United Living)
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£1,500,000
Directorate	Property Services
WH Lead Officer	Ian Gardner / Neil Causer
Procurement Route	Open Market Competitive Tender
Status	Fencing renewals will continue to be delivered through the Strategic Construction Partnership until we are able to award the contract. Procurement documentation being developed.

Contract Title	Maintenance of Domestic Lifts
Contract Description	Wolverhampton Homes requires a contractor to carry out the twice-yearly service and maintenance of domestic stair lifts, through floor lifts and ceiling hoists and to undertake any repairs including those as a result of breakdown / call outs.
Existing Contractor / Supplier / Service Provider	Lift & Engineering Services Ltd
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£600,000
Directorate	Property Services
WH Lead Officer	Tommy Crowson / Keith Gibbons
Procurement Route	Open Market Competitive Tender / Framework provider
Status	Current contract in place until 31 May 2024

Contract Title	Occupational Health Nurse
Contract Description	The service provided through Occupational Health will help support sustained attendance at work, bring sickness absence down, and promote employee wellbeing through health surveillance, management referrals, wellbeing activities, physiotherapy services, DSE assessments & ill health retirement assessments.
Existing Contractor / Supplier / Service Provider	BHSF OH Ltd
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£120,000
Directorate	Services
WH Lead Officer	Julie Haydon / Emma Rollinson
Procurement Route	Open Market Competitive Tender / Framework provider
Status	Following a number of clarifications received during the original tender process, the terms and conditions are currently being reviewed by the legal team before procurement re-publish.

Contract Title	Asbestos surveying & analytics
Contract Description	As a result of changes to our Asbestos management arrangements, Wolverhampton Homes require an additional specialist Asbestos surveying and analytics company to support the delivery of our inhouse repairs requirements and Capital Projects delivered through the Strategic Construction Partnership.
Existing Contractor / Supplier / Service Provider	Bradley Environmental Consultants Limited
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£3,500,000
Directorate	Property Services
WH Lead Officer	Ian Gardner / Simon Bamfield
Procurement Route	Framework provider
Status	Current performance of BEC contract is satisfactory, but the increased demand will outstrip their capacity to satisfactorily deliver our requirements under the scope of their current contract. Documentation being developed to provide to Procurement / Legal Services.

Contract Title	Electric Fleet Vehicle Home Charging Management
Contract Description	To support the City's decarbonisation targets, WH has procured ten electric vehicles for its Trades colleagues, further orders are expected to be placed during 2025. Some colleagues park the fleet vehicles at home for out of hours duty arrangements, their convenience and to reduce overnight corporate parking provision for the company. Home Charging will be required for some colleagues and the company requires a management arrangement to monitor and calculate energy costs the driver incurs that that is the responsibility of the WH.
Existing Contractor / Supplier / Service Provider	New
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£200,000 (value includes estimated management fee and energy costs)
Directorate	Property Services
WH Lead Officer	Ian Gardner / Steve North
Procurement Route	Framework provider
Status	Documentation being developed to provide to Procurement / Legal Services.

Wolverhampton Homes Contracts Let 2023-2024

Contract Title	Roofing Repairs and Maintenance
Contract Description	Wolverhampton Homes require a contractor to provide a fully responsive roofing repairs and maintenance service to support its in-house repairs team.
Existing Contractor / Supplier / Service Provider	Roofstyle Ltd
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£1,200,000
Directorate	Property Services
WH Lead Officer	Ian Gardner / Neil Causer
Procurement Route	Open Market Competitive Tender
Status	Requirements are being revised following an amendment to the national schedule of rates and to be issued to Procurement to review and republish early January 2024.

Contract Title	Glazing, Window and Door Repairs
Contract Description	Wolverhampton Homes require a contractor to provide a fully responsive glazing and specialist fitting services to support the activities of Wolverhampton Homes in-house repairs team.
Existing Contractor / Supplier / Service Provider	Harris Glass Ltd (Glazing) – McDougall Brothers (Fitting Services)
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£700,000
Directorate	Property Services
WH Lead Officer	Ian Gardner / Neil Causer
Procurement Route	Open Market Competitive Tender
Status	Requirements are being revised following an amendment to the national schedule of rates and to be issued to Procurement to review. Documents will be with Procurement in January 2024 for publishing.

Contract Title
Contract Description
Existing Contractor / Supplier / Service Provider
Proposed Contract Term
Total Value of Contract (approx.)
Directorate
WH Lead Officer
Procurement Route
Status

Contract Title	Valuation Services
Contract Description	Wolverhampton Homes require a specialist property valuation service to support the delivery of the Right to Buy scheme for existing tenants
Existing Contractor / Supplier / Service Provider	Lee Shaw Partnership
Proposed Contract Term	5 years, with a break clause at year 2
Total Value of Contract (approx.)	£500,000
Directorate	Homes & Communities
WH Lead Officer	Angela Barnes / Chris Churm
Procurement Route	Non-OJEU Open Tender
Status	Contract value increased to allow for increased surveys to be delivered for Right to Buy applications and boundary definitions. Tender documentation being reviewed

Contract Title	Supply of fitting services
Contract Description	To provide specialist fitting services on a responsive basis as and when required. To support the activities of the inhouse Repairs team by providing a fully integrated and flexible service to Wolverhampton Homes.
Existing Contractor / Supplier / Service Provider	McDougall Brothers (Metal Windows Ltd)
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£640,000
Directorate	Property Services
WH Lead Officer	Neil Causer
Procurement Route	Open Tender / OJEU
Status	This contract will now be incorporated within the Glazing, window and door repairs contract and is no longer a separate contract.

Contract Title	Fire Safety Services
Contract Description	Maintenance, repair and testing of fire alarm and intruder alarm systems, fire equipment (fire extinguishers, emergency lighting systems, wet & dry risers and sprinkler systems to communal areas and residential properties).
Existing Contractor / Supplier / Service Provider	Midwest Mechanical & Electrical Services Ltd
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£800,000
Directorate	Property Services
WH Lead Officer	Keith Gibbons / Tommy Crowson
Procurement Route	Open Tender / OJEU
Status	Documentation to be developed and will be with Procurement in January 2024 ready for publication.

Contract Title	Building / Stock condition surveys.
Contract Description	Provision of stock condition surveys including dilapidation, party wall and other specialist surveys required to support the strategic asset management of WH stock portfolio and profile data to develop long term investment strategy.
Existing Contractor / Supplier / Service Provider	New contract
Proposed Contract Term	4 years – Delivery of circa 6000 surveys
Total Value of Contract (approx.)	£2.1m
Directorate	Property Services
WH Lead Officer	Ian Gardner / Simon Bamfield
Procurement Route	CHIC Framework
Status	Documentation being established and issued to Procurement to review.

Contract Title	Empty Property Care (Void Properties)
Contract Description	Wolverhampton Homes requires a suitably qualified contractor to provide house clearance, garden clearance, garage and shed clearance, vermin control, removal of sharps / needles and boarding up properties in order to make them secure until they become fit for tenancy again.
Existing Contractor / Supplier / Service Provider	Orbis
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£1,590,000
Directorate	Property Services
WH Lead Officer	Ian Gardner
Procurement Route	Open FTS / OJEU Tender
Status	WH23005 Awarded to Orbis – Contract sent out to Orbis by Legal for Signature on 13 th November

Contract Title	Painting & Decorating
Contract Description	To provide external redecoration to houses, low rise flats and garages to include elements such as rendered wall areas, doors, gates, canopies, fascia's, fencing and other external elements. Internal redecoration of communal areas to low, medium, and high-rise blocks will also form part of the planned painting programme. Internal redecoration to domestic houses and flats both tenanted and void, will be requested on a response basis.
Existing Contractor / Supplier / Service Provider	Tony Davies & Partners Limited
Proposed Contract Term	4 years
Total Value of Contract (approx.)	£6,000,000
Directorate	Property Services
WH Lead Officer	Ian Gardner
Procurement Route	Open Market Competitive Tender
Status	Contract signed by all parties. Start Date: 24 April 2023 running for a period of 4 years. Product Code: Q2050-C033V and Contract Ref: WH22007

Contract Title	Domestic Periodic Testing
Contract Description	Wolverhampton Homes require an electrical contractor to undertake Electrical Inspection Condition Report (EICR) testing to its properties, ensuring Wolverhampton Homes conforms to guidance and best practice in respect of electrical safety.
Existing Contractor / Supplier / Service Provider	Dodd Group (Midlands Limited)
Proposed Contract Term	4-year direct award
Total Value of Contract (approx.)	£3,600,000 (if option to extend is taken up subject to CPI uplift)
Directorate	Property Services
WH Lead Officer	Tommy Crowson / Keith Gibbons
Procurement Route	EEM Framework – Direct Award
Status	Contract signed by all parties. Start date 17 May 2023 running for a period of 4 years. Product Code Q2050-C020V and Contract Ref WH22005.

Contract Title	Compliance Management System
Contract Description	Accurate and timely reporting of compliance related performance is business critical, including data management, auditing, and archiving. WH's current core ICT provider (NEC) is unable to provide the level of performance reporting and functionality required to satisfactorily report across the wide range of compliance activities the company undertakes. WH therefore requires an alternative system until such point in the future (estimated to be up to three years) when NEC's products are considered satisfactory.
Existing Contractor / Supplier / Service Provider	C365 Cloud
Proposed Contract Term	3-year direct award
Total Value of Contract (approx.)	£130,000
Directorate	Property Services
WH Lead Officer	Ian Gardner
Procurement Route	CCS G-13 Framework – Direct Award
Status	Contract signed. Start date 01 July 2023 – 30 June 2026 with an option for a further 1-year extension to 30th June 2027. Call-off Contract reference WH23004.

Capital Programme Forecasts 2023-2024 to 2028-2029

Programme Budget	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	Total
	£000	£000	£000	£000	£000	£000	£000
<u>Estate Remodelling</u>							
Estate Remodelling – City Wide Non -Traditional	2,484	8,000	8,000	7,200	-	-	25,684
Adaptations for People with Disabilities							
Disabled Adaptations Total	2,600	2,600	2,600	2,600	2,600	2,000	15,000
Decent Homes Stock Condition							
Refurbishment of Voids	13,400	15,000	10,500	9,500	8,500	8,500	65,400
Boiler Replacement Programme	1,000	820	810	830	860	860	5,180
Internal Decency Works	12,300	10,600	10,000	9,400	7,500	5,700	55,500
Heath Town - Refurb of Retained Properties	14,400	16,500	8,400	2,200	-	-	41,500
Bushbury Improvement Programme	158	-	-	-	-	-	158
High Rise M&E	22,700	12,000	9,000	6,500	4,000	-	54,200
Low and Mid Rise infrastructure	3,300	10,500	4,200	4,700	5,500	5,500	33,700
Sustainable Estates Programme	130	300	300	300	300	300	1,630
Non-traditional property surveys	550	300	50	50	300	300	1,550
High Rise External Works	1,300	17,900	16,500	17,000	17,000	17,000	86,700
Decent Homes Stock Condition Total	69,238	83,920	59,760	50,480	43,960	38,160	345,518
Other Stock Condition Improvements							
Structural Works	1,851	1,140	1,140	1,140	1,140	1,140	7,551
Lift and Disability Discrimination Act Improvements - High Rise	500	460	460	460	460	400	2,740
Fire Safety – Medium and Low Rise	3,600	-	-	-	-	-	3,600

Programme Budget	2023- 2024	2024- 2025	2025- 2026	2026- 2027	2027- 2028	2028- 2029	Total
	£000	£000	£000	£000	£000	£000	£000
Roofing Refurbishment Programme	7,020	3,916	3,400	3,400	2,900	2,900	23,536
Door Entry Security Programme	910	410	250	250	300	300	2,420
Remedial Works to non-traditional properties	16,100	13,600	8,200	3,000	2,800	2,000	45,700
Other Stock Condition Improvements Total	29,981	19,526	13,450	8,250	7,600	6,740	85,547
Other Improvements to the Public Realm							
Pathway Improvement and Safety Programme Total	210	220	220	230	230	230	1,340
Service Enhancements and Miscellaneous							
Right to Buy Sale Administration	60	60	60	60	60	60	360
Wolverhampton Homes Capitalised Salaries	2,100	2,100	2,100	2,100	2,100	2,100	12,600
Service Enhancements and Miscellaneous Total	2,160	2,160	2,160	2,160	2,160	2,160	12,960
GRAND TOTAL	106,673	116,426	86,190	70,920	56,550	49,290	486,049

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Good Growth Strategy	
Decision designation	RED	
Cabinet member with lead responsibility	Councillor Stephen Simkins Leader of the Council	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Charlotte Johns, Director of Strategy	
Originating service	Strategy and Policy	
Accountable employee	Laura Collings Tel Email	Head of Strategy and Policy Telephone number Email address
Report to be/has been considered by	Economy and Growth Scrutiny Panel Strategic Executive Board Full Council	29 November 2023 30 January 2024 20 March

Recommendation for decision:

The Cabinet recommends that Council:

1. Approve the City of Wolverhampton Council strategic economic plan, Good Growth Strategy (appendix 1).

Recommendations for noting:

The Cabinet recommend that Council note:

1. That the priorities set out in the Good Growth Strategy have been developed through consultation and engagement with communities and partners across our city.
2. That a presentation and draft Good Growth Strategy was considered by Economy and Growth Scrutiny Panel on the 29 November 2024.

1.0 Purpose

- 1.1 To approve the City of Wolverhampton Council's strategic economic plan, the Good Growth Strategy.

2.0 Background

- 2.1 Full Council approved the City of Wolverhampton Strategic Economic Plan 2019 – 2024 in March 2019. Since the publication of the plan the local, regional, and national economic, political and social context has changed significantly.
- 2.2 The Good Growth Strategy responds to this changing landscape and will help to boost our economy in the right way. It focuses on three themes: people, place and productivity. Good growth is about a sustainable model, a roadmap to economic prosperity and most importantly, a huge opportunity for us to improve the life chances and wellbeing of our residents. It's living up to the vision of Our City: Our Plan to ensure '*All Wulfrunians living longer, healthier lives*'.
- 2.3 Over the last 10 years the City of Wolverhampton has seen major successes and our city economy is now worth over £4.7 billion pounds and supports over 100,000 jobs. We want to go further and faster. The scale of the prize is significant – up to 2040 the city's economy is projected to grow by £2 billion to £6.7 billion, an increase of 43%. GVA per head is forecast to rise by 47.5% in the same period – a bigger increase than the UK average of 45%. This strategy sets out targeted interventions and priorities which could see us eclipse our projected growth to deliver more jobs and higher incomes for local people.
- 2.4 This item was considered as pre-decision scrutiny on the 29 November 2023 by Economy and Growth Scrutiny Panel and will therefore not be available to call in once a decision is made by Cabinet.

3.0 City of Wolverhampton Economy

- 3.1 We want all business, residents, families and communities to benefit from the growth and new opportunities in our city. There are many encouraging signs:
 - Home to the country's most successful enterprise zone, at the award winning £1 billion i54 advanced manufacturing business park. Home to thousands of higher skilled jobs.
 - We have world class research facilities on our doorstep at the National Brownfield Institute at the University of Wolverhampton's Springfield Campus. Spearheading low carbon research and innovation.
 - 91% of our city schools are rated good or outstanding by Ofsted and the number of city residents with higher level skills have risen steadily over the last five years. The City Learning Quarter will futureproof our skills system with a seamless learner offer.

- There are clear industrial strengths in the Wolverhampton economy that are showing growth, and a host of opportunities to further this such as sustainable construction, manufacturing and materials, and the green economy.
- Wolverhampton has a diverse business ecosystem with major strategic companies, fledgling start-ups / scaleups and innovators, as well as very high levels of female-led firms (6th of all local authorities in the UK), ethnic-minority owned businesses and social enterprises.

3.2 But more is needed. The city, like many post-industrial places faces long term social and economic challenges. We believe our industrial heritage is an asset to our economy, but it has left a legacy of brownfield sites that present redevelopment challenges, and the restructuring of our economy has left pockets of low skills. Productivity levels, the amount of value created for every hour somebody works, have been poor for the UK since the financial crisis and Wolverhampton has also struggled.

4.0 Good Growth Framework

4.1 The Good Growth Strategy has an overarching strategic framework comprised of three interlinking themes of place, productivity and people, supported by nine core priorities. These are;

- Place
 - Sustainable city with quality neighbourhoods and workplaces
 - Inclusive, low carbon transport network
 - Secure the economic potential of our city and town centres
- Productivity
 - Help businesses and organisations to increase their productivity
 - Collaborate with the businesses and academia to stimulate innovation
 - Maximise the city's investment potential
- People
 - Education, skills and employment system which meets local need
 - Work with our partners to support health and wellbeing
 - Build community wealth through the Wolverhampton Pound

4.2 The Good Growth Strategy incorporates a clear set of indicators against the three themes which provides city data on key priorities and will enable us to monitor and benchmark the city's performance against national and regional data. Regular reports on the delivery of the strategy and the indicator set will be taken to the relevant scrutiny

panel. This process helps to embed the golden thread of data, showing how we translate overarching strategy into operational delivery.

5.0 Working in Partnership to Deliver Good Growth

- 5.1 Delivering this strategy – people, place and productivity, means collaboration and strong partnership working – not least with the West Midlands Combined Authority, where we will utilise the funding and powers of devolution and the single settlement to deliver our priorities for the city.
- 5.2 The City of Wolverhampton Council is one piece of a complex economic system which operates across multiple footprints and actors. Delivering real economic change requires key partners to align around a shared vision. To make that happen, the Council commits to using its role as a partner, enabler and leader to deliver change. We will utilise the full power our local networks and economic forums to realise the ambitions of this strategy, including the Wolverhampton Anchor Network, the city’s Economic Growth Board, City Investment Board and other business and partner forums.
- 5.3 The Council will continue to work collaboratively with public and private sector partners to deliver projects which accelerate good economic growth in the city. Including, the Green Innovation Corridor in partnership with the University of Wolverhampton accelerating the low carbon economy in the city, our Vacant Properties Taskforce which will help to regenerate our city centre and

6.0 Scrutiny and Consultation

- 6.1 The plan has been developed through regular, continued engagement with key stakeholders and communities. An online survey was undertaken to gain feedback from residents, partners, and businesses on the priorities of the Good Growth Strategy. The survey ran from the 12 December 2023 to 7 February 2024 receiving 86 responses. An overview of the quantitative responses to the survey is attached as appendix 2.
- 6.2 Key qualitative themes fed back during engagement include:
 - Transport and Connectivity: Accessible transport options which connect residents and businesses to opportunities.
 - High Streets and Town Centres: Transformation of our city and town centres, with a diverse, welcoming offer which demonstrates all that the city has to offer. Supported by further inward investment into the city which can support city regeneration.
 - Sustainability and Low Carbon: Sustainable business growth and new low carbon skills which can bring new job opportunities.
 - Housing and Neighbourhoods: Access to a safe, secure home in clean and green communities and neighbourhoods.

- Jobs, Employment and Skills: Support for small businesses, ensuring all residents can access stable well paid job opportunities and skills which help local people to get, and keep work.

6.3 In addition, the Good Growth Strategy builds on and captures feedback from engagement with residents, businesses, and partners throughout the year. Including, the Education, Skills and Employment Strategy consultation, engagement with local businesses through our IGNITE Hub and business support offer and the 'Your Priorities for Wolverhampton' survey undertaken as part of our budget consultation for 2024-2025.

6.4 The strategy was considered by Economy and Growth Scrutiny Panel on the 27 November 2023. The panel highlighted the importance of attracting inward investment to the city to support business growth and regeneration of the city, support for small businesses to grow, transport connectivity and infrastructure to support the city's economic growth, ensuring a joined-up approach to economic development in the city and capturing the views and feedback of a wide group of respondents to the strategy. These elements have been captured and reflected in the final strategy.

7.0 Evaluation of alternative options

7.1 Option 1 would be not to develop a new strategic economic plan for the city.

7.2 Option 2 and the chosen option is to develop a new strategic economic plan which will enable the city to

8.0 Reasons for decision(s)

8.1 The Good Growth Strategy is a key component of the Council's policy framework and supports development of the medium-term financial strategy and annual budget. Cabinet is recommended to approve the Good Growth Strategy to ensure the Council's to have a strong strategic economic framework which identifies opportunities for growth, tackles key challenges and reflects the needs of local people.

9.0 Financial implications

9.1 There are no direct financial implications from the recommendations of the report and the plan itself, although the actions outline projects and programmes that will have financial implications; these will be subject to individual reports as appropriate in line with financial procedure rules.

9.2 All costs associated with engagement and the preparation of the plan will be accommodated within existing budgets.

[LD/09022024/L]

10.0 Legal implications

10.1 Legal Services will be engaged if and when required to advise should any legal matters arise from this report.

[AS/08022024/A]

11.0 Equalities implications

11.1 Fair and Equal is one of the cross-cutting pillars of the Good Growth strategy. Central to the future approach to economic growth is a focus on inclusivity. A city where no one is left behind, with access to jobs, training, housing and healthcare, being available to all in our community. A destination that is nationally and internationally competitive, where new investment and development is spread across the whole of the city. All programmes and projects noted in the plan will also be subject to individual equalities analysis.

12.0 All other Implications

- 12.1 The Good Growth strategy has implications across the Council. Four cross cutting principles are highlighted in the strategy including climate action, driven by digital, fair and equal and the Wolverhampton Pound.
- 12.2 Working with our partners to support health and wellbeing is one of the priorities for the Good Growth Strategy. Research shows that a local area's employment rate is related to how long people are likely to live, and how many years they can expect to live in good health. In places with higher economic inactivity people are more likely to have a lower healthy life expectancy. Through the Good Growth Strategy, we will focus on the wider determinants of health and
- 12.3 Through the climate action cross cutting pillar of the strategy, we will continue to contribute to the delivery of the council's climate change plan to meet our commitment to be net carbon neutral as a Council by 2028.
- 12.4 The plan is aligned to the Digital Wolves strategy approved by Cabinet in March 2022, setting out how as a city and as a council we can harness the benefits of digital and technology for local people.

13.0 Schedule of background papers

13.1 N/A

14.0 Appendices

- 14.1 Appendix 1: Good Growth Strategy
- 14.2 Appendix 2: Good Growth Strategy Online Survey Response

Good Growth Strategy

Created: February 2024
Last published February 2024

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an economy that supports over 100,000 jobs



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FOREWORD

We want all businesses, residents, families and communities to benefit from economic growth and new opportunities in our city.

This Good Growth Strategy will help to boost our economy in the right way. It focuses on three themes: people, place and productivity. Good growth is about benefitting our people and our planet. It's a sustainable model, a roadmap to economic prosperity and most importantly, a huge opportunity for us to improve the life chances and wellbeing of our residents. It's living up to our goal of *'All Wulfrunians living longer, healthier lives'*.

Delivering this strategy means collaboration and strong partnership working – with the West Midlands Combined Authority, government departments and other city partners.

We are ambitious about good growth in our city which is why we need longer-term financial certainty and significant investment, targeted in the right way, to deliver for local people and businesses.



Councillor
Stephen Simkins
Leader of the Council



Tim Johnson
Chief Executive

OUR STORY

Over the last 10 years the City of Wolverhampton has seen major successes, including the award-winning £1 billion i54 business park, the £150 million Interchange transport hub, the National Brownfield Institute at the University of Wolverhampton's Springfield Campus and the £16 million construction of the i9 office complex – now home to the Department for Levelling Up, Homes and Communities' second headquarters.

We have innovative businesses across a range of sectors, hard-working employees, an expanding skills sector, world class connectivity and a growing arts and culture scene. All of this and much more has led to growth – driving forward our economy and building confidence. Our city economy is now worth £4.7 billion pounds and supports over 100,000 jobs.

But more is needed. The city, like many post-industrial places faces long term social and economic challenges. We believe our industrial heritage is an asset to our economy, but it has left a legacy of brownfield sites that present redevelopment challenges, and the restructuring of our economy has left

pockets of low skills. Productivity levels, the amount of value created for every hour somebody works, have been poor for the UK since the financial crisis and Wolverhampton has also struggled.

We now face a new growing challenge to support our residents and businesses to decarbonise our economy and make our city net carbon neutral by 2041. Wolverhampton made history by becoming the first English city to sign the European Circular Cities Declaration, a major environmental designed to accelerate the adoption of circular economies across the continent. The success of this strategy ultimately relies on delivering not just good growth, but good green growth.

The scale of the prize is significant – up to 2040 the city's economy is projected to grow by £2 billion to £6.7 billion, an increase of 43%. We want to go further and faster. This strategy sets out targeted interventions and priorities which could see us eclipse our projected growth to deliver more jobs and higher incomes for local people.

£1 billion i54 business park,

£150 million Interchange transport hub,
the National Brownfield Institute at the University of
Wolverhampton's Springfield Campus and the
£16 million construction of the i9 office complex



Spot - Boston
Dynamic's
'Robot Dog'

**an economy
worth
£6.7 billion
pounds
by 2040**

increase of 43%





OUR ROLE AS A PARTNER, ENABLER AND LEADER

The City of Wolverhampton Council is one piece of a complex economic system which operates across multiple footprints and actors. Delivering real economic change requires key partners to align around a shared vision. To make that happen, the Council commits to using its role as a partner, enabler and leader to deliver change.

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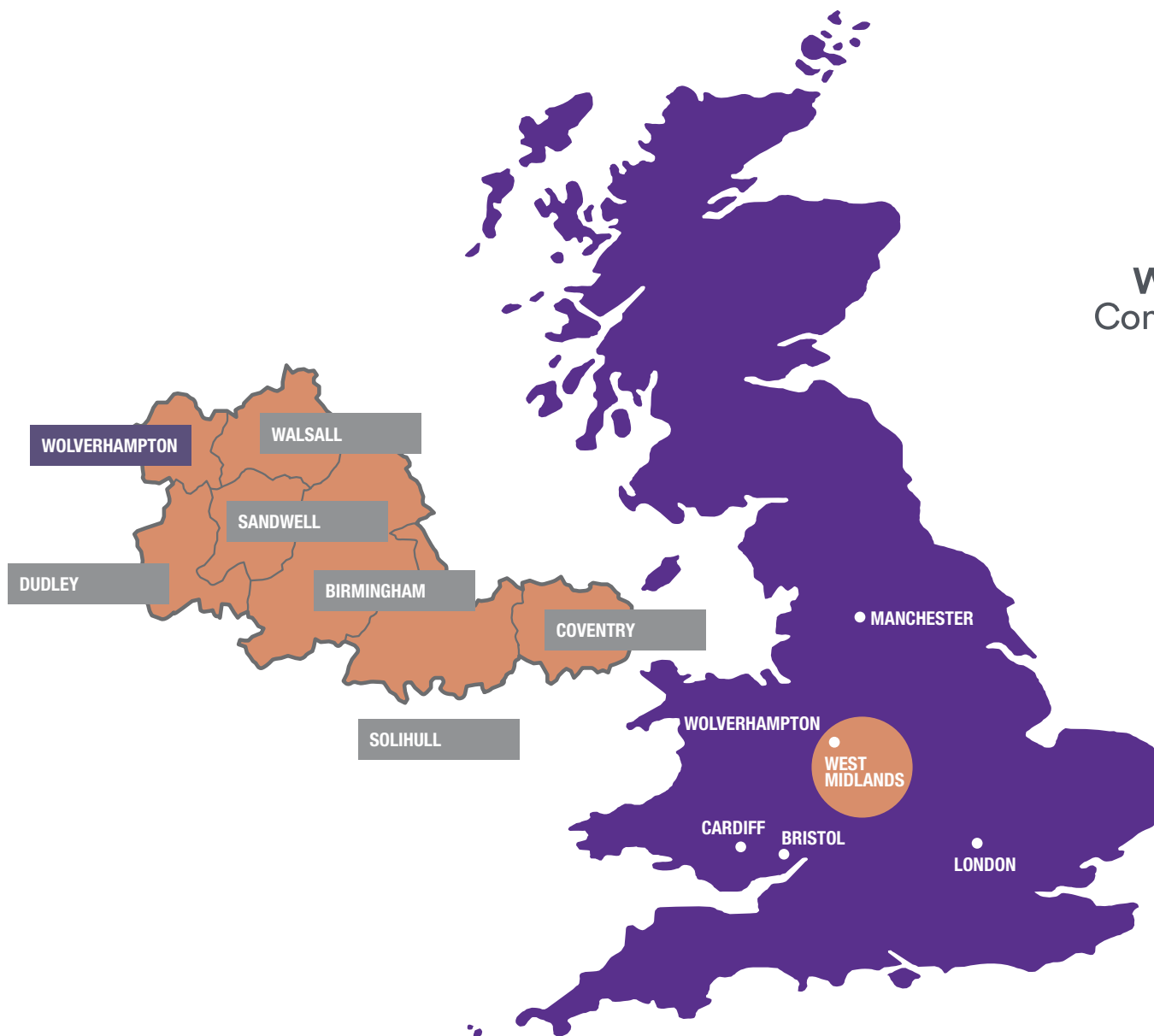
- We'll make it as easy as possible to work with us – streamline our processes, join up our services.
- We'll lead the development of game changing investment through city and regional partnership including the Green Innovation Corridor, i54 western extension and Canalside.
- We'll be a lead partner and applicant for new public funding opportunities to support business investment, skills development, and employment support.
- Preparing our young people and all residents with the skills to support businesses and industries in our city and region.
- We'll use our assets effectively to support and enable good development in our city.
- We'll lead and coordinate Wolverhampton's response on how the city tackles challenges and opportunities associated with climate change and the necessary transition to a net-zero carbon economy.

OUR PLACE IN THE REGION

City of Wolverhampton Council played a pivotal role in setting up the West Midlands Combined Authority (WMCA), which was established in 2016. Since then the city, alongside six other constituent authorities of the WMCA, have been at the forefront of devolution in England. On the 15 March 2023 a third deeper devolution deal was announced for the region, including:

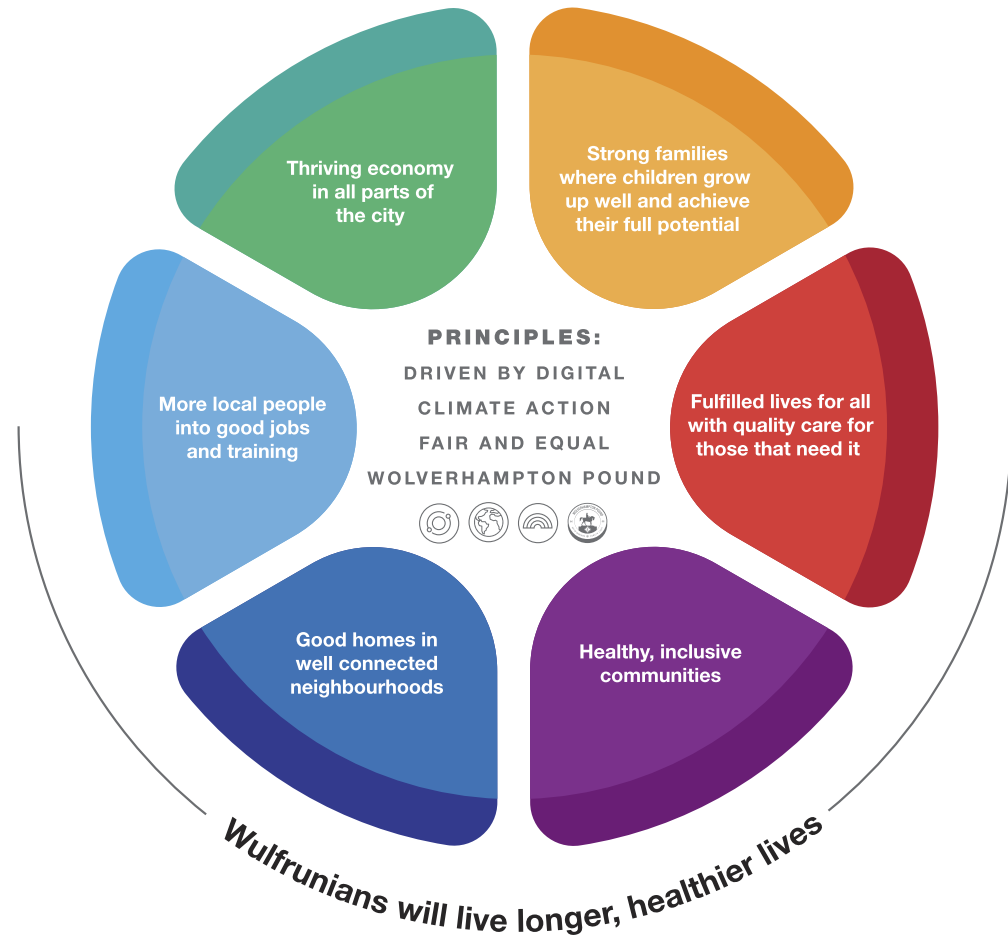


- Housing and regeneration funding worth at least £200 million and a £100 million brownfield land fund.
- Devolution of net zero funding, including for buildings' retrofit from 2025 onwards.
- Further devolution of adult skills and employment powers and flexibilities.
- A new role for WMCA in the governance of the British Business Bank UK funds in the Midlands and stronger relationship with the UK Infrastructure Bank.
- A Strategic Innovation Partnership providing a new and influential role informing the national research and innovation ecosystem.
- Provision of essential infrastructure, especially public transport connectivity, to give communities access to essential services, facilities and opportunities.



OUR CITY, OUR PLAN

Our City: Our Plan is our strategic framework for levelling up, co-produced with over 4,500 local people and stakeholders and approved at Full Council on 2 March 2022. We have one plan for our 'place', derived bottom up and collectively owned with clear interface with Levelling Up missions. The plan outlines an overarching ambition that Wulfrunians will live longer, healthier lives, and outlines six priorities.





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most entrepreneurial city in the UK

(Superscript, November 2022)

OUR STRENGTHS

- Wolverhampton was crowned most entrepreneurial city in the UK (Superscript, November 2022).
- 95% of the city is gigabit capable compared to the UK average of 80%
- Over 90 languages are spoken in the city
- 3 million people live within 20 miles of the city centre
- University of Wolverhampton has a consistently high graduate employability rate with over 90% of the University's cohort in employment, education, or running their own business.
- Between 2021 and 2043 Wolverhampton will have grown by more than 34,000 people
- Ranked 6th for the number of female owned business across all local authority areas in the UK



WHAT IS GOOD GROWTH TO US?

Climate Action: Wolverhampton is a place at the forefront of a green revolution. We will be pioneers in green growth focused on technology, innovation and manufacturing. Advancing the low carbon economy in the city through transformational schemes like the Green Innovation Corridor.

Driven by Digital: Now more than ever digital skills and connectivity are vital to ensure our businesses can grow and our residents can access training and employment.

Fair and Equal: A city where no one is left behind, with access to jobs, training, housing and healthcare, being available to all in our community. A destination that is nationally and internationally competitive, where new investment and development is spread across the whole of the city.

Wolverhampton Pound: We want to use the combined power of institutions, businesses and communities to retain local wealth, creating new jobs and opportunities. We'll do this in partnership with the city's anchor institutions





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PLACE



We are a unique and distinct city a wealth of heritage and history. We have a significant diversity of people, places and traditions, values and beliefs. Our buildings, places and spaces not only reflect the history of our city but present opportunities to shape a new outlook, responding to communities that live and work here.

This section sets out how we will make our places work, putting people first. Creating a city where you don't need a car if you don't want one, delivering jobs and homes in the right places, ensuring our city and local centres thrive, building in resilience and adapting for the future.



Steam Mill canalside development



SUSTAINABLE CITY WITH QUALITY NEIGHBOURHOODS AND WORKPLACES

A thriving, inclusive, resilient and liveable Wolverhampton is vital to improving quality of life for people in our city, as well as creating the conditions to attract further investment to realise our ambitious regeneration plans.

Like many parts of the country, building new homes is a priority for our communities and there is demand for a range of homes to suit many different needs and aspirations. Wolverhampton is an urban area with limited land supply, we will need to be innovative in how we deliver new, quality homes and neighbourhoods which create healthy and attractive places to live. This includes leadership of estate renewal schemes like our £120 million Heath Town redevelopment, and housing vehicle WV Living which provides opportunities for affordable home ownership.

By identifying and promoting redevelopment schemes in our city we can unlock new opportunities. Our Wolverhampton Investment Prospectus highlights key development opportunities in the city, which can act as a catalyst for facilitating wider investment. The City Council is proactive in developing, enabling and encouraging innovative delivery partnerships which bring investment, expertise and resources to transform our city.

We have seen major successes through partnership working. i54 business park, a joint venture between the City Council and South Staffordshire Council, is the UK's most successful enterprise zone with over £1 billion already invested. We're responding to changing business models and growth sectors in our city by supporting a range of work spaces, from office space at i9 in our emerging commercial district, to start up space at IGNITE and prime industrial land across the city.





Increasing reliance on digital connectivity is opening up new opportunities for living and working. Our residents and businesses need access to modern infrastructure so they can benefit from these changes. We're rapidly rolling out a full fibre network across the city, 75% of Wolverhampton is now 5G enabled compared to 52% across the West Midlands and 60% nationally.

Wolverhampton is rapidly developing a city-wide approach to green infrastructure. Building on the city's first solar farm, a joint project between the City of Wolverhampton Council and Wolverhampton NHS Trust, we're developing a clean energy centre in Heath Town, building net zero homes, delivering a network of electric vehicle charging points, enhancing our green space and protecting our natural environment.



SPOTLIGHT

CANALSIDE

We're staying true to the city's identity, enhancing and repurposing the Victorian architecture at canalside to create 1,000 new homes as part of the wider regeneration project.

We have reached a major milestone in the Canalside regeneration plans after completing a land deal with developer Placefirst.

By pooling our resources and working alongside the Canal and River Trust and West Midlands Combined Authority, we're creating a new city centre living community.

INCLUSIVE, LOW CARBON TRANSPORT NETWORK

An effective and efficient transport network is critical to sustaining and growing the city's economic potential. Connecting local people to jobs, education and other services, businesses with their supply chains, and markets and visitors to all that the city has to offer.

Located in the heart of the country, Wolverhampton is at the centre of the national transport network with excellent rail and road links. We've achieved a step change in our city transport infrastructure in recent years, with a new city centre interchange, train station and tram network. We're investing in enhanced multi-modal transport connectivity across our growth corridors, unlocking wider regeneration and economic opportunity.

We can't deliver our vision for transport alone, our network doesn't stop at the city boundary. We will continue to work with our partners in local and national government, transport operators, businesses and those who live and work in the city to develop a transport offer that works for all. A shared

challenge we all have in common is achieving net zero for the city. Transport accounts for 27% of all carbon emissions in Wolverhampton, making it the second highest emitting sector.

Like many cities car travel is still the dominant travel option for many people in Wolverhampton. 54% of people in the city drive a car or van to work which is greater than the national average of 45% (Office of National Statistics 2021). If we are to deliver net zero, we will need to change how we travel.

We understand that there will always be a need for a limited number of cars, but we want to create a city where you don't have to have a car if you don't want one. To reduce the need for cars we must make alternatives much easier, affordable, and safer. We're taking a people centred approach to transport to deliver this change, creating connected neighbourhoods and providing routes for walking, cycling and public transport on major gateways.

We're being innovative in how we design and deliver our future transport offer. Rolling out our electric vehicle charging



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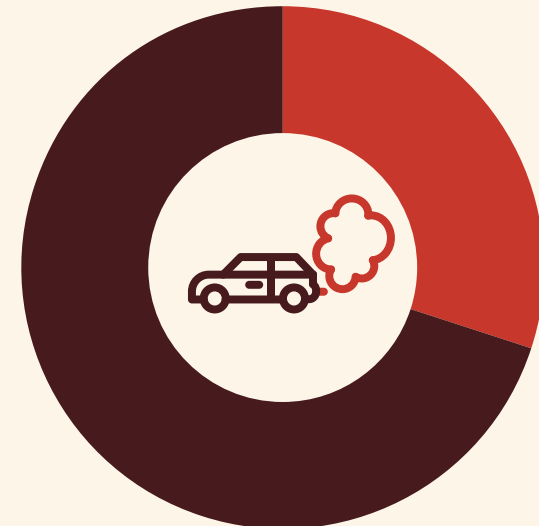
Wolverhampton Interchange

network, investing in active travel options and leveraging the opportunity of Smart City technology. Working with our partners we will lead a technology revolution, exploiting our regional strengths in products such connected and autonomous vehicles, as well as battery technology to provide world-class transport services for residents and businesses.

EMISSIONS IN WOLVERHAMPTON

Transport accounts for 27% of all carbon emissions in Wolverhampton

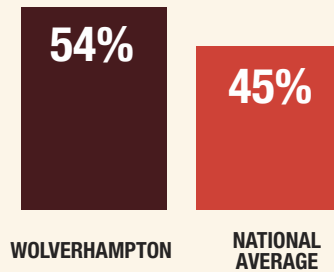
73%
OTHER
EMISSIONS
COMBINED



27%
TRANSPORT
EMISSIONS



People commuting by car or van



(Office of National Statistics 2021)

SECURE THE POTENTIAL OF OUR CITY AND TOWN CENTRES

City and town centres are critical parts of our local economy, providing a range of services to local people. They are hubs for independent businesses and provide valued spaces where people can socialise, connect and celebrate local identity through events and festivals.

The way people use our city and town centres has changed. There is a move away from retail to more social, leisure and entertainment activities. This doesn't mean that retail and hospitality are not important for our city, they are a vital part of providing much needed services. What it does mean is that we need to diversify our city and town centres so that we can provide a more balanced offer which attracts more people to come and spend time on our high streets.

One way that we are growing the potential of our city and town centres is by driving the creation of new high-quality housing and workspaces, which increases footfall and demand for amenities and services. Fundamentally, these developments create new communities and a new sense of place.

A key focus of that future sense of place for our city is the prominence of our cultural and creative offer. Wolverhampton is a uniquely diverse and vibrant city, with many different voices which make up our population. Our arts, culture and



creative sectors reflect this landscape. We aren't starting from scratch, with nationally significant cultural assets like Wolverhampton Football Club, The Halls, Wolverhampton Art Gallery and the Grand Theatre. The city has five National Portfolio Organisations funded by Arts Council England. Reflecting the importance of the city's arts and culture offer.

The visitor economy in Wolverhampton has bounced back to pre-pandemic levels. Visitor numbers in 2022 rose by more than 360,000 between 2019 and 2022 to 9.84m, while the visitor economy was worth £406m in 2022, up 21% compared with 2019.

Supporting the growth of our cultural and creative sector is only part of the answer. It is part of a wider integrated approach to city regeneration, development and enhancement, including excellent public transport connectivity, effective city marketing and welcoming public spaces.



Cycling Time Trial, Birmingham Commonwealth Games 2022



SPOTLIGHT THE HALLS

AEG Presents' and the City of Wolverhampton Council's investment sees the restoration of an iconic local institution.

The Grade II listed building is a key part of the city's economic and cultural regeneration and a leading home for live music in the West Midlands.

Since its reopening The Halls has attracted 100,000 visitors to date and boosted the local economy by at least £10 million per year.



**our visitor
economy
was worth
£406 million
pounds in 2022**

up 21% compared with 2019

Priority	Objectives	
<p>Liveable city with quality neighbourhoods and workspace</p>	<ul style="list-style-type: none"> • Work in partnership to create diverse and affordable homes. Use our planning powers, assets and housing delivery vehicles to ensure a range of housing types that meet all needs and aspirations. • Promote mixed use developments providing employment, open spaces, leisure and social infrastructure, supported by walking, cycling and public transport routes. • Ensure that areas have the amenities and services which support local living, including green spaces, locally accessible schools, and community spaces within a healthy, and well-connected environment. 	<ul style="list-style-type: none"> • Take a net-zero carbon approach to development working towards circular economy principles. Promote opportunities to provide multifunctional green infrastructure and renewable energy as an integral part of new and existing building designs. • Support provision of world class digital infrastructure throughout the city supporting digital access for homes, education providers and businesses. • Ensure we have the right employment space to support our diverse range of businesses to grow, as well as providing space to attract new businesses to the city.
<p>Inclusive, low carbon transport network</p>	<ul style="list-style-type: none"> • Enable different travel choices providing the opportunity for everyone to have access to the transport options they require, wherever they live in the city or travel into the city. • Support delivery of an equitable transport system which provides choice and access for all, reducing barriers to movement. • Take a whole system approach to the planning and delivery of our transport network, providing a balance of infrastructure dependent on the needs of an area and the people who live there, supporting place making and focusing on liveability. 	<ul style="list-style-type: none"> • Invest in transport infrastructure to improve strategic connectivity to maximise economic growth across the city, including working with partners to further develop mass transit options and multi-modal schemes. • Be innovative in how we deliver a sustainable low carbon transport network fit for the future, using technology to develop intelligent transport systems and embracing green transport infrastructure.
<p>Securing the potential of our city and town centres</p>	<ul style="list-style-type: none"> • Diversify our city and town centres through a blended approach which includes retail and hospitality supported by events and activities in quality public space, as well as city centre living and working. • Maximise the benefits of our unique qualities of diversity and identity, heritage, leisure and arts to boost our visitor, cultural and creative economy. 	<ul style="list-style-type: none"> • Develop our evening and night time economy providing diverse and vibrant events, safe and welcoming public spaces, accessible and inclusive high streets, supported by a range of transport options. • Work in collaboration with our business networks and forums including City Centre and Bilston Business Improvement Districts to promote our city and town centres.

Catalytic Projects

- **i54 and the Western Extension:** One of the most successful enterprise zones i54 is a major business park which has delivered over 1,000 new jobs. i54 and the Western extension will provide almost 350,000 sqm of commercial floorspace over 116 hectares of grade A employment space.
- **Canalside:** Hundreds of new homes built along one of the most historic stretches of canal in the country to create a new city centre living community.
- **City Events Programme:** We can already proudly call ourselves an 'Events City' with over 1,000 events held in the city every year.
- **Box Space:** A new £6 million entertainment, hospitality, leisure and retail destination on the Bell Street site. The next phase of a £22million package of investment in the west of the city centre.
- **St George's:** City centre development including historic Grade II listed church will deliver a mix of 400 homes, communal spaces, and green areas connected to the upcoming £61m City Learning Quarter.
- **Wednesfield Investment:** This project aims to support Wednesfield High Street, providing environmental enhancements to the public realm, shop fronts and market which increase footfall, dwell-time with improved seating areas, and support businesses.
- **Full Fibre Rollout:** Futureproofed digital infrastructure is the backbone of a modern thriving economy driving productivity and spreading growth. Additional public buildings and assets are being connected to full fibre public sector network (PSN) building on the initial 170 public sector buildings funded by £4.9 million Local Full Fibre Network grant.



PRODUCTIVITY



Raising productivity is key to increasing wages, raising living standards, and delivering growth.

Productivity is about businesses being able to adapt, pivot and survive through changes, driving efficiencies and ‘working smarter not harder’.

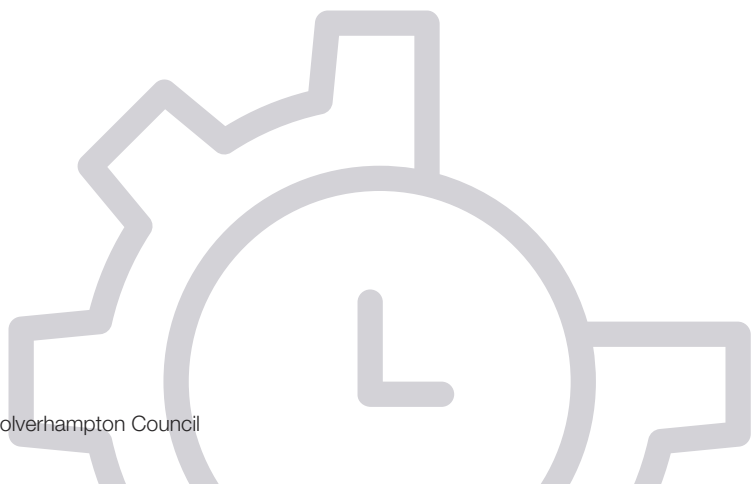
This section sets out the ways in which we can raise productivity in Wolverhampton. It looks at how we can support businesses to access the support they need, stimulate innovation-led growth, and the importance of continuing to promote our city as a place to live, work, study, visit and invest.



GREEN INNOVATION CORRIDOR

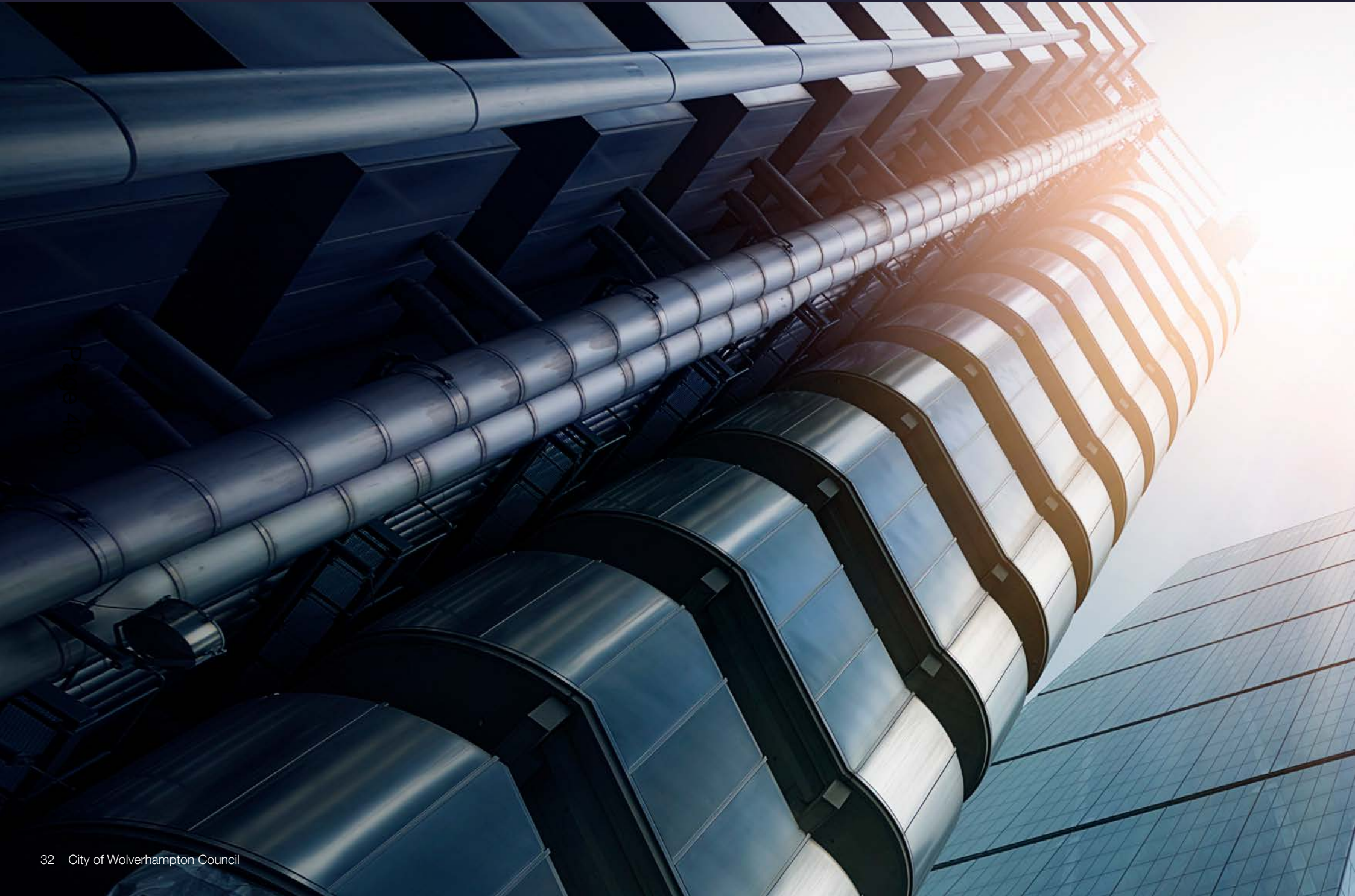
The Council has secured Investment Zone status and up to £20 million of investment from Government to bring forward the Green Innovation Corridor.

The GIC will drive the Green Industrial Revolution, building upon Wolverhampton’s sustainable construction, green credentials and circular economy for transformation that will create quality jobs for local people.





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Every commercial plane flying in the sky contains actuation systems made in the City of Wolverhampton.

HELP BUSINESSES AND ORGANISATIONS TO INCREASE THEIR PRODUCTIVITY



We have a pioneering business community in the city, including very high levels of female-led firms (6th of all local authorities in the UK), ethnic-minority owned businesses and social enterprises. These organisations form part of a diverse business ecosystem with major strategic companies, fledgling start-ups, scaleups and innovators.

Attracting more of these high value companies to start up, stay and grow in the city is central to our growth approach. Currently, however, businesses face persistent and serious challenges linked to the cost of doing business, with high energy prices and interest rates, as well as structural challenges related to skills gaps, infrastructure and access to finance.

There is a challenging balance required, between supporting business survival in the here and now, and strategically supporting a more productive, innovative and successful business base for the long-term. To achieve the latter, we will

focus on growing our sector strengths, while also diversifying the business base and wider economy. There are major future opportunities to be harnessed for local economic growth as part of a more mixed economy. For example:

- Harnessing future manufacturing and materials-based opportunities, such as in electric vehicles, lightweighting, future propulsion and automation in all sectors including food and drink.
- Building on Wolverhampton's advanced and sustainable construction cluster, incorporating modern methods, digitisation, brownfield land remediation and regeneration.
- Further developing the city centre's business services and digital offer to attract more high-value activities that drive productivity and agglomeration effects.
- Exploiting the opportunities presented by the green economy and net zero, and driving a circular economy.



SPOTLIGHT IGNITE

Ignite was launched in July 2022 as part of the Council's response to the impact of Covid-19 on our city's business base. In its first 12 months Ignite has gained over 560 members.

The hub provides incubation space for small businesses to develop in a safe and supportive environment. It provides them with free access to experienced business professionals and other key resources that will help them grow into more mature and stable businesses.

Ignite is centrally located in the heart of the city, taking a prominent position in our commercial district. It offers first class business support facilities with an offer that continues to grow.

We know from engagement with our local businesses that it can be difficult to know where to go to access independent business support. This is because the business support landscape has a large number of providers, offers and services creating a complex environment which can be difficult to navigate. We are a city predominantly made up of SME's with fewer than 15 employees, we need to make it as easy as possible for businesses to access the support they need.

That is why we are developing our new Business Growth offer which will work in partnership with Business Growth West Midlands and other public and private business support providers to help businesses increase their productivity. The new offer will help businesses navigate the complex business support landscape, understand and access the right support for them and provide 1-2-1 support to develop long term growth plans. We've already launched our city centre business hub IGNITE, working in partnership with the University of Wolverhampton and the Black Country Chamber of Commerce.

COLLABORATE WITH BUSINESS AND THE UNIVERSITY TO STIMULATE INNOVATION



Technological development, which occurs through the discovery and adoption of innovations, is one of the key drivers of long-term productivity growth. To close the city's productivity gap we need to continue to develop spaces for creativity and collaboration where innovative ideas can be nurtured.

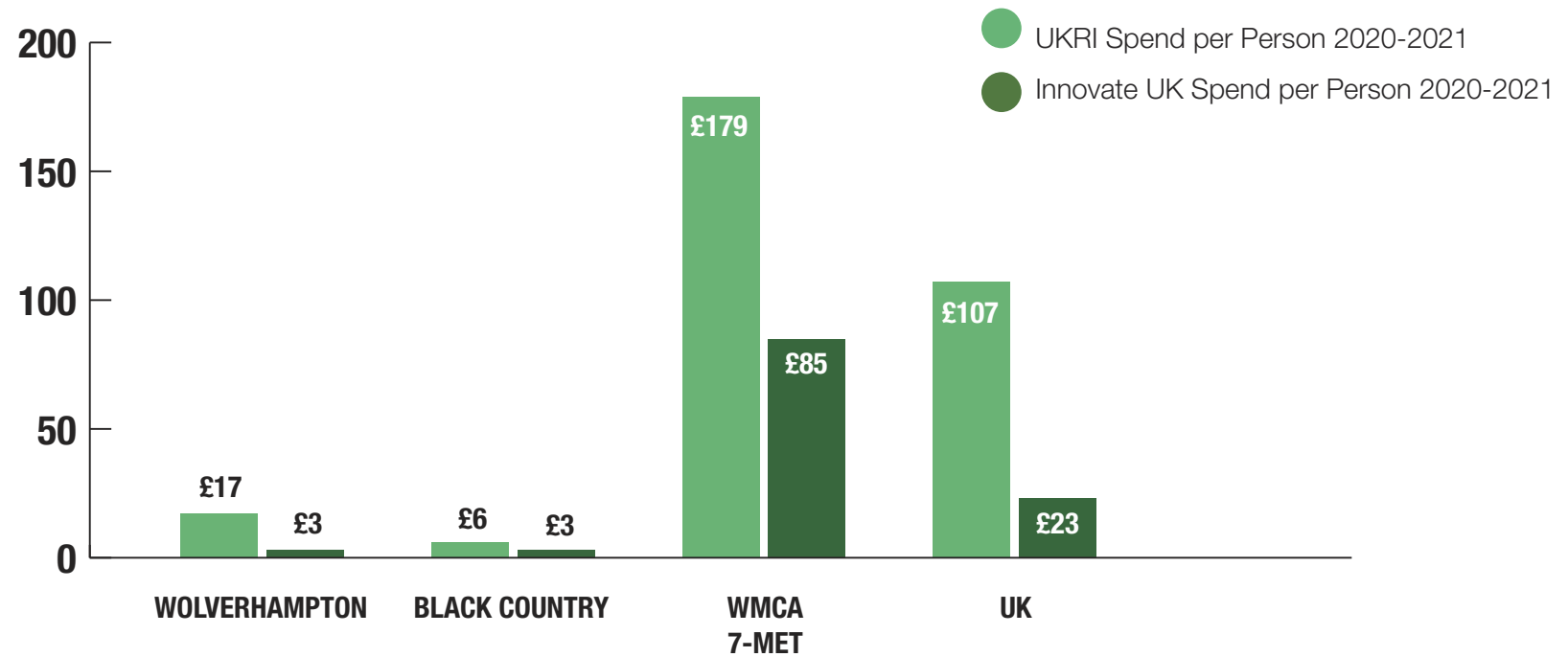
Wolverhampton has a long history of pioneering innovation. The world's oldest original digital computer is the WITCH (Wolverhampton Instrument for Teaching Computing from Harwell), which was used at the University of Wolverhampton in the 1950s. Wolverhampton-based inventor Thomas Parker built the first practical electric car, while the Wolverhampton-built Sunbeam motor car became the first vehicle to reach 200mph when it broke the land speed record.

It is a tradition of ingenuity which has continued today. Every commercial plane flying in the sky contains actuation systems made in the City of Wolverhampton. Moog, whose history in Wolverhampton dates back to 1938, supplies aircraft around the world such as Boeing and Airbus. However it is not just in industry that we find major contributions to the world of research and development.

The University of Wolverhampton's Cyber Research Institute is vital to the sector through its collaboration and innovative research. The National Brownfield Institute, part of the city's Springfield Campus, brings together specialist researchers, consultants, and industry experts to advance research into brownfield land remediation and the circular economy. Our city's university has been host to a number of spinout companies including Disulfican, developing new cancer drugs, Space Audit Systems, a specialist computer software company and Algorid Limited, developing an innovative approach to identification through fingerprinting.

There is still more to do to capture the potential of innovation-led growth. We must address the imbalance in allocation of public research and development funding. The table on the next page shows the disparity between funding for the city when compared the region and UK average. Working with the West Midlands Combined Authority and Innovate West Midlands we will set the case for increased innovation funding for Wolverhampton and the region.

UKRI & Innovate UK Spend per Person 2020-2021
(via UKRI data)

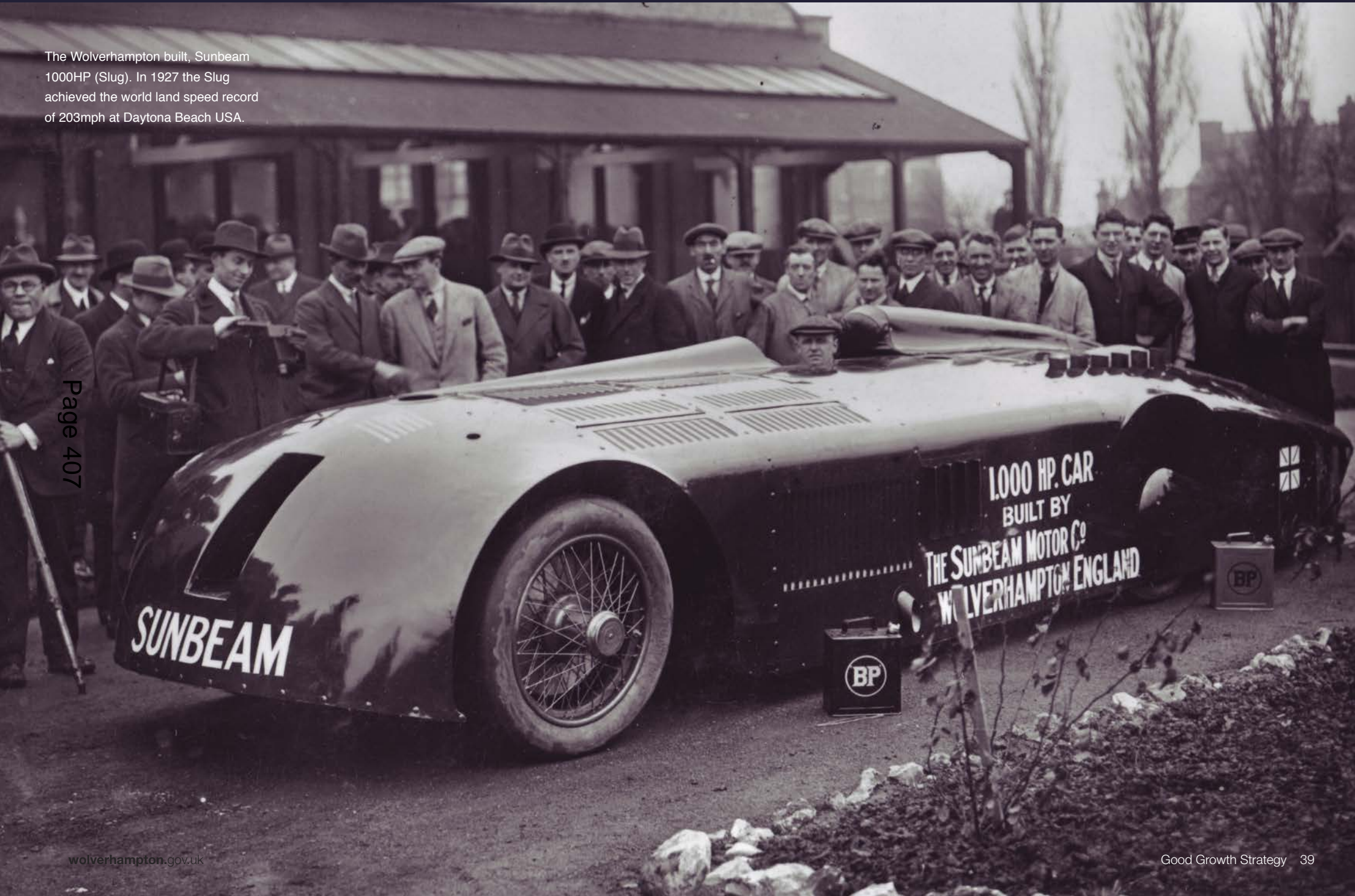


We also need to support more of our SME's to access the advice and funding which can help them identify ways to innovate their business practices to deliver efficiencies, digitise and meet the net zero challenge. One way we are helping to do this is through our Green Innovation Corridor, which will provide incubation and research space drawing together innovation driven entrepreneurs, start-ups and businesses to share ideas and access support.

WORLD ————— LAND SPEED RECORD

203mph

The Wolverhampton built, Sunbeam 1000HP (Slug). In 1927 the Slug achieved the world land speed record of 203mph at Daytona Beach USA.



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SPOTLIGHT GREEN INNOVATION CORRIDOR

The aim of the Green Innovation Corridor is to build on Wolverhampton's growth as a centre for sustainable construction and create skilled jobs for local people in the emerging green economy.

It will focus on creating high value jobs in specialist sectors, support student retention, harness home grown talent, develop new opportunities for business investment and growth, and leverage private sector funding.

The early phases for the Green Innovation Corridor will focus on the development of sites at and near the University of Wolverhampton Springfield Campus and Science Park with the longer term vision to connect and link these key city assets to the city centre and the advanced manufacturing cluster in the north of Wolverhampton.

MAXIMISE THE CITY'S INVESTMENT POTENTIAL

Our city needs to continue to welcome inward investment and to promote and provide the opportunities for a range of major developments for new homes, workplaces, jobs, leisure, culture and social infrastructure.

Attracting investment can take many different forms. This includes new businesses setting up in the city, existing companies expanding and government and public sector relocations. More than two-thirds of all inward investment jobs created in the



UK each year are as a result of expansions from existing investors. While new arrivals are a valuable contribution to the Wolverhampton economy, the most significant source of jobs and investment in the next few years is likely to be from companies already located here.

There are also major opportunities for the city to attract investment and new businesses to the city. Many businesses are looking at reshoring and rethinking their supply chains with concerns over resilience, costs and carbon footprint. This is a trend accelerated by the pandemic, but which has been underway for many years. Shorter supply-chains are being implemented that offer resilience against global events. A study by the Chartered Institute of Procurement & Supply (CIPS), shows 40% of organisations in the UK switched at least one international supplier to a domestic alternative in 2021.

Our approach to attracting and retaining investment is developing a strong Wolverhampton offer. This includes identifying, promoting and in some cases preparing sites to ensure availability for development, growing our city talent pipeline, targeted business support offer and showcasing all that the city has to offer. In September 2023, Wolverhampton Business Week celebrated its



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tenth anniversary, with hundreds of people from the city and beyond engaging in a wide range of events to support and celebrate local businesses and investment.

Identifying new companies and investors from outside of the city will be done largely in partnership with West Midlands Growth Company and Department for Business & Trade across a range of sectors including automotive; aerospace; digital; energy; business services and government relocations. There is scope for Invest Wolverhampton to be proactive in certain sectors where there is a clear niche, nationally-significant strength, such as sustainable construction.

SPOTLIGHT

CITY CENTRE HOUSING SHOWCASE

More than 200 delegates attended the City Centre Living Showcase at the WV1 Restaurant and Bar at Molineux Stadium. The event outlined how the city centre was being reimagined and how new urban living opportunities were being brought forward by the city council with public and private sector partners that would revitalise the area. In total, developments to deliver 6,500 new homes were showcased.

6,500 new homes



They include:

1,300 at Brewers Yard,

1,000 at City Centre West,

799 at Canalside South,

391 at St. George's,

366 at Horseley Fields,

342 at the Royal Quarter,

181 at Sunbeam,

163 at Steam Mill and Sackworks.

Priority	Objectives	
<p>Support businesses and organisations to increase their productivity</p>	<ul style="list-style-type: none"> • Simplify routes to support for local businesses by providing information on a range of support options through a single front door, both online through our Business Growth website and face to face at our city centre business hub, IGNITE. • Support businesses to understand their support needs offering 121 support to help business explore the challenges they face and identify the best package of assistance to help them grow. • Provide intelligence and insight on local business need using our CRM platform to track, collate and monitor up to date and accurate information on local business need. 	<ul style="list-style-type: none"> • Encourage business to take up support: the Hub will promote business support generally and specific priority services to ensure businesses understand the help on offer and the potential growth benefits it can unlock. • Ensure that publicly funded support for businesses is aligned with the Council's long-term strategic objectives and delivers economic impact which benefits the city. • Work with our partners to deliver targeted business support programmes and initiatives where there is a gap in the current market and an evidence of local need.
<p>Collaborate with businesses and the University to stimulate innovation</p>	<ul style="list-style-type: none"> • Support local businesses to identify innovation opportunities and connect them with funding and support through our Business Growth Offer. • IGNITE start up hub will provide wrap around support for spin outs. • Create the right environment and workspace for innovation to collaborate and thrive through established locations like I54 and our new Green Innovation Corridor. 	<ul style="list-style-type: none"> • Encourage research and development in green technologies which can lead to new business opportunities. • Work in collaboration with the University of Wolverhampton and other research institutions to increase links between industry and research to create the right conditions for innovation.
<p>Maximise the city's investment potential</p>	<ul style="list-style-type: none"> • Strengthen our global position as an attractive place for inward investment and first-choice location for a range of companies to be based here. • Identify and promote major development sites to secure investment across the city. • Join up our city growth offer with our inward investment priorities to identify target sectors and functions for investment of existing businesses and to attract new businesses to the city. 	<ul style="list-style-type: none"> • Build an even closer relationship with investors and strategic employers through effective account management to better understand their needs and how they can contribute to growth in our city. • Deliver our soft-landing platform for investors to make Wolverhampton the easiest Council in the country to work and invest with.

Catalytic Projects

- **Start Up Support:** Working in partnership with Black Country Chamber of Commerce, with funding from the UK Shared Prosperity Fund, we will deliver aims to increase the number of new enterprises, ranging from sole trader and micro business to small, medium-sized and large enterprises, including social enterprises.
- **IGNITE:** Wrap around business support and incubation space at our city centre hub. In partnership with the University of Wolverhampton and the Black Country Chamber of Commerce.
- **Green Innovation Corridor:** Phase 1 of a wider regeneration scheme to unlock the green economic potential of our city and launch a step change in reaching net zero for Wolverhampton.
- **Net Zero and SME Grant Support:** We're delivering a package of grant support to local SME's in partnership with Business Growth West Midlands.
- **Growth Advice:** Delivering 121 growth advice and support to city businesses. Helping to identify their challenges and opportunities so they can maximise all of the opportunities in our city and wider region.
- **Marketing Our City:** Delivering a package of annual events which showcase all that our city has to offer, raising the profile and attracting investment to Wolverhampton.



PEOPLE

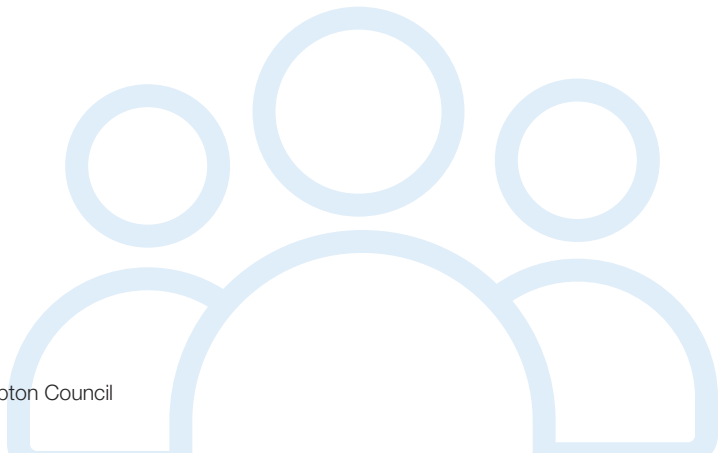


People are our city's greatest asset.

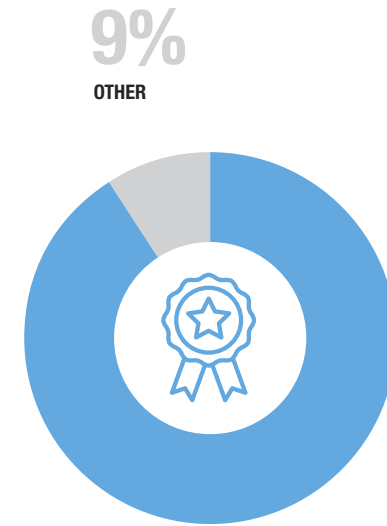
There has never been greater demand for well skilled people, with every sector and industry facing shortages and recruitment challenges. There is currently an ongoing disconnect in the labour market, between continued heightened levels of claimants seeking work and a record number of job vacancies.

This section looks at how we will continue to raise skills levels in the city ensuring that our training and learning offer meets the needs of business and local people, the importance of health and wellbeing for entering and staying in work, and how we will build local economic resilience through the Wolverhampton Pound.

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OFSTED RATINGS IN WOLVERHAMPTON



91%
OF WOLVERHAMPTON'S
SCHOOLS ARE RATED
GOOD OR OUTSTANDING
BY OFSTED





EDUCATION, SKILLS AND EMPLOYMENT SYSTEM THAT MEETS LOCAL NEED



Skill levels in the city have been steadily increasing with the numbers of local people securing higher level qualifications at record numbers.

However, there remain areas for improvement and the current education, skills and employment system in the city faces a number of challenges arising from a legacy of deindustrialisation, low aspirations, pockets of entrenched worklessness, relatively low pay, low skill levels, and more recently the Covid-19 pandemic and the cost of living crisis.

The Council is committed to continuing to drive up skills outcomes for our residents and has set out its holistic whole life approach to Education, Skills and Employment in a new Council led strategy which seeks to bring together partners to improve employment outcomes for local people and increase local economic growth.

Through this strategy we want to enhance the city's talent pool so that local people can get good quality jobs, businesses can access the skills they need to grow and we can attract new enterprise to our city. The role of academic and business

partnerships in developing skills for the future is vital, both in connecting employers to education and skills providers, and ensuring that courses are being developed that align with the evolving needs of companies.

A key opportunity for Wolverhampton is integrating our industry specialisms with our approach to talent. These will be focused across our strategic sectors both large and growing, as well as our critical foundational sectors. Through the development of sector focused action plans we will identify and align the skills needs of businesses to help them grow and residents. These sectors will be further supported through business support, spatial development and infrastructure investment. A challenge going forward is how we develop both the hard and soft skills which local people need to secure well paid jobs of the future.

There has been significant change within many industries post pandemic, digitisation of services has increased significantly since people adjusted to doing things online during lockdown. Businesses need to be able to adapt to shifts in consumer demand in order to survive.

MOST IN-DEMAND SKILLS IN WOLVERHAMPTON

Frequency in Job Postings

TOP 10 HARD SKILLS



Page 417

TOP 10 SOFT SKILLS



SPOTLIGHT CITY LEARNING QUARTER

The aim of the scheme is to futureproof our skills system.

c. £60 million state-of-the-art learning hub in the heart of the city co-locating adult education, library and college facilities, supporting more local people into good jobs and training and enabling further housing development.

A partnership between the City of Wolverhampton Council and Wolverhampton College will also safeguard hundreds of jobs and increasing footfall in the city centre, as the scheme will see thousands of students located at the new city centre campus.

WORK WITH OUR PARTNERS TO SUPPORT HEALTH AND WELLBEING



Research from The Health Foundation shows that a local area's employment rate is related to how long people are likely to live, and how many years they can expect to live in good health. In places with higher economic inactivity people are more likely to have a lower healthy life expectancy.

The Covid pandemic accelerated the need to move beyond mere economic growth as the sole measure of a successful economy. Understanding the broader impact of economies on all individuals and communities is crucial, necessitating the integration of social and equality indicators to monitor progress.

Addressing the existing inequalities within Wolverhampton is paramount for genuine levelling-up, ensuring that every person in the area reaps the benefits of economic growth and prosperity, irrespective of their geographical location, ethnicity, age, or gender.

As adults in employment spend a large proportion of their time in work, our jobs and our workplaces can have a big impact on our health and wellbeing. In fact, employment can impact

both directly and indirectly on the individual, their families and communities. Therefore, work and health-related worklessness are important public health issues, both at local and national level.

There is clear evidence that good work improves health and wellbeing across people's lives, not only from an economic standpoint but also in terms of quality of life. 'Good work' means having not only a work environment that is safe, but also having a sense of security, autonomy, good line management and communication within an organisation.

Combined costs from worklessness and sickness absence amount to around £100 billion annually, so there is also a strong economic case for action. Addressing and removing health-related barriers requires collaborative work between partners from across the private, public and third sectors at both national and local level.

Enabling people with health issues to obtain or retain work, and be productive within the workplace, is a crucial part of the economic success and wellbeing of our city.



SPOTLIGHT

BILSTON HEALTH AND WELLBEING HUB

Bilston scheme to deliver a new state-of-the-art Health and Wellbeing Hub in the town that brings together a number of partners and providers from the NHS, social care and wellbeing, and leisure sectors.

The hub will be an anchor within the community, investing in early intervention and prevention, giving access to a campus that builds resilience, integrates and transforms primary and community services and brings care closer to people's homes - connecting people, communities and place.

It will be located in the centre of the town next to WV Active Bilston-Bert Williams, bringing people to the town centre - and connecting to extensive public space improvements and Bilston's public transport hub.

BUILD COMMUNITY WEALTH THROUGH THE WOLVERHAMPTON POUND

For us, the Wolverhampton Pound is about building economic resilience for businesses and local people.

At its core community wealth-building (CWB) is a place-based approach which uses the strengths and assets of a local place to drive economic change. While different areas have interpreted the approach differently, they all share a common objective of generating local wealth to benefit the most disadvantaged communities.

Our approach to community wealth building is centred around ensuring fair employment and just labour markets, making financial power work for our local place and growing local and community ownership of the economy. One of the main objectives of the Wolverhampton Pound is to embed social value in the City to help leverage local spend and employment and make the City the best it can be for our communities.

Although the Wolverhampton Pound presents a new overarching approach to economic development for the city, many of the actions and priority areas associated with it are not. Organisations across the city, in particular those in our VCS, have been leading initiatives to support the growth of community wealth.

Acting alone the Council will have limited impact. The Wolverhampton Pound approach has been developed collaboratively with five key city partners who have made a commitment to work together as the Wolverhampton Anchor Network to deliver the priorities.



WOLVERHAMPTON POUND

SPEND LOCAL FOR MORE JOBS AND OPPORTUNITIES

Priority	Objectives	
<p>An education, skills and employment system that meets local needs</p>	<p>Working with partners to deliver our Education, Skills and Employment strategy, and Wolves at Work Transformation Programme, we will:</p> <ul style="list-style-type: none"> • Ensure we have a range of higher-level skills and training support available in the city aligned to growth sectors to support productivity and higher wage jobs. • Work with partners to maximise the number of apprenticeship and training opportunities for young people and adults in the city. • Work with our partners including businesses, job centres, training providers, colleges and the University to develop flexible pathways for local people who are in work to retrain and progress. 	<ul style="list-style-type: none"> • Establish clear pathways and entry routes for unemployed adults, particularly those from underrepresented groups to access employment in growth sectors or where there are skills shortages. • Build on the city centre youth hub at The Way, using our community hubs to deliver co-located employment and skills support to young people in their local areas.
<p>Tackle health and wellbeing barriers to work</p>	<ul style="list-style-type: none"> • Work with partners at DWP to deliver inclusive employment support opportunities for all raising awareness of support to create inclusive opportunities. • Work with employers and other city partners to champion inclusive employment practices to ensure there is a pathway to success for all residents in our city and healthy workspaces. 	<ul style="list-style-type: none"> • Work with partners and stakeholders to provide a profile of mental health and wellbeing across the city that includes both risk and protective factors. • Work with our local businesses and anchor partners to support development of healthy, inclusive workplaces and employment.
<p>Grow community wealth through the Wolverhampton Pound</p>	<ul style="list-style-type: none"> • Ensure public and private investment opportunities create good work opportunities for local people and support our businesses to grow. • Undertake an annual spend analysis our five anchor institutions, understanding where we currently spend locally and where we could do more. • Analyse anchor supply chains to develop a 10-year procurement and commissioning pipeline. 	<ul style="list-style-type: none"> • Identify priority areas to direct more of our collective anchor network spend locally. • Incorporate and monitor social value/local employment clauses through the council's supply chain. • Leverage agreements with investors and partners to maximise benefits for local people, including by securing the delivery of S106 skills and training opportunities.

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Catalytic Projects

- **City Learning Quarter:** A significant city centre learning hub consisting of a prime location for the College, the Council's Adult Education service and Central Library enabling improved learning, skills, apprenticeship and employment levels with enhanced accessibility for students, employers and residents.
- **Wolves at Work:** Wolves at Work seeks to improve labour market access and opportunities for disadvantaged communities, increase employment rates and to support inclusive economic growth.
- **Bilston Health and Regeneration Programme:** New state-of-the-art Health and Wellbeing Hub in the town that brings together a number of partners and providers from the NHS, Social Care and Wellbeing and Leisure sectors. The wider programme will also include investment in Bilston city centre and high street.
- **Employment and Skills Hubs:** Building on the city's Youth Employment Hubs we will launch our city centre Adult Skills Hub at i10 which will support local people into work, improve their career prospects and gain new skills.
- **Cost of Living Support:** Building financial resilience for families through our cost of living support. Since 2020 we've awarded £15 million to help all those experiencing financial difficulties as a direct result of the cost of living crisis.

DELIVERING GOOD GROWTH



The delivery of this Strategy will be a major priority for the Council working across all sectors, public, private, community and voluntary.

It must also engage local communities in the delivery effort and inspire a sense of confidence in Wolverhampton's economic potential and future. The key ingredient of this is collective leadership, delivering our growth ambition will require strong entrepreneurial, whole-place leadership, bringing together business, political leaders, formally and informally, to drive system change.

Anchor Institutions

A key feature of the delivery of this strategy will be the role of Wolverhampton's Anchor Institutions. These are our large and influential private and public sector employers and other institutions which can, in each of the key priorities, play a lead role in creating good growth. This could involve using their purchasing power to drive growth at a local level in Wolverhampton and providing employees with opportunities for in-work progression.

Anchor institutions share a number of key characteristics including:

- **Spatial immobility:** have strong ties to an area and are invested in it
- **Size:** tend to be large employers and have significant purchasing power
- **Land and assets:** occupy various sites across the city and have good community reach

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City of Wolverhampton




CITY OF OPPORTUNITY



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Economic Insight and Indicators

The Council already collects and monitors a number of indicators to understand how the local economy is performing. Those indicators included in the Our City Our Plan relating to the economy are below. As part of the consultation on the Good Growth Strategy we will continue to refine and add to our economic indicators.

Economic Insight and Indicators						
Theme		Indicators				
 Page 426	Place	<ul style="list-style-type: none"> Number of rapid charging electric car points in the city % of premises in the city with full fibre coverage Number of new builds completed in the city 	<ul style="list-style-type: none"> % of new builds that are affordable housing (against planning target) Net additional dwellings in the city % of housing stock that is empty / empty homes 	<ul style="list-style-type: none"> Housing affordability ratio Total crime recorded per 1000 population Energy efficiency of housing stock 	<ul style="list-style-type: none"> Carbon reduction against 2024/25 target 	
		Productivity	<ul style="list-style-type: none"> Businesses that survive one year in city Businesses that survive five years in the city 	<ul style="list-style-type: none"> % of premises in the city with full fibre coverage Wolverhampton based businesses supported by the Council 	<ul style="list-style-type: none"> Number of new investment opportunities generated by the Council 	<ul style="list-style-type: none"> Public R&D spend in Wolverhampton (Innovate UK and UKRI)
		People	<ul style="list-style-type: none"> Number of working age adults (16-64) claiming unemployment benefits Number of young adults (18-24) claiming unemployment benefits 	<ul style="list-style-type: none"> Levels of 16-17 year olds Not in Education, Employment or Training % of population with no qualifications 	<ul style="list-style-type: none"> % of working age population qualified to level 3 and 4 % of population in skilled occupations 	<ul style="list-style-type: none"> % of physically inactive adults (Public Health Outcomes Framework)

You can get this information in large print, braille, audio or in another language by calling 01902 551155 or emailing translations@wolverhampton.gov.uk

wolverhampton.gov.uk 01902 551155

  [WolverhamptonToday](#)  [Wolverhampton_Today](#)  [@WolvesCouncil](#)

City of Wolverhampton Council, Civic Centre, St. Peter's Square,
Wolverhampton WV1 1SH

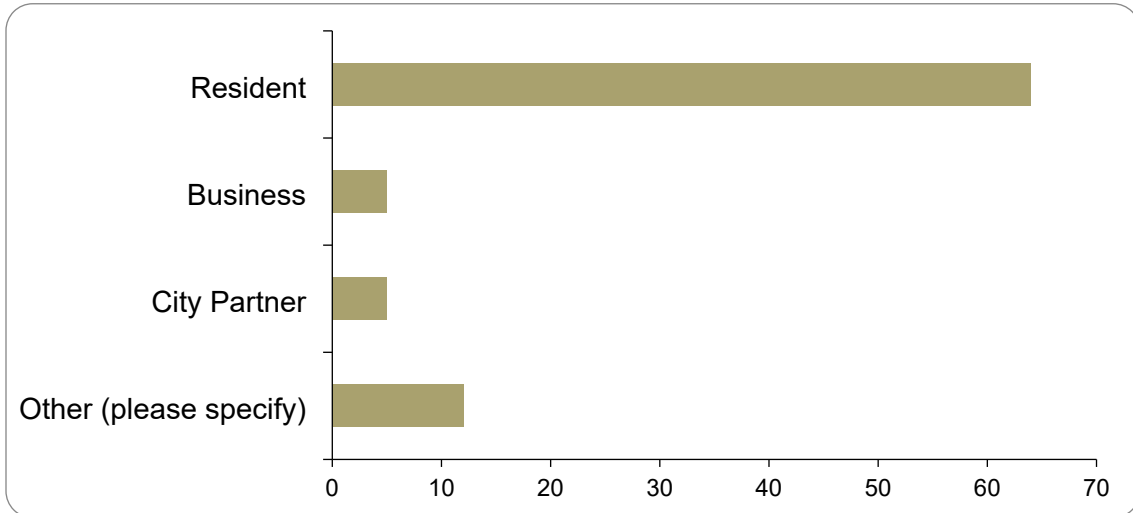
Good Growth Strategy

Appendix 2 Online Survey Response

Responses to this survey: 86

**Are you responding to this survey as a:
Type**

There were 86 responses to this part of the question.

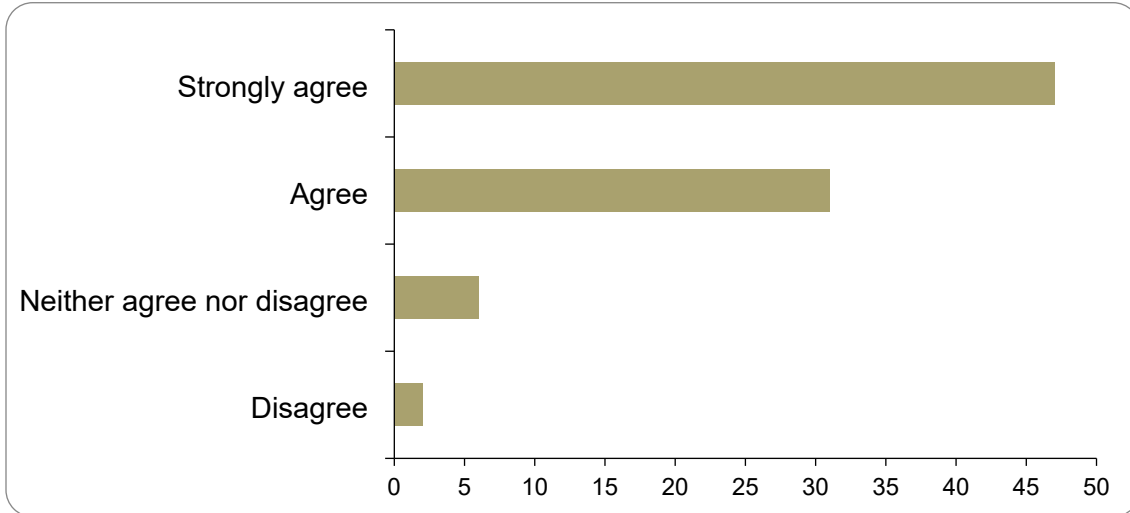


Option	Total	Percent
Resident	64	74.42%
Business	5	5.81%
City Partner	5	5.81%
Other (please specify)	12	13.95%
Not Answered	0	0.00%

To what extent do you agree with our priorities for the 'Place' theme:

Agree/Disagree - Support the development of sustainable communities and workplaces

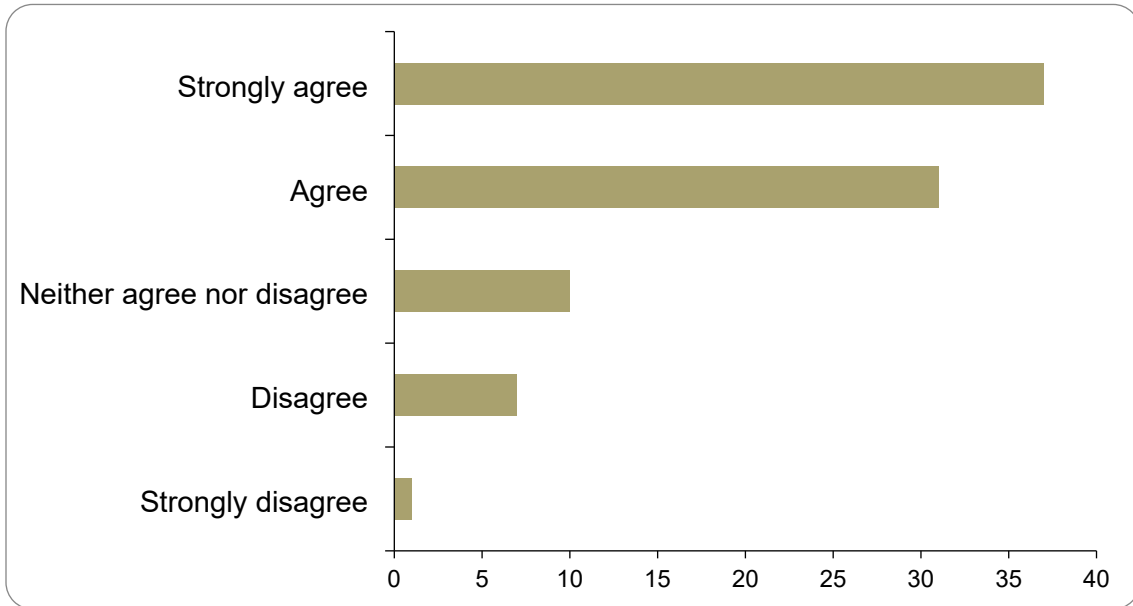
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	47	54.65%
Agree	31	36.05%
Neither agree nor disagree	6	6.98%
Disagree	2	2.33%
Strongly disagree	0	0.00%
Not Answered	0	0.00%

Agree/Disagree - Inclusive, low carbon transport network

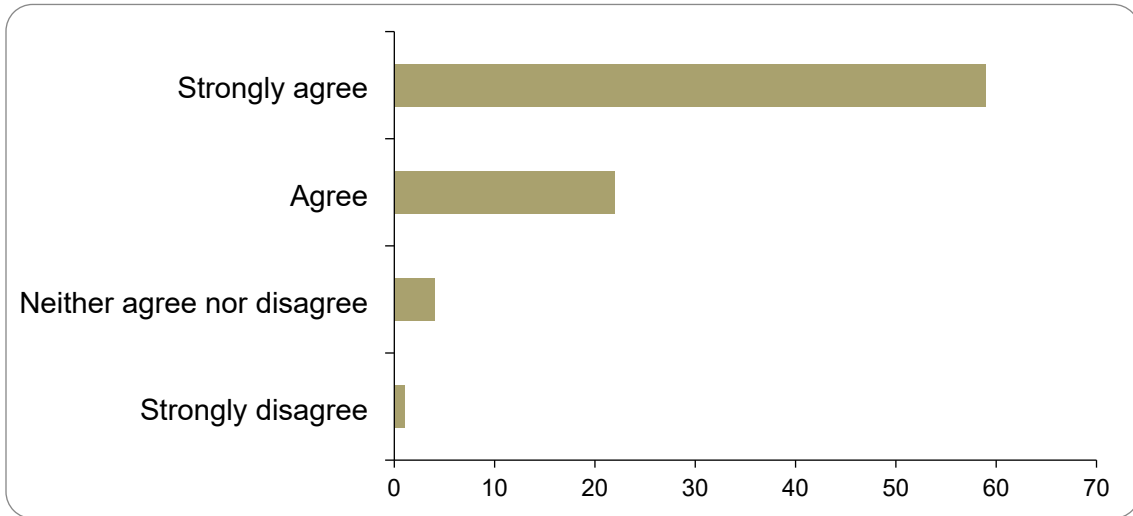
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	37	43.02%
Agree	31	36.05%
Neither agree nor disagree	10	11.63%
Disagree	7	8.14%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

Agree/Disagree - Secure the potential of our city and town centre's

There were 86 responses to this part of the question.

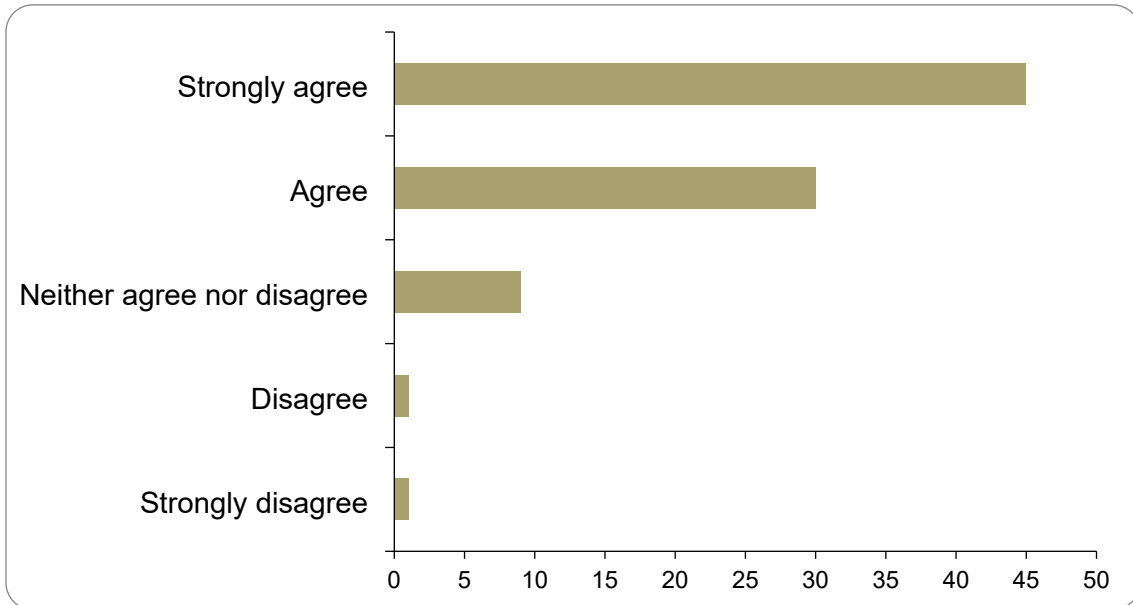


Option	Total	Percent
Strongly agree	59	68.60%
Agree	22	25.58%
Neither agree nor disagree	4	4.65%
Disagree	0	0.00%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

To what extent do you agree with our priorities for the 'Productivity' theme:

Agree/Disagree - Help business and organisations to increase their productivity

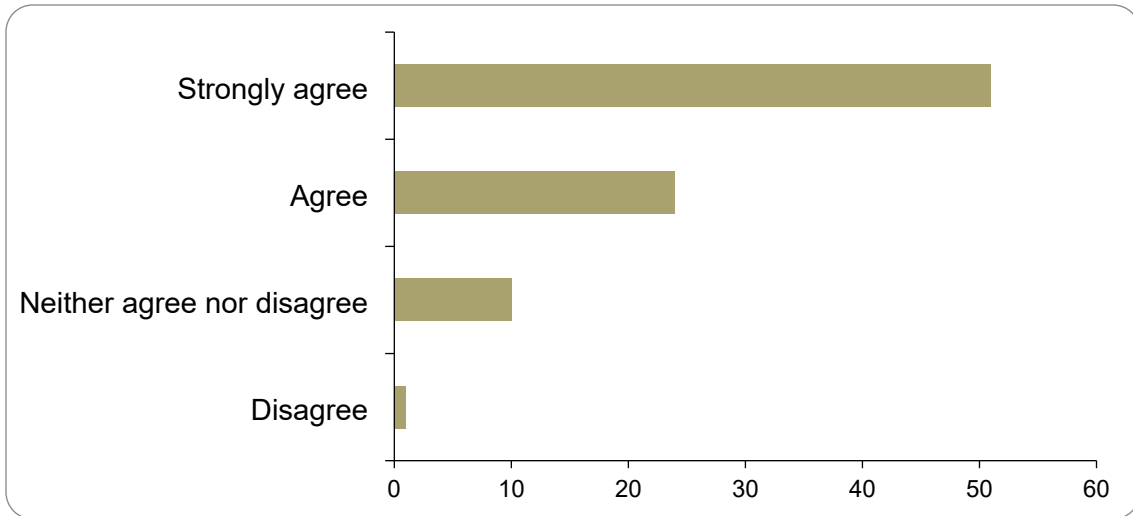
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	45	52.33%
Agree	30	34.88%
Neither agree nor disagree	9	10.47%
Disagree	1	1.16%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

Agree/Disagree - Collaborate with business and Universities to stimulate innovation

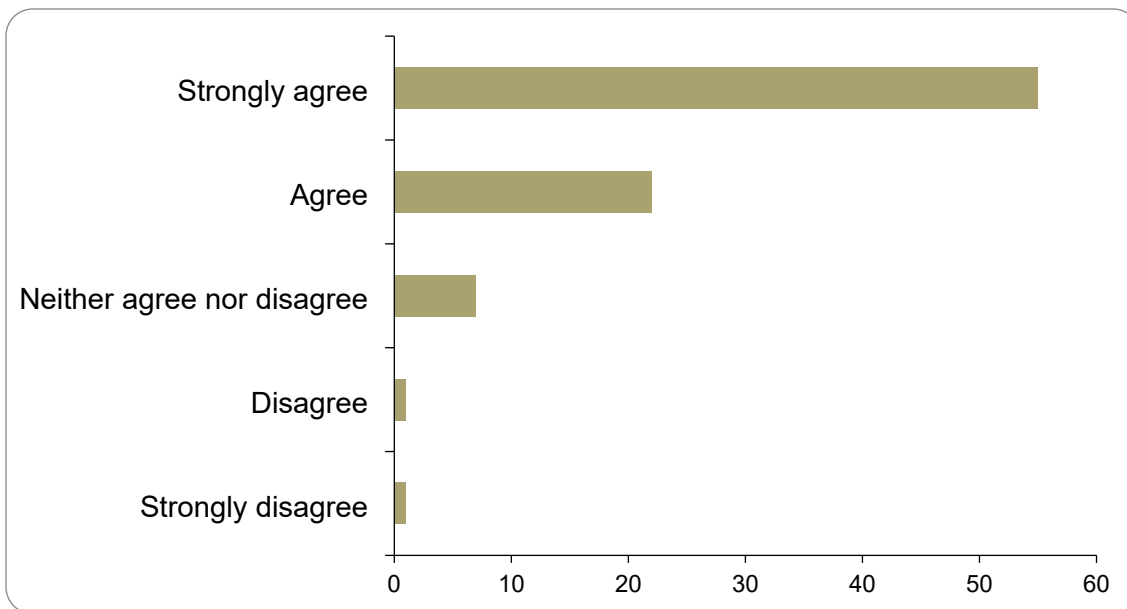
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	51	59.30%
Agree	24	27.91%
Neither agree nor disagree	10	11.63%
Disagree	1	1.16%
Strongly disagree	0	0.00%
Not Answered	0	0.00%

Agree/Disagree - Maximise the city's investment potential

There were 86 responses to this part of the question.

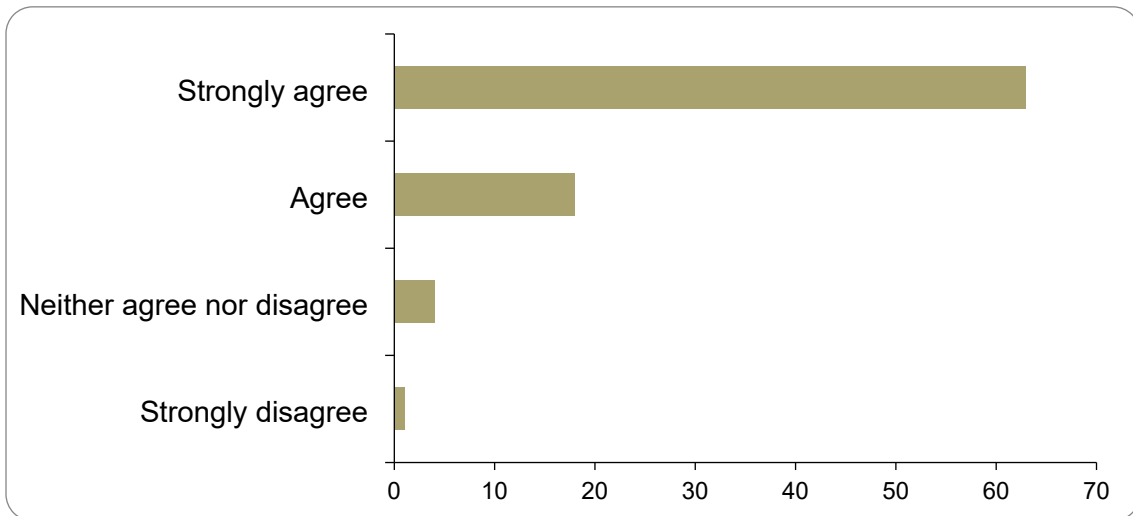


Option	Total	Percent
Strongly agree	55	63.95%
Agree	22	25.58%
Neither agree nor disagree	7	8.14%
Disagree	1	1.16%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

To what extent do you agree with our priorities for the ‘People’ theme:

Agree/Disagree - An education, skills and employment system which meets local need

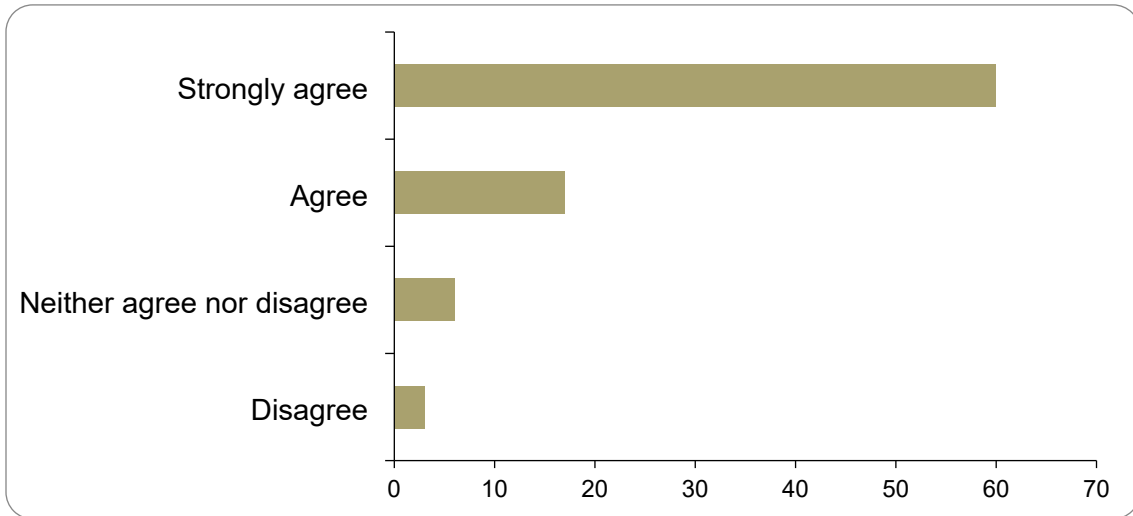
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	63	73.26%
Agree	18	20.93%
Neither agree nor disagree	4	4.65%
Disagree	0	0.00%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

Agree/Disagree - Work with our partners to support health and well being

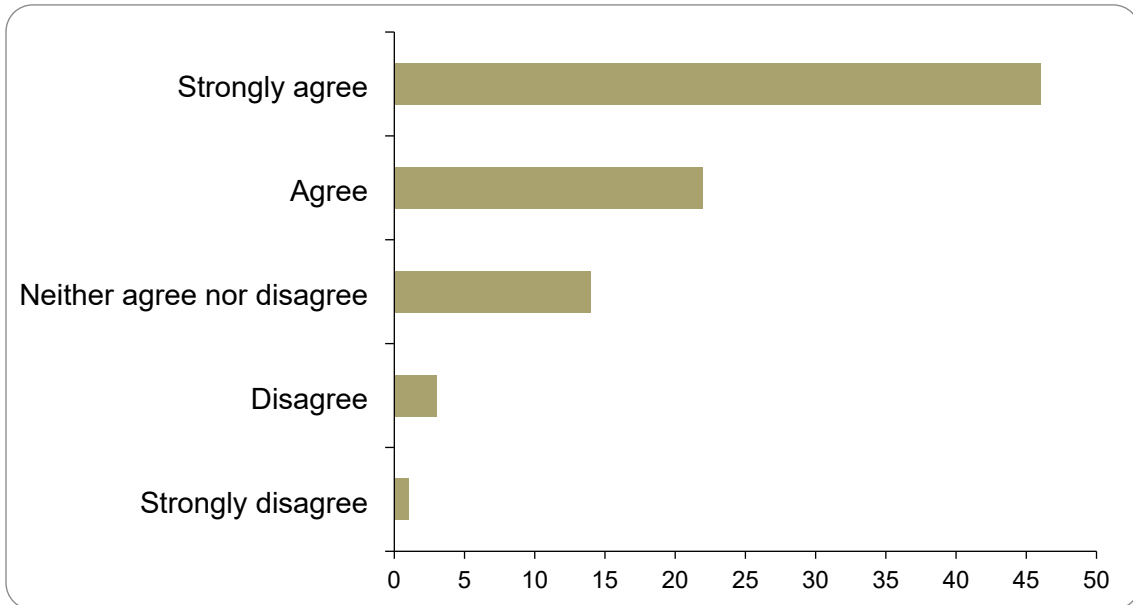
There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	60	69.77%
Agree	17	19.77%
Neither agree nor disagree	6	6.98%
Disagree	3	3.49%
Strongly disagree	0	0.00%
Not Answered	0	0.00%

Agree/Disagree - Build community wealth through the Wolverhampton Pound

There were 86 responses to this part of the question.



Option	Total	Percent
Strongly agree	46	53.49%
Agree	22	25.58%
Neither agree nor disagree	14	16.28%
Disagree	3	3.49%
Strongly disagree	1	1.16%
Not Answered	0	0.00%

What is your postcode?

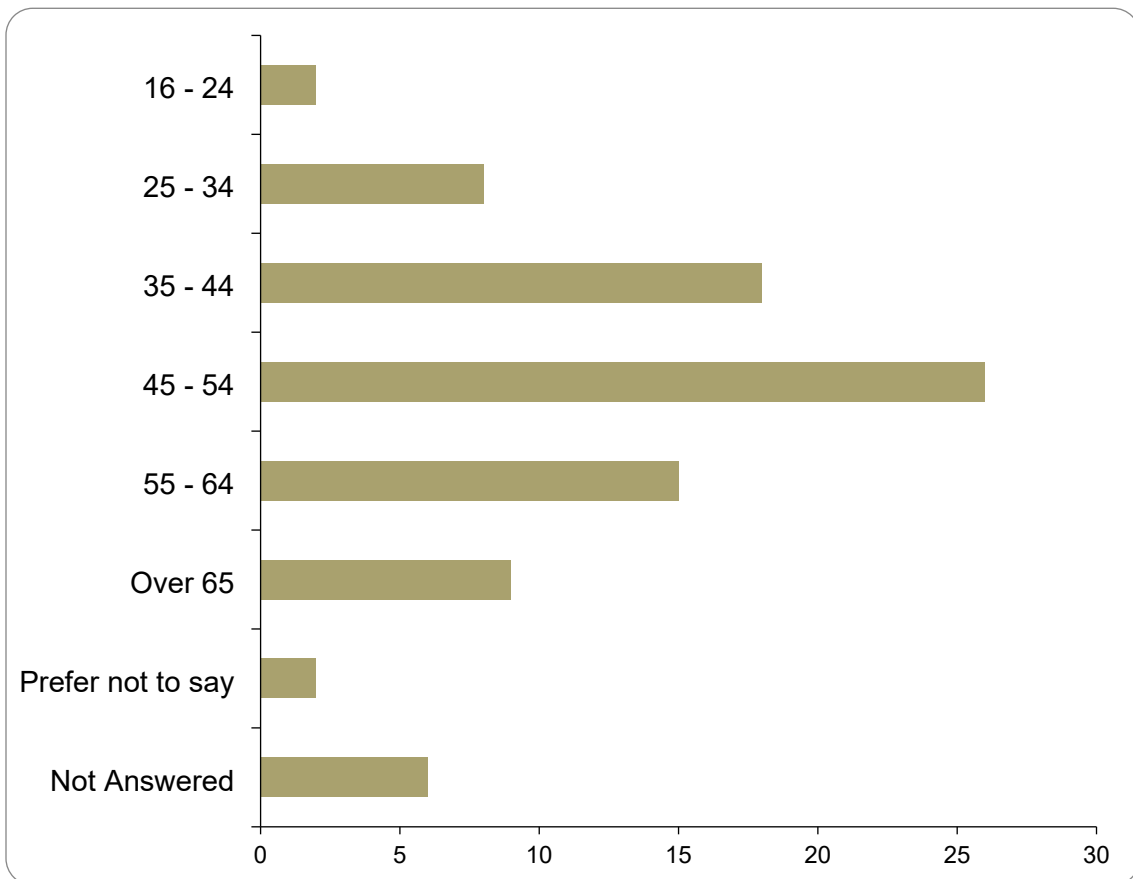
Postcode

There were 75 responses to this part of the question.

What is your age?

Age

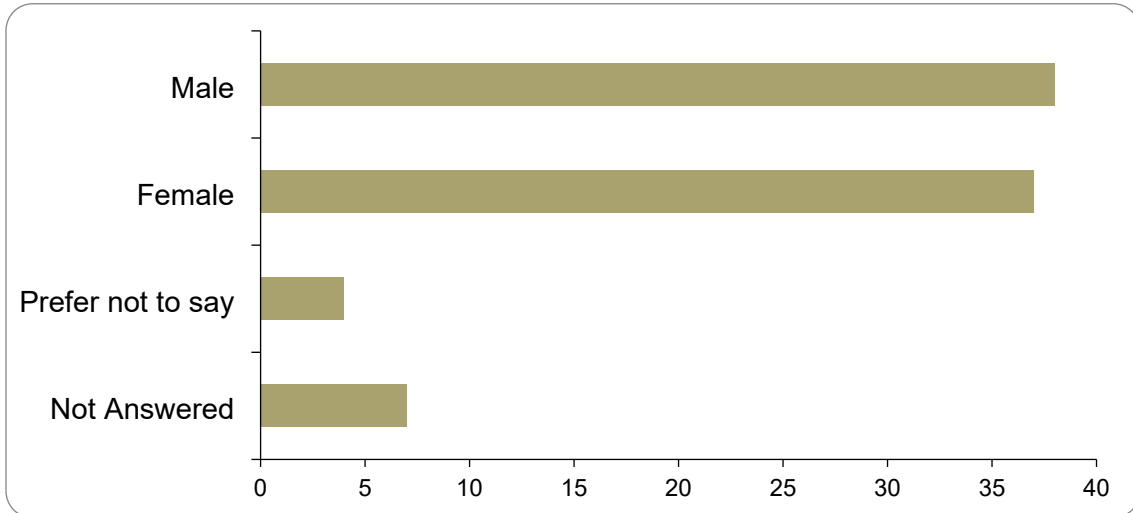
There were 80 responses to this part of the question.



Option	Total	Percent
Under 16	0	0.00%
16 - 24	2	2.33%
25 - 34	8	9.30%
35 - 44	18	20.93%
45 - 54	26	30.23%
55 - 64	15	17.44%
Over 65	9	10.47%
Prefer not to say	2	2.33%
Not Answered	6	6.98%

What is your sex? (a question about gender identity will follow)
sex

There were 79 responses to this part of the question.

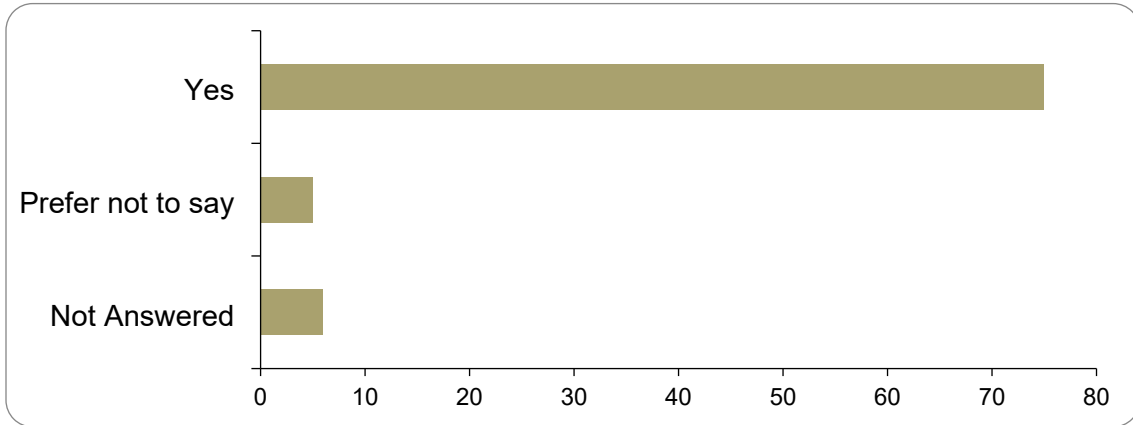


Option	Total	Percent
Male	38	44.19%
Female	37	43.02%
Prefer not to say	4	4.65%
Not Answered	7	8.14%

Is the gender you identify with the same as your sex registered at birth?

Gender identity

There were 80 responses to this part of the question.

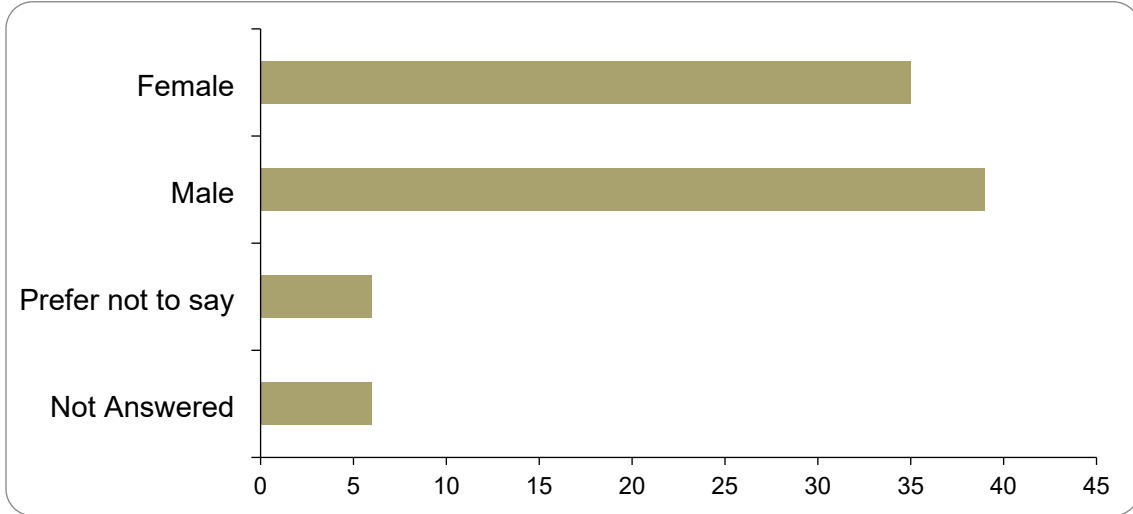


Option	Total	Percent
Yes	75	87.21%
No	0	0.00%
Prefer not to say	5	5.81%
Not Answered	6	6.98%

What best describes your gender?

Gender

There were 80 responses to this part of the question.

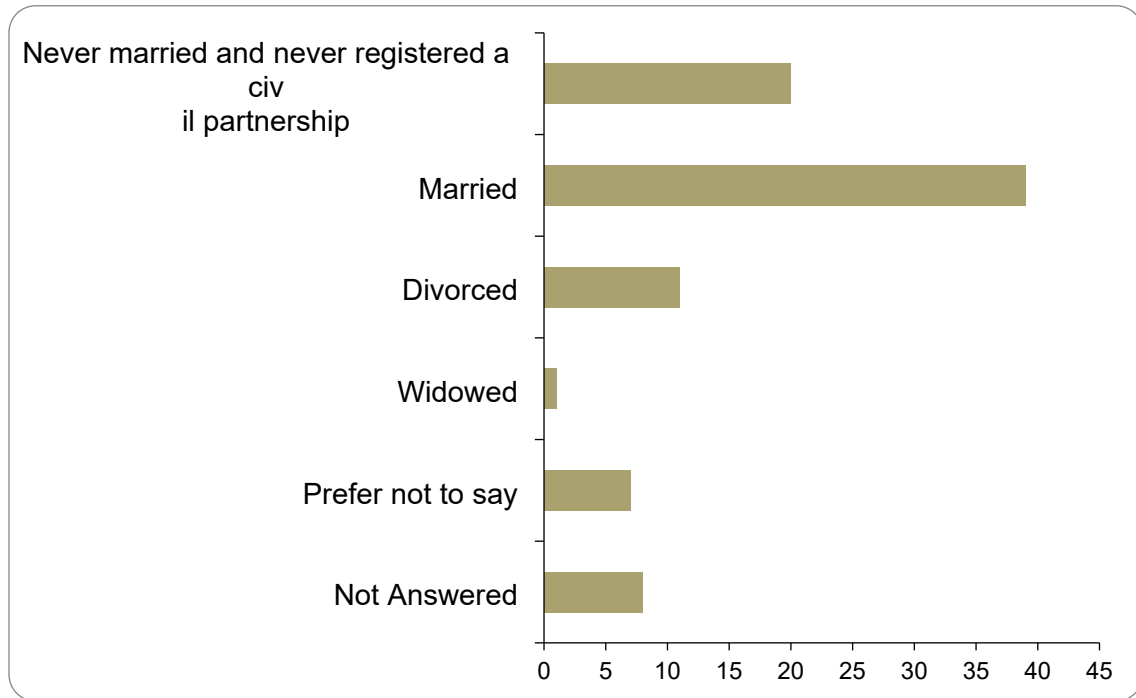


Option	Total	Percent
Female	35	40.70%
Male	39	45.35%
Non-binary	0	0.00%
I use another term	0	0.00%
Prefer not to say	6	6.98%
Not Answered	6	6.98%

What is your legal marital or registered civil partnership status?

Marital status or civil part

There were 78 responses to this part of the question.

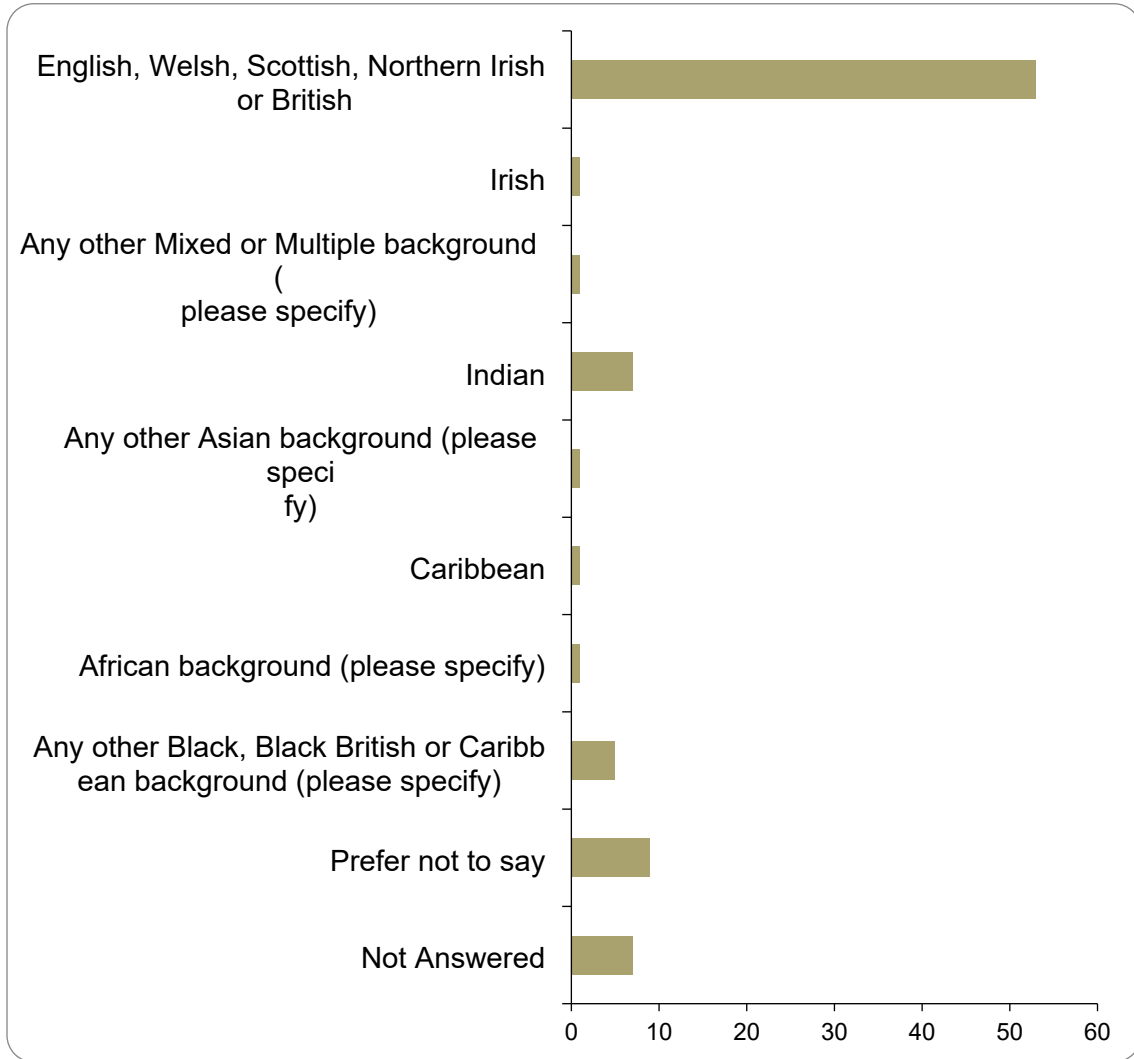


Option	Total	Percent
Never married and never registered a civil partnership	20	23.26%
Married	39	45.35%
In a registered civil partnership	0	0.00%
Separated, but still legally married	0	0.00%
Separated, but still legally in a civil registered partnership	0	0.00%
Divorced	11	12.79%
Formally in a civil partnership which is now legally dissolved	0	0.00%
Widowed	1	1.16%
Surviving partner from a registered civil partnership	0	0.00%
Prefer not to say	7	8.14%
Not Answered	8	9.30%

What is your ethnic origin?

Ethnic origin

There were 79 responses to this part of the question.



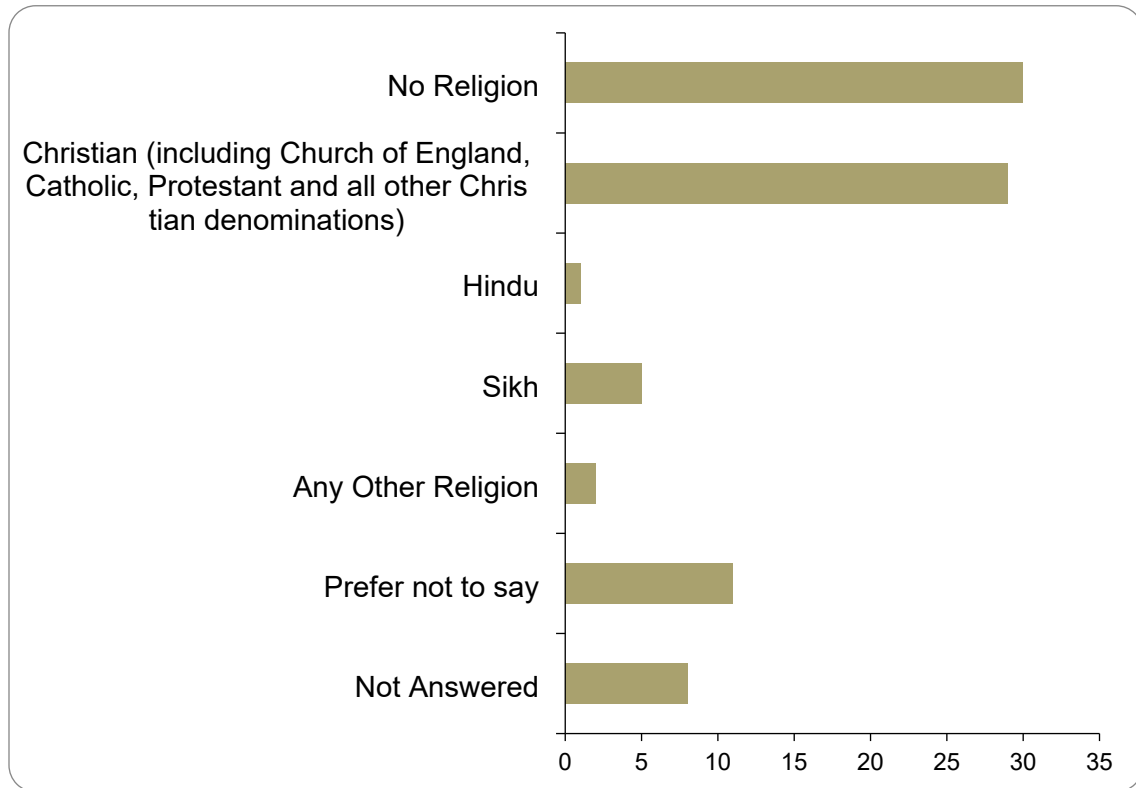
Option	Total	Percent
English, Welsh, Scottish, Northern Irish or British	53	61.63%
Irish	1	1.16%
Gypsy or Irish Traveller	0	0.00%
Roma	0	0.00%
Any other white background (please specify)	0	0.00%
White and Black Caribbean	0	0.00%
White and Black African	0	0.00%
White and Asian	0	0.00%

Any other Mixed or Multiple background (please specify)	1	1.16%
Indian	7	8.14%
Pakistani	0	0.00%
Bangladeshi	0	0.00%
Chinese	0	0.00%
Any other Asian background (please specify)	1	1.16%
Caribbean	1	1.16%
African background (please specify)	1	1.16%
Any other Black, Black British or Caribbean background (please specify)	5	5.81%
Arab	0	0.00%
Any other ethnic group (please specify)	0	0.00%
Prefer not to say	9	10.47%
Not Answered	7	8.14%

What is your religion?

Religion

There were 78 responses to this part of the question.

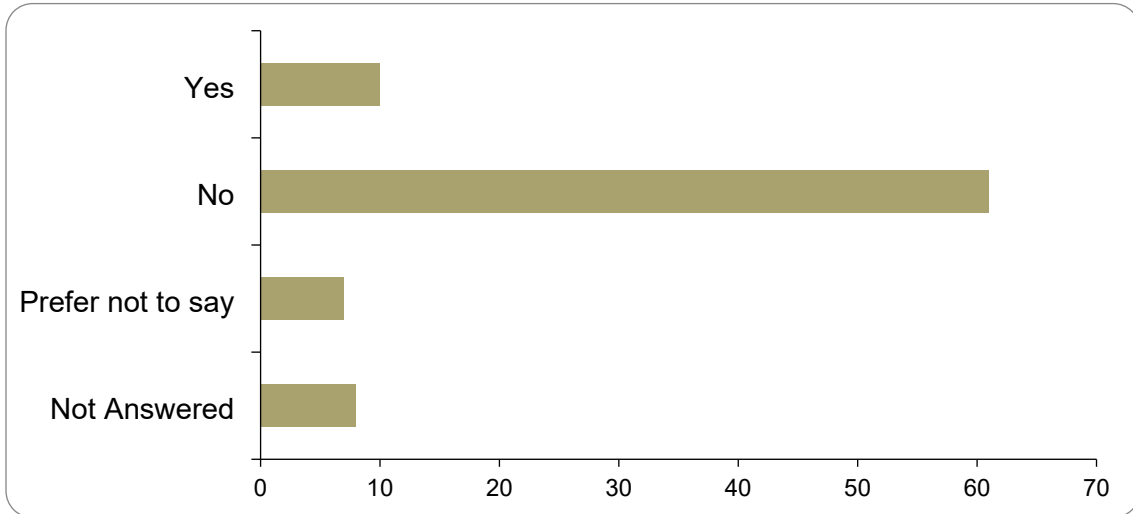


Option	Total	Percent
No Religion	30	34.88%
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	29	33.72%
Buddhist	0	0.00%
Hindu	1	1.16%
Jewish	0	0.00%
Muslim	0	0.00%
Sikh	5	5.81%
Any Other Religion	2	2.33%
Prefer not to say	11	12.79%
Not Answered	8	9.30%

Do you have any, disabilities, physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

Disability

There were 78 responses to this part of the question.

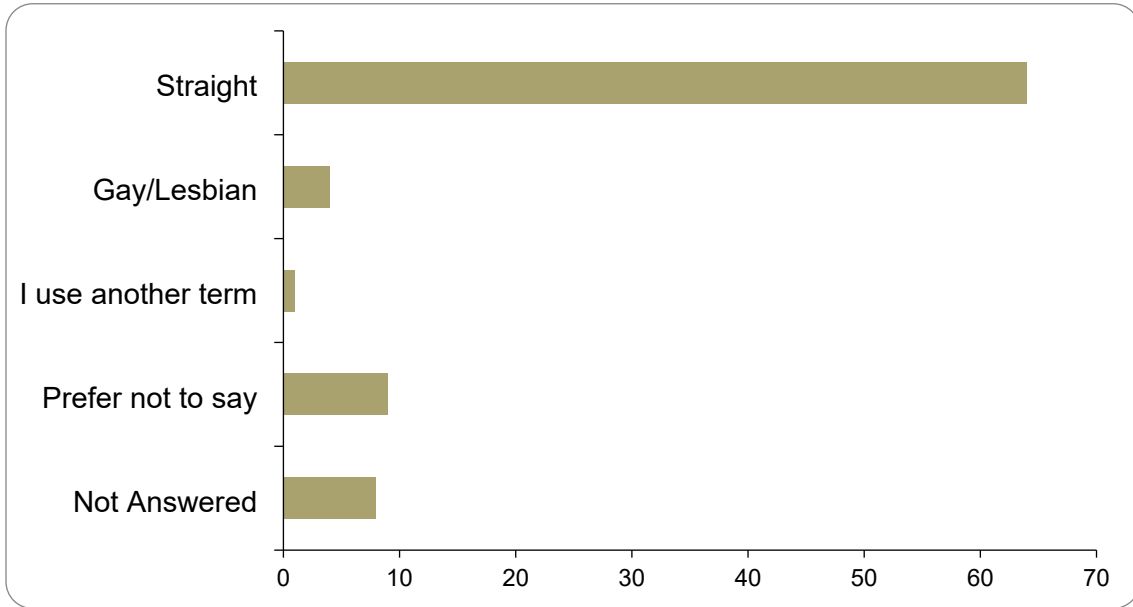


Option	Total	Percent
Yes	10	11.63%
No	61	70.93%
Prefer not to say	7	8.14%
Not Answered	8	9.30%

What best describes your sexual orientation?

Sexual orientation

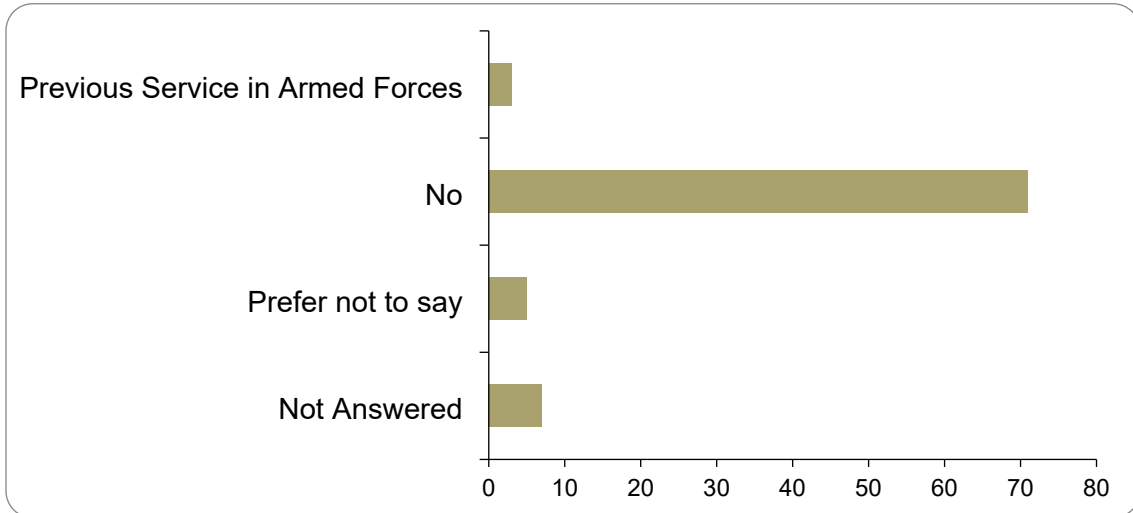
There were 78 responses to this part of the question.



Option	Total	Percent
Straight	64	74.42%
Gay/Lesbian	4	4.65%
Bisexual	0	0.00%
I use another term	1	1.16%
Prefer not to say	9	10.47%
Not Answered	8	9.30%

Do you have an armed forces connection in the past or present day?
Armed forces

There were 79 responses to this part of the question.



Option	Total	Percent
Currently a full-time member of the Armed Forces	0	0.00%
Currently a Reservist	0	0.00%
Previous Service in Armed Forces	3	3.49%
A Military spouse/partner	0	0.00%
No	71	82.56%
Prefer not to say	5	5.81%
Not Answered	7	8.14%

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Wolverhampton Local Plan Issues and Preferred Options Consultation	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Stephen Simkins Leader of the Council	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Richard Lawrence, Director of Regeneration	
Originating service	City Planning	
Accountable employee	Michele Ross	Lead Planning Manager
	Tel	01902 554038
	Email	Michele.ross@wolverhampton.gov.uk
Report has been / will be considered by	Regeneration Leadership Team	19 December 2023
	Strategic Executive Board	16 January 2024
	Scrutiny Board	21 February 2024

Recommendations for decision:

The Cabinet is recommended to:

1. Approve the Wolverhampton Local Plan Issues and Preferred Options Report (Appendix 1), Sustainability Appraisal Report (Appendix 2), and Summary Leaflet (Appendix 3), for consultation during spring 2024.
2. Delegate authority to the Leader of the Council, in consultation with the Director of Regeneration, to make any necessary minor amendments to the Wolverhampton Local Plan Issues and Preferred Options Report (Appendix 1), Sustainability Appraisal Report (Appendix 2), and Summary Leaflet (Appendix 3), prior to commencement of the consultation process.
3. Request a further report summarising key issues raised during the consultation and seeking approval for consultation on the Publication Wolverhampton Local Plan.
4. Approve a new Wolverhampton Local Development Scheme (2024-2027) (Appendix 4).

1.0 Purpose

- 1.1 This report seeks approval to consult on a Wolverhampton Local Plan Issues and Preferred Options Report and associated Sustainability Appraisal Report during spring 2023 and to adopt a new Wolverhampton Local Development Scheme (2024-2027).

2.0 Background

- 2.1 The Black Country Core Strategy (BCCS), adopted in 2011, is the key strategic planning and regeneration document covering the Black Country Authorities (BCA) of Dudley, Sandwell, Walsall and Wolverhampton. The BCCS covers the period to 2026 and contains a commitment to a review in 2016. The review began with production of key evidence in 2016, followed by consultation on an Issues and Options Report in summer 2017.
- 2.2 On 17 October 2018, Cabinet received a report summarising key issues raised during the consultation and agreed to widen the scope of the review to include detailed site allocations and change the name of the document to the Black Country Plan (BCP). The BCP would have become the key Local Plan document for Wolverhampton, replacing the out-of-date BCCS and elements of Wolverhampton specific Area Action Plans.
- 2.3 On 7 July 2021, Cabinet approved consultation on the Draft BCP (Regulation 18) during summer 2021. The Draft Plan included proposed site allocations for housing and employment development and attracted a large number of consultation responses. On 6 July 2022, Cabinet approved public consultation on Additional Housing Sites in Walsall (Regulation 18) during summer 2022.
- 2.4 On 6 October 2022 Dudley Council announced that they were withdrawing from the BCP. On 19 October 2022 Cabinet approved a new Wolverhampton Local Development Scheme and requested a further report to approve Issues and Preferred Options consultation on a Wolverhampton Local Plan (WLP).
- 2.5 The WLP will take forward the parts of the Draft BCP relating to Wolverhampton, whilst taking into account new evidence and consultation responses made to date. This approach was taken because there is an urgent need for Wolverhampton to prepare and adopt a new Local Plan and it will make most effective use of the large amount of work undertaken and resources expended to date, including the Draft BCP consultation responses received in 2021.
- 2.6 In December 2022, the Government published a consultation on changes to the National Planning Policy Framework (NPPF) which would remove the need to review the green belt to meet housing need as part of the Local Plan preparation process. As this change was likely to have a significant impact on the WLP, it was necessary to wait for the results of the consultation before progressing the WLP Issues and Preferred Options. In December 2023 the revised NPPF was issued, including the statement that: "there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being

prepared or updated” (para 145). Therefore, it is now possible to progress the WLP to a revised timetable, as set out below:

Issues and Preferred Options Consultation (Reg 18):	Feb 2024 – Apr 2024
Publication Consultation (Regulation 19):	Dec 2024 – Jan 2025
Submission (Regulation 20):	Mid 2025
Examination:	Mid 2025 – Mid 2026
Adoption:	Mid 2026

This new timetable is set out in a new Wolverhampton Local Development Scheme (LDS), attached as Appendix 4 to this report.

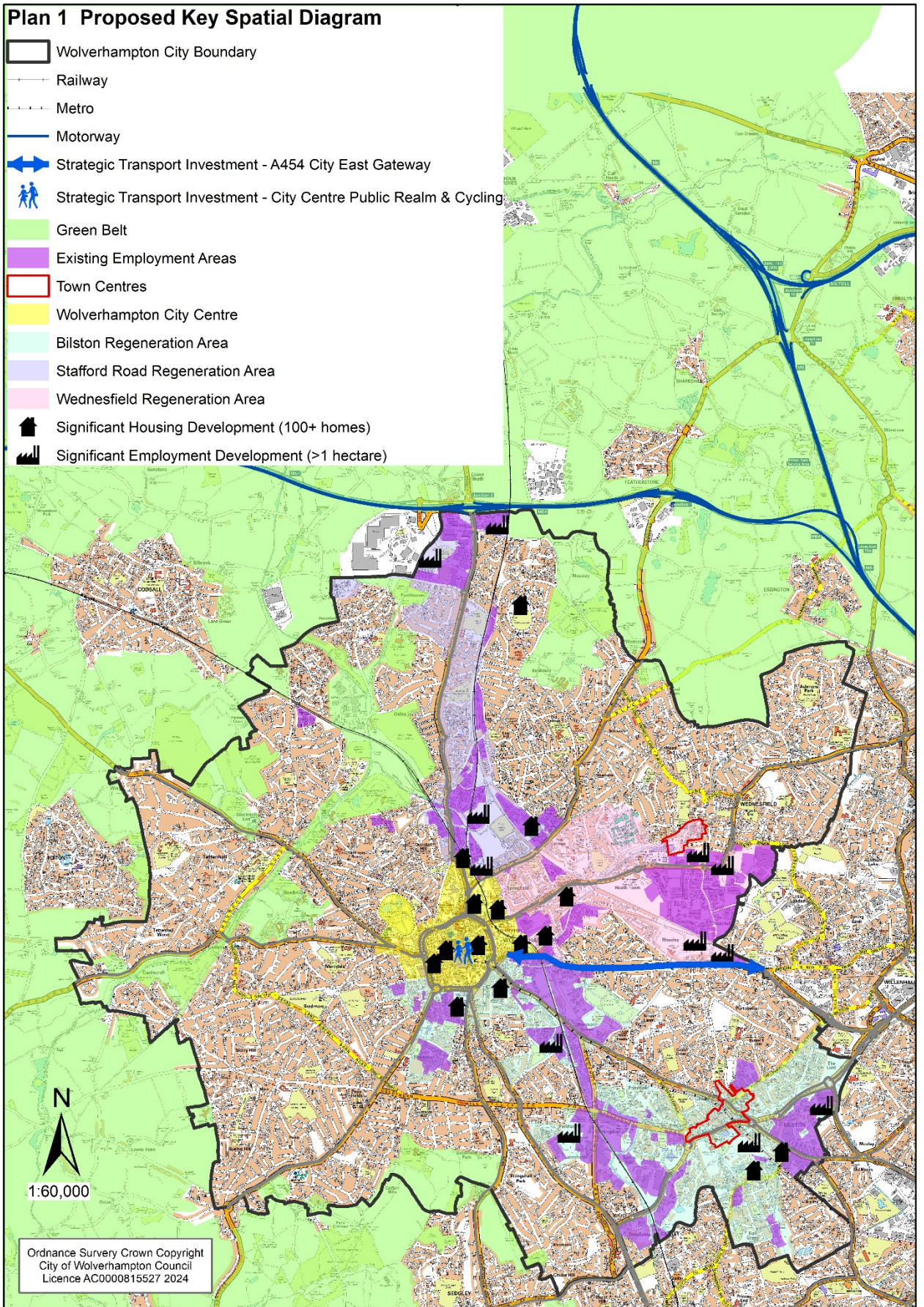
3.0 The Wolverhampton Local Plan Issues and Preferred Options Consultation

- 3.1 The WLP Issues and Preferred Options (I&PO) Report (attached as Appendix 1) details the proposed scope for the WLP. This is similar to the scope of the Draft BCP, except in one key regard: in line with the revised NPPF the WLP will not include a review of the green belt and therefore no green belt sites will be released for development. The WLP will contain strategic policies¹ for Wolverhampton and housing and employment allocations for all parts of the City excluding Wolverhampton City Centre to meet needs up to 2042. Non-strategic policies for Wolverhampton are contained in the saved parts of the Wolverhampton Unitary Development Plan and the three Area Action Plans (AAPs) covering the City. Parts of these documents will be replaced when the WLP is adopted. The Wolverhampton LDS sets out the intention to prepare a Supplementary Plan under the new national planning system to make any additional housing allocations in Wolverhampton City Centre which are required to deliver WLP housing targets.
- 3.2 The I&PO provides the policy context for the WLP, a spatial portrait of the Wolverhampton area and key evidence which has been prepared or will be prepared to support the Publication Plan. The I&PO then sets out the key issues which the Plan needs to address, followed by a series of strategic, spatial, policy and site allocation preferred options to address these issues. These preferred options propose substantially carrying forward the Draft BCP as it relates to Wolverhampton, but with some major changes to respond to planning issues raised during consultation, new evidence, changes in national guidance and extension of the Plan period from 2039 to 2042. References to how planning issues raised by Draft BCP consultation responses have been addressed are provided throughout the I&PO, and further detail will be provided in the WLP Consultation Statement to be published alongside the I&PO.
- 3.3 A number of strategic and spatial options for the Plan were considered when selecting the preferred options for the WLP, in light of available evidence. These options have

¹ National Planning Policy Framework para's 17-23

been subject to sustainability appraisal, as set out in the Sustainability Appraisal Report (attached as Appendix 2).

- 3.4 The proposed Vision and Strategic Priorities for the WLP are based upon Our City:Our Plan, which is the Council's strategic framework to improve outcomes for local people and deliver levelling up ambitions, and are also aligned with the City's Vision for Public Health, Climate Commitment and Good Growth Strategy. The preferred growth options for housing and employment land will provide sufficient land to deliver 10,307 homes and 52 ha of employment development up to 2042. This translates into a preferred spatial strategy which balances the need to bring forward a supply of land to provide new homes and jobs, while at the same time protecting and enhancing key environmental assets and safeguarding the amenity of the City's residential areas. To achieve these objectives, the Strategy directs the great majority of development onto brownfield land within the urban area, with a focus on the City Centre and a series of Core Regeneration Areas. The Strategy is illustrated in Plan 1 below.



- 3.5 To deliver regeneration ambitions and respond to national trends affecting town centres, 44% of all housing will be delivered in Wolverhampton City Centre, and 22% in the Bilston, Wednesfield and Stafford Road Core Regeneration Areas.
- 3.6 The preferred spatial strategy will provide additional land for employment development in suitable locations, however this will not be enough to meet forecast growth in key employment sectors within Wolverhampton. Evidence indicates that there will be a shortfall of 53 ha in Wolverhampton and 152 ha across the Black Country Functional Economic Market Area, of which Wolverhampton is a part. Government guidance requires Local Plans to have regard to needs arising in wider areas where there is evidence of strong economic relationships. The Black Country is recognised as such an area, therefore it is proposed that the WLP recognises the importance of continuing to engage with the other Black Country Councils and neighbouring authorities to address an identified shortfall of employment land across the Black Country as a whole.
- 3.7 Whilst the preferred spatial strategy will provide significant land for housing, this is not enough to meet local needs and there will be a significant shortfall of around 11,413 homes against Government housing need figures for Wolverhampton. It is proposed to address this shortfall by requesting that neighbouring authorities' Local Plans provide levels of housing above their own needs and make a specific contribution towards Wolverhampton's unmet need. It is important to develop an evidence-led approach to dividing up such contributions between authorities across the region which can demonstrate unmet housing needs. The proposed approach is based on the proportion of historic net migration flows from Wolverhampton compared to other authorities across the region with a demonstrable unmet housing need.

Policies

- 3.8 The Draft BCP included 63 strategic policies covering a range of strategic planning subjects, as required by national guidance. The Draft BCP consultation responses raised a number of issues regarding these policies and in some cases new evidence or national guidance is now available which requires changes in policy. The change in geography of the Plan from Black Country to Wolverhampton has also made it necessary to reconsider the scope of certain policies e.g. for minerals. As a result, a limited number of major changes are proposed to the Draft BCP policies. For all other Draft BCP policies, it is considered appropriate to retain the broad policy approach, subject to minor changes to respond to issues raised through the Draft BCP consultation, new evidence and the need to refer to Wolverhampton only.
- 3.9 For each of the ten subject areas of the Draft BCP, a summary of the Draft BCP policies and proposed major changes is provided. The key proposed major changes to the Draft BCP policies are:
- Remove all references to Neighbourhood Growth Areas, release of land from the green belt for housing, and compensatory improvements for loss of green belt;

- Amend figures relating to employment land, housing, gypsy and traveller accommodation and waste so that they relate to Wolverhampton only, extend to 2042 and reflect up-to-date evidence of need and supply;
- Remove requirement for brownfield housing sites to provide 20% accessible and adaptable homes, as this is likely to make development unviable;
- Include a new policy on playing fields and built sports facilities in line with Sport England advice, including new requirement for strategic housing allocations to provide playing pitch contributions as recommended in the Wolverhampton Playing Pitch Strategy (2022), if this is supported by a viability study update;
- Include a new policy on water quality, in line with Environment Agency advice;
- Amend existing health policies to clarify the supporting evidence developers will be required to provide on health impacts, and policy on hot food takeaways, shisha bars and other uses with potential negative effects on health and well-being;
- Clarify that transport evidence will be provided to support site allocations, update the transport projects list; and strengthen references to influencing travel demand and choices, including parking;
- Clarify that any development in Wolverhampton City Centre which requires a Transport Statement will need to be compatible with and contribute to accessibility and sustainable development;
- Require large leisure / evening economy developments to address anti-social behaviour;
- Commit to carry out air quality modelling to estimate the impact of traffic arising from WLP developments on the habitat value of nearby Special Areas of Conservation (SACs) – if analysis shows there will be harmful impacts, the WLP may need to introduce policies to mitigate these impacts.

Site Allocations

- 3.10 As set out in para 3.1, the WLP will not include a review of the green belt and therefore no green belt sites will be released for development. This means that a number of sites which were proposed for release from the green belt for housing in the Draft BCP are not included in the I&PO report - including land at Bushbury, land at Fallings Park and the former Wolverhampton Environment Centre (WEC) site, Westacre Crescent.
- 3.11 Following consultation on the Draft BCP, a number of planning issues have arisen regarding four greenfield sites which were proposed as housing allocations in the Draft BCP, as set out in Table 1. These sites are now not suitable for housing development for planning reasons including highways constraints, sufficiency of open space, wildlife value and viability, and therefore will not be included in the WLP. This will remove 238 homes from supply (following discount) and reduce the proportion of housing supply on greenfield land to only 3%.

Table 1: Draft BCP Proposed Housing Allocations now Not Suitable for Development

Draft BCP Site Ref	Site Name	Reason(s) not suitable for development
WOH185	Alexander Metals Open Space, Darlaston Lane / Wrenbury Drive, The Lunt (70 homes)	Following ecological survey, the site has been designated a Site of Importance for Nature Conservation (SINC). SINC's are not suitable for development under local planning policy and the site assessment methodology.
WOH193 & WOH194	Former St Luke's Junior School, Goldthorn Road (89 homes)	There is evidence that highways access places significant limits on housing capacity and there is a need to retain flexibility for the site to be used, together with adjoining land, as part of a Royal Primary School reconfiguration scheme.
WOH200	Fmr Nelson Mandela House, Whitburn Close (20 homes)	There is evidence that the site is not viably deliverable for housing.
WOH273 (WOH274 in error in Draft BCP)	Moseley Road Open Space (part), Langdale Drive, Bilston (also known as "Grapes Pool Field") (85 homes)	There is evidence that a reduction in open space in this part of Wolverhampton would lead to deficiencies against open space standards adopted through the Wolverhampton Open Space Strategy and Action Plan (2018).

- 3.12 Since 2021, housing monitoring work has identified four new brownfield sites in the urban area which are suitable for housing and deliverable by 2042, as detailed in Table 2. It is proposed to allocate these sites for housing in the WLP, which will strengthen the brownfield element of the Plan and add 275 homes to supply (following discount).

Table 2: Urban Brownfield Sites now Suitable for Housing Development

Site Name and Address	Indicative Housing Capacity	Site Area (ha)	Further information
Bluebird Industrial Estate and land to rear, Park Lane	130	3.10	Existing housing allocation in Stafford Road Corridor Area Action Plan. Not consulted on through Draft BCP due to delivery concerns - now considered deliverable.
Former Loxdale Primary School, Chapel Street, Bradley	100	1.30	Surplus site.
Fmr Gym, Craddock Street	48	1.20	Existing housing allocation in Wolverhampton Unitary Development Plan. Not consulted on through Draft BCP as operational gym - now considered deliverable.
Fmr Probert Court / Health Centre, Probert Road	35	0.88	Subject to relocation of existing GP surgery.

- 3.13 A number of other key changes are proposed to Draft BCP housing, gypsy and traveller, employment, waste and minerals site allocations for Wolverhampton:

- For all housing site allocations, update delivery timescales and provide a housing trajectory which is broken down by year for the first five years;
- Increase housing capacity of the Former Pipe Hall site in Bilston Town Centre from 20 to 38 homes to reflect the latest proposals for the site;
- Increase the site boundary of West of Qualcast Road housing site to include 0.25 ha required to provide access to the Crane Foundry housing site allocation within Wolverhampton City Centre;
- Provide a detailed site boundary for the employment site allocation at Neachells Lane, and details of buffers required within the site, to reflect the most recent evidence and the latest proposals for the site.

3.14 The details of all housing, gypsy and traveller pitch and employment development site allocations proposed to be taken forward into the WLP are provided in the I&PO report and their locations can be viewed in more detail through an interactive draft Policies Map available on the Council website.

Public Consultation

3.15 Public consultation on the WLP I&PO will take place for six weeks in accordance with the Council's adopted Statement of Community Involvement (SCI) and will allow stakeholders and local residents the opportunity to comment on most details of the Plan in advance of the formal Publication (Regulation 19) stage, when only consultation responses on the legality and soundness of the Plan can be considered. A Summary Leaflet (attached as Appendix 3) has been produced, which pulls out the key information to assist with the public consultation process. The I&PO consultation responses will then be analysed and any relevant planning issues raised, together with any new evidence and changes to national guidance, will feed into preparation of the Publication WLP, which is programmed for consultation in late 2024, subject to Cabinet approval.

4.0 Evaluation of alternative options

4.1 The alternative option would be to make no change to the existing Black Country Core Strategy. This would mean that the City would not have an up-to-date Local Plan in place for a number of years.

4.2 Failure to have a Local Plan that is based on sound evidence could result in the City having insufficient land to meet the need for housing, employment and other land uses that are necessary to support the economic and environmental well-being of the area. It could also result in development taking place in the wrong locations, leading to an inefficient use of resources, traffic congestion and other harm. Having an up-to-date Local Plan in place is also essential to defend the Council's position at planning appeals. Lack of an up-to-date Plan risks intervention from central government and may compromise our ability to make decisions locally.

5.0 Reasons for decisions

5.1 It is important that Wolverhampton is covered by an up-to-date Local Plan, in order to meet statutory requirements and to support regeneration and investment in the City and protect areas of value from development. Cabinet approval is required for each consultation stage of the Local Plan preparation process.

6.0 Financial implications

6.1 Following a full review of potential costs, it is estimated that taking the WLP to adoption will cost £465,000 over the period 2023-2026. Work is also required on the Wolverhampton City Centre Supplementary Plan during 2025-2026, to demonstrate that significant development targets for the City Centre will be delivered. It is estimated that this will cost £80,000 in 2025-2026.

6.2 The indicative cost breakdown is provided in the table below:

	2023-2024 £000	2024-2025 £000	2025-2026 £000	Total £000
Wolverhampton Local Plan cost	40	175	250	465
Wolverhampton City Centre Supplementary Plan	0	0	80	80
Available in Existing Budgets / Grants	(40)	(110)	(55)	(205)
<i>Shortfall</i>	<i>0</i>	<i>65</i>	<i>275</i>	<i>340</i>

6.3 It is anticipated that the estimated costs of £40,000 for 2023-2024 can be fully met through existing planning grants and planning revenue budgets, with resources within existing approved budgets contributing £165,000 for the period 2024-2026.

6.4 The 2024-2025 final budget and medium term financial strategy 2024-2025 to 2026-2027 report on the same Cabinet agenda incorporates the growth of £340,000 to mitigate the shortfall and will be subject to approval by full Council on 1 March 2024. In the event that funding is not identified or approved, efficiencies will need to be delivered or additional income achieved to fund these costs.

[LD/12012024/A]

7.0 Legal implications

7.1 As set out in the body of the report, the Council is required to have an up-to-date Local Plan. The legal implications are detailed in this report. The Wolverhampton Local Plan will form part of the adopted Local Plan for the City.

[JA/15012024/C]

8.0 Equalities implications

8.1 Preparation of the Wolverhampton Local Plan will include the carrying out of an integrated Sustainability Appraisal at each formal stage, and at later stages an Equality Impact Assessment. The Plan will seek to ensure that sufficient homes, shops and employment, social and recreational facilities are planned and provided for in that time to meet the needs of the communities in the City. This will include meeting the needs of children and young people by seeking to provide sufficient facilities for them as well as having a positive effect for future generations.

9.0 All other implications

9.1 A Sustainability Appraisal (SA) is being carried out throughout the plan preparation process. SA is a process for evaluating the environmental consequences of proposed policies and proposals to ensure sustainability issues are fully integrated and addressed at the earliest appropriate stage. The overall aim of the SA process is to inform and influence the development of the Plan and maximise its sustainability value.

9.2 There are currently sufficient staff resources in the Planning team to progress the Wolverhampton Local Plan to timetable. Delivery of the timetable will be dependent upon the retention of key staff and maintenance of staffing resource up to adoption.

10.0 Schedule of background papers

10.1 Black Country Core Strategy 2006-26, adopted February 2011

10.2 Cabinet – 27 June 2017 '[Black Country Core Strategy Review – Issues and Options Report](#)'

10.3 Cabinet – 17 October 2018 '[Progress on Black Country Core Strategy Review](#)'

10.4 [Cabinet – 7 July 2021 'Black Country Plan Draft for Consultation'](#)

10.5 Cabinet – 26 October 2022 [Wolverhampton Local Development Scheme](#)

11.0 Appendices

11.1 Appendix 1: Wolverhampton Local Plan Issues and Preferred Options Report

11.2 Appendix 2: Sustainability Appraisal of Wolverhampton Local Plan Issues and Preferred Options Report

11.3 Appendix 3: Summary Leaflet

11.4 Appendix 4: Wolverhampton Local Development Scheme (2024-2027)

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Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024

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How to Respond to the Consultation

We are consulting on the Wolverhampton Local Plan Issues and Preferred Options **from 26 February to 10 April 2024** under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

Have your say - we welcome your views

Please visit the website: www.wolverhampton.gov.uk/localplan

On the website you will find this main document, the Issues & Preferred Options summary leaflet, and other information including evidence documents and an interactive map.

We would encourage you to use the online response form that is designed to be quick and easy to complete, where you can answer the questions in this document and make any other comments about the Wolverhampton Local Plan. A shorter survey about the Issues & Preferred Options summary leaflet is also available.

Paper copies of this document and other documents (for reference), plus the summary leaflet and response forms are available at:

- Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1SH (at the business reception by the mayoral entrance)
- All of Wolverhampton's libraries

Drop-in: you can view the consultation documents and speak to Planning Officers at the following drop-in sessions:

Wednesday 6th March, 9am – 5pm

Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1SH

Thursday 7th March, 3pm – 7pm and

Saturday 9th March, 10am – 2pm

Wolverhampton Central Library, Snow Hill, Wolverhampton WV1 3AX

Tuesday 12th March, 10am - 1pm

Wednesfield Library, 2 Well Lane, Wednesfield WV11 1XT

Wednesday 13th March, 4pm - 7pm

Bilston Library, Mount Pleasant, Bilston WV14 7LU

Thursday 14th March, 2pm – 5pm

Tettenhall Library, St Michael's Parish Centre, Upper Street, Tettenhall, WV6 8QF

If you need help understanding the documents, completing the response form, or would like to discuss with Planning Officers, please contact the Wolverhampton Local Plan Team at: localplan@wolverhampton.gov.uk or Tel: 01902 551155

Please send paper responses to Wolverhampton Local Plan, City Planning, City of Wolverhampton Council, Civic Centre, St Peter’s Square, Wolverhampton WV1 1RP; or hand them in at Wolverhampton Civic Centre.

What is the deadline for responses?

The consultation will end at **5:00 pm on Wednesday 10 April 2024**
Please provide your response to us by this date.

How will my response be used?

We will use your response to inform the preparation of next stage of the Plan, which is called the Publication Wolverhampton Local Plan. Please note that the responses will be made public - for more information see the privacy notice at www.wolverhampton.gov.uk/localplan

Thank you for your interest in the Wolverhampton Local Plan.

Wolverhampton Local Plan Timetable

Issues and Preferred Options Consultation	26 February – 10 April 2024
Publication Consultation	Dec 2024 – Jan 2025
Submission to Government	June 2025
Independent Examination by Planning Inspector	June 2025 – Spring 2026
Adoption by City of Wolverhampton Council	Mid 2026

1. Introduction

What is the Purpose of the Wolverhampton Local Plan?

- 1.1 The Wolverhampton Local Plan (referred to as the WLP throughout this document) will contain strategic planning policies and land allocations and targets to support the growth and regeneration of the City of Wolverhampton up to 2042.
- 1.2 The WLP will set out a vision and strategic priorities and a spatial and policy framework for delivery. This framework will guide and shape development across Wolverhampton and set clear parameters for growth and transformation. The policies and proposals will be used to help make planning decisions and guide investment and regeneration in Wolverhampton.
- 1.3 Once adopted, the WLP will provide a strategy for bringing land forward with a clear presumption in favour of sustainable development. It will provide certainty and transparency to residents, businesses and developers about how the city is expected to grow up to 2042.

Why Does Wolverhampton Need a Local Plan?

- 1.4 The government requires all local authorities to develop a long-term plan that sets out how and where land can be developed over the next 15 years, to meet the growing needs of local people and businesses. The development plan for an area is made up of strategic policies (which address the strategic priorities for an area) and non-strategic policies (which deal with more detailed matters).
- 1.5 The WLP will set out strategic policies for Wolverhampton and housing and employment allocations for the whole of Wolverhampton, except for Wolverhampton City Centre. The WLP will sit alongside non-strategic policies for Wolverhampton provided in the saved parts of the Wolverhampton Unitary Development Plan, and Area Actions Plans for Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre. A future review of the Wolverhampton City Centre Area Action Plan will provide up-to-date development allocations for Wolverhampton City Centre.
- 1.6 The WLP will provide a policy framework to:
 - a) enable delivery of the right type of development to meet identified needs in the most sustainable places;
 - b) provide certainty about which types of development are likely to be approved where and help prevent uncoordinated development;
 - c) protect and enhance areas designated for their environmental value;
 - d) seek to meet housing needs up to 2042;

- e) attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;
- f) ensure infrastructure (such as roads, public transport, schools, healthcare, utilities, broadband, waste and sewage disposal) is provided at the right time to serve the new homes and employment provision it supports;
- g) increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), the Local Industrial Strategy and Covid-19 recovery plans;
- h) address the issues arising from climate change to support delivery of the Council's Climate Commitment (2020);
- i) promote and enhance health and well-being to reduce health inequalities and support the Council's Public Health Vision for 2030 and Health Inequalities Strategy.

What will the Wolverhampton Local Plan replace?

1.7 When adopted, the WLP will replace:

- the Black Country Core Strategy (2011) for the Wolverhampton area
- significant parts of the Stafford Road Corridor and Bilston Corridor Area Action Plans (2014)
- some parts of the Wolverhampton City Centre Area Action Plan (2016)
- parts of the Wolverhampton Unitary Development Plan (2006)

How does the Wolverhampton Local Plan relate to the Black Country Core Strategy and the Black Country Plan?

1.8 The Black Country Core Strategy (BCCS) was produced by the four Black Country authorities (BCA) of Dudley, Sandwell, Walsall and Wolverhampton and covered the period up to 2026. The BCCS provided the strategic framework for the three Area Action Plans (AAPs) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated.

1.9 The four authorities began a review of the BCCS in 2016, to roll forward the plan and address changes that had taken place since 2011. The Black Country population and economy were growing and there was a need to identify additional housing and employment sites beyond the capacity of the BCCS. There had been several changes to national planning policy and the national economic situation had also changed. The BCCS was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline. Therefore, the BCCS anticipated significant recycling of industrial land for housing. However, the manufacturing and industrial markets of the Black Country remained stable and have expanded in some cases, meaning that the expected surplus of vacant brownfield land has not occurred.

- 1.10 The BCCS review began in 2016 followed by an Issues and Options Consultation and Call for Sites in 2017. The scope of the review was wider than the BCCS, including detailed site allocations for housing and employment development across the Black Country, excluding Wolverhampton City Centre and other Strategic Centres. At this point the work was retitled the 'Black Country Plan'.
- 1.11 The Covid-19 pandemic of 2020–21 caused a significant shift in the way Black Country residents work, shop and access services, bringing about some longer term changes to the ways communities operate that may have implications for land uses which need to be addressed through robust yet flexible policies.
- 1.12 In 2021, consultation took place on a Draft Black Country Plan (BCP), which took into account Issues and Options consultation responses and a range of evidence produced to inform the Plan. The Draft BCP identified a vision and framework for future development of the Black Country up to 2039, addressing needs and opportunities in relation to housing, the local economy and infrastructure and seeking to safeguard the environment, enable adaptation to climate change and secure high quality and accessible design.
- 1.13 A number of consultation respondents raised concerns about the proposed release of land from the green belt for development, whilst others questioned whether the brownfield first approach could, alone, deliver sufficient capacity to meet needs. The consultations also demonstrated that there was support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country. A summary of the key issues raised in the Draft BCP consultation is set out in the WLP Consultation Statement.
- 1.14 In autumn 2022 it was decided not to take forward the BCP, and for the four BCAs to instead pursue separate strategic plans and progress differing approaches to site allocations to meet identified needs. However, there will still be continued joint working across the Black Country on a number of planning issues, particularly transport, and some of the joint evidence prepared to support the BCP is still relevant for individual plans.

What is the Scope and Timetable for the Wolverhampton Local Plan?

- 1.15 Following the decision to end work on the BCP, Wolverhampton adopted a new Local Development Scheme setting out a timetable for the immediate preparation of a Wolverhampton Local Plan (WLP). This has since been updated, as set out below:

Issues and Preferred Options Consultation:	26 February – 10 April 2024
Publication Consultation (Regulation 19):	Dec 2024 – Jan 2025
Submission to Secretary of State:	June 2025
Independent Examination by Planning inspector:	June 2025 – Spring 2026
Adoption of Wolverhampton Local Plan:	Mid 2026

- 1.16 To progress the WLP as quickly as possible, it is important to build on the extensive work that took place recently to develop the BCP. This means making use of existing evidence, draft policies and responses made to the Draft BCP consultation, where these are still relevant.
- 1.17 To facilitate this, the WLP will have the same scope as the BCP – covering all strategic policies for Wolverhampton and all housing and employment allocations, with the exception of sites in Wolverhampton City Centre. This gap will be filled by a review of the Wolverhampton City Centre AAP to provide up-to-date site allocations for the City Centre area. The WLP will have a Plan period that extends to 2042, covering at least 15 years after adoption in line with national requirements.
- 1.18 The scope and timetable for the WLP reflect an urgent need to review and update Wolverhampton strategic policies and site allocations, for the following reasons:
- The large and increasing shortfall between housing and employment land needs and available development land;
 - The need to bring forward a strategic plan before 2025, when local plan system changes are expected to come into effect through implementation of the Levelling Up and Regeneration Bill.

What is the Purpose of this Issues and Preferred Options Consultation?

- 1.19 Under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, it is necessary to carry out a public consultation to test the issues, scope and preferred options for the WLP. The Plan will then be written up in detail for consultation at Publication stage (under Regulation 19) and then submitted to the Secretary of State (under Regulation 22) for an independent examination by the Planning Inspectorate.
- 1.20 It is important to identify and consult on the key issues which the WLP will need to address and then to identify options for the WLP - in terms of the vision and strategic priorities, spatial strategy, policies and site allocations. Given the amount of work undertaken recently on the BCP, it is also possible to select and consult on preferred options for the WLP.
- 1.21 Wolverhampton is a densely developed urban area, with small areas of green belt on the fringes. Most of the sites in the urban area which were proposed for allocation for housing and employment use in the Draft BCP are still considered suitable to include in the WLP. A continual “call for sites” in Wolverhampton has been open through the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) for over ten years. Since consultation on the Draft BCP, the SHLAA process has generated some new sites suitable for housing, which are included in this consultation. The Issues and Preferred Options consultation will promote and encourage the submission of any further sites through the “call for sites” process.

- 1.22 At the present time, even taking into account all suitable and deliverable sites in the urban area, uplifting housing densities and including housing windfall allowances and an ambitious estimate of the housing capacity of Wolverhampton City Centre, there are still significant shortfalls of development land for housing and employment use over the Plan period, as detailed in sections 5b(i) and 5b(iii) below.
- 1.23 At the heart of the National Planning Policy Framework (NPPF) is a **presumption in favour of sustainable development** which is detailed in paragraph 11. For plan-making purposes, this means that: *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷.”* Footnote 7 clarifies that the policies referred to include land designated as Green Belt.
- 1.24 In December 2023 there was a key change to national planning policy as set out in paragraph 145 of the NPPF: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 1.25 This change means that local authorities preparing a Local Plan, which do not have enough suitable land to meet their housing or employment development needs, can now choose whether or not to review the green belt to release land for more housing or employment development.
- 1.26 Wolverhampton is a densely developed and constrained urban area with a small amount of green belt land, forming only 11% of the total land area. Much of this green belt land provides important services for the urban area, such as public open space, education and sports facilities, or is of significant value for wildlife, historic character or landscape character. Therefore, City of Wolverhampton Council has chosen not to review the green belt to address the housing and employment development shortfalls arising from the WLP. This means that none of the spatial options being consulted on involve release of green belt land for development, and no green belt sites will be considered for development or assessed as reasonable alternatives throughout the WLP preparation process.
- 1.27 It is considered that the majority of policies in the Draft BCP are still supported by the evidence, subject to some changes to address valid planning issues raised by consultees and considerations specific to Wolverhampton. Therefore, this consultation proposes that the WLP should substantially repeat the Draft BCP strategic policies, but with some amendments to respond to: new evidence and national guidance; the new

geography and timescale; and any valid planning issues raised during the Draft BCP consultation (2021).

- 1.28 This consultation should therefore be read alongside the Draft Black Country Plan (2021) and published evidence and consultation responses, which are available at: [link]. Some of the evidence prepared to support the BCP will also support the WLP – subject to updates in some cases.
- 1.29 Other evidence produced to support the WLP, including the Sustainability Appraisal report, is available at: www.wolverhampton.gov.uk/localplan. The WLP will be supported by a continual Sustainability Appraisal process which includes an Equalities Impact Assessment, as required by legislation and guidance, and there will be a full Habitats Regulations Assessment of the WLP at Publication stage.
- 1.30 A WLP Infrastructure Delivery Plan will also be produced at Publication stage, and Statements of Common Ground will be agreed between the City of Wolverhampton Council and neighbouring authorities and organisations, as appropriate, to support the later stages of the Plan process. A full list of evidence and supporting documents is provided in Section 4.

Question 1: Do you agree with the proposed scope of the Wolverhampton Local Plan?
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2. National, Regional, Black Country and Local Policy Context

2.1 The WLP is being prepared in the context of national, regional, Black Country and local policy, guidance, strategies and evidence. The following section summarises the key elements of this context, however this is not intended to be exhaustive and other more detailed work has been and will be used to inform the approach to developing specific planning policies.

National

National Planning Policy Framework (NPPF)

2.2 The NPPF (2023) sets out the Government's planning policies for England and how these should be applied. It provides the framework within which locally prepared plans for housing and other development can be produced.

2.3 Planning law requires that applications for planning permissions are determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF must be taken into account when preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and other statutory requirements.

Duty to Co-operate

2.4 The Localism Act (2011) introduced a requirement on all local authorities to co-operate with neighbouring local authorities and other bodies with a regulatory or strategic interest in Local Plan issues. The duty requires ongoing, constructive, and effective engagement on areas of plan-making, which may have strategic cross-boundary implications. The WLP Duty to Co-operate Statement prepared for Publication stage will demonstrate how the City of Wolverhampton Council has fulfilled this duty through the WLP preparation process, and how the bodies referred to in the Act have helped to shape the emerging WLP.

2.5 As part of this strategy, it is intended to draft and agree Statements of Common Ground at Publication stage with relevant authorities and bodies on key Duty to Co-operate issues. These will build on Duty to Cooperate engagement at a Black Country level associated with the preparation of the BCP as well as direct Wolverhampton engagement with neighbouring local plans, both during that time and in the period following the end of work on the BCP. The outcomes from this work, how it has shaped the emerging WLP, and the preferred approach to addressing the Duty to Cooperate for the WLP are detailed in section 5 (b).

Regional - West Midlands Combined Authority

- 2.6 Wolverhampton is a constituent member of the West Midlands Combined Authority (WMCA) which was established in 2016. The WMCA overarching objective is to build 'a better connected, more prosperous, fairer, greener and healthier West Midlands'. To deliver this objective, the WMCA have developed a number of strategies and associated programmes relevant to the preparation of the WLP. These are summarised below.
- 2.7 The WMCA Strategic Economic Plan (SEP) was adopted in 2016 and sets out the vision, objectives, strategy and actions needed to improve the quality of life for everyone who lives and works in the West Midlands. While this strategy pre-dates Britain leaving the European Union, the Covid-19 recession, and ongoing shifting economic turbulence, it outlines a number of high-level challenges facing the West Midlands which remain relevant. These include:
- Bringing forward land for housing and employment
 - Accelerating the rate of house building to match aspirations for growth.
- 2.8 Following the 2016 SEP, the WMCA produced the West Midlands Local Industrial Strategy (LIS) which was published in May 2019. The LIS demonstrates how the West Midlands is forging its future and building an inclusive and balanced economy. Together with the supporting documents published locally, it shows the West Midlands is taking action to continue growth in productivity and earning power for all.
- 2.9 In July 2022, the WMCA published their Plan for Growth which captures the key features of the West Midlands economy. The Plan for Growth pinpoints clusters where the West Midlands has comparative advantage and businesses are confident to invest. Working in conjunction with local authorities and universities as local anchor institutions, the WMCA will deliver conditions for growth through:
- New powers over economic development
 - Transport investment
 - Housing and land investment
 - Pioneering new approaches to regeneration
 - Developing skills
 - Working with investors
 - Committing to net zero by 2041
- 2.10 These strategies have formed the basis for a range of investment programmes supported by Government funding packages. One of the priorities for this funding is the delivery of projects which provide land for new homes and employment. WMCA has led the way nationally in the delivery of brownfield land, including sites in Wolverhampton, and moving forward, over the lifetime

of the WLP, this activity will continue, providing valuable support to unlock constrained sites and deliver critical infrastructure. The focus of this future work includes supporting projects in town centres to enable them to thrive again, innovative approaches to the delivery of sustainable homes, zero carbon homes and the delivery of land to support business needs.

- 2.11 In March 2023, the WMCA agreed a new Deeper Devolution Deal with Government, securing new and significant longer-term funding agreements and a range of new powers. From the next spending review, the WMCA will have a departmental-style arrangement with a single pot of funding negotiated with Government. This financial certainty will enable local authorities and the WMCA to better plan and fund transformative investment in the region to create a fairer, greener and better-connected West Midlands. The deal also included further commitments for City Region Sustainable Transport Settlements, Investment Zones and Levelling Up Zones, and a landmark housing deal worth up to £500 million, offering greater flexibility to drive brownfield regeneration and unique powers and funding to deliver affordable housing at pace.
- 2.12 The City of Wolverhampton Council will continue to work closely with the WMCA to drive forward investment in housing, regeneration, transport, employment to deliver a better connected, more prosperous, fairer, greener and healthier West Midlands.
- 2.13 The West Midlands Local Transport Plan (LTP) 2011-2026 Movement for Growth sets out clear objectives for dealing with transport issues, problems and challenges in the wider region and within Wolverhampton. It draws on a number of national, regional and local planning and transportation policy documents to ensure that the strategy guides the delivery of wider objectives. A new West Midlands LTP is being developed to replace Movement for Growth and will set out overall aims, vision and approaches to guide the development and delivery of transport policies until the end of 2041. The emerging strategy seeks to: sustain economic success; create a fairer society; support local communities and places; become more active; and tackle the climate emergency.

Sub-regional – the Black Country

- 2.14 The Black Country – made up of the local authorities of Dudley, Sandwell, Walsall and Wolverhampton - forms a distinctive sub-region on the western side of the West Midlands conurbation. It shares an eastern boundary with the City of Birmingham and to the north, west and south it is bounded by districts in Staffordshire and Worcestershire, and it is in relative proximity to Shropshire and centres such as Cannock and Bromsgrove. The Black Country sub-region has a unique economic history, settlement form and topography and is very much shaped by its industrial past. The four Black Country Authorities (BCAs) have a shared set of social, economic, and environmental issues and challenges, and have a long history of successful joint working most notably

through the Black Country Local Enterprise Partnership (LEP). The LEP was established in 2011 with an overarching objective of creating jobs and building a strong economy by tackling barriers to sustainable growth, securing and delivering a total of £2.4bn of funding. The LEP has now been disbanded, along with others throughout England, with key functions transferred to other organisations including WMCA.

2.15 The WLP will draw on work carried out to prepare the Draft BCP, which is firmly rooted in a robust understanding of sub-regional as well as local issues. Therefore, sub-regional issues are still of significant relevance to the WLP, as reflected in the issues and challenges set out below.

2.16 There are many planning issues which have cross-boundary impacts across the Black Country and continue to benefit from a common evidence base, assumptions and approach. These issues include:

- **Employment** – there are strong trading and commuting links between the BCAs, which form part of the same Functional Economic and Market Area (FEMA) with a joint Employment Development Needs Assessment (EDNA).
- **Housing** – there are strong migration and commuting links between the BCAs and they form a sub-market of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA), with a joint Housing Market Assessment (2020).
- **Transport** – much transport infrastructure and strategic transport planning is shared and access catchments overlap for some residential services. The BCAs carry out traffic modelling jointly to support Local Plans.
- **Centres** – retail, leisure and commuting catchments overlap across the Black Country and the four Strategic Centres have complementary roles.
- **Sport** – access catchments overlap for some facilities and there is a proposed sub-regional strategic approach to forward planning, based on jointly commissioned Playing Pitch and Outdoor Sports Strategies and Built Facilities planning.
- **Nature Conservation** – the Black Country and Birmingham have a common Local Sites system and the BCAs have developed a common tree evidence base and a Nature Recovery Network approach which reflects the cross-boundary nature of wildlife corridors across the sub-region and will help inform the statutory West Midlands Combined Authority Local Nature Recovery Strategy.
- **Historic Environment** – the BCAs have adopted a common approach to Historic Landscape Characterisation which seeks to protect areas of highest landscape character and was a key factor in the Draft BCP site assessment process.
- **Air Quality** – the BCAs have an agreed approach to air quality impact mitigation set out in a joint Supplementary Planning Document. This is

based on regional work which is currently being updated through the West Midlands Combined Authority.

- **Waste** – Waste planning policy requires a strategic cross-boundary approach to ensure waste is appropriately managed and facilities appropriately located, therefore the BCAs have completed joint evidence, which currently shows that Wolverhampton has surplus waste processing capacity which can contribute to meet the needs of other authorities in the Black Country Waste Processing Area (WPA).

Local

Our City: Our Plan

2.17 Our City: Our Plan is the City of Wolverhampton Council's strategic framework for improving outcomes for local people and delivering levelling up ambitions, co-produced with over 4,500 local people and stakeholders. It sets out how the City of Wolverhampton Council will work with their partners and communities to build a more prosperous and inclusive Wolverhampton where everyone can share in the opportunities and success of our city. The plan is structured around six key priorities.

- Strong families where children grow up well and achieve their full potential
- Fulfilled lives for all with quality care for those that need it
- Healthy, inclusive communities
- Good homes in well-connected neighbourhoods
- More local people into good jobs and training
- Thriving economy in all parts of the city



2.18 Three cross cutting principles support the delivery of the plan: driven by digital; climate action; and being fair and equal. High quality and aspirational physical development and land use is an important element to realise and deliver the priorities of Our City: Our Plan, which will help to create a virtuous cycle of: attracting further investment; widening local demographics and increasing local spend; advancing pride in place and local aspirations; and increasing economic productivity.

Vision for Public Health 2030 and Health Inequalities Strategy (2021 – 2023)

2.19 The City's Vision for Public Health 2030 envisages that in 2030 Wolverhampton will be a healthy, thriving city of opportunity where we are serious about boosting health and wellbeing. Actions to achieve this include driving a city-wide focus on tackling the wider determinants of health and wellbeing by seeking improvements to the broad factors which impact on people's lives. These factors relate to lifestyle choices and socio-economic factors which are heavily influenced by the built environment and the housing, employment, education, leisure and other opportunities which it offers.

2.20 The Health Inequalities Strategy provides the strategic framework for addressing the stark and entrenched health inequalities within Wolverhampton. The framework provides an overarching set of guiding principles and tools that facilitate and embed an agreed approach to tackling health inequalities in a way that is tangible, and outcome focused. The strategy sees health inequalities as the result of the interplay between:

- Short term causes (ability to access a service or manage a condition)
- Medium term risk factors (e.g. lifestyle, uptake of vaccination, access to healthcare information)
- Longer-term causes (education and skills, economy, housing, and environment)

2.21 One of the key guiding principles is to “Pro-actively identify opportunities to have a positive impact on the wider determinants of health for example through planning, licensing and housing functions, use of assets and green space and provision of facilities for usage by community groups.”

Our Climate Commitment (2020)

2.22 Our Climate Commitment is the City Council’s commitment to action following its declaration of a Climate Emergency in July 2019. The Council pledged to make all council activities net carbon zero by 2028, and to ensure all strategic decisions and budgets are in line with the shift to net carbon zero. The Council have also pledged to work with partners across the city and region to make Wolverhampton net carbon zero by 2041.

2.23 Reaching this target will require the City Council to embed low carbon practices within planning policy, land allocation, development and regeneration, and for us to work closely with our public and private sector partners to maximise the use of low carbon solutions.

Good Growth Strategy (2024)

2.24 The City Council is developing a Good Growth Strategy to enable all businesses, residents, families and communities to benefit from the growth and new opportunities in our city. The strategy outlines the Council’s proposed approach to economic development and how the Council will work alongside partners to support the local economy to grow. The strategy is based on three interconnected themes of Place, Productivity and People and a central principle of ‘good growth’. This means achieving both the right quantity and the right quality of growth; creating a strong, productive and resilient economy where a radical uplift in business competitiveness, productivity and profits goes hand in hand with access to good jobs that pay higher wages, and where all residents have access to opportunity and enjoy improved quality of life. The strategy explains the main focus of the Council’s work, and actions that can propel Wolverhampton’s economic prospects and, fundamentally, the life chances and wellbeing of residents.

2.25 The “Place” element of the strategy focuses on supporting the development of sustainable communities and workplaces, delivering inclusive low carbon transport network, and securing the potential of the City and town centres. Delivering these aims will require a positive planning framework.

3. A Spatial Portrait and the Big Issues

A Spatial Portrait of Wolverhampton

- 3.1 Wolverhampton is a young, vibrant, and diverse city with a population of c.270,000 people. The city covers an area of 69.4sq km and includes the city centre and the town centres of Bilston and Wednesfield.
- 3.2 Wolverhampton has a long history as a settlement going back to the 10th century, and in the Middle Ages was a small market town. From the 18th century, the industrial revolution transformed Wolverhampton into an important manufacturing town. Until the 1980s, Wolverhampton, together with the wider Black Country and Birmingham, was the powerhouse of Britain's manufacturing economy. The decline in heavy industry, and jobs associated with it, has left a legacy of difficult ground conditions and brownfield sites that present redevelopment and regeneration challenges.
- 3.3 Covid-19 hit the city hard from the earliest wave and during subsequent waves of the pandemic, exacerbating existing social and economic challenges, including lower-than-average earnings, relatively high levels of unemployment and a need to enhance the skills base of the local workforce. But the city is bold and ambitious and has been driving forward, forging economic recovery and 'levelling up'.
- 3.4 The city is going through a period of significant transformation with new investment, new opportunities and new challenges. With effective planning, Wolverhampton has the right local conditions to deliver transformational and sustainable regeneration to benefit all of its people.

The Big Issues

- 3.5 This section summarises the big issues which a Wolverhampton Local Plan will need to respond to. Some of these issues have arisen since the BCCS was adopted in 2011. They form the main opportunities and challenges which the WLP will seek to address, and draw on local issues identified in Our City: Our Plan (2023) and themes identified in the WLP Sustainability Scoping Appraisal Report (2022).

The big issues are:

1. Climate change and zero-carbon
 2. A growing and changing population
 3. Health and wellbeing
 4. Economic recovery and growth
 5. Centres
 6. Transport and connectivity
 7. The natural and built environment
 8. Infrastructure
- 3.6 The role of the WLP in addressing these big issues is set out below.

Issue 1 – Climate change and zero-carbon

- 3.7 The climate emergency remains one of the biggest long-term challenges facing the world today. In July 2019, the City of Wolverhampton Council became the first local authority in the Black Country to declare a Climate Emergency. The Climate Emergency Declaration pledged to make all council activities net carbon zero by 2028, ensure all strategic decisions and budgets are in line with the shift to net carbon zero, and work with partners across the city to work towards a net carbon zero future.
- 3.8 The Council has made good progress towards becoming a net zero council, with carbon emissions dropping from 16,841 tonnes CO₂e in 2018/19 to 13,276 tonnes CO₂e in 2021/22. The drop has mainly been achieved by the council switching to a renewable electricity provider and the introduction of LED streetlights.
- 3.9 The Council has also committed to supporting Wolverhampton to become a carbon net zero city by 2041. In 2020, Wolverhampton produced a total of 855 Kt CO₂e emissions. This has reduced by 77 Kt CO₂e (-8.3%) since 2019, compared to a decrease of 3.8% in England. 28.9% of these emissions were domestic, 31.4% were from transport, 14% were from industry, and 8.7% from commercial sources.
- 3.10 The WLP has a role in addressing these issues by: reducing the carbon emissions from new developments; reducing the need to travel and enabling a shift to more sustainable travel modes; maximising the use of low carbon energy solutions; seeking to reduce the impact of flooding; and enhancing Wolverhampton's green and blue infrastructure, to protect the people, environment and economy of Wolverhampton.

Issue 2 – A growing and changing population

- 3.11 Wolverhampton has a growing and changing population, which presents a range of planning and regeneration challenges. Wolverhampton is a young and diverse city of c.270,000 people. The population has increased by c.6% over the past ten years and is projected to rise to c.296,000 by 2041, a further increase of c.10%. As the population continue to grow, the city will also see changes in its characteristics and structure.
- 3.12 Although the city is younger than the England average, it still faces challenges from an ageing population. Between 2011 and 2021 the city saw significant growth of 25.8% in residents aged 90 years and over. A growing dependent population exerts significant pressure on services and housing.
- 3.13 Wolverhampton is proud of its diverse population. In 2021, 45% of the population were from ethnic minorities, above the Black Country average of 23% and the England average of 27%. 15% of Wolverhampton residents have a main language which is not English - also higher than the England average of 9%. Wolverhampton will continue to harness the talents of different groups

of people to make for a more robust and resilient economy, and rich and vibrant culture.

- 3.14 Wolverhampton is the third most densely populated of the 30 local authorities in the West Midlands. The City is continuing to see an increase in new homes built, despite a temporary decline in 2020/21 due to Covid-19. As of March 2022, Wolverhampton had a total of 112,630 homes, an increase of 1315 (+1.2%) since March 2021.
- 3.15 A growing and changing population compounds local housing need pressures. The WLP has a role in addressing this issue by providing a range and choice of accommodation, house types and tenures to improve and diversify the Wolverhampton housing offer, and to meet the needs of current and future residents.

Issue 3 – Health and wellbeing

- 3.16 Stark inequalities continue to exist in the conditions in which people are born and live in Wolverhampton, which in turn has an adverse effect on people's health and wellbeing.
- 3.17 Wolverhampton was ranked as the 24th most deprived local authority out of 317 using the ONS indices of deprivation measure (which has improved from the 2015 ranking at 17th). The City also experiences high levels of child poverty; 33.3% in 2022 compared to a national average of 20.1%.
- 3.18 Wolverhampton has lower rates of physical activity than the national average, with 55.1% of adults classed as active between 2020-2021, compared to 61.4% nationally. Both male and female life expectancy were lower in Wolverhampton (81.3 and 76.6 years respectively), than the national average (83.1 and 79.4 respectively) in the period 2018-2020. Wolverhampton also has higher rates of obesity than the rest of England, and residents suffer from higher levels of alcohol abuse, smoking, depression and social isolation. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.
- 3.19 These issues vary significantly across Wolverhampton, with pockets of deprivation and poor health scattered across the city. Covid-19 has further exacerbated these existing health inequalities with negative impacts falling disproportionately on more deprived, disadvantaged and excluded groups. The role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing is increasingly recognised and understood. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.
- 3.20 The WLP has a role in addressing existing health and wellbeing issues in Wolverhampton by providing a built and natural environment that protects health and wellbeing through: supporting the making of healthier choices; minimising pollution (air, noise and other forms); providing healthy homes;

providing a range of employment opportunities; supporting and facilitating investment in health infrastructure; reducing the negative health effects of climate change; and providing streets safe for active, low emission travel for all.

Issue 4 – Economic recovery and growth

- 3.21 Wolverhampton, like many post-industrial localities, faces long term social and economic challenges. However, prior to the onset of Covid-19, Gross Value Added (GVA) growth in Wolverhampton had been at its highest on record. Longer term, the average growth in GVA for the last five years for Wolverhampton was 3.8%, which was above the England growth rate of 2.5%.
- 3.22 Wolverhampton's economy and business community has been hit hard by the major shocks of recent years, halting a period of growth. Output and productivity have decreased faster than the national average, and Wolverhampton still has a significant "output gap", which has increased long-term. Wolverhampton's total GVA decreased from £5.3bn in 2019 to £5.1bn in 2020. This equated to a 3.9% annual decrease, compared to an England-wide decrease of 3.1%. Wolverhampton's output gap (GVA per head in Wolverhampton compared to national average) was £2.7bn for 2020.
- 3.23 Wolverhampton had an employment rate of 66% in 2022, 10% lower than the England average. Average hourly weekly pay for Wolverhampton residents working full-time was £569 in 2022, which was £76 lower than the England average (£646).
- 3.24 Wolverhampton has the highest unemployment claimant rate in the Black Country, and the second highest claimant rate in England for residents aged 16+ (7.5% in September 2023), surpassed only by Birmingham (8.6%). Between 2020 and 2022, unemployment in Wolverhampton rose by 1.5% (from 5.9% to 7.4%). Wolverhampton has a low business survival rate, with 30% of businesses founded in 2016 surviving for 5 years compared to the England average of 38%.
- 3.25 Skills levels in Wolverhampton remain below the national average, and the Covid-19 pandemic has exacerbated some of the barriers young people face in accessing good skills training and employment prospects. However, we are starting to see positive trends. The number of residents in Wolverhampton with NVQ Level 4+ increased by 12.3% from 2020 to 2021, reaching 35.4%, the highest proportion of residents since records began. 9.5% of Wolverhampton's population have no formal qualifications.
- 3.26 The WLP has a role in addressing these issues by providing a balanced portfolio of employment sites with more energy efficient buildings, protecting and enhancing existing sustainable employment areas and encouraging new investment, allowing some poorer quality employment sites to be redeveloped for more beneficial alternative uses and enabling communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.

Issue 5 – Centres

- 3.27 Centres play a crucial role in contributing to the distinctive spatial character and identity of Wolverhampton, being focal points to sustainably provide services to meet the needs of communities, from shopping and leisure to housing and education. The City of Wolverhampton covers an area of around 70 sq km and is served by a hierarchy and network of centres, with Wolverhampton City Centre acting as the key strategic centre, two town centres at Bilston and Wednesfield, and numerous district and local centres.
- 3.28 There are a number of challenges facing Wolverhampton's centres, such as the prevailing economic climate and changing shopping patterns resulting in high vacancy levels, which mean centres are struggling.
- 3.29 The WLP has a role to play in enhancing the vitality, diversification and performance of centres, to serve the current and future needs of communities as places to live, shop, work and visit. The Plan can help address challenges facing centres by:
- providing a flexible policy framework to allow centres to diversify and serve realistic ambitions for future mixed use growth;
 - ensuring that future growth (particularly housing and employment) is well served by the existing network of centres, to help support their future vitality and viability;
 - setting out tests to prevent proposals which could undermine centres by causing significant adverse impacts, such as out-of-centre developments.

Issue 6 – Transport and connectivity

- 3.30 Wolverhampton has excellent transport connectivity with the sub-region and the rest of the UK. It is well served by the M54 and M6 motorways and benefits from good public transport links through the Metro, inter-city and cross-country railway links and in its role as a hub of the sub-regional bus network. All of these networks are effectively linked through the recently opened £150 million Wolverhampton Interchange in the city centre.
- 3.31 Key current and future transport projects to improve connectivity within Wolverhampton and to the wider Black Country include: A454 City East Gateway (Phases 1, 2 and 3); A449 Stafford Road Corridor; A4124 Birmingham New Road; Wolverhampton City Centre public realm and cycling schemes; and electric vehicle charging infrastructure.
- 3.32 A balanced approach to transport investment is required that recognises the need to invest in all modes of transport but prioritises increasing the proportion of people using sustainable and active modes such as public transport, walking and cycling.
- 3.33 The WLP has a role in addressing these issues by seeking to improve transport infrastructure to ensure efficient and sustainable accessibility within an integrated network, prioritising sustainable and active travel and supporting electric vehicle infrastructure.

Issue 7 - The natural and built environment

- 3.34 Wolverhampton is rich in both its natural and built heritage and its environmental assets. There is an extensive canal network which has the potential to provide a wide range of ecosystem services, including recreation, land drainage, flood protection, water supply, energy generation, carbon storage, heritage preservation and nature conservation. Parts of the Wolverhampton landscape have been recognised for their importance for nature and are protected under various laws or designations. The area is home to the Smestow Valley and Wyrley & Essington Canal Local Nature Reserves, as well as Ancient Woodlands such as Tettenhall Ridge.
- 3.35 The City's Open Space Strategy and Action Plan (2020) identifies where there are surpluses and shortfalls in a range of types of open space across the City. It identifies a broadly adequate level of open space in Wolverhampton, although there are significant variations across the City producing some local surpluses and shortfalls, as well as an overall shortfall in allotment provision. The Open Space Strategy is currently being reviewed and a revised Strategy and Action Plan will be completed in 2024. The City's Playing Pitch and Outdoor Sport Strategy (2022) has recently been updated and, whilst it identifies some local shortfalls in sports provision, it suggests these can largely be addressed by improvements to existing facilities plus provision of additional 3G (third generation) pitches.
- 3.36 There are approximately 473,000 trees across Wolverhampton, that cover an area equivalent to 1,150 ha. They filter 14.5 tonnes of airborne pollutants and remove an estimated 6,150 tonnes of carbon from the atmosphere, each year. They also intercept around 151,000 m³ of rainwater each year, equivalent to an estimated £149,000 in avoided water treatment costs.
- 3.37 While the City has the smallest population of the four BCAs, it is the second most densely populated, the administrative boundary being very tightly drawn around the urban area. The northern, western and south-western fringes of the City lie within the West Midlands Green Belt, which also extends into the urban area in a series of green 'corridors'.
- 3.38 In the industrial revolution Wolverhampton became a major centre for coal mining, lock-making and subsequently the manufacture of cars and motorcycles. This has created a rich legacy of historic buildings and attractive parks and open spaces. It has a strong sporting, cultural and leisure offer, and is home to Wolverhampton Wanderers Football Club, the Grand Theatre and nationally important The Halls Wolverhampton concert venue. The City's industrial heritage is an asset to the economy, but it has left a legacy of brownfield sites that can present redevelopment challenges.
- 3.39 The WLP will need to create a strategy for the protection and enhancement of the natural environment and strengthen the environmental infrastructure network to support sustainable growth. It will also need to protect, sustain and

enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places.

Issue 8 - Infrastructure

- 3.40 Physical and social infrastructure is required to enable and support the growth required over the Plan period. New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide infrastructure solutions.
- 3.41 Future-proofed digital infrastructure is the backbone of a modern thriving economy, driving productivity and spreading growth. Wolverhampton is making significant progress upgrading its digital infrastructure with gigabit coverage at 94% and full fibre coverage at 62% (2023), with all providers upgrading to full fibre in the city. Wolverhampton has an extensive digital infrastructure and is at the forefront of digital innovation. The City is also making progress supporting the upgrade of mobile connectivity, with 5G available for 99% of the city from at least one operator and 66% of the city from all operators. Digital connectivity will increasingly become important, with the switch over from analogue to digital, to support new ways of working, service delivery and consumer demand, so we need to continue to support the rollout to ensure digital infrastructure meets our needs now and in the future.
- 3.42 An estimated 11,660 households in Wolverhampton are without broadband and there are an estimated 118,000 limited and non-users of the internet in the City. Although older people generally use the internet less, 44% of those that are offline are under the age of 60. Digital is increasingly important for accessing services, skills, job search and employment along with keeping in touch with families and friends, with digital considered the 4th utility.
- 3.43 To maximise the benefit locally, the city is proactively supporting residents to get online by providing devices and connectivity through a network of trusted partners to improve digital skills and supporting businesses to digitalise and introduce smart technology to support the delivery of services.
- 3.44 The provision of high quality and aspirational physical development is an important element to help to create a virtuous cycle of attracting further investment; widening local demographics and increasing local spend; advancing pride in place and local aspirations; and driving productivity. Social infrastructure is also necessary to create capacity and resilience within communities.
- 3.45 The WLP has a role in addressing these issues by ensuring that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity.

Question 2: Do you agree with the “big issues” identified for the Wolverhampton Local Plan to address?

4. Evidence

- 4.1 A considerable body of evidence, background documents and data covering a range of planning issues supported the preparation of the BCP, and much of this is still relevant to the WLP. Further evidence has been produced specifically to support this consultation, and more detailed evidence will be gathered to support the WLP for Publication and Submission stages.
- 4.2 Table 1 lists the significant evidence and background documents which have supported development of the WLP to date, and also lists further evidence work required to support completion of the WLP. New evidence produced during the WLP preparation process may also be used to support the WLP, where appropriate. Views are sought through this consultation on whether the WLP should make use of other existing evidence or if any other new evidence is needed to support the WLP.

Table 1 Evidence and Background Documents to support the Wolverhampton Local Plan

Name	Status	Further Work Required
Black Country Plan		
Adopted Black Country Core Strategy	Published 2011	
Black Country Core Strategy Issues and Options Report, Sustainability Appraisal and Consultation Statement	Published 2017/ 2019	
Black Country Plan Call for Sites Submissions and interactive site map	Published 2020 / 2021	
Draft Black Country Plan (Regulation 18), Errata, Draft Policies Map and Sustainability Appraisal (Lepus)	Published 2021	
Draft Black Country Plan consultation responses	Published 2022	
Interim Habitat Regulations Assessment of the Black Country Plan (Lepus)	Published 2021	
Black Country Plan Options Document	Published 2021	
Black Country Plan Reg 18 Duty to Cooperate Statement	Published 2021	
Black Country Plan Viability and Delivery Study (Aspinall Verdi)	Published 2021	Wolverhampton element to be updated for Publication
Black Country Utilities Infrastructure Capacity Study (PBA Stantec)	Published 2021	
Black Country Digital Infrastructure Evidence Base	Published 2021	Wolverhampton element to be updated for Publication

Name	Status	Further Work Required
Black Country Urban Capacity Review Update 2020	Published 2021	
West Midland Combined Authority Black Country Brownfield Land Study (Chilmark)	Published 2022	
Black Country Housing Market Assessment (HDH)	Published 2021	
Black Country Gypsy and Traveller Accommodation Assessment 2022 (RRR)	Published 2023 and Wolverhampton figures updated 2024	
Black Country Plan Health Chapter Evidence Base	Published 2021	To be updated for Publication
Black Country Economic Development Needs Assessment (EDNA) Updates (Warwick Economics and Development)	Published 2021 and updated 2023	To be updated for Publication
Black Country Employment Area Review (BEAR)	Published 2021	
Black Country Employment Land Supply Technical Paper	Published 2021 and updated 2023	To be updated for Publication
West Midlands Strategic Employment Sites Study (Avison Young / Arcadis)	Published 2021	
West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper (Stantec)	Published 2021	
Black Country Centres Study & Update / Addendum (Lambert Smith Hampton)	Published 2021/ 2023	Relevant Wolverhampton element to be updated for Publication
Draft Black Country Plan Traffic Modelling Report (Sweco)	Published 2023	To be updated for Publication
West Midlands Cycling and Walking Network Improvement Plan	Published 2019	
Black Country Parking Study Stage 1 / Stage 2 (Aecom)	Published 2021 / 2024	
Black Country Landscape Sensitivity Assessment (LUC)	Published 2019	
An Ecological Evaluation of the Black Country Green Belt (Wildlife Trust for Birmingham and the Black Country / EcoRecord)	Published 2019	
Black Country Level 1 Strategic Flood Risk Assessment (JBA)	Published 2019	
Black Country Water Cycle Study: Phase 1 Scoping (JBA)	Published 2019	To be updated if required for Publication

Name	Status	Further Work Required
Black Country Historic Landscape Characterisation Study (Oxford Archaeology)	Published 2019	
Black Country Waste Study and Update (Wood)	Published 2021 / 2022	To be updated for Publication
Black Country Minerals Study and Update (Wood)	Published 2019	To be updated for Publication
Wolverhampton Local Plan		
Wolverhampton Local Development Scheme 2024-2027	Published 2024	
Wolverhampton Statement of Community Involvement	Published 2023	
Wolverhampton Local Plan Sustainability Appraisal Scoping Report (Lepus)	Published 2022	
Wolverhampton Local Plan Issues and Preferred Options Sustainability Appraisal (Lepus)	Published 2024	To be updated for Publication and Submission
Wolverhampton Local Plan Habitats Regulations Assessment (Lepus)	HRA Scoping Report Published 2023	Full HRA to be produced for Publication
Wolverhampton Draft Policies Map	Published 2024	To be updated for Publication and Submission
Wolverhampton Local Plan Consultation Statement (Reg 18) including summary of issues raised on proposed policies in Draft Black Country Plan consultation	Published 2024	To be updated for Publication and Submission
Wolverhampton Local Plan Duty to Cooperate Statement (Reg 18)	Published 2024	To be updated for Publication and Submission
Wolverhampton Local Plan Site Assessment Report (Reg 18)	Published 2024	To be updated for Publication and Submission, if required
Wolverhampton Housing Market Assessment		To be produced for Publication
Wolverhampton Strategic Housing Land Availability Assessment 2022	Published 2024	To be updated as of April 2024 for Publication and Submission
Wolverhampton Urban Capacity Review		To be produced for Publication
Wolverhampton Infrastructure Delivery Plan		To be produced for Publication
Wolverhampton Level 1 update and Level 2 Strategic Flood Risk Assessment		To be completed for Publication

Name	Status	Further Work Required
Wolverhampton Local Site Assessment Reports (Wildlife Trust for Birmingham and the Black Country)	Published 2023	
Black Country Local Nature Recovery Map and Strategy – an emerging approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord)	Published 2023	
Black Country iTree survey (Black Country Consortium / Black Country Authorities)	Published 2023	
Wolverhampton Playing Pitch and Outdoor Sport Strategy Assessment and Action Plan / Black Country Playing Pitch and Outdoor Sport Overarching Strategic Framework (KKP)	Published 2022 / 2023	
Wolverhampton Open Space Strategy and Action Plan (LUC)		To be completed for Publication

Question 3: Do you agree that the evidence and background documents listed in Table 1 are sufficient to support the Wolverhampton Local Plan?

5. The Preferred Options

5.1 This section details the options for the Wolverhampton Local Plan (WLP) and, for each set of options, the preferred option which has been selected. Options have been developed based on:

- the national, regional, Black Country and local policy context (set out in section 2);
- the spatial portrait, big issues and evidence (set out in sections 3 and 4);
- responses made to consultations undertaken to date on the Black Country Plan (set out in section 1)

5.2 The Preferred Options are set out in the following order:

- a. Vision and Strategic Priorities
- b. Growth and Spatial Options
- c. Policies
- d. Site Allocations

5.3 The process of developing and selecting preferred options for the WLP is explained in more detail in the WLP Options Document. All options considered when preparing the WLP have been subject to Sustainability Appraisal, as explained in the WLP Issues and Preferred Options Sustainability Appraisal Report. This process includes a Sustainability Appraisal of all “reasonable alternative” sites i.e. those sites which have been considered but are **not** proposed for allocation in the WLP. Green belt sites do not fall within the scope of “reasonable alternative” sites for the purposes of the WLP.

a. Vision and Strategic Priorities

5.4 The Vision for the WLP will reflect what the City will be like in the future if the needs and aspirations of those who live, work in or visit the area are to be met, whilst also ensuring that it retains the characteristics that make it attractive and distinctive. It also needs to be flexible, to allow the City to respond to future challenges in a way that is right for Wolverhampton, its residents and its businesses.

5.5 It is proposed to use Our City: Our Plan (the City of Wolverhampton Council’s strategic framework for improving outcomes for local people and delivering levelling up ambitions as explained in para’s 2.17 – 2.18) to provide a strong local vision and strategic priorities for the WLP.

5.6 Our City: Our Plan sets out an ambition that ‘Wulfrunians will live longer, healthier lives’, and is focussed on delivering three cross-cutting principles and six priorities. Of these six priorities, the WLP will be directly relevant to four:

- healthy, inclusive communities
- good homes in well-connected neighbourhoods

- more local people into good jobs and training
- thriving economy in all parts of the City

The WLP will support the delivery of these four priorities by harnessing opportunities for strategic planning policies and land allocations to support the growth and regeneration of the City of Wolverhampton up to 2042, to benefit local people.

5.7 The Our City: Our Plan vision will be delivered through progress towards the achievement of fifteen strategic priorities, aligned to the four priorities, as illustrated in Table 2. The strategic priorities are designed to directly address the big issues set out in section 3 above. Table 2 sets out which of the WLP policies (referred to using a Draft BCP Policy reference) would be most important in delivering each strategic priority.

Table 2 Wolverhampton Local Plan Strategic Priorities aligned to Our City: Our Plan Priorities

Our City: Our Plan Priority	Wolverhampton Local Plan Strategic Priority	WLP replacement for Draft BCP Policy
Healthy, inclusive communities	Strategic Priority 1: To provide a built and natural environment that supports the making of healthier choices through provision for physical activity and recreation, active travel, encouraging social interaction and discouraging harmful behaviours	CSP1; CSP5; HW1 – HW3; CEN5; TRAN5; TRAN8; ENV8; ENV9; CC4;
	Strategic Priority 2: To provide a built and natural environment that protects health and wellbeing through minimising pollution (air, noise and other forms), providing healthy homes, reducing the negative health effects of climate change and providing streets safe for active, low emission travel for all	CC4; W3; W4; MIN4
	Strategic Priority 3: To mitigate and adapt to climate change to protect the people, environment and economy of Wolverhampton and meet wider national and international obligations	CSP1; CSP4; HOU1; ENV2; ENV4; ENV8; ENV9; CC1 – CC7; HW1; HW3
	Strategic Priority 4: To protect and enhance the natural environment, biodiversity, wildlife corridors, geological resources, countryside and landscapes, whilst ensuring that residents have good access to interlinked green infrastructure	ENV1 – ENV10; HW1; HW3

Our City: Our Plan Priority	Wolverhampton Local Plan Strategic Priority	WLP replacement for Draft BCP Policy
Good homes in well-connected neighbourhoods	Strategic Priority 5: To provide a range and choice of accommodation, house types and tenures to meet the needs of current and future residents	HOU2; HOU3; HOU4; HOU6
	Strategic Priority 6: To improve and diversify the Wolverhampton housing offer	HOU2; HOU6
	Strategic Priority 7: To prioritise sustainable and active travel and seek to improve transport infrastructure to ensure efficient and sustainable accessibility within an integrated network	TRAN1 – TRAN8; HW1; HW3
	Strategic Priority 8: To adapt to and minimise the impact of climate change by reducing carbon emissions, maximising the use of low carbon energy solutions, seeking to reduce the impact of flooding, and enhancing Wolverhampton’s green and blue infrastructure	CSP1; GB1; TRAN3; TRAN5; TRAN6; TRAN8; ENV3; ENV4; ENV8; CC1 – CC7; HW1; HW3
	Strategic Priority 9: To manage waste as a resource and minimise the amount produced and sent to landfill	W1 – W5
More local people into good jobs and training	Strategic Priority 10: To enable communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.	DEL3; HOU5; EMP5
Thriving economy in all parts of the city	Strategic Priority 11: To provide a balanced portfolio of employment sites and to protect and enhance existing sustainable employment areas to support the development of key employment sectors and enable existing businesses to expand.	CSP1; DEL1; DEL2; EMP1 – EMP5; TRAN1; TRAN2; TRAN4;
	Strategic Priority 12: To enhance the vitality, diversification and performance of town centres, to serve the current and future needs of communities as places to live, shop, work and visit.	CSP2; CSP5; CEN1 – CEN6

Our City: Our Plan Priority	Wolverhampton Local Plan Strategic Priority	WLP replacement for Draft BCP Policy
	Strategic Priority 13: To protect, sustain and enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places	CSP4; GB2; ENV5; ENV6; ENV10
	Strategic Priority 14: To ensure that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity	DEL1, HW2
	Strategic Priority 15: To safeguard and make the most sustainable use of Wolverhampton's mineral resources without significantly compromising environmental quality	MIN1 – MIN4

Question 4: Do you agree with the proposed approach to the Vision and Strategic Priorities for the Wolverhampton Local Plan?

b. Growth and Spatial Options

5.8 It is important to test and consult on various housing growth, employment growth and spatial strategy options for the WLP, as required by national guidance and the Wolverhampton Statement of Community Involvement. There is also a need to test and consult on growth options for gypsy and traveller pitch need and supply.

5.9 Given the constrained land supply in Wolverhampton, there is a clear preferred option for both growth and spatial options. We are seeking views on all of the options set out in this section as part of this consultation.

Growth Options

5.10 A range of housing growth options and employment land growth options have been developed for the WLP which reflect the most recent housing and employment land need and supply figures for Wolverhampton.

i) Housing Growth

5.11 Under planning law and national guidance, the housing need figure for Wolverhampton must be calculated each year using a national formula. In April 2022 the housing need figure for Wolverhampton was 1,086 homes per year (including a 35% uplift which applies to the 20 largest towns and cities). This means that **the housing need which the WLP must seek to meet for the Plan period 2022-2042 is currently 21,720 homes.**

- 5.12 The national housing need figures change slightly each year and must be updated as the Plan is prepared up to Submission stage. When the WLP is published in autumn 2024 and then submitted in spring 2025, the period covered by the Plan will move forward to 2024-2042 and the annual housing need figure will be slightly different. Housing supply figures also change each year, as sites in the urban area are completed, some sites change capacity and new windfall sites come forward. However, given the significant scale of housing need in Wolverhampton and the minor nature of need and supply changes in recent years, it is anticipated that such changes will not alter the overall approach towards housing growth in the WLP.
- 5.13 The Wolverhampton SHLAA 2022 estimates the current supply of housing land in the Wolverhampton urban area up to 2042. This supply takes into account all identified sites which are currently suitable and deliverable for housing, and also reasonable windfall allowances. Many of the identified sites have planning permission and others are allocated in the Area Action Plans. Appropriate discounts have been applied to parts of this supply to allow for a proportion of sites which may not come forward and for likely constraints. This is the equivalent of a buffer in the housing supply, as required by national guidance.
- 5.14 **The total identified housing supply is 9,722 homes. This means that there is a significant unmet need for 11,998 homes over the Plan period.**
- 5.15 There are very limited options available to address this considerable unmet housing need. All potential new housing sites in the urban area which are suitable under current planning policy are identified in the SHLAA and counted in the existing housing supply. Therefore, the only other potential housing sites are those currently not suitable for housing, for example, because they are protected for other uses or on land with environmental constraints. Only one such site has been identified - occupied employment land at Lane St / Highfields Road, Bradley.
- 5.16 A change in policy could also be pursued to increase the density of housing required in locations with good walking and public transport access to residential services. The potential for structural changes in working and shopping patterns to deliver more homes in the City Centre can also be explored. Finally, if these sources are not sufficient, it is possible to export unmet need to willing neighbouring authorities through the “Duty to Cooperate”.
- 5.17 These housing growth options and an assessment of the advantages, disadvantages and limitations for each option are set out below. **The Preferred Option H3 is the only one of the three growth options which has the potential to meet housing need for Wolverhampton and meet national guidance on sustainable development.**

Wolverhampton Housing Growth Options

Option	Description of Option	Assessment of Option
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Option H1	Carry forward existing housing allocations which focus housing growth in urban area: <ul style="list-style-type: none"> • Around 9,722* homes on existing supply in urban area 	<ul style="list-style-type: none"> • Shortfall of 11,998* homes against housing need 2022*-42 • Sustainable pattern of development
Option H2	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres: <ul style="list-style-type: none"> • Around 9,722* homes on existing supply in urban area • 61 homes on one new allocation (following discount) • 524* homes from density uplift and structural change in Wolverhampton City Centre 	<ul style="list-style-type: none"> • Shortfall of 11,413* homes against housing need 2022*-42 • Highly sustainable pattern of development
Option H3	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres, and export remaining housing need to neighbouring authorities: <ul style="list-style-type: none"> • Around 9,722* homes on existing supply in urban area • 61 homes on one new allocation (following discount) • Around 524* homes from density uplift and structural change in Centres • Around 11,413* homes exported through Duty to Cooperate 	Preferred Option: <ul style="list-style-type: none"> • All of housing need 2022*-42 met • Highly sustainable pattern of development • Sufficient existing and potential offers from neighbouring authorities which have a strong relationship with Wolverhampton

* subject to amendment at Regulation 19 / Regulation 22 stage due to annual changes in housing need and supply

Duty to Cooperate

5.18 As set out above, the WLP cannot provide sufficient homes to meet all of the Wolverhampton housing need and so there is a reliance on 'exporting' unmet housing need to neighbouring authorities through the Duty to Cooperate (DtC). Work on the BCP involved considerable DtC engagement with neighbouring authorities to try and secure contributions to address the substantial Black Country housing shortfall. The status of these contributions varies - some Local Plans are more progressed than others and some 'offers' have been made specifically to the Black Country whilst others have been made to the wider Greater Birmingham and Black Country Housing Market Area. In order to provide certainty for the WLP, it is critical that a specific portion of these potential contributions is secured for the WLP. This will enable any remaining unmet housing need for Wolverhampton to be calculated.

5.19 The approach used to apportion each Local Plan housing contribution between relevant authorities must be based on evidence. Historic net migration data available since 2003 provides a sound evidence basis for an

apportionment approach, as this clearly demonstrates the strength of long term household flows between authorities.

- 5.20 For the Shropshire Local Plan, which is at an advanced stage of preparation, housing contributions have been secured for the Black Country as a whole on the basis of the Draft BCP position. The four BCAs have agreed an apportionment of this contribution based on net migration flows and this approach would result in some 593 homes being attributed to meeting needs arising in Wolverhampton.
- 5.21 Building on the engagement undertaken for the BCP, the Council will continue to engage with other Local Plans which could be expected to make a contribution to meeting needs arising in the City given current and potential functional and physical relationships. The focus of this engagement to date has been with South Staffordshire, Telford & Wrekin, Lichfield, Cannock and Stafford, with each of those Plans being at different stages of preparation and adopting differing approaches to meeting wider needs. Excluding the withdrawn Lichfield Local Plan, and the emerging Stafford Local Plan, the October 2023 drafts of these Plans would provide some 6,140 homes over and above local needs. Based on the approach used for Shropshire, a significant proportion of this capacity could be apportioned to meeting needs arising in the City, potentially in the order of a minimum of 2,248 homes. The basis for this calculation is set out in the Duty to Cooperate Paper.
- 5.22 The remaining shortfall could be addressed through contributions from other neighbouring Local Plans, including the Wyre Forest Local Plan (through a future review of the recently adopted Plan) and the Lichfield Local Plan (following recent withdrawal of their submitted Local Plan which would have contributed 2,000 homes to the Black Country authorities). However, these Plans will be prepared under the new Local Plan system which will operate under different arrangements to the current Duty to Cooperate. The local authorities within the wider Greater Birmingham and Black Country Housing Market Area have scoped out a programme of work to quantify and address housing needs and shortfalls across an extended period, including that covered by the WLP. This programme of work will play a key role in informing emerging Local Plans, and early reviews as appropriate, potentially providing further capacity to address the WLP housing shortfall.

Question 5: Do you agree with the Preferred Housing Growth Option (H3) for the Wolverhampton Local Plan and the proposed apportionment approach to housing contributions from neighbouring authorities?

ii) Gypsy and Traveller Pitch Growth

- 5.23 The WLP is required to demonstrate that there is sufficient land in Wolverhampton to meet identified need for gypsy and traveller permanent pitches for the first five years of the Plan period (up to 2032). The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022 identifies a need for 33 pitches in Wolverhampton up to 2032 using the

definition set out in national Planning Policy for Travellers 2015. There is a site currently allocated for 12 gypsy pitches at the Former Bushbury Reservoir and the potential to regularise a site of 2 pitches. This leaves an unmet need for 19 pitches in Wolverhampton up to 2032.

- 5.24 Following a review of publicly owned land and privately-owned housing sites in Wolverhampton, no potential suitable new gypsy and traveller pitch sites have been identified.
- 5.25 The gypsy and traveller pitch options and an assessment of the advantages, disadvantages and limitations for each option are set out below. **The Preferred Option G2 is the only one of the two options which has the potential to provide the required 5 year supply of gypsy and traveller pitches for Wolverhampton and also meet national guidance on sustainable development.**

Wolverhampton Gypsy and Traveller Pitch Options

Option	Description of Option	Assessment of Option
Option G1	<p>Make use of existing sites to deliver new gypsy and traveller pitches up to 2032:</p> <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site 	<ul style="list-style-type: none"> • 19 pitch shortfall against Wolverhampton gypsy and traveller pitch need up to 2032
Option G2	<p>Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032:</p> <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site • 19 pitches exported through Duty to Cooperate 	<p>Preferred Option</p> <ul style="list-style-type: none"> • No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032

Question 6: Do you agree with the Preferred Gypsy and Traveller Pitch Option (G2) for the Wolverhampton Local Plan?

iii) Employment Land Growth

- 5.26 Wolverhampton is located within the Black Country Functional Economic Market Area (BC FEMA) which also covers Dudley, Sandwell and Walsall. Across the BC FEMA as a whole, the 2023 update of the Black Country Economic Development Needs Assessment (EDNA) identifies the need for an additional 533 ha of land for employment development for the period 2020/21 to 2040/41. Forecast supply based on the position set out in the Black Country Employment Land Supply Paper (2023) is 381 ha, resulting in a shortfall of 152 ha.
- 5.27 For the Wolverhampton element of the FEMA, the EDNA identifies a need for 116 ha of land for employment development up to 2041, based on an annual need of 5.5 ha and allowing for the replacement of programmed losses to other uses. Taking into account completions since April 2020 (10 ha), current

Local Plan allocations proposed to be carried forward into the WLP (31.4 ha) and other sites with planning permission for employment development (6 ha), the April 2022 supply is 47.4 ha. Therefore, there is a shortfall of 68.6ha. This figure will need to be updated for subsequent stages of the Plan in the light of completions and to ensure that the need covers the whole of the Plan period.

- 5.28 There are limited options available to address this unmet need. Potential new sites in the urban area, which are in locations suitable for employment use and with good transport access, can be identified. There are currently four such sites providing 15.3 ha – Phoenix Rd and Tata Steel in Wednesfield, the Former MEB Site, Major Street / Dixon Street and Land at Neachells Lane. These sites were consulted on through the Draft BCP. Even with these additional sites, there is insufficient land to meet the City’s needs in full, the shortfall being in the order of 53 ha.
- 5.29 The employment land growth options and an assessment of the advantages, disadvantages and limitations for each option are set out below. **The Preferred Option E3 is the only one of the three growth options which has the potential to meet employment land needs for Wolverhampton, allow Duty to Cooperate requirements to be met for the Black Country FEMA, and meet national guidance on sustainable development.**

Wolverhampton Employment Land Growth Options

Option	Description of Option	Assessment of Option
Option E1	Carry forward existing employment allocations: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area (including completions since 2020). 	<ul style="list-style-type: none"> Shortfall of 68.6 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E2	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area 15.3 ha on new allocations 	<ul style="list-style-type: none"> Shortfall of 53.3 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E3	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and explore remaining employment land need to neighbouring authorities:	Preferred Option <ul style="list-style-type: none"> All of employment land need for Wolverhampton up to 2041 met. Sufficient offers from neighbouring authorities which have a strong relationship with Wolverhampton Contributions from neighbouring areas are available to address employment land need across the Black Country FEMA as a whole. Sustainable pattern of development

	<ul style="list-style-type: none"> • 47.4 ha on existing employment land supply in urban area • 15.3 ha on new allocations • 53.3 ha exported through Duty to Cooperate 	
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Duty to Cooperate

- 5.30 The City cannot meet its employment land needs in full through land within the administrative area. The City is located within the wider BC FEMA within which there is also a shortfall of employment land in the order of 152 ha to 2041 as set out in the 2023 EDNA. There are no additional suitable sites within the City which could provide land to contribute towards meeting the Wolverhampton and wider BC FEMA shortfall. Therefore, the proposed DtC approach is different to that for housing. Contributions secured through current Statements of Common Ground between the BC FEMA authorities and Shropshire and South Staffordshire Councils have potential to provide 133.6 ha towards BC FEMA needs, which would reduce the BC FEMA shortfall to 19.4 ha.
- 5.31 The City of Wolverhampton Council will continue to engage with other neighbouring authorities preparing Local Plans which have a functional relationship with the BC FEMA, in partnership with the BC FEMA authorities, to help address the shortfall across the BC FEMA as a whole. The focus for this work will be those areas identified in the EDNA as having strong or moderate relationships with the BC FEMA (Bromsgrove and Tamworth) and other areas which have an evidenced relationship with the BC FEMA (Stafford and Telford & Wrekin). Additional opportunities for the bringing forward of employment land to meet BC FEMA needs may arise through the West Midlands Strategic Employment Sites Study (SESS), currently being progressed by Mace consultants and anticipated for completion in early 2024. This work will be used to inform Local Plan preparation including the early review of relevant Plans subject to the recommendations of this work.

Question 7: Do you agree with the Preferred Employment Land Growth Option (E3) for the Wolverhampton Local Plan?

iv Spatial Strategy Options

- 5.32 The preferred housing and employment growth options explored above are inextricably linked to the spatial options for the WLP. This is because there is a finite amount of land available for development in the Wolverhampton urban area, and this is concentrated in certain locations.
- 5.33 The spatial options and an assessment of the advantages, disadvantages and limitations for each option (which relate to those for the housing and employment growth options) are set out below. **The Preferred Option G:**

Balanced and Sustainable Growth effectively forms a balance between the other six options and is the option which has the most potential to: provide sufficient land to meet Wolverhampton housing needs (both within Wolverhampton and in neighbouring authorities); provide sufficient employment land within Wolverhampton to meet employment land needs for Wolverhampton and allow Duty to Cooperate requirements to be met for the Black Country FEMA; and meet national guidance on sustainable development.
















Wolverhampton Spatial Options

Option	Description of Option	Impact on Growth Options
Option A	“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> • As for Option H1 • As for Option E1
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	<ul style="list-style-type: none"> • As for Option H1 but with larger shortfall against housing need • As for Options E2 & E3
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations	<ul style="list-style-type: none"> • As for Option H1 but with larger shortfall against housing need • As for Options E2 & E3 but without sites in less attractive commercial locations and therefore larger shortfall against employment land need
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services	<ul style="list-style-type: none"> • As for Option H1 but with larger shortfall against housing need • As for Options E2 & E3 but with larger shortfall against employment land need
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where good public transport access.	<ul style="list-style-type: none"> • As for Options H2 & H3 but with larger shortfall against housing need • As for Options E2 & E3 but without sites where not good public transport access and therefore larger shortfall against employment land need
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated and regeneration benefits can be maximised.	<ul style="list-style-type: none"> • As for Options H2 & H3 but with larger shortfall against housing need • As for Options E2 & E3
Option G	Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in	<p>Preferred Option:</p> <ul style="list-style-type: none"> • As for Options H2 & H3 • As for Options E2 & E3

	the most accessible locations; more housing in Wolverhampton City Centre.	
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5.34 The preferred spatial option translates into the proposed key spatial diagram illustrated in Plan 1: Proposed Key Spatial Diagram. An interactive version of this map is available to view at: www.wolverhampton.gov.uk/localplan. Table 3 sets out the proposed spatial distribution of housing and employment development in line with the information set out in d. Site Allocations.

Plan 1 Proposed Key Spatial Diagram

-  Wolverhampton City Boundary
-  Railway
-  Metro
-  Motorway
-  Strategic Transport Investment - A454 City East Gateway
-  Strategic Transport Investment - City Centre Public Realm & Cycling
-  Green Belt
-  Existing Employment Areas
-  Town Centres
-  Wolverhampton City Centre
-  Bilston Regeneration Area
-  Stafford Road Regeneration Area
-  Wednesfield Regeneration Area
-  Significant Housing Development (100+ homes)
-  Significant Employment Development (>1 hectare)

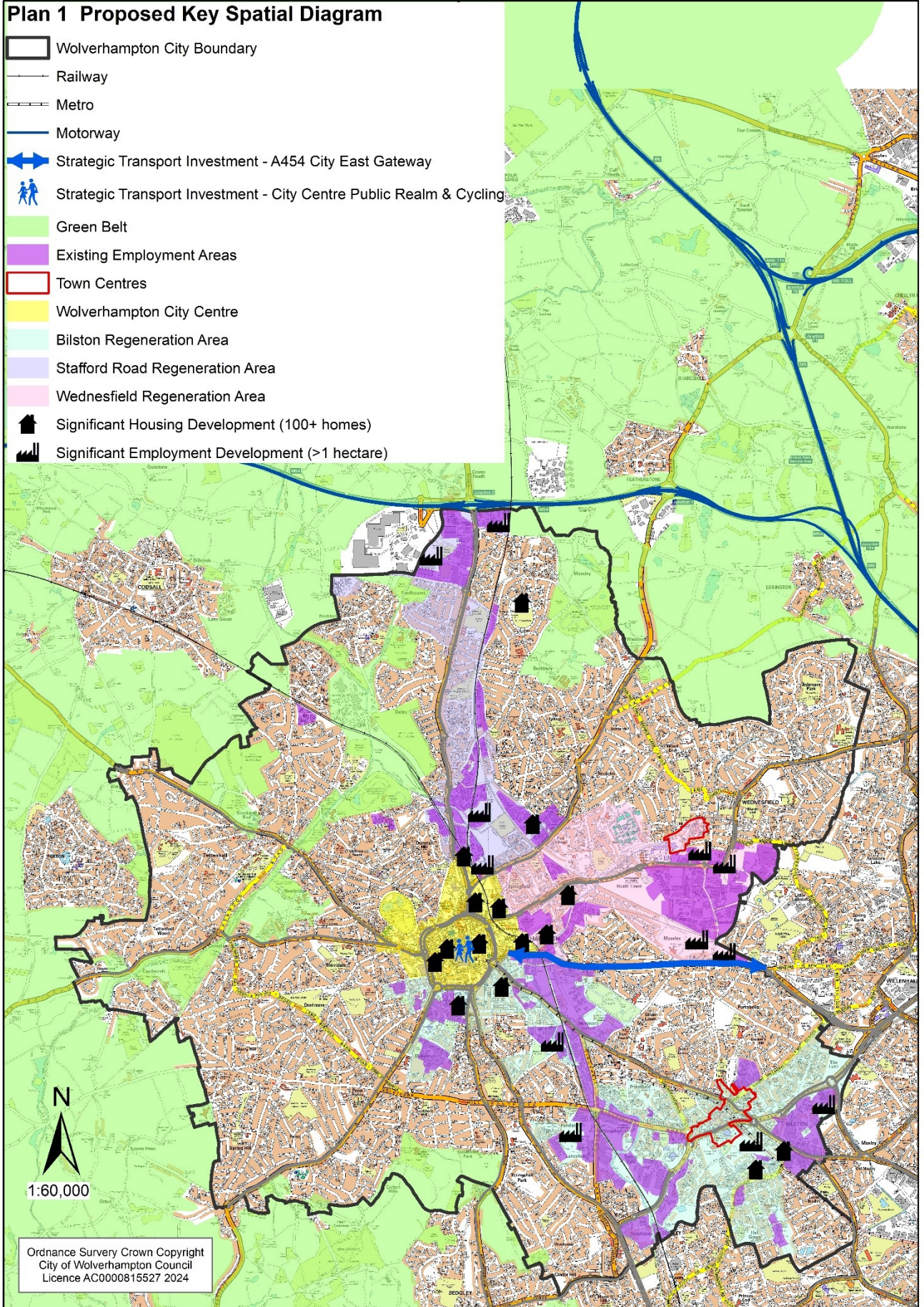


Table 3 Proposed Spatial Distribution of Housing and Employment Development Land (2022-42)

Location	Housing (net homes including discount)	Employment Development Land (ha)
Wolverhampton City Centre	Identified Sites: 3227 Small Windfalls: 225 Flexible AAP Allocations: 460 Structural Change Surplus Floorspace: 184 Structural Change Potential New Allocations: 440 = 4536 (44%)	0
Bilston Core Regeneration Area	1391 (14%)	20 (38%)
Wednesfield Core Regeneration Area	553 (5%)	15 (29%)
Stafford Road Core Regeneration Area	290 (3%)	17 (33%)
Growth Network	6770 (66%)	52 (100%)
Neighbourhoods Area (identified sites)	1767 (17%)	0
Small Windfall Housing Sites (<10 homes) outside Wolverhampton City Centre	1770 (17%)	-
Total	10307	52

Question 8: Do you agree with the Preferred Spatial Option (G – Balanced and Sustainable Growth) for the Wolverhampton Local Plan?

c. Policies

5.35 The Draft BCP included 63 strategic policies covering a range of strategic planning subjects, as required by national guidance. A number of these policies have associated Policies Map designations. Information about the Draft BCP (Regulation 18) Consultation (August 2021), including the consultation document and interactive policies map is available from: [link]. These policies were developed in considerable detail and were based on key evidence and consultation with relevant stakeholders. The majority of the policies were supported by consultees. However, some consultation responses raised valid planning issues regarding these policies and this Issues and Preferred Options document sets out amendments to those policies where appropriate.

- 5.36 In some cases, new evidence or national guidance has emerged since 2021 which requires changes in policy. The change in geography of the Plan from Black Country to Wolverhampton has also made it necessary to revise the scope of certain policies e.g. for minerals. Finally, the decision taken by City of Wolverhampton Council not to review the Green Belt following changes to national planning policy has necessitated some major changes to the spatial strategy policies.
- 5.37 **Therefore, the preferred option is to repeat the Draft BCP policies and Policies Map designations in the WLP, but with a number of specific amendments to reflect:**
- **the decision taken by City of Wolverhampton Council not to review the Green Belt;**
 - **valid planning issues raised in Draft BCP consultation responses;**
 - **the changed geography;**
 - **any new evidence;**
 - **any new national guidance.**

The detail of major amendments is provided in Appendix 2. There will also be minor amendments made to the structure and format of the document and to update background information and supporting text.

- 5.38 In summary, the Preferred Option will strengthen existing policies to address the Climate Crisis, improve the environment and tackle local health issues:
- promotion of sustainable and active transport
 - higher renewable energy, energy efficiency and water efficiency standards for development
 - protection of existing trees and providing new trees through development
 - addressing the health impacts of development, including hot food takeaways, betting shops and shisha bars
 - protection of water quality and air quality
 - making sure new homes have enough internal space.
- 5.39 It is important to note that the WLP is not intended to cover planning policies for all subject areas, only those considered strategic in nature. The strategic policies in the WLP will be supported by a suite of local policies in other Local Plan documents (currently the Wolverhampton UDP and Area Action Plans).
- 5.40 The proposed policy approach for the WLP is summarised below, for each of the ten subject areas. Approaches which are different from the Draft BCP are highlighted in purple.

Proposed Policy Approach

a. Spatial Strategy

1. Sustainable pattern of development which makes most efficient use of land whilst protecting and enhancing the sustainability of existing communities;
2. A Spatial Strategy for Wolverhampton which delivers the majority of housing and employment development up to 2042 on brownfield land in an urban Growth Network made up of Wolverhampton City Centre and the Core Regeneration Areas of Bilston, Wednesfield and Stafford Road. Includes designation of Core Regeneration Areas on Policies Map;
3. Towns and Neighbourhood Areas outside the Growth Network providing high quality, smaller scale housing opportunities in the urban area;
4. Protecting and enhancing the green belt and the full range of environmental assets. Includes carry forward of existing Green Belt boundary on Policies Map;
5. Minimising and mitigating the effects of climate change;
6. Delivering high quality design on all developments;
7. Protecting and supporting cultural facilities and the visitor economy.
8. Introduce requirement for large leisure / evening economy developments to address potential security, crime and anti-social behaviour issues.

Not carried forward from Draft BCP:

9. References to Neighbourhood Growth Areas, release of land from the green belt for housing, and compensatory improvements for loss of green belt.

b. Infrastructure and Delivery

1. Ensuring timely delivery of physical, social and environmental infrastructure to support development;
2. Infrastructure Delivery Plan and Viability Assessment to accompany the Plan, to demonstrate that infrastructure improvements can be viably delivered;
3. Criteria to control windfall changes of use to housing or employment;
4. Promotion and enablement of the creation of a high quality, future-proofed digital network across Wolverhampton through supporting the rollout of Fibre to the Premises and 5G.

c. Health and Wellbeing

1. Summary of the health and wellbeing benefits of other policies in the Plan;
2. Design criteria for new healthcare facilities and requirement for major housing developments (10+ homes) to contribute to primary and secondary healthcare infrastructure, where this is required and financially viable;
3. Requirement for development proposals likely to affect health and wellbeing to demonstrate an acceptable impact or mitigation for negative impacts.
4. Provide for future restrictions to be placed on hot food takeaways (to supplement current controls in the Wolverhampton Hot Food Takeaway Supplementary Planning Document), shisha bars, off licenses, licensed premises, betting shops and other uses with potential negative health impacts, in accordance with evidence and to be detailed in a SPD;
5. Requirement for: a rapid Health Impact Assessment (HIA) to be provided for all developments of 20 to 100 homes; non-residential developments of 1,000 sqm to 5,000 sqm gross floorspace; and waste or minerals-related development, and a full

HIA for developments of over 100 homes or non-residential developments of over 5,000 sqm gross floorspace.

d. Housing

1. Set out the housing target for the Plan and how this will be delivered through a combination of sites which have planning permission, allocated sites and windfall allowances;
2. Set out a housing trajectory showing how housing will be delivered over the Plan period up to 2042;
3. Density, type and accessibility requirements for major developments (10+ homes) which ensure densities are maximised in locations with the highest level of access by sustainable transport and that a mix of house types is provided across Wolverhampton which broadly meets local needs;
4. Affordable housing requirements for major developments which are sensitive to viability - varying from 10% to 30% depending on housing values in the local area and whether sites are brownfield or greenfield;
5. Requirement for all housing on greenfield major developments to be accessible and adaptable for wheelchair use, and for 15% of homes to be fully adapted for wheelchair use;
6. Requirement for all developments of 100+ homes to provide 5% self-build and custom build plots, where there is current evidence of need in Wolverhampton.
7. Set out gypsy and traveller and travelling showpeople accommodation targets for Wolverhampton, in line with local need, and how these will be met;
8. Design criteria for new education facilities and requirement for major developments to contribute to creation of new primary and secondary school places, where this is required and financially viable;
9. Criteria for assessment of proposals to create Houses in Multiple Occupation.

Not carried forward from Draft BCP:

10. Requirement for 20% of housing on brownfield major developments to be accessible and adaptable for wheelchair use.

e. Employment

1. Set out the target for delivery of new employment development up to 2042, to facilitate the growth and diversification of the economy and accommodate jobs and output growth;
2. Provide a balanced portfolio of sites to meet a variety of business needs, including high technology manufacturing and logistics sectors;
3. Set out criteria to protect and enhance land and premises in existing employment areas which provides for the needs of jobs and businesses – in both strategic employment areas and local employment areas. Includes designation of Strategic Employment Areas, Local Employment Areas and Other Employment Areas on Policies Map;
4. Set out criteria to allow the redevelopment of employment uses, on sites outside defined employment areas which are unsuitable for continued employment use, to alternative uses including housing;
5. Require major job-creating development to demonstrate how job opportunities will be made available to local residents, particularly those in the most deprived areas and priority groups, to enable local communities to share the benefits of economic growth;

6. Include a summary of key economic strategies to explain how the Plan is consistent with them and helping to assist with their delivery;
7. Clarify that land within existing employment areas which is not currently in employment use, such as vacant yardage and landscaping, can contribute towards meeting employment land requirements;
8. Introduce criteria to control the loss of employment sites outside defined employment areas: to market the site for employment use for at least 6 months; to engage with any occupiers to secure their relocation; to prove that new uses will not be adversely affected by retained employment uses;
9. Introduce flexibility to allow local job opportunities to be negotiated with developers through planning obligations.

f. Centres

1. Define a three-tier hierarchy of centres and set out the functions and priorities for this network of centres. Centre-use allocations, Wolverhampton City Centre allocations and the review of any specific floorspace targets, centre boundaries (such as primary shopping areas) and more detailed centres policies (such as frontage policy) to be covered in the Wolverhampton City Centre Supplementary Plan and other Plans;
2. Emphasise that future housing and employment growth should be served by the existing network of centres to help support their future vitality and viability;
3. Consistent with the findings of the Black Country Centres Study, insufficient capacity has been identified to justify the inclusion of formal centre-use floorspace targets for future strategic growth. This would not preclude individual proposals coming forward through, or subject to, the framework of centres policies in the development plan.
4. Identify Wolverhampton City Centre (WCC) as the Tier-One Strategic Centre for Wolverhampton and define the WCC boundary for the purposes of the WLP. Promote diversification and flexibility to maximise investment and regeneration, particularly a balanced mix of uses, especially housing, retail, office and leisure. Promote an approach to car parking common for Tier-One centres in the Draft BCP in order to enhance sustainability;
5. Identify Bilston and Wednesfield as Tier-Two Town Centres for Wolverhampton, supporting their important function, particularly for food retail and local shopping, and promote future diversification and regeneration;
6. Protect and support the network of 29 Tier-Three District & Local Centres in Wolverhampton that provide day-to-day convenience shopping and meet local service needs;
7. Set out criteria to determine proposals for small-scale local facilities (under 280 sqm gross) outside centres;
8. Set out a reasonable threshold of over 280 sqm gross for edge-of-centre and out-of-centre proposals to undertake proportionate NPPF impact tests to ensure adverse impacts on the vitality and viability of centres are minimised and investment in centres is maximised;
9. Emphasise the importance of providing a variety of facilities in centres, to create a successful evening economy and ensure a safe, accessible and inclusive environment, in line with the requirement for large leisure / evening economy developments to address potential security, crime and anti-social behaviour issues;
10. Emphasise the value of natural and cultural aspects of WCC for the visitor economy;
11. Promote health and wellbeing by ensuring services and retail facilities in centres promote choice while enabling and encouraging healthy choices;

12. Clearly set out the housing target for Wolverhampton City Centre, to emphasise the importance of housing provision and its contribution towards regenerating the City Centre, and inform preparation of the Wolverhampton City Centre Supplementary Plan;
13. Amend accessibility requirements for WCC to clarify that any developments that require a transport statement should evidence how sustainable transport is being promoted;
14. Reference the potential for Tier-One and Tier-Two Centres to become public transport interchanges/ hubs, and for Tier-Two and Tier-Three Centres to provide increased sustainable transport access to residential services;
15. Make wording adjustments to ensure policies are concise, make appropriate reference to national guidance and are augmented with relevant information/ evidence relating to Wolverhampton, including referencing:
 - examples of specific schemes/ locations that can assist with delivering regeneration priorities, projects and the application of policies (such as the undertaking of impact tests);
 - relevant Wolverhampton planning documents/ policies/ evidence to assist with the determination of planning applications related to centre-uses.

Not carried forward from Draft BCP:

16. Section 16: Appendix – Centres (a collation of national and Black Country policies, which can be replaced by references specific to Wolverhampton in the WLP Centres section, where relevant)

g. Transport

1. Set out the strategic approach to delivering an integrated, modernised and sustainable transport network by providing sufficient development land in accessible locations and protecting key transport networks. Includes designation of Key Route network, Rail Network and Existing West Midlands Metro on Policies Map;
2. Identify capital improvements and management strategies to ensure the Key Route Network fulfils its function of serving strategic flows of people and freight across Wolverhampton by sustainable means;
3. Require planning proposals to identify and mitigate transport-related impacts;
4. Promote development of a cycling network and ensures locations are accessible to pedestrians and cyclists. Includes designation of Cycle Network on Policies Map;
5. Identify priorities and requirements for traffic management and travel choices, promoting sustainable transport and park and ride, and parking;
6. Support use of and infrastructure for low emission vehicles;
7. Provide a list of key transport projects to reflect latest priority projects for Wolverhampton (including improvements to the Key Route Network) and reference current investment plans, whilst allowing for changes during the Plan period;
8. Refer to key findings of transport evidence base, which will be finalised for Publication stage;
9. Promote more innovative freight modes and smaller logistics requirements;
10. Promote innovative practices to influence transport demand e.g. micro-mobility;
11. Clarify that parking management is part of the wider strategy for influencing travel and widen range of parking measures to include: quality of parking; parking for coaches and HGVs; and integration of parking with other measures e.g. air quality improvement, active travel promotion, zero emission vehicles and car clubs, plus the needs of people with disabilities.

h. Environment and Climate Change

1. Strategic framework for protection of nature conservation sites (Sites of Importance for Nature Conservation – SINCs and Sites of Local Importance for Nature Conservation- SLINCs), species, habitats and geological features in Wolverhampton, and Special Areas of Conservation outside Wolverhampton which may be affected by development within Wolverhampton;
2. Set out what type and local of development is likely to have an impact on Cannock Chase SAC, how this will be assessed and acceptable mitigation measures. Includes designation of Cannock Chase SAC 15km Zone of Influence on Policies Map;
3. Set out how development will be required to consider the Local Nature Recovery Strategy and deliver national biodiversity net gain requirements;
4. Protection and enhancement of trees and hedgerows, including promotion of a significant increase in tree cover by requiring developments to provide replacement and additional trees;
5. Strategic framework for protection and enhancement of historic character, including townscape, landscape and individual heritage assets. Includes designation of Historic Environment Area Designations on Policies Map;
6. Requirement for development to conserve geological features and support the Black Country GeoPark. Includes designation of Black Country GeoPark on Policies Map;
7. Protection and enhancement of the canal network, recognising its role in and opportunities for leisure, recreation, nature conservation, design and historic environment;
8. Strategic framework for protection and enhancement of open space, recognising role in promoting good design, healthy communities, leisure, recreation and biodiversity;
9. Require developments to protect sports pitches and built sports facilities and compensate for any loss;
10. Strategic framework for design of new development, including introduction of national water efficiency and space standards for housing, road safety, **suicide prevention** and crime prevention principles, and building orientation to maximise energy efficiency and resilience and manage heat risk;
11. Require development to be air quality neutral, consider indoor air quality and promote initiatives to improve air quality such as walking, cycling, electric vehicle charging points, public transport, protection of open spaces / tree cover;
12. Require flood risk assessment for new development and promotes naturalisation of urban water courses, opening up culverts, protection of groundwater and prevention of downstream flooding;
13. Require developments to provide sustainable drainage (SuDS) and surface water management (including adoption, maintenance and management) to reduce surface water flows to equivalent greenfield runoff rates, unless this is not viable;
14. Require 20% renewable energy generation on site for major housing/commercial developments, and 10% for minor developments, unless this is not viable. Requires BREAAAM standards are met for commercial, student housing and care home developments unless this is not viable. Require major development to link into any existing decentralised energy network close to the site where practical and viable;
15. **Strengthen expectation that development will not harm protected species;**
16. **Require ecological information provided to support proposals to include a data search from the Local Records Centre, and a Local Sites Assessment where development affects a SINC or SLINC;**
17. **Set out special justification for and level of mitigation necessary for the limited number of proposed WLP developments which will result in loss of part of a SLINC;**

18. Commit to carry out air quality modelling to estimate the impact of traffic arising from proposed WLP developments on the habitat value of nearby Special Areas of Conservation. If analysis shows there will be harmful impacts, consider if WLP policies are needed to mitigate these impacts.
19. Clarify that developments will be required to consider both the emerging Black Country Local Nature Recovery Map and Strategy and planned West Midlands Local Nature Recovery Strategy;
20. Clarify that biodiversity net gain is considered separately from protected sites, and include monitoring and management requirements for biodiversity net gain;
21. Strengthen protection of playing fields and built sports facilities in accordance with national guidance and Sport England best practice;
22. Include a new policy on water quality in line with Environment Agency advice, to address current River Basin Management Plan and Water Framework Directive priorities relevant to the Wolverhampton area, supported by updated water cycle study evidence as required.

Not carried forward from Draft BCP:

23. Parts of Policies CC1, CC2 and CC3 which cover energy infrastructure, energy efficiency and resilience and managing heat risk;
24. Requirement for all major developments to deliver a 19% carbon reduction above Part L of Building Regulations.

j. Waste

1. Set out waste management strategy for Wolverhampton, the types of waste development that will support this and how much new waste management capacity is required;
2. Safeguard the capacity of existing waste facilities to maintain existing waste management capacity and address resource and infrastructure needs. Includes designation of Strategic Waste Sites on Policies Map;
3. Identify preferred areas for new waste facilities and where delivery of new waste management facilities will make a significant contribution towards meeting needs. Includes designation of Preferred Areas of Search for new Waste Facilities on Policies Map;
4. Set out criteria for location of new waste facilities, promoting direction of waste management facilities towards locations where they are likely to generate maximum benefits in terms of co-location, provide supporting infrastructure for other uses and minimise potential harmful effects on the environment and local communities;
5. Set out the need to manage material resources – including waste - in a responsible way as an important element of sustainable development.

k. Minerals

1. Identify requirements for production of aggregate minerals and industrial minerals over the Plan period, having regard to national guidance, likely demand, constraints and imports from other areas;
2. Identify and protect mineral infrastructure sites in Wolverhampton which contribute to mineral processing, storage and distribution. Includes designation of existing Mineral Infrastructure Sites on Policies Map;
3. Require development sites of 5ha+ to provide supporting information demonstrating that mineral resources would not be sterilised;
4. Set out the criteria for assessing minerals infrastructure developments, including any prior extraction in advance of redevelopment.

Not carried forward from Draft BCP:

5. References to primary mineral production, mineral reserves, Mineral Safeguarding Areas and new mineral development.

Question 9: Do you agree with the preferred approach to policies in the Wolverhampton Local Plan (that the policies and Policies Map designations should repeat those in the Draft Black Country Plan (2021), subject to the amendments set out in Appendix 2 and summarised in section 5 c)?

d. Site Allocations

- 5.41 The details of all housing, gypsy and traveller pitch and employment development allocations proposed to be taken forward into the WLP are provided in Table 4. The locations of the allocations, and other key proposed policy designations, are shown on Plan 2: Proposed Policies Map. The site boundaries can be viewed in more detail as part of the interactive Map at: www.wolverhampton.gov.uk/localplan

Plan 2: Proposed Policies Map

-  Wolverhampton City Boundary
-  Green Belt (GB1)
-  Wolverhampton City Centre (CSP2)
-  Bilston Core Regeneration Area (CSP2)
-  Stafford Road Core Regeneration Area (CSP2)
-  Wednesfield Core Regeneration Area (CSP2)
-  Rail Network (TRAN4)
-  Wolverhampton to Birmingham Metro Line (TRAN4)
-  Motorways
-  Key Route Network (TRAN4)
-  Strategic Employment Area (EMP2)
-  Local Employment Area (EMP3)
-  Other Employment Area (EMP4)
-  Employment Development Allocation (EMP1)
-  Housing Allocation (HOU1)
-  Gypsy and Traveller Pitch Allocation (HOU4)
-  Tier Two Centres (CEN3)
-  Tier Three Centres (CEN4)
-  Municipal Waste Recovery Infrastructure (W2)
-  Other Significant Waste Management Infrastructure (W2)
-  Preferred Areas for New Waste Facilities (W3)

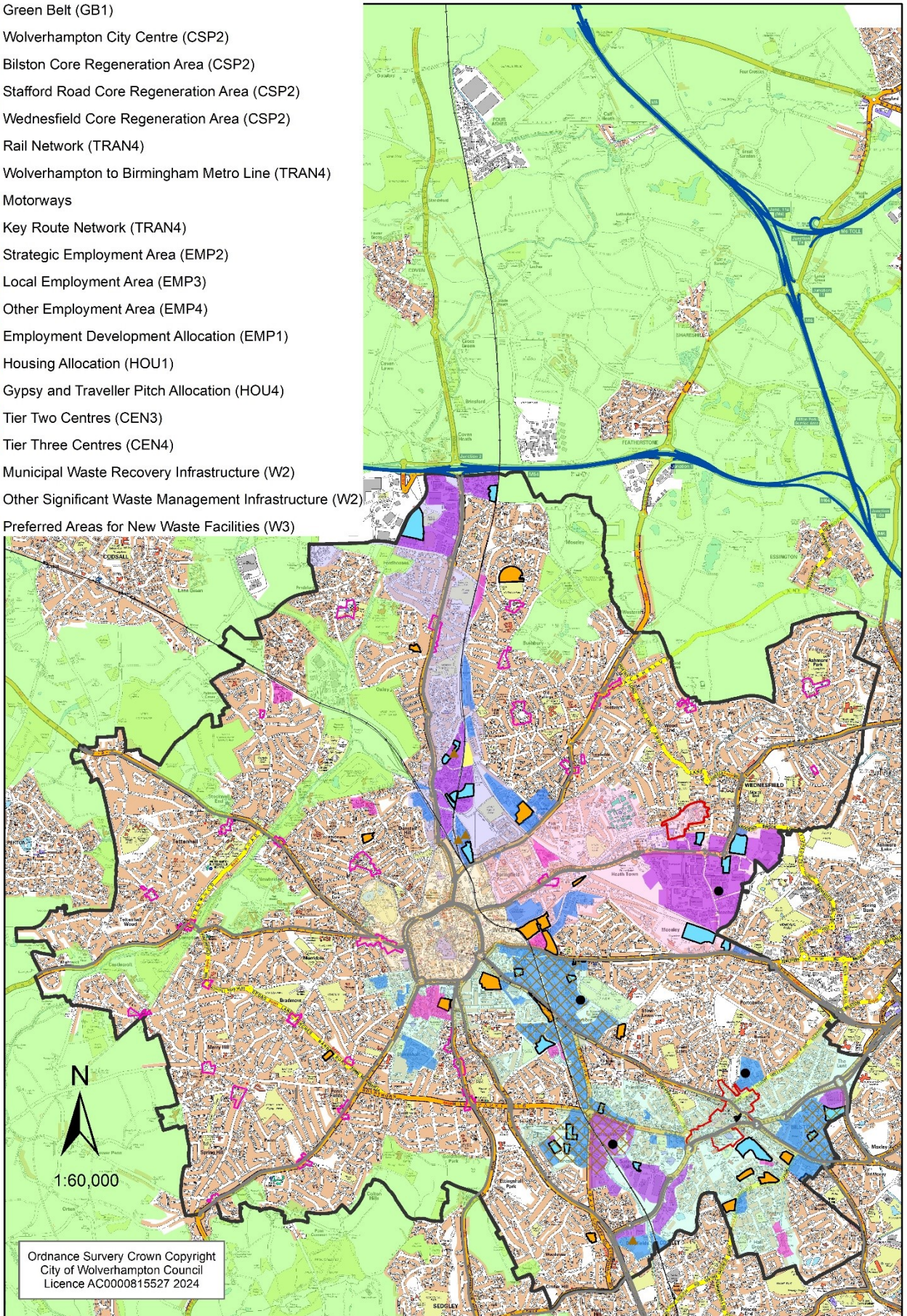


Table 4 Wolverhampton Local Plan Proposed Site Allocations – Housing, Gypsy and Traveller Pitch, Employment Development

WLP Site ref (Draft BCP ref)	Site name	Further Information	Proposed Use	Indicative no. of homes	Area to be developed in hectares (Predominantly Brownfield / Greenfield)
Stafford Road Core Regeneration Area					
H1	Bluebird Industrial Estate and site to rear, Park Lane	Existing housing allocation in Stafford Road Corridor Area Action Plan. Not consulted on through Draft BCP due to delivery concerns - now considered deliverable.	Housing	130	3.10 (B)
GT1 (GT06)	Former Bushbury Reservoir, Showell Road	Existing allocation in Stafford Road Corridor Area Action Plan.	Gypsy and traveller pitches (G)	12 pitches	0.30 (G)
E1 (WOE725)	Wolverhampton Business Park	Existing allocation in Stafford Road Corridor Area Action Plan. Site has Local Development Order and secured outline planning permission.	Employment	-	1.77 (G)
E2 (WOE684)	Rear of IMI Marstons, Wobaston Road	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.	Employment	-	7.20 (B)
E3 (WOE690)	Shaw Road	Existing allocation in Stafford Road Corridor Area Action Plan.	Employment	-	0.80 (B)
E4 (WOE758)	Former Strykers, Bushbury Lane	Site has outline planning permission.	Employment	-	0.80 (B)
E5 (WOE723)	Gas Holder site, Wolverhampton Science Park	Existing allocation in Stafford Road Corridor Area Action Plan.	Employment	-	2.60 (B)
E6 (WOE727)	Mammoth Drive, Wolverhampton Science Park	Existing allocation in Stafford Road Corridor Area Action Plan.	Employment	-	0.80 (G)

E7 (WOE726)	Stratosphere Site, Wolverhampton Science Park	Existing allocation in Stafford Road Corridor Area Action Plan.	Employment	-	0.70 (G)
E8 (WOE681)	Cross Street North / Crown Street	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.	Employment	-	2.10 (B)
Wednesfield Core Regeneration Area					
H2 (H183)	Former G & P Batteries, Grove Street, Heath Town	Existing allocation in Heathfield Park Neighbourhood Plan. Site has outline planning permission.	Housing	56	0.79 (B)
H3 (H186)	East of Qualcast Road	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission.	Housing	101	2.00 (G)
H4 (H187)	West of Qualcast Road	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission. Occupied employment land.	Housing	119	3.25 (B)
H5 (H188)	West of Colliery Road	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land. Additional 1 ha suitable for other commercial uses as part of mixed use scheme.	Housing	90	2.00 (B)
E9 (WOE729)	Bentley Bridge Business Park, Well Lane, Wednesfield	Site has full planning permission.	Employment	-	1.20 (B)
E10 (WOE618)	Tata Steel, Wednesfield	Site has full planning permission.	Employment	-	4.30 (B)
E11 (WOE698)	Phoenix Road, Wednesfield	Part of site has full planning permission.	Employment	-	1.80 (B)
E12 (WOE703)	Land at Neachells Lane	Part of Neachells Lane Open Space and Site of Local Importance for Nature Conservation. Subject to satisfactory highways access being demonstrated and mitigation for loss of open	Employment	-	6.70 (G)

		space and nature conservation value. Appropriate buffers are required around the development to mitigate harm to nature conservation and open space value, and to the amenity of existing residential development: (1) continuous wildlife corridor alongside the railway line; (2) minimum 30m to the west to retain openness, allow for diversion/ retention of existing public right of way and avoid pinch point in public open space corridor; (3) minimum 35m to the south between existing residential boundaries and proposed buildings to include diversion/ retention of existing public right of way. Further assessment work should be carried out on transportation, nature conservation and open space implications of the proposed development to support any planning application.			
E13 (WOE694)	Land rear Keyline Builders, Neachells Lane / Noose Lane		Employment	-	1.20 (G)
Bilston Core Regeneration Area					
H6 (H196)	Dobbs Street, Blakenhall	Part occupied employment land.	Housing	266	1.35 (B)
H7 (H192)	Dudley Road / Bell Place, Blakenhall	Existing allocation in Wolverhampton City Centre Area Action Plan. Site has full planning permission.	Housing	100	0.68 (B)
H8 (H182)	Former Royal Hospital, All Saints	Site is under construction.	Housing	192	4.11 (B)
H9 (H189)	Delta Trading Estate, Bilston Road	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.	Housing	80	2.00 (B)

H10 (H195)	Land at Hall Street / The Orchard, Bilston Town Centre	Existing allocation in Bilston Corridor Area Action Plan.	Housing	21	0.12 (B)
H11 (H197)	Former Pipe Hall, The Orchard, Bilston Town Centre	Subject to retention and conversion of listed building.	Housing	38	0.13 (B)
H12 (H272)	Lane Street / Highfields Road, Bradley	Occupied employment land.	Housing	72	1.79 (B)
H13 (H190)	Greenway Road, Bradley	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.	Housing	180	4.00 (B)
H14	Former Loxdale Primary School, Chapel Street, Bradley		Housing	100	1.30 (B)
H15 (H191)	South of Oxford Street, Bilston	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.	Housing	20	0.45 (B)
E14 (WOE761)	Chillington Fields	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Willenhall Road.	Employment	-	0.60 (B)
E15 (WOE759)	Powerhouse, Commercial Road	Existing allocation in Bilston Corridor Area Action Plan.	Employment	-	0.90 (B)
E16 (WOE754)	Hickman Avenue	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Hickman Avenue.	Employment	-	0.70 (B)
E17 (WOE662)	Former MEB Site, Major Street / Dixon Street		Employment	-	2.50 (B)
E18 (WOE658)	Millfields Road, Ettingshall		Employment	-	0.70 (B)

E19 (WOE755)	Rolls Royce Playing Field, Spring Road	Existing allocation in Bilston Corridor Area Action Plan. Subject to compensation for loss of playing field / bowling green.	Employment	-	1.80 (G)
E20 (WOE757)	South of Inverclyde Drive	Existing allocation in Bilston Corridor Area Action Plan.	Employment	-	1.40 (B)
E21 (WOE760)	Rear of Spring Road	Existing allocation in Bilston Corridor Area Action Plan.	Employment	-	0.70 (B)
E22 (WOE734)	Springvale Avenue	Existing allocation in Bilston Corridor Area Action Plan.	Employment	-	0.70 (B)
E23 (WOE737)	Bilston Urban Village, Bath Street	Existing allocation in Bilston Corridor Area Action Plan.	Employment	-	6.00 (B)
E24 (WOE763)	Dale St, Bilston		Employment	-	0.90 (B)
E25 (WOE735)	South of Citadel Junction, Murdoch Road, Bilston	Existing allocation in Bilston Corridor Area Action Plan. Subject to remediation and mitigation for loss of nature conservation value.	Employment	-	3.20 (G)
Neighbourhoods Area					
H16 (H199)	Former Northcote Secondary School, Northwood Park Road	Site has full planning permission.	Housing	178	4.94 (B)
H17 (H198)	Beckminster House, Beckminster Road	Subject to retention and conversion of listed building.	Housing	15	0.25 (B)
H18 (H184)	Former Rookery Lodge, Woodcross Lane	Outline permission for care village in 2012.	Housing	16	0.25 (B)
H19 (H201/ H202)	Former Stowheath Centres, Stowheath Lane		Housing	53	1.00 (B)

H20	Former Probert Court / Health Centre, Probert Road	Subject to relocation of existing GP surgery.	Housing	35	0.88 (B)
H21	Former Gym, Craddock Street	Existing housing allocation in Wolverhampton Unitary Development Plan. Not consulted on through Draft BCP as operational gym - now considered deliverable.	Housing	48	1.20 (B)

- 5.42 The majority of the sites listed in Table 4 were consulted on through the Draft Black Country Plan (BCP). However, there are four new sites to be consulted on, which are highlighted in purple. All of these sites are identified in the Wolverhampton SHLAA (2022) as suitable for housing under current adopted planning policy.
- 5.43 A number of Draft BCP proposed housing allocations are not included in Table 4. All sites in the green belt have been excluded, as the Council has decided not to review the Green Belt (see para's 1.23-1.26 above).
- 5.44 Four sites in the urban area are also now excluded, as listed in Table 5. These sites are predominantly greenfield and are not now suitable for housing development, for a range of planning reasons including highways constraints, sufficiency of open space, wildlife value and viability.

Table 5: Draft BCP Proposed Housing Allocations in the Urban Area now Not Suitable for Housing Development

Draft BCP Site Ref	Site Name	Reasons not suitable for development
WOH185	Alexander Metals Open Space, Darlaston Lane / Wrenbury Drive, The Lunt (70 homes)	A Local Sites Assessment was completed during 2022 which concluded that the site is of Site of Importance for Nature Conservation (SINC) value and the site has subsequently been designated as a SINC. SINC's are protected from development under current and proposed local policy and are unsuitable for development under the WLP site assessment methodology.
WOH193 & WOH194	Former St Luke's Junior School, Goldthorn Road (89 homes)	There is evidence that highways access places significant limits on housing capacity and there is a need to retain flexibility for the site to be used, together with adjoining land, as part of a Royal Primary School reconfiguration scheme.
WOH200	Fmr Nelson Mandela House, Whitburn Close (20 homes)	There is evidence that the site is not viably deliverable for housing.
WOH273 (WOH274 in error in Draft BCP)	Moseley Road Open Space (part), Langdale Drive, Bilston (also known as "Grapes Pool Field") (85 homes)	There is evidence that a reduction in open space in this part of Wolverhampton would lead to deficiencies against open space standards adopted through the Wolverhampton Open Space Strategy and Action Plan (2018).

- 5.45 It is also proposed that the detail of housing and employment allocations reflects the most recent evidence and provides a more detailed housing trajectory for the first five years of the Plan. Site specific changes proposed are:
- Increase housing capacity of the Former Pipe Hall in Bilston Town Centre from 20 to 38 homes to reflect the latest proposals for the site in advance of submission of a planning application;

- Increase the site boundary of West of Qualcast Road housing site to include 0.25 ha required to provide access to the Crane Foundry housing site allocation within Wolverhampton City Centre;
- Increase the site boundary of Dobbs Street, Blakenhall housing site to reflect planning guidelines for the site;
- Provide a detailed site boundary for the employment site allocation at Neachells Lane, and details of buffers required within the site, to reflect the most recent evidence and the latest proposals for the site in advance of submission of a planning application;
- Remove housing and employment site allocations which have now been built out.

5.46 It is proposed to carry forward the waste and mineral allocations set out in Tables 46, 47 and 48 of Chapter 13-D Wolverhampton of the Draft Black Country Plan (2021) into the WLP unchanged.

Question 10. Do you agree with the proposed site allocations for the Wolverhampton Local Plan (housing, gypsy & traveller pitch, employment development, waste and minerals)?

Question 11. Do you have any other comments to make about the Wolverhampton Local Plan?

Appendix 1. Consultation Questions

The consultation questions that appear throughout this document are collated below. We would encourage you to use the online response form that is designed to be quick and easy to complete, where you can answer these questions and make any other comments about the Wolverhampton Local Plan. A shorter survey about the Issues & Preferred Options summary leaflet is also available. For further information please see www.wolverhampton.gov.uk/localplan

1. Do you agree with the proposed scope of the Wolverhampton Local Plan? (please see section 1)
2. Do you agree with the “big issues” identified for the Wolverhampton Local Plan to address? (please see sections 2 & 3)
3. Do you agree that the evidence and background documents listed in Table 1 are sufficient to support the Wolverhampton Local Plan? (please see section 4)
4. Do you agree with the proposed approach to the Vision and Strategic Priorities for the Wolverhampton Local Plan? (please see section 5 A)
5. Do you agree with the Preferred Housing Growth Option (H3) for the Wolverhampton Local Plan and the proposed apportionment approach to housing contributions from neighbouring authorities? (please see section 5 B (i))
6. Do you agree with the Preferred Gypsy and Traveller Pitch Option (G2) for the Wolverhampton Local Plan? (please see section 5 B (ii))
7. Do you agree with the Preferred Employment Land Growth Option (E3) for the Wolverhampton Local Plan? (please see section 5 B (iii))
8. Do you agree with the Preferred Spatial Option (G – Balanced and Sustainable Growth) for the Wolverhampton Local Plan? (please see section 5 B (iv))
9. Do you agree with the preferred approach to policies in the Wolverhampton Local Plan (that the policies and Policies Map designations should repeat those in the Draft Black Country Plan (2021), subject to the amendments set out in Appendix 2 and summarised in section 5 C)? Please tell us which policies you are referring to.
10. Do you agree with the proposed site allocations for the Wolverhampton Local Plan? (please see section 5 D - housing, gypsy & traveller pitch, employment development, waste and minerals; and please tell us which

sites you are referring to, using the site references in Table 4 and the Draft Black Country Plan (2021)).

11. Do you have any other comments to make about the Wolverhampton Local Plan? This could include any responses to the Issues & Preferred Options Summary Leaflet and/ or other information, such as the Sustainability Appraisal, Interactive Map and supporting evidence. Please state clearly what aspect of the consultation you are referring to (e.g. document/ page/ section/ question/ site reference/ policy area).

Appendix 2: Specific Amendments to Draft Black Country Plan Policies

Links to view the publication of responses to the Draft Black Country Plan Consultation (August – October 2021) and the Draft Black Country Plan (Regulation 18) Consultation Document - August 2021 are available from: [\[link\]](#)

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Spatial Strategy			
Policy CSP1 / Policy CSP2 / Policy CSP3	26 33 37	Amend text and all housing and employment land figures to relate to Wolverhampton only and a Plan period of up to 2042, in accordance with amended figures in the Housing and Employment sections (see below). Amend text to remove all references to Neighbourhood Growth Areas, release of land from the green belt for housing, and compensatory improvements for loss of green belt.	To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending up to 2042. To ensure that the figures reflect up to date evidence on land supply consistent with the spatial strategy. City of Wolverhampton Council decision not to review the Green Belt, in line with the NPPF (2023).
Policy CSP5	44	Add new point 5): “An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate.”	To emphasise the importance of ensuring safety relating to the evening economy and leisure proposals in the light of issues raised in Draft BCP consultation responses.
Policy GB1	51	Amend text to relate to Wolverhampton only and to remove all references to Neighbourhood Growth Areas, release of land from the green belt for housing, and compensatory improvements for loss of green belt.	City of Wolverhampton Council decision not to review the Green Belt, in line with the NPPF (2023).
Health and Wellbeing			
Policy HW1	74-79	Replace detailed criteria with requirement for applicants to demonstrate that proposals have a positive effect on health and wellbeing in line with other policies in the plan. Add detail on restrictions to hot food takeaways, shisha bars, off licenses, licensed	Issues raised in Draft BCP consultation responses.

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		premises, betting shops and other uses with a potential negative effect on public health.	To provide a Wolverhampton specific policy, rather than an enabling Black Country-wide policy.
Policy HW3	84-85	<p>Clarify when an assessment of health impact is required for specified development.</p> <p>Clarify in Justification that:</p> <ul style="list-style-type: none"> • An extended screening or rapid Health Impact Assessment would be required for developments of 20 to 100 dwellings or for 1,000 to 5,000 sqm gross of new non-residential floorspace (either newbuild or change of use); • A full Health Impact Assessment would be required for developments of over 100 dwellings or over 5,000 sqm gross of new non-residential floorspace. • Other developments which the Local Planning Authority considers have a significant potential impact on public health may be required to provide an assessment of their potential impacts through either a Design and Access Statement, Planning Statement or an extended screening or rapid Health Impact Assessment. Such uses to include: amusement arcades/ centres, casinos and betting offices/ shops; payday loan shops; public houses, wine bars or drinking establishments, including drinking establishments with expanded food provision; hot food takeaways; and shisha bars. <p>Merge with Policy HW1.</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To provide a Wolverhampton specific policy, rather than an enabling Black Country-wide policy.</p>
Housing			
Policy HOU1 / Table 3 / Table 4 / relevant parts of Chapter 13 D - Wolverhampton / Appendix 17	89 – 94	<p>Update housing need and supply figures to relate to Wolverhampton only, and to cover a Plan period for housing purposes of 2024-42. Housing supply figures to reflect sites and additional sources of housing supply identified in the 2024 SHLAA.</p> <p>For the period 2022-42, Wolverhampton housing need is 21,720 homes and housing supply for the emerging Wolverhampton Local Plan is 10,307 homes (made up of the urban housing capacity identified in the Wolverhampton SHLAA 2022 plus other</p>	<p>To reflect that the Plan is covering Wolverhampton only and will have a new Plan period for housing purposes of 2024-42.</p> <p>National guidance requires Local Plans to use the most recent housing monitoring year data for the purposes of calculating housing need and supply. New evidence has been produced on urban sources of housing</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		preferred option WLP housing allocations). These figures will be updated as of April 2024 for Publication and Submission stages.	supply, particularly within centres, which will be updated as of 2024 and reflected in the new figures.
Policy HOU1 / Table 3 / Table 4 / relevant parts of Chapter 13 D - Wolverhampton / Appx 17	88 – 93	Update housing supply figures and housing allocations shown on Figure 4 to reflect changes to housing allocations as proposed in this consultation.	Issues raised in Draft BCP consultation responses and new evidence which is reflected in the Wolverhampton Site Assessment Report (2024).
Policy HOU3 / para 6.33	102 / 106	Remove the requirement for M4(2): Accessible and Adaptable Dwellings on brownfield sites and greenfield sites in lower value zones.	Following Draft BCP consultation responses from Developers and the Home Builders Federation, the estimated cost of providing M4(2) dwellings used in Black Country Viability and Delivery Study was re-evaluated, leading to the conclusion that a M4(2) requirement was likely to make development of brownfield sites and greenfield sites in lower value zones unviable.
Policy HOU4 / Table 6 / para's 6.41-6.46	108-111	Update gypsy and traveller accommodation need and supply figures to relate to Wolverhampton only, cover a Plan period up to 2042 and accord with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) 2022 and updates. The Wolverhampton gypsy and traveller pitch need up to 2032 is 33 pitches and the current supply figure for the emerging Wolverhampton Local Plan over this period is 14 pitches. Duty to Cooperate contributions will be sought towards the unmet need for 19 pitches. Pitch need for 2032-42 is 18 pitches and will be met through windfalls.	To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending to 2042. Completion of Black Country GTAA 2022 and requirement to meet as much as possible of the identified Wolverhampton need for gypsy and traveller pitches (using the planning definition) up to 2032 within Wolverhampton.
The Economy			

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Policy EMP1 / relevant parts of Chapter 13 D - Wolverhampton	89 – 94	<p>Update employment land need and requirement figures to relate to Wolverhampton only, and to cover a Plan period of up to 2042.</p> <p>For the period 2020-41 the Wolverhampton employment land need is 116 ha as recommended in the Black Country EDNA Update (2023) in the light of more up to date economic projections and intelligence. The Wolverhampton employment land supply for this period is 64 ha, reflecting more up to date information on land availability as set out in the Wolverhampton Employment Land Supply Paper. These figures will be updated as of April 2024 for Publication and Submission stages, based on up-to-date evidence.</p> <p>Include a summary of key economic strategies to explain how the Plan is consistent with them and helping to assist with their delivery.</p> <p>Clarify the definition of other sources of land referred to in Part (2) of the Policy as being land within existing employment areas not currently in employment use, such as vacant yardage and landscaping.</p>	<p>To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending to 2042.</p> <p>To ensure that the employment land need and requirement figures are based on the most up to date and robust evidence.</p> <p>This information is provided in the EDNA - to ensure the Plan provides a comprehensive explanation of the overall strategy it would be helpful if this narrative was also set out in the Plan.</p> <p>To confirm the source of land referred to in Part (2) as net additional employment land and therefore appropriate to consider as a source of land to meet the overall employment land requirement.</p>
Policy EMP4	133	<p>Replace tests a), b) and c) to be applied to proposals involving redevelopment of land currently in employment use to non-employment uses with the following:</p> <ul style="list-style-type: none"> a) if the site is vacant, that it has been marketed for employment use for a period of at least 6 months, including by site notice and through the internet or as may be agreed by the local planning authority; b) if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation; c) if the site forms part of a larger area occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area. 	<p>The Policy would benefit from clarification in terms of the detail of the tests which will be applied to proposals for redevelopment.</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Policy EMP5	136	<p>Change to part 3 of Policy to refer to planning obligations being negotiated with applicants rather than required.</p> <p>Change to part 2c of Policy to be consistent with Part 2 of Policy TRAN1.</p>	<p>The reference to planning conditions and obligations is necessary to show how the objectives of Policy EMP5 will be secured. However, to ensure consistency between the various elements of the Policy it is recognised that part 3 should refer to such obligations being negotiated (as is stated in part 2) rather than required.</p> <p>Part 2c of the Policy should emphasise sustainable transport modes consistent with part 2 of Policy TRAN1 rather than 'a choice of means of transport'.</p>
Centres			
Centres Chapter	140 - 173	<p>Make wording adjustments to ensure policies are concise, make appropriate reference to national guidance and are augmented with relevant information/ evidence relating to Wolverhampton, including referencing:</p> <ul style="list-style-type: none"> • examples of specific schemes/ locations that can assist with delivering regeneration priorities, projects and the application of policies (such as the undertaking of impact tests); • relevant Wolverhampton planning documents/ policies/ evidence to assist with the determination of planning applications related to centre-uses. 	<p>To reflect the para 5.40 f. proposed approach above, the 'Sub-Areas and Site Allocations – Section 13 – D Wolverhampton' adjustments below, and that the Plan is covering Wolverhampton only and has a new Plan period extending up to 2042.</p>
Policy CEN1	143 - 156	<p>Add text to end of para 8.15 b) "In order to have a successful evening economy it is important that a variety of facilities, appealing to a wide range of age and social groups, are provided in such a way to ensure a safe, accessible and inclusive environment and any anti-social behaviour is discouraged."</p>	<p>To emphasise the importance of ensuring safety relating to the evening economy and leisure proposals in the light of issue raised in Draft BCP consultation responses, which is also addressed in proposed changes to Policy CSP5 point 5.</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>Emphasise the value of natural and cultural aspects of WCC for the visitor economy. Reference the potential for Tier-One and Tier-Two Centres to become public transport interchanges/ hubs, and for Tier-Two and Tier-Three Centres to provide increased sustainable transport access to residential services</p> <p>Promote health and wellbeing by ensuring services and retail facilities in centres promote choice while enabling and encouraging healthy choices;</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To reflect the priorities set out for Health & Wellbeing.</p>
Policy CEN2	156-161	<p>Amend text of Part (1)(a) to add the housing target for Wolverhampton City Centre. This figure is currently 4536 homes (as of 2022) and will change slightly for Publication stage in 2024.</p> <p>Replace text of Part (8) with: “Accessibility: Wolverhampton Strategic Centre should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial, leisure and business development that require a Transport Statement within Wolverhampton Strategic Centre boundary shall evidence the means to which they are compatible with achieving sustainable development. This evidence must be proportionate to the scale and nature of the proposal and: incorporate provisions for the enablement and/or enhancement of sustainable means of travel and integrated modes of transport to and within Wolverhampton Strategic Centre; have due regard to any sustainable transport projects and measures prioritised within the Local Transport Plan and Local Planning Documents, including the management of demand for car parking, impact of car-borne traffic, and car parking regimes; and meet any relevant requirements set out in Policies TRAN6 and TRAN7”</p> <p>Replace text of para 8.29 with: “It is recognised that individual Strategic Centres in the Black Country, particularly Wolverhampton Strategic Centre, have their own vehicle parking regimes and approaches to parking, both within and outside the influence of the planning system. Nevertheless, a common approach going forward can help to ensure and enhance sustainability and encourage a modal shift in transport towards</p>	<p>To emphasise the importance of housing provision for Wolverhampton City Centre, and for the City Centre housing target to reflect up to date and robust evidence which will inform the Wolverhampton City Centre Supplementary Plan..</p> <p>To provide clarity on the proportionate nature and scope requiring proposals to demonstrate compatibility with/ contribute to accessibility and sustainable development in the light of issues raised in Draft BCP consultation responses and the Black Country Parking Study (2021).</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>publicly accessible transport, cycling and walking, as well as reducing the need to travel. This can be assisted by ensuring relevant proposed development within Wolverhampton Strategic Centre contributes to facilitating this objective, with due regard to any sustainable transport projects and measures as prioritised within the Local Transport Plan and Local Planning Documents, and including helping to manage the demand for, and seeking an appropriate degree of parity between, car parking provision in the Black Country's Strategic Centres."</p> <p>At end of first sentence of para 8.25 add cross-reference to para 8.15 b) regarding an increased focus on the evening economy in centres.</p>	<p>To emphasise importance of ensuring safety relating to the evening economy and leisure proposals in light of issues raised in Draft BCP consultation response.</p>
Transport			
Policy TRAN1 Priorities for the Development of the Transport Network	174-181	<p>Paragraph 4: Update list of key transport projects to reflect latest Transport for West Midlands, West Midlands Rail, National Highways, City of Wolverhampton Council and other partner Authorities' priority projects which are of relevance to Wolverhampton.</p> <p>Add reference, in introductory text and justification, to relevant current investment plans including City Region Sustainable Transport Settlement (CRSTS), West Midlands Rail Strategy, and Bus Service Improvement Plan (BSIP), as well as to the emerging West Midlands Local Transport Plan (LTP) and to the need to decarbonise transport in line with national and local targets.</p> <p>Add reference, in introductory text and justification, to production of a transport evidence base for the land use allocations.</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To reflect current key transport projects and investment plans of relevance to Wolverhampton whilst providing flexibility for changes which may occur in the lifetime of the Local Plan.</p>
Policy TRAN2 Safeguarding the Development of the Key Route Network	183-184	Merge with Policy TRAN1 Priorities for the Development of the Transport Network; add as paragraph 2) with added reference in justification, to Key Route Network Enhancement package and Action Plans plus to Highway Investment packages as part of CRSTS, as currently relevant investment plans.	<p>To clarify that development of the Key Route Network is part of the development of the overall transport network.</p> <p>Issues raised in Draft BCP consultation responses.</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
			To reflect current investment plans, allowing for changes in the lifetime of the Local Plan.
Policy TRAN 4 Managing Transport Impacts of New Development	187-189	Add wording in policy to promote more innovative freight modes and smaller logistics requirements with further detail in Justification.	Issues raised in Draft BCP consultation responses.
Policy TRAN 6 Influencing the Demand for Travel and Travel Choices	194-195	<p>Add reference in policy to innovative practices of influencing demand, including demand responsive transport and micro-mobility, and cross-reference zero emission vehicles in justification.</p> <p>Merge with Policy TRAN7 Parking Management; add as paragraph 2) with added reference to a fuller range of parking measures in policy, supported by Justification. These measures to include the quality of parking and the integration of parking measures with others to: improve air quality; promote active travel, Zero Emission Vehicles and car clubs; and the needs of those people with disabilities and who use demand responsive transport and taxis. Also to include reference to parking facilities for coaches and HGVs.</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To clarify that parking management is part of the wider strategy for influencing demand for travel and travel choices.</p>
Policy TRAN7 Parking Management		Merge with Policy TRAN6 (see above)	To clarify that parking management is part of the wider strategy for influencing demand for travel and travel choices.
Environmental Transformation and Climate Change			
Policy ENV1 Nature Conservation	203-206	In section 1(e), remove the words “where possible” and make clear the expectation that development should not harm species which are legally protected, in decline, rare or identified in Biodiversity Action Plans.	Issues raised in Draft BCP consultation responses.

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>In section 2), add requirements for supporting information to include a data search from the Local Records Centre, and for a Local Sites Assessment to be submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation or a Site of Local Importance for Nature Conservation.</p> <p>In supporting text, set out the special justification for and level of mitigation necessary for the limited number of developments proposed in the WLP which will result in loss of part of a SLINC.</p>	
Policy ENV2 Development affecting Special Areas of Conservation (SACs)	207-210	Carry out air quality modelling to estimate the impact of traffic arising from WLP developments on the habitat value of Fens Pool, Cannock Extension Canal and Cannock Chase Special Areas of Conservation (SACs). If analysis shows that there will be harmful impacts (either alone or in combination with other plans), liaise with Natural England and relevant local authorities to develop Policies which will mitigate these impacts.	<p>Issues raised in Draft BCP consultation responses.</p> <p>Recommendations in Habitat Regulations Assessment of Draft BCP and Black Country traffic modelling evidence.</p>
Policy ENV3 Nature Recovery Network and Biodiversity Net Gain / para's 10.31-10.49	212-216	<p>Ensure accordance with current national guidance and legislation and make clear that the Policy will relate to the Black Country Local Nature Recovery Map and Strategy until adoption of the West Midlands Combined Authority Local Nature Recovery Strategy, which will have a statutory role.</p> <p>Clarify that protections for irreplaceable habitats and European / internationally designated sites are separate to biodiversity net gain requirements.</p> <p>Include requirements for biodiversity net gain plans, including monitoring arrangements and management for 30 years, to be agreed before commencement of development.</p>	Issues raised in Draft BCP consultation responses and emerging changes to national guidance and legislation regarding Local Nature Recovery Strategies and Biodiversity Net Gain.
Policy ENV8 Open Space and Recreation / para's 10.107-10.119	246-252	<p>Separate out the playing field and built sports facility elements of Policy ENV8 and justification text into the following new, strengthened Policy which reflects national guidance and Sport England best practice:</p> <p>Existing playing fields and built sports facilities should be retained unless:</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>Completion of the Wolverhampton Playing Pitch Strategy (2022).</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>1) an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for the existing or alternative sports provision) at the local and sub-regional level; or</p> <p>2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>3) the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or</p> <p>4) The proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.</p> <p>New built sports facilities should be:</p> <p>1) demonstrated to accord with identified needs to ensure provision of appropriate facilities in a suitable location to meet that need;</p> <p>2) well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and</p> <p>3) well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.</p> <p>Where assessments demonstrate that a housing development would increase the need for playing pitches or built sports facilities to a level where significant new or improved facilities are required to meet demand, proportionate planning obligations will be used to acquire sufficient provision, where it is financially viable and appropriate to do so, and long-term management arrangements can be secured and funded.</p> <p>Where land is provided for a new built sports facility as part of a housing development, the financial contribution made by that development towards built sports facilities will be reduced accordingly.</p>	
Policy ENV9 Design Quality	252-259	Include a clause that states that suicide prevention should be considered in the design of all new public buildings, multi-storey car parks, bridges and other infrastructure projects.	In accordance with the Government's 'Suicide prevention strategy for England', September 2023

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Policy CC1 Increasing Efficiency and Resilience	265-268	Relocate part 1a) regarding orientation of buildings to Policy ENV9 and delete remainder of policy.	Issues raised in Draft BCP consultation responses. Need to remove unnecessary duplication with other Local Plan policies and national guidance.
Policy CC2 Energy Infrastructure	269-272	Delete policy and amend part 4) of Policy CC7 to require all major developments to demonstrate that they will link into any existing decentralised energy network close to the site, or that this is not practical and viable, in the energy assessment.	Issues raised in Draft BCP consultation responses.
Policy CC3 Managing Heat Risk	273-276	Delete policy.	Issues raised in Draft BCP consultation responses.
Policy CC5: Flood Risk	287-293	Include a new policy on water quality in line with Environment Agency advice, to address current River Basin Management Plan and Water Framework Directive priorities relevant to the Wolverhampton area, supported by updated water cycle study evidence as required	Issues raised in Draft BCP consultation responses.
Policy CC7 Renewable and Low Carbon Energy and BREEAM Standards / para's 10.208-10.211	290-293	Remove requirement for all major developments to deliver a 19% carbon reduction improvement above Part L of Building Regulations. Review and update Viability Study evidence to test deliverability in light of Building Regulations changes.	Changes to Part L of Building Regulations came into effect in June 2022 which introduced a higher improvement of c. 31%. Issues raised in Draft BCP consultation responses.
Waste			
Policy W1 (Waste Infrastructure – Future Requirements)		Update waste figures to reflect the most recent Black Country Waste Study Update (currently 2022), relate to Wolverhampton only, and cover a Plan period up to 2042.	To reflect that the Plan is covering Wolverhampton only and has a new Plan period.

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Minerals			
Policy MIN1 - Mineral Production – Requirements		Clarify that primary mineral production in Wolverhampton is not available and remove references to Primary Land Won Sand and Gravel, Brick Clay Etruria Marl and fireclay, as reserves are not available in Wolverhampton. Update minerals figures to relate to Wolverhampton only.	To reflect that the Plan is covering Wolverhampton only.
Policy MIN2 - Minerals Safeguarding		Remove references to Mineral Safeguarding Areas (MSAs), as there are no MSAs in Wolverhampton.	To reflect that the Plan is covering Wolverhampton only.
Policy MIN3 - Preferred Areas for New Mineral Development		Delete policy, as there is no potential for new mineral development in Wolverhampton.	To reflect that the Plan is covering Wolverhampton only.
Policy MIN4 - Managing the Effects of Mineral Development		Delete criteria 1-8 relating to types of mineral development for which there is no potential in Wolverhampton.	To reflect that the Plan is covering Wolverhampton only.
Sub-Areas and Site Allocations – Wolverhampton			
Section 13 – D Wolverhampton	572-634	Update information, including the housing and employment land figures in Table 42 and the sites shown on Figure 21. Move introductory text to the front of the document, within Chapters 1, 2 and 3. Update reference to Wolverhampton City Centre to reflect latest regeneration priorities and projects, including reference in the Centres Chapter, where relevant.	To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending up to 2042.

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>Update Tables 43, 44, 45, 46, 47 and 48 and move to Housing, Economy, Waste and Minerals Chapters as appropriate.</p> <p>For all housing allocation sites, amend anticipated delivery timescale in line with most recent site assessment evidence and housing monitoring information. Include an individual housing trajectory for all housing allocations, broken down by year for the first five years.</p> <p>Remove all references to Neighbourhood Growth Areas and release of land from the green belt for housing.</p>	<p>To ensure that the figures reflect up to date evidence on land supply consistent with the spatial strategy.</p> <p>To respond to issues raised in Draft BCP consultation.</p> <p>City of Wolverhampton Council decision not to review the Green Belt, in line with NPPF (2023).</p>
<p>Policy CSA1 Bushbury Strategic Allocation</p> <p>Policy CSA2 Fallings Park Strategic Allocation</p>	619 - 628	Delete policies.	City of Wolverhampton Council decision not to review the Green Belt, in line with NPPF (2023).
Section 16: Appendix – Centres	697 - 704	Delete Appendix	To reflect that the Plan is covering Wolverhampton only and as the appendix was a collation of national and Black Country policies, it can be replaced by references specific to Wolverhampton in the WLP Centres section, where relevant

Sustainability Appraisal of the Wolverhampton Local Plan

Regulation 18: Issues and Preferred Options

January 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Wolverhampton Local Plan

Including:
Strategic Environmental Assessment,
Health Impact Assessment and
Equality Impact Assessment

Regulation 18: Issues and Preferred Options

LC-1035	Document Control Box
Client	City of Wolverhampton Council
Report Title	Sustainability Appraisal of the Wolverhampton Local Plan – Regulation 18: Issues and Preferred Options
Status	Final
File Name	LC-1035_Wolverhampton_SA_Reg18_14_180124GW.docx
Date	January 2024
Author	GW
Reviewed	LB
Approved	ND

Front Cover: Wolverhampton by Tony Hisgett (<https://tinyurl.com/355ayn65>)

About this report & notes for readers

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This Regulation 18 Issues and Preferred Options SA Report is based on the best available information, including that provided to Lepus by CWC and information that is publicly available. No attempt to verify these secondary data sources has been made and they have been assumed to be accurate as published. This report was prepared between November 2023 and January 2024 and is subject to and limited by the information available during this time. This report has been produced to assess the

sustainability effects of the Wolverhampton Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

Client comments can be sent to Lepus using the following address.

Eagle Tower

Montpellier Drive

Cheltenham

Gloucestershire

GL50 1TA

Telephone: 01242 525222

E-mail: enquiries@lepusconsulting.com

Website: www.lepusconsulting.com

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Acronyms & abbreviations

A&E	Accident and Emergency
AAP	Area Action Plan
AHHLV	Areas of High Historic Landscape Value
AHHTV	Areas of High Historic Townscape Value
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
APA	Archaeological Priority Area
AQMA	Air Quality Management Area
BCCS	Black Country Core Strategy
BCP	Black Country Plan
BMV	Best and most versatile
BNG	Biodiversity Net Gain
CA	Conservation Area
CfS	Call for Sites
CWC	City of Wolverhampton Council
DBEIS	Department for Business, Energy and Industrial Strategy
DEFRA	Department for Environment, Food and Rural Affairs
DLHHV	Designed Landscapes of High Historic Value
DLUHC	Department for Levelling Up, Housing and Communities
DtC	Duty to Cooperate
EDNA	Economic Development Needs Assessment
EqIA	Equality Impact Assessment
EU	European Union
FEMA	Functional Economic Market Area
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
GTAA	Gypsy and Traveller Accommodation Assessment
HEAD	Historic Environment Area Designation
HIA	Health Impact Assessment
HLC	Historic Landscape Characterisation
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LNR	Local Nature Reserve
LTP	Local Transport Plan
MHCLG	Ministry of Housing, Communities and Local Government
NHS	National Health Service
NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PM₁₀	Particulate Matter (10 micrometres)
PPP	Policies Plans and Programmes

PRoW	Public Rights of Way
RIGS	Regionally Important Geological Site
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
WLP	Wolverhampton Local Plan
ZOI	Zone of Influence

Executive summary

About this report

- E1 Lepus Consulting is conducting an appraisal process for City of Wolverhampton Council (CWC) to help them prepare the Wolverhampton Local Plan (WLP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (CWC) and the appraisal team (Lepus Consulting). The process seeks to provide high level environmental protection and the different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- E2 SA is the process of informing and influencing the preparation of a Development Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Local Plan.
- E3 This report is being published following consultation with the statutory consultees on the SA Scoping Report, prepared in November 2022, which identified the scope and level of detail to be included in the SA process going forward.
- E4 This Regulation 18 SA Report has been prepared to assess the options (or 'reasonable alternatives') as presented in the 'WLP Issues and Preferred Options Consultation (Regulation 18) February 2024' document¹. This includes options for:
- Housing growth;
 - Gypsy and Traveller growth;
 - Employment growth;
 - Spatial strategy;
 - Policy areas; and
 - Development sites.
- E5 The assessment of reasonable alternatives is an important requirement of the SEA Regulations.

Summary findings

- E6 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further (time consuming) detailed analysis of a particular policy.
- E7 As required by the SEA Regulations, cumulative, indirect and synergistic effects are also identified and evaluated during the assessment, where relevant.

¹ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

Housing growth options

- E8 Three options for housing growth have been identified by CWC, which include overall housing quanta, and broad direction of growth i.e. the proportion of the housing to be met within Wolverhampton's urban area and met through exporting through the Duty to Cooperate (DtC). In light of the government's changes to national planning policy, CWC have taken the decision to not review the Green Belt and as such distribution of growth within the Green Belt is not considered to be a reasonable alternative.
- **Option H1** – Carry forward existing housing allocations which focus housing growth in the urban area (c.9,722 homes)
 - **Option H2** – As for Option H1, with increased density in accessible locations and structural change in Centres (c.10,307 homes)
 - **Option H3** – As for Option H2, with export of remaining housing need to neighbouring authorities (c.21,720 homes)
- E9 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only 'nature', in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.
- E10 A larger quantum of housing growth would generally have more potential to lead to adverse effects, particularly on environmentally focused SA Objectives. Options H1 and H2 propose significantly smaller housing numbers at 9,722 and 10,307 respectively, compared to Option H3 which proposes 21,720 homes. Development proposed under Options H1 and H2 would be located wholly within Wolverhampton's urban area. Options H1 and H2 perform similarly based on the high-level scoring system, however, as Option H1 provides a lower housing supply than Option H2, it has potential to perform slightly better against environmental SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste). Despite this, Options H1 and H2 would both lead to a significant shortfall against the identified housing need; therefore, minor negative impacts have been identified against SA Objective 11 (equality) and minor positive impacts against SA Objective 10 (housing) due to the likely reduced scope for delivering varied and high-quality homes to meet the needs of the population.
- E11 On the contrary, Option H3 recorded a major positive impact against SA Objective 10 and a minor positive impact against SA Objective 11, where the proposed development would meet the identified housing need of 21,720. However, major negative impacts were identified for Option H3 for SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste) due to the larger quantum of growth proposed under this option having potential to lead to more adverse effects than Options H1 or H2. Approximately half of the growth proposed under Option H3 (11,413 homes) will be exported to neighboring authorities, which has resulted in uncertainty in the expected impacts for the proposed housing growth since the location would be determined through other authorities' local plans.

E12 Overall, whilst Option H1 can be identified as the best performing within several SA Objectives, the three options would deliver a similar level of growth within Wolverhampton itself and as such there is very little separating the options in terms of effects within the Plan area. Options H2 and H3 both seek to deliver the same amount of increased growth in accessible locations and maximise opportunities for sustainable urban growth within Wolverhampton. In order to meet the identified housing needs, it will be necessary to export a proportion of growth to neighbouring authorities as set out in Option H3; however, this is likely to increase potential for adverse effects when compared to pursuing a lower quantum of growth.

Gypsy and Traveller growth options

E13 Two options for Gypsy and Traveller growth have been identified by CWC: Option G1 and G2. Both options include provision of 12 Gypsy and Traveller pitches at the carried forward 'Former Bushbury Reservoir, Showell Road' site, and regularising two pitches on the currently unauthorised site located on Wolverhampton Road in Heath Town. Option G2 also considers the potential to export growth through DtC.

- **Option G1** – Make use of existing sites to deliver new Gypsy and Traveller pitches up to 2032 (2 pitches regularised on currently unauthorised site and 12 pitches on existing allocated site) (14 pitches)
- **Option G2** – As for Option G1, with 19 pitches exported through DtC (33 pitches)

E14 As both proposed options for Gypsy and Traveller growth relate to the same two sites within Wolverhampton itself, Options G1 and G2 perform similarly overall. However, across several objectives the two options do perform slightly differently as Option G1 does not meet the identified Gypsy and Traveller need whereas Option G2 does, through exporting a proportion of growth to neighbouring authorities.

E15 Both options would give rise to potential adverse effects in terms of the local landscape character (SA Objective 2), biodiversity (SA Objective 3), climate change mitigation (SA Objective 5), natural resources (SA Objective 6), pollution (SA Objective 7), and waste (SA Objective 8). Negative impacts could also be expected in regard to the surface water flood risk (SA Objective 4) present on the existing allocated site, without intervention.

E16 There is some uncertainty regarding the effects of the proposed development on climate change mitigation (SA Objective 4) owing to uncertainty in the scale and nature of development involved, and in terms of equality (SA Objective 11) which is difficult to determine without further site-specific information.

E17 Overall, the proposed introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, means that Option G2 would be likely to have a major positive impact against SA Objective 10 (housing) in comparison to Option G1 which is identified as having a minor positive impact. Option G2 would be the favourable option of the two as it would meet the identified 5-year supply of Gypsy and Traveller pitches for Wolverhampton; however, this option is reliant upon exporting 19 pitches to neighbouring authorities. The exported growth of small-scale Gypsy and Traveller pitches would be unlikely to cause

significant adverse effects, although uncertainty remains on the likely effects of exported pitches.

Employment growth options

- E18 Three options for employment growth have been identified by CWC: Option E1 – E3. These options include distributions of employment land across existing allocations taking into account the 47.4ha baseline supply figure, proposed new sites, and potential to export growth through the DtC.
- **Option E1** – Carry forward existing employment allocations on existing land supply in urban area, including completions since 2020 (c.47.4ha)
 - **Option E2** – As for Option E1, with new employment allocations in locations suitable for employment use with good transport access (c.62.7ha)
 - **Option E3** – As for Option E2, with export of remaining employment land need to neighbouring authorities (c.116ha)
- E19 As Options E1 and E2 have a similar urban focus and both fail to meet the employment land need for Wolverhampton, resulting in 47.4ha and 62.7ha of employment land respectively, the overall identified impacts against the SA Objectives are similar.
- E20 All three options would locate new development in central areas of Wolverhampton where there is generally good access via existing transport infrastructure, however Option E3 is the only option that would satisfy Wolverhampton’s identified employment need (although reliant on DtC to achieve this). As a result, a major positive impact has been identified for Option E3 under SA Objective 14 (economy), and there may be greater potential than the other options to achieve positive impacts on equality (SA Objective 11) due to the employment need being met, although the overall effect is uncertain.
- E21 On the other hand, Options E1 and E2 could potentially lead to minor negative impacts on pollution (SA Objective 7), in comparison to a major negative impact identified for Option E3, given that less development would take place in total under Options E1 and E2. However, all options would also give rise to potential adverse effects in terms of increasing threats and pressures to local biodiversity assets (SA Objective 3), including the canal network, as well as potentially locating some employment sites in proximity to areas of flood risk (SA Objective 5).
- E22 The options are unlikely to significantly affect natural resources (SA Objective 6), owing to a large proportion of development being located within existing urban areas with potential for efficient use of land including brownfield development, although there is some uncertainty in the location of exported growth under Option E3. There is unlikely to be a significant effect from any employment option on housing provision (SA Objective 10).
- E23 The effects of the proposed development under any option on climate change mitigation (SA Objective 4) and waste (SA Objective 8) are uncertain, owing to the unknown scale and nature of employment development involved. Furthermore, without knowledge of the specific site proposals and the nature of the employment land to be delivered, it is difficult to determine overall effects on landscape and townscape character (SA Objective 2) and cultural heritage (SA Objective 1) as the growth could give rise to positive or negative effects depending on these factors.

E24 Overall, whilst Option E1 would deliver the smallest quantum of employment growth and could therefore give rise to the least adverse effects against several SA Objectives, there is very little separating any of the three options in terms of growth within Wolverhampton itself. Given that Option E3 would meet Wolverhampton's employment needs within the Functional Economic Market Area (FEMA), and is likely to provide a greater range of local employment opportunities, this option could be identified as the best performing of the three; however, CWC would have little control as to the location of exported growth and there may be increased potential for adverse effects on some receptors.

Spatial options

E25 Seven options for the spatial strategy have been identified by CWC: Option A – G. These options incorporate elements of the housing and employment growth options, but provide more detail regarding options for the broad spatial distribution of growth in Wolverhampton as well as some more thematic approaches for consideration. It should be noted that none of these options alone could deliver the required growth within the Plan area.

- **Option A** – 'Business as usual'
- **Option B** – Employment-led
- **Option C** – Market-led
- **Option D** – Garden village / health promotion
- **Option E** – Minimise climate change impacts
- **Option F** - Infrastructure and regeneration-led
- **Option G** – Balanced and sustainable growth

E26 It is difficult to determine an overall best performing spatial option, as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities.

E27 Options A and B performed joint best against SA Objectives 3 (biodiversity), 5 (climate change adaptation) and 6 (natural resources) due to the protection of previously undeveloped land. Option B also performed best against SA Objective 13 (economy) as it proposes an employment-led strategy.

E28 Option D performed best against SA Objectives 7 (pollution) and 12 (health) owing to the focus on 'Garden Village' principles including the protection of existing open spaces and integration of new open spaces within new developments.

E29 Option E performed best against SA Objectives 4 (climate change mitigation), 9 (transport and accessibility) and 14 (education), as this option would direct new development towards areas with the best sustainable transport access.

E30 Option F performed best against SA Objectives 1 (cultural heritage) and 2 (landscape) due to its focus on urban regeneration, and SA Objective 8 (waste) due to its emphasis on concentrating development where infrastructure provision is best.

E31 Option G performed best against SA Objectives 10 (housing) and 11 (equality), because the balanced approach would meet identified housing and employment needs, and aims

to direct new development towards accessible areas, whilst also supporting urban regeneration.

E32 The worst performing option could be identified as Option C, as the option was not identified to perform best against any SA Objectives.

E33 Overall, Option B performs the best (or joint best) against the most SA Objectives; however, this strategy would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport.

Policy areas

E34 The WLP Issues and Preferred Options Consultation document presents a suite of 56 proposed policy areas for inclusion in the emerging WLP, many of which are derived from the ceased Black Country Plan (BCP).

E35 The proposed policies to be included within the WLP are anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.

E36 For the majority of policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more 'thematic' policies.

E37 A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economy policies, or set out the broad direction for growth, such as the spatial strategy policies. As such, minor negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.

E38 Opportunities for enhancement may also be secured through policies in the WLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in the SA process (see recommendations in **Chapter 10**).

Development sites

E39 A total of 48 sites have been identified by CWC as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the WLP, and previously for the ceased BCP. This includes 'carried forward' housing and employment sites, which have previously been allocated in the adopted Development Plans. The 48 reasonable alternative sites include:

- 22 sites proposed for residential use;

- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

E40 The SA identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA framework, based on the methodology and baseline information as discussed within **Chapter 2** and **3** of this report. The assessment of the 48 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.

E41 Positive impacts were identified for many of the reasonable alternative sites in terms of access to social infrastructure, due to their location in areas where accessibility modelling data indicates good sustainable access to local shops, healthcare, schools, transport and employment opportunities. Identified positive impacts also included the impact of reasonable alternative sites on the provision of housing and employment floorspace, contributing to the identified needs. The majority of reasonable alternative sites are located in Flood Zone 1 away from fluvial flood risk, and many sites comprise previously developed land leading to positive effects in terms of encouraging an efficient use of natural resources.

E42 Identified negative impacts included the potential for small-scale loss of soil resources at some sites, impacts on local biodiversity designations, changes to local views, possible alteration of the character or setting of cultural heritage assets, and increased pollution and waste associated with large scale development. The entirety of Wolverhampton is designated as an AQMA, and several sites are located in close proximity to main roads, and as such the proposed development could potentially expose site end users to higher levels of transport-associated air pollution. Identified negative impacts also included the location of reasonable alternative sites in regard to surface water flood risk, where a large proportion of sites are located on areas of vulnerable to surface water flooding.

Next steps

E43 This Regulation 18 Issues and Preferred Options SA Report will be subject to consultation with statutory consultees, stakeholders and the general public.

E44 This report represents the latest stage of the SA process. Any comments received on this report during the Regulation 18 consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.

E45 Once CWC have reviewed Regulation 18 consultation comments and have begun preparing the next version of the WLP (Regulation 19 stage), preparation of an Environmental Report will be, also known as a full SA report. The Environmental Report will include all of the legal requirements set out in Schedule 2 of the SEA Regulations.

1 Introduction

1.1 Background

- 1.1.1 The City of Wolverhampton Council (CWC) are in the process of writing the Wolverhampton Local Plan (WLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA). The purpose of SA/SEA is to help guide and influence the decision making process for CWC by identifying the likely sustainability effects of reasonable alternatives and various options.
- 1.1.2 The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18)² document.
- 1.1.3 A wide range of reasonable alternatives have been identified by CWC through the plan making phase known as 'Issues and Preferred Options'. This includes growth options, spatial options, policy areas and sites. The SA outputs will help CWC to identify sustainable development options and prepare a local plan which is economically, environmentally, and socially sustainable.
- 1.1.4 A sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.5 This SA/SEA document follows on from the SA Scoping Report prepared in November 2022³, which was consulted on with the statutory bodies (Natural England, Historic England and the Environment Agency) between November and December 2022.

1.2 The City of Wolverhampton

- 1.2.1 The Wolverhampton City administrative area comprises roughly 6,943.6ha, with a population of approximately 264,036 people according to the Office for National Statistics (ONS) population estimate for mid-2021⁴. **Figure 1.1** shows the administrative boundary of Wolverhampton, which comprises the Plan area for the WLP.

² City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

³ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

⁴ ONS (2022) Estimates of the population for the UK. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021unroundeddata> [Date accessed: 10/01/24]

- 1.2.2 Wolverhampton City lies within the Black Country, which is a predominantly urban sub-region of the West Midlands. The sub-region includes the boroughs of Dudley, Sandwell, Walsall and the City of Wolverhampton.
- 1.2.3 Wolverhampton is highly urbanised with some small extents of Green Belt land mainly to the north and west, and alongside the Smestow Brook and the Staffordshire and Worcestershire Canal. Although the city contains no major rivers, it does support several watercourses including the River Penk and River Tame which form tributaries of the River Trent, as well as Smestow Brook which is a tributary of the River Stour.
- 1.2.4 Wolverhampton City Centre is the key strategic centre of Wolverhampton, although the administrative area also contains two town centres of Bilston and Wednesfield, in addition to several local centres.
- 1.2.5 The area has a rich industrial heritage, including its extensive canal network, which opened up the mineral wealth of the area for exploitation during the Industrial Revolution. The Black Country area owes its name to black smoke, particularly from iron and coal industries, during a time when the Black Country became one of the most heavily industrialised areas in Britain.
- 1.2.6 Mining ceased in the area in the late 1960s, but manufacturing continues today, although on a much smaller scale. There is a total of 446,000 employee jobs across the Black Country as a whole⁵. In addition to manufacturing, which equate to approximately 13% of employee jobs in the Black Country, the biggest employment sectors include wholesale and retail trade (19.3%) and human health and social work activities (16.4%)⁶.
- 1.2.7 Wolverhampton itself was originally a market town, historically forming part of Staffordshire, but later became a major centre for the Industrial Revolution⁷. Today, Wolverhampton still provides a wide range of employment, leisure, retail and tourism opportunities to serve the Black Country and the wider area. Engineering remains an important aspect of Wolverhampton's economy.
- 1.2.8 Although there are challenges within Wolverhampton, and the wider Black Country, in terms of unemployment and lower earnings compared to other parts of the country, the plan area also supports several further and higher educational facilities. This includes the University of Wolverhampton and the City of Wolverhampton College.

⁵ Nomis (2020) Labour Market Profile – Black Country. Available at:
<https://www.nomisweb.co.uk/reports/lmp/lep/1925185537/report.aspx> [Date accessed: 31/10/22]

⁶ Ibid

⁷ Wolverhampton City Guide. Available at: <http://www.wolverhamptoncity.co.uk/> [Date accessed: 06/12/23]

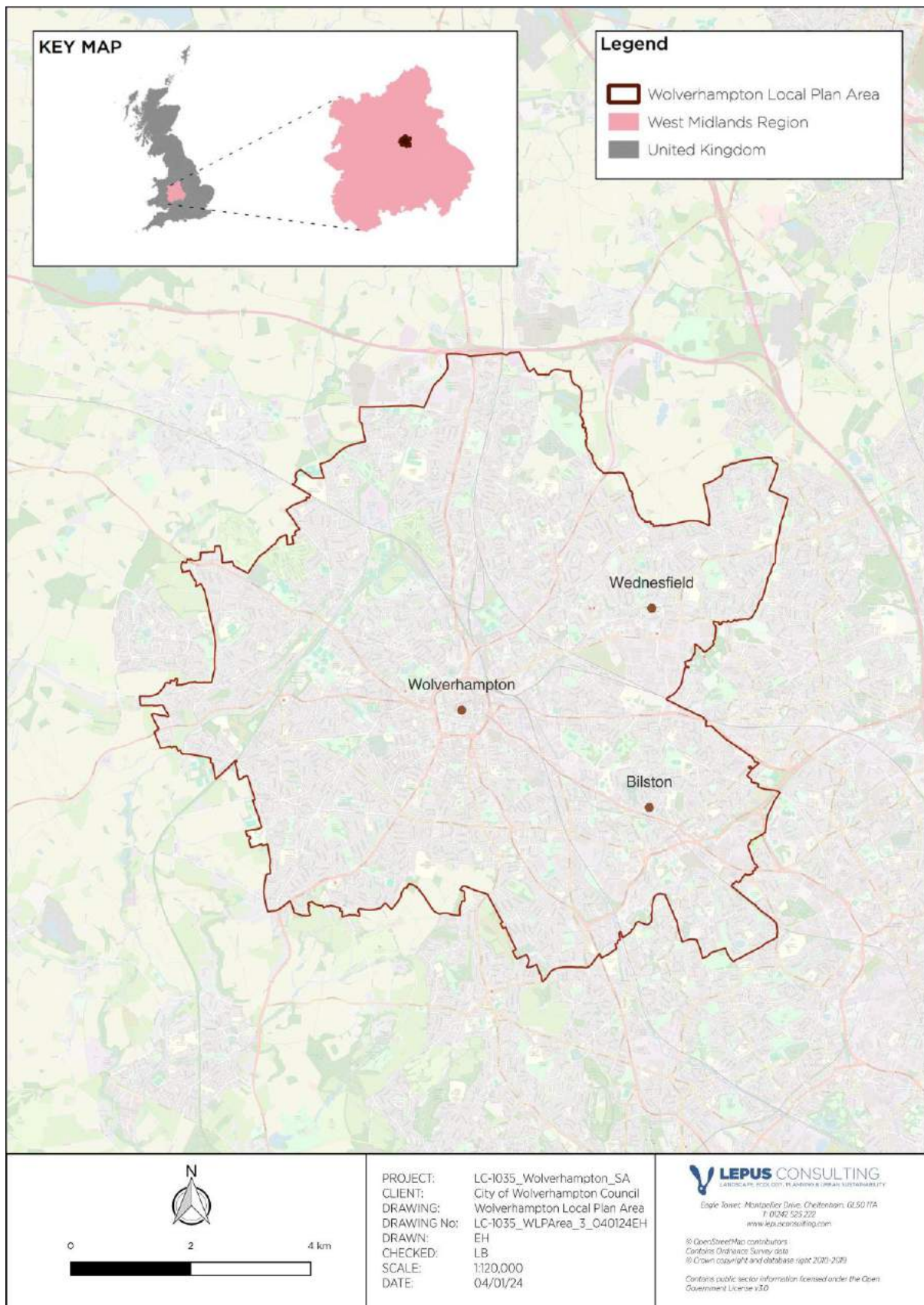


Figure 1.1: Wolverhampton administrative boundary

1.3 The Wolverhampton Local Plan

- 1.3.1 The Wolverhampton Local Plan (WLP) is being prepared by CWC, following the ending of work on the Black Country Plan (BCP) in autumn 2022. The WLP will carry forward relevant information and evidence prepared as part of the Draft BCP, with specific changes in response to planning issues raised during consultation and new evidence and information for the City of Wolverhampton.
- 1.3.2 The BCP itself began as a review of the adopted Black Country Core Strategy (BCCS), produced by the four Black Country Authorities of Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and City of Wolverhampton Council.
- 1.3.3 The BCCS was adopted in 2011 and covers the period up to 2026. The BCCS currently provides the strategic framework for the three Area Action Plans (AAPs) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated.
- 1.3.4 The purpose of the BCP was to review and update the adopted BCCS, and to set out planning policies and land allocations to support the growth and regeneration of the Black Country up to 2039.
- 1.3.5 Following the decision to end work on the BCP, in October 2022, Wolverhampton adopted a new Local Development Scheme (LDS) setting out the timetable for the immediate preparation of a new development plan for Wolverhampton called the Wolverhampton Local Plan (WLP). The WLP is an evolution of the Regulation 18 Draft Black Country Plan (2021), specific to Wolverhampton. Work on the WLP was paused when the government consulted on changes to the National Planning Policy Framework (NPPF) in December 2022. Following publication of a revised NPPF⁸ in December 2023, a new LDS has been produced which programmes Issues and Preferred Options consultation for spring 2024 and submission by June 2025, under the current local planning system. The LDS also anticipates production of a Wolverhampton City Centre Supplementary Plan AAP under the new local plan system, to provide any additional housing allocations required for the City Centre area.
- 1.3.6 The WLP will provide a vision, strategic goals and priorities for land use and development within Wolverhampton, as well as a spatial policy framework to define guidelines for growth and change whilst striving to protect the environment.
- 1.3.7 Once adopted, the WLP will provide a strategy for delivering development across the Plan area, and allocation of sites to help meet these needs. The WLP will provide certainty and transparency to residents, businesses and developers about how Wolverhampton City is expected to grow up to 2042.

⁸ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/23]

1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011⁹ and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4.2 A DtC Statement will be prepared, which will demonstrate how CWC has fulfilled this duty through the plan-making process. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key DtC issues at the Publication stage.

1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.5.2 The European Union Directive 2001/42/EC¹⁰ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.
- 1.5.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004¹¹ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.

⁹ Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 01/12/23]

¹⁰ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 01/12/23]

¹¹ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 01/12/23]

1.5.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004¹² and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012¹³. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

1.5.5 Public consultation is an important aspect of the integrated SA/SEA process.

1.6 Health impact assessment

1.6.1 Government guidance states that health is influenced by numerous social, economic, environmental and cultural impacts¹⁴. Therefore, potential direct impacts from developments could be key contributors to negative health impacts. For example, transport developments cause issues with traffic accidents, noise and air pollution. Health Impact Assessments (HIAs) help decision-makers quantify the health risks or benefits associated with a development and propose likely alternatives.

1.6.2 HIAs are not statutory requirements for Local Plans. However, carrying out this assessment helps to ensure the WLP considers all health issues and construct new policies with the aim of increasing positive health impacts and reducing negative impacts.

1.6.3 It should be noted that human health is a topic which features in Schedule 2 of the SEA Regulations: Information for environmental reports. The HIA has been incorporated within SA Objective 12: Health (see **Appendix A** for the full SA Framework).

1.7 Equality impact assessment

1.7.1 The aim of the Equality Act (2010)¹⁵ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and thus includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and employment and do all they can to promote equality.

¹² Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 01/12/23]

¹³ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 01/12/23]

¹⁴ Department of Health (2010) Health Impact Assessment Tools. Available at: <https://www.gov.uk/government/publications/health-impact-assessment-tools> [Date accessed: 01/12/23]

¹⁵ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 01/12/23]

- 1.7.2 EqIA is a systematic and evidence-based tool, which enables the WLP to consider the likely impact of work on different groups of people who share a protected characteristic¹⁶, identified in the Equality Act. Completion of EqIAs is a legal requirement under race, disability and gender equality legislation.
- 1.7.3 The EqIA has been incorporated within SA Objective 11: Equality (see **Appendix A** for the full SA Framework).

1.8 Best practice guidance

1.8.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁷.
- Office of the Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁸.
- Department for Levelling Up, Housing and Communities (DLUHC) (2023) National Planning Policy Framework (NPPF)¹⁹.
- DLUHC and Ministry of Housing, Communities and Local Government (MHCLG) (2023) Planning Practice Guidance (PPG)²⁰.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²¹.

¹⁶ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

¹⁷ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at:

http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 01/12/23]

¹⁸ Office of the Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 01/12/23]

¹⁹ DLUHC (2023) National Planning Policy Framework. December 2023. Available at:

https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

²⁰ DLUHC & MHCLG (2023) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 01/12/23]

²¹ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 01/12/23]

1.9 Sustainability appraisal

1.9.1 This document is a component of the SA of the WLP. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to PPG on SA²².



Figure 1.2: Sustainability appraisal process

²² DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 01/12/23]

1.10 The SA process so far

1.10.1 **Table 1.1** below presents a timeline of stages of the WLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**. The Council have gathered information in relation to site availability through numerous 'Call for Sites' processes.

Table 1.1: The WLP and Sustainability process so far

Date	WLP stage	Sustainability Appraisal
November 2022	Plan making commences.	SA Scoping Report This report identifies the scope and level of detail to be included in the SA.
February–April 2024	Issues and Preferred Options (Regulation 18) Consultation The Issues and Preferred Options is the first consultation stage for plan making. It sets out options for the overall levels of growth and spatial strategy as well as site allocations and policy areas, and seeks consultation views on these to help inform the WLP process going forward.	Regulation 18: Issues and Preferred Options SA Report This report assesses the WLP options for housing growth, employment growth, Gypsy and Traveller growth, spatial strategy, development sites and policy areas.

1.11 Scoping report

1.11.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report²³ was produced in November 2022.

1.11.2 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.11.3 The Scoping report was consulted on between November and December 2022 with the statutory bodies Natural England, Historic England and the Environment Agency. Comments received during the consultation have informed the preparation of this Regulation 18 SA Report. **Table 1.2** summarises the responses received and how these comments have been incorporated into the SA process going forward.

²³ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

Table 1.2: Consultation responses from statutory consultees on SA Scoping Report (November 2022)

Consultee	Summary of Consultation Response	Incorporation into the SA
Natural England	No comments received at this stage, but NE officer indicated that NE expect to input at a later stage of the plan making process.	N/A
Historic England	<p><i>"Chapter 6: Cultural Heritage Baseline Data – We are pleased to see that this baseline presents a comprehensive background into the designated and non-designated heritage assets of the Plan area, and also refers to heritage at risk, although not in any detail.</i></p> <p><i>Key Issues – We consider that although some relevant key sustainability issues in relation to the historic environment have been identified, we suggest that heritage at risk may also be an issue which should be included, as this has been identified elsewhere within the document. Historic England also considers that other sustainability issues should be included here, such as improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement.</i></p> <p><i>Chapter 12: SA Framework Historic England welcomes SA Objective 1: "Cultural Heritage" and also objectives 2: Landscape, and 4 & 5 on Climate Change. However, we note that the report does not set out any appraisal questions or decision-making criteria under these objectives. In relation to the historic environment/cultural heritage we suggest that these decision-making criteria should reflect all of the Key Issues identified under this theme, as well as wider sustainability issues regarding the historic environment, such as:</i></p> <ul style="list-style-type: none"> <i>• "Will it tackle heritage at risk?"</i> <i>• "Will it improve the energy efficiency of historic buildings?"</i> <i>• "Will it re-use/retain historic buildings or fabric?"</i> <p><i>In addition to the above comments, Historic England is concerned that it is not clear from the document as to how impacts will be evaluated, as there is no framework, or mechanism, for assessment included. The document does not therefore set out how policies or site allocations will be assessed or provide detailed information about how potential significant effects will be identified (both positive and negative); for example, using professional judgement and reference to evidence base documents. We strongly recommend that this is included within a revised SA Scoping document."</i></p>	<p>The key issues referred to within the cultural heritage section have been updated to reflect the suggestions made (see Box 2.5).</p> <p>The full SA Framework is set out in Appendix B of the SA Scoping Report (November 2022), and has been updated within Appendix A of this Regulation 18 SA Report.</p> <p>Chapter 3 sets out the methodology used to appraise the options and proposals included within the Issues and Preferred Options (Regulation 18) Consultation.</p>
Environment Agency	No comments received at this stage.	N/A

1.12 Signposting for this report

1.12.1 This Regulation 18 Issues and Preferred Options SA Report sets out an assessment of reasonable alternatives, or 'options', set out in the Issues and Preferred Options document prepared by CWC. These relate to options for growth and the spatial strategy, policy areas and development sites.

1.12.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:

- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the WLP and the accompanying SA process.
- **Chapter 2** summarises information relating to the environmental baseline, which was identified and set out in full in the SA Scoping Report (2022).
- **Chapter 3** sets out the methodology used to present and assess the findings of the SA process.
- **Chapter 4** presents the assessment of the housing growth options.
- **Chapter 5** presents the assessment of the Gypsy and Traveller growth options.
- **Chapter 6** presents the assessment of the employment growth options.
- **Chapter 7** presents the assessment of the spatial strategy options.
- **Chapter 8** summarises the SA findings in relation to the assessment of proposed policy areas for the WLP.
- **Chapter 9** summarises the SA findings in relation to the assessment of reasonable alternative development sites, and presents selection and rejection information.
- **Chapter 10** sets out the conclusions of this Regulation 18 SA, and outlines the next steps.
- **Appendix A** presents the SA Framework.
- **Appendix B** presents the assessment of the proposed policy areas for the WLP.
- **Appendix C** sets out the assessment of the reasonable alternative development sites, presented by receptor within each SA Objective.

2 Environmental baseline

2.1 Overview

2.1.1 This chapter summarises key baseline information relating to each SEA topic and sets out how these are considered within the SA Framework, against which all options have been assessed. Please refer to the SA Scoping Report²⁴ for the full environmental baseline.

2.2 Accessibility and transport

2.2.1 The city centre is the key strategic centre of Wolverhampton, with two town centres (Bilston and Wednesfield) and numerous local centres. The density of the urban area and the number of centres create particularly complex movement patterns and have led to a complicated transport network.

2.2.2 There is good access to the rail network and bus links within the city. The rail network in the wider Black Country area includes four passenger rail lines and the Midland Metro light rail system that operates between Birmingham and Wolverhampton. This service takes approximately 40 minutes from Wolverhampton St Georges to Birmingham Grand Central.

2.2.3 Within the WLP area, there are a few but fragmented PRoW including paths along the canal system. The City of Wolverhampton has a generally well-connected network of cycle routes. Ongoing development and upgrades to the cycling and walking network seek to connect communities and promote active travel as a healthy and sustainable mode of transport.

2.2.4 The transport theme is relevant to a variety of other sustainability themes. For example, improving sustainable transport accessibility and usage would be likely to lead to a reduction in greenhouse gas (GHG) emissions, which would contribute towards climate change mitigation efforts. If residents are encouraged to cycle or walk, they will be likely to realise health benefits. A reduction in congestion would also be likely to provide an economic boost to the local area, whilst improved air quality would benefit human health, as well as habitats or wildlife sites which are sensitive to air pollutants such as atmospheric nitrogen.

2.2.5 In the SA process, accessibility and transport is considered primarily under SA Objective 9: Transport and Accessibility, although there is some degree of overlap with other SA Objectives such as SA Objective 4: Climate Change Mitigation (see **Appendix A**).

²⁴ Lepus Consulting (2022) Sustainability Appraisal of the Wolverhampton Local Plan: Scoping Report, November 2022.

Box 2.1: *Key issues regarding accessibility and transport identified during Scoping*

- ⇒ The City of Wolverhampton is well serviced by a range of transport modes.
- ⇒ Growth in travel and car use is likely to increase pressure on the road network within the WLP. Road junctions, especially along the motorway network, suffer with congestion issues.
- ⇒ Reliance on personal car use is high.
- ⇒ New development in Wolverhampton and the wider Black Country has the potential to impact on the transport infrastructure.
- ⇒ There is a limited number of Public Rights of Way (PRoW) within the WLP area.

2.3 Air quality

- 2.3.1 There is one designated AQMA covering the entire WLP area; 'Wolverhampton AQMA'. This AQMA was declared in 2005, due to exceedances in the national annual mean objectives for NO₂ and PM₁₀²⁵. The principal pollutant affecting air quality in Wolverhampton is nitrogen dioxide (NO₂), mostly sourced from road traffic²⁶. The adjacent authorities of Dudley, Walsall and Sandwell are also wholly designated as AQMAs.
- 2.3.2 As all proposed development in Wolverhampton will be located within an AQMA, this is likely to lead to adverse impacts on health and may reduce the likelihood of the Council achieving air quality targets. It is assumed that new development proposals within the Black Country would also result in an increase in traffic and thus could potentially increase traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.
- 2.3.3 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) in their Transport Analysis Guidance consider that, *"beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant"*²⁷. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{28 29}. Exposure to road transport associated emissions may have long term health impacts. Air pollution, particularly excessive nitrogen deposition, is known to be harmful to the health and functioning of natural habitats.
- 2.3.4 In the SA process, air quality is considered primarily under SA Objective 7: Pollution (see **Appendix A**).

Box 2.2: Key issues regarding air quality identified during Scoping

- ⇒ Wolverhampton AQMA covers the whole local authority area and the principal pollutant affecting air quality is nitrogen dioxide (NO₂), mostly sourced from road traffic.
- ⇒ New housing, employment development areas, commercial and domestic sources, transport, and increasing visitor numbers in the area have the potential to lead to adverse impacts on air quality.
- ⇒ Atmospheric pollutants are expected to increase as a result of increasing traffic congestion issues.

²⁵ DEFRA UK Air Information Resource: Wolverhampton City Council. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=319 [Date accessed: 29/11/22]

²⁶ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

²⁷ Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 29/11/23]

²⁸ Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

²⁹ Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

2.4 Biodiversity, flora, fauna and geodiversity

Habitats sites

- 2.4.1 Habitats sites (previously referred to as European sites) provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, paragraph 187 of the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated Habitats sites.
- 2.4.2 There are two Habitats sites located in proximity to the Plan area; 'Fens Pools' SAC and 'Cannock Extension Canal' SAC. Threats and pressures which could potentially be exacerbated by the development set out in the WLP could include habitat fragmentation and water pollution³⁰. Some threats and pressures to Cannock Extension Canal SAC include water pollution and air pollution³¹. No Zones of Influence (ZOIs) have been identified for these sites at the time of writing.
- 2.4.3 'Cannock Chase' SAC lies some 11.5km to the north east of Wolverhampton, at its closest point. The identified threats and pressures to the qualifying features of Cannock Chase SAC include air pollution (atmospheric nitrogen deposition), hydrological changes, wildfire/arson and public access and disturbance³². A 15km ZOI for Cannock Chase SAC has been identified through analysis of visitor survey data³³, a proportion of which falls within Wolverhampton.
- 2.4.4 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the WLP to provide an in-depth assessment of the potential threats and pressures to a number of Habitats sites and analysis of potential impact pathways. The outputs of the HRA process will help to inform the SA.

National designations

- 2.4.5 There are no Sites of Special Scientific Interest (SSSIs) within Wolverhampton itself, although some areas in the north of Wolverhampton lie within SSSI Impact Risk Zones (IRZs) which state that "*Strategic solutions for recreational impacts are in place. Please contact your Local Planning Authority as they have the information to advise on specific requirements*".

³⁰ Natural England (2014) Site Improvement Plan: Fens Pools. Available at:
<http://publications.naturalengland.org.uk/file/4872756676001792> [Date accessed: 29/11/23]

³¹ Natural England (2014) Site Improvement Plan: Cannock Extension Canal. Available at:
<http://publications.naturalengland.org.uk/file/6749431462363136> [Date accessed: 29/11/23]

³² Natural England (2014) Site Improvement Plan: Cannock Chase. Available at:
<http://publications.naturalengland.org.uk/publication/4957799888977920> [Date accessed: 29/11/23]

³³ Underhill-Day, J. & Liley, D. (2012) Cannock Chase Visitor Impacts Mitigation Report. Footprint Ecology. Unpublished Report.

- 2.4.6 There are no National Nature Reserves (NNRs) located within the WLP area, the nearest being 'Wren's Nest' NNR approximately 1.5km to the south, in Dudley.

Local designations

- 2.4.7 The WLP area contains an important network of local designations running through the urban area, including Local Nature Reserves (LNR), Sites of Importance for Nature Conservation (SINC) and Sites of Local Importance for Nature Conservation (SLINC) for their geological importance. These also form important wildlife corridors, allowing species to move between habitats.
- 2.4.8 Revised SINC and SLINC boundaries have been confirmed by the Local Sites Partnership, including a proposed new SINC at 'Alexander Metals Open Space', a proposed new SLINC at 'Bushbury Pastures', and an amended boundary for 'Land East of Dale Street / Land South of Citadel Junction' SLINC. The emerging Wyrley & Essington Canal LNR has been approved by the Cabinet on 14th June 2017 but is awaiting formal approval by Natural England.
- 2.4.9 There are 15 Regionally Important Geodiversity Sites (RIGS) within the West Midlands area, but none within the City of Wolverhampton.

Habitats and green infrastructure

- 2.4.10 Priority habitats present in Wolverhampton include: good quality semi-improved grassland; deciduous woodland; coastal and floodplain grazing marsh; traditional orchard (small extents); and lowland meadows (small extents).
- 2.4.11 Ancient woodland is defined as an area that has been wooded continuously since at least 1600AD and includes 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF. There are some small areas of ancient woodland located within Wolverhampton.
- 2.4.12 Green Infrastructure (GI) can be described as a network of multi-functional assets including natural and semi-natural features which can contribute to a range of ecosystem services, including biodiversity conservation and resilience. Much of Wolverhampton is heavily urbanised, with a lack of mature trees within the centres. Lack of GI results in a reduced capability of the environment to provide ecosystem services.

Nature Recovery Network

- 2.4.13 A Nature Recovery Network is a joined-up system of places important for wildlife to be able to move from place to place and enables the natural world to adapt to change³⁴. It is a major commitment in the government's 25 Year Environment Plan³⁵ to expand, improve and better connect wildlife rich places. A critical tool in the success of Nature Recovery Networks are Nature Recovery Maps. The map ensures that development and infrastructure is permitted in the right places and has a positive impact on the network, and ensures key wildlife sites are strongly protected for future restoration.
- 2.4.14 A draft Black Country Local Nature Recovery Opportunity Map (**Figure 2.1**) has been produced by the Wildlife Trust for Birmingham and the Black Country and the Local Environmental Records Centre (EcoRecord)³⁶ through analysis of local and national data sets including designated sites, priority habitats, species distribution, land use and ecological connectivity. This drew on the Birmingham and Black Country Nature Improvement Area (NIA) Ecological Strategy³⁷ which identified the conurbation's Core Ecological Areas, Ecological Linking Areas and Ecological Opportunity Areas through a detailed review of data and evidence collected over 17 years.
- 2.4.15 The Nature Recovery Opportunity Map (**Figure 2.1**) comprises a number of components that depict the areas of current high ecological value, ecological connectivity between these areas, and prioritises opportunities for investment in nature recovery on a landscape scale. Key ecological sub-areas within Wolverhampton include 'Smestow Valley and Tettenhall Ridge'³⁸, 'Moseley Hall and Northcote Farm'³⁹, and 'Limestone Way and Sedgley Park'⁴⁰.

³⁴ Wildlife Trust (2018). A Wilder Britain. Creating a Nature Recovery Network to bring back wildlife to every neighbourhood. Available at: https://www.wildlifetrusts.org/sites/default/files/2018-06/Nature_recovery_network_final.pdf [Date accessed: 06/12/23]

³⁵ DEFRA (2018) 25 Year Environment Plan. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan> [Date accessed: 06/12/23]

³⁶ Birmingham & Black Country Wildlife Trust (2022). Black Country Local Nature Recovery map and strategy: an emergin approach. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Black-Country-Local-Nature-Recovery-map-and-strategy-%20an-emerging-approach.pdf> [Date accessed: 06/12/23]

³⁷ Birmingham & Black Country Wildlife Trust (2017) Technical Report of the Birmingham and Black Country Nature Improvement Area Ecological Strategy 2017 – 2022.

³⁸ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. Smestow Valley and Tettenhall Ridge. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Smestow-Valley-%26-Tettenhall-Ridge.pdf> [Date accessed: 06/12/23]

³⁹ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. Moseley Hall and Northcote Farm. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/Moseley-Hall-%26-Northcote-Farm.pdf> [Date accessed: 06/12/23]

⁴⁰ Birmingham & Black Country Wildlife Trust (2022). Ecological Sub-area Statement of Biodiversity Priorities – Technical Appendix. The Limestone Way and Sedgley Park. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-10/The-Limestone-Way-%26-Sedgley-Park.pdf> [Date accessed: 06/12/23]

2.4.16 To produce the draft Nature Recovery Opportunity Map, the Core Landscapes and Priority Network Restoration Zones were overlain on the components of the Nature Recovery Network Map. Locations where the Core Landscapes directly link with the Natural England’s National Habitat Network in adjoining local authority areas are indicated as National Habitat Network Connections.

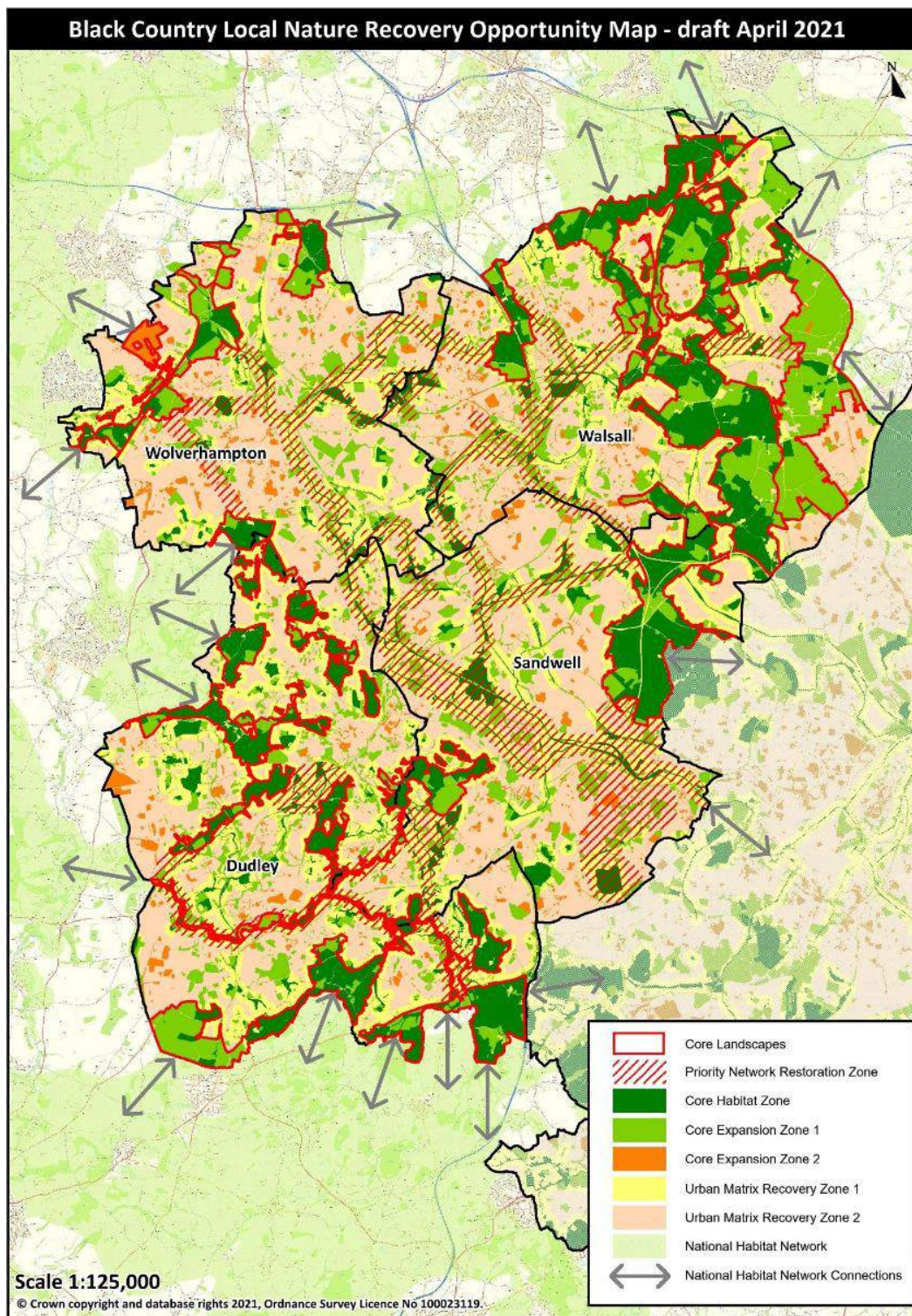


Figure 2.1: Draft Black Country Local Nature Recovery Opportunity Map

2.4.17 In the SA process, biodiversity, flora, fauna and geodiversity are considered primarily under SA Objective 3: Biodiversity, flora, fauna and geodiversity (see **Appendix A**).

Box 2.3: *Key issues regarding biodiversity, flora, fauna and geodiversity identified during Scoping*

- ⇒ There are a few BAP habitats and species present within the Local Plan area, which should continue to be managed and conserved appropriately.
- ⇒ Enhancements to the Core Strategy area's GI network will support local and sub-regional biodiversity networks through helping to improve connectivity for habitats and species.
- ⇒ Growth within the WLP area is likely to put pressure on biodiversity. There are potential impacts from habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites.
- ⇒ Geodiversity is a key contributor to the WLP's natural environment and may be affected by noise or light pollution.

2.5 Climatic factors

Carbon emissions

2.5.1 As of 2021, the City of Wolverhampton’s per capita carbon dioxide (CO₂) emissions are lower than the West Midlands and the national average (see **Table 2.1**). The UK local authority dataset⁴¹ indicates a general trend of reduced emissions over time.

Table 2.1: Estimated CO₂ emissions in 2021⁴²

	Total CO ₂ emissions estimates (kt CO ₂)	Per Capita CO ₂ emissions (t CO ₂)
Wolverhampton	895.6	3.4
West Midlands	28,114.3	4.7
National Total	323,462.4	4.8

2.5.2 Major sources of CO₂ emissions in Wolverhampton are from transport and domestic sources (see **Table 2.2**). It is likely that residential development proposed within the Plan area would result in an increase in domestic CO₂ (and other GHG) emissions, and also an increase in the number of vehicles on the road in the Plan area with a consequent increase in transport-related GHG emissions, contributing to the ‘greenhouse effect’ and exacerbating anthropogenic climate change.

Table 2.2: Per capita carbon dioxide emissions by sector: regional summary 2021 (kt CO₂)⁴³

Region/ Country	Industrial	Commercial	Public Sector	Domestic	Transport	Total
Wolverhampton	175.8	61.0	64.7	348.2	242.0	895.6
West Midlands	6,576.7	1,251.0	1297.0	8,012.1	10,861.6	28,114.3

2.5.3 The layout and design of future development can have benefits to achieving sustainable development and reducing contributions to climate change. The WLP could potentially help to encourage the development of more energy efficient homes to help reduce the overall carbon emissions of Wolverhampton. Energy efficient homes can include Eco Houses, Zero Carbon Homes and Passivhaus⁴⁴.

2.5.4 The promotion of on-site renewable or low carbon technologies incorporated with new development in the WLP would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels.

⁴¹ Department for Energy Security and Net Zero (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2021. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2021> [Date accessed: 29/11/23]

⁴² Ibid

⁴³ Ibid

⁴⁴ Urbanist Architecture. How to design Eco, Passivhaus and Zero Carbon Homes. Available at: <https://urbanistarchitecture.co.uk/how-to-design-eco-houses-passivhaus-and-zero-carbon-houses/> [Date accessed: 01/11/22]

Flooding

- 2.5.5 Climate change is anticipated to increase the risk of extreme weather events, leading to rising risk of flooding. Surface water flooding in urban areas may increase in particular in light of more torrential and frequent rainfall events, especially during winter. Extents of low, medium and high surface water flood risk are present across the WLP area.
- 2.5.6 A network of waterways course through the WLP area. Associated with these waterways are differing extents of fluvial flood risk. The significant majority of the WLP area is within Flood Zone 1, where fluvial flood risk is low; however, there are some extents of Flood Zone 2 and 3 located to the north, south west and south east of Wolverhampton.
- 2.5.7 A Level 1 Strategic Flood Risk Assessment (SFRA)⁴⁵ identified flood risk across the Black Country, including Wolverhampton, from all sources in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs. Indicative Flood Zone 3b identified in this study can be found in the northern and south eastern edges of the WLP area.
- 2.5.8 In the SA process, climatic factors is considered primarily under SA Objective 4: Climate Change Mitigation and SA Objective 5: Climate Change Adaptation, although there is some degree of overlap with aspects of many other SA Objectives (see **Appendix A**).

Box 2.4: Key issues regarding climatic factors identified during Scoping

- ⇒ Flooding from main rivers is an issue across the WLP area. The highest flooding risk is flash flooding from excessive overland flow or overtopping of minor watercourses. Therefore, surface water run-off management in the WLP area is an important issue on all developments of any size, clearly highlighting the need for a sustainable drainage system (SUDS) that maximise source control measures.
- ⇒ Climate change has the potential to increase the risk of fluvial and surface water flooding.
- ⇒ A range of further risks linked to climate change may affect the WLP area. These include the following:
 - an increased incidence of heat related illnesses and deaths during the summer;
 - increased risk of injuries and deaths due to increased number of storm events and flooding;
 - adverse effect on water quality from watercourse levels and turbulent flow after heavy rain and a reduction of water flow;
 - a need to increase the capacity of sewers; loss of species that are at the edge of their southerly distribution and spread of species at the northern edge of their distribution;
 - an increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for local business; and
 - increased drought and flood related problems such as soil shrinkages and subsidence.
- ⇒ GI should be enhanced and expanded. New development needs to incorporate energy efficiency measures and climate change adaptive features in order to respond to predicted levels of climate change.

⁴⁵ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 29/11/23]

2.6 Cultural heritage

- 2.6.1 Historic environment priorities from the international to the local level seek to address a range of issues, particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in place making and the quality of life for local residents.
- 2.6.2 Wolverhampton has a rich industrial history. Many of the Listed Buildings and other designated heritage assets within the Plan area are associated with the numerous warehouses, factories, and network of canals that were opened during the Industrial Revolution, as well as the main town centre of Wolverhampton.
- 2.6.3 There are two Registered Parks and Gardens (RPGs), four Scheduled Monuments (SMs), 31 Conservation Areas (CAs), two Grade I, 23 Grade II* and 352 Grade II Listed Buildings located within the Plan area.
- 2.6.4 New Conservation Area Appraisals were prepared for existing CAs within Wolverhampton to support the plan making process. These Appraisals and the new CA boundaries have now been formally designated through Cabinet approval. This relates to three CAs: Bushbury Hill, Wightwick Bank and Vicarage Road (Penn). Wolverhampton also supports a range of non-designated heritage features. The Black Country Historic Landscape Characterisation (HLC) Study⁴⁶ aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country. The study identified several Historic Environment Area Designations (HEADs) within the Green Belt and in the urban area. The study also identified a number of Archaeological Priority Areas (APAs), which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest.
- 2.6.5 APAs are identified within the HLC as *"sites with a high potential for archaeological remains of regional or national significance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state or preservation of any remains to justify a designation"*. The APAs have been identified using the 'Scheduled Monuments and nationally important but non-scheduled monuments'⁴⁷.

⁴⁶ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 29/11/23]

⁴⁷ Historic England. Scheduled Monuments. Available at: <https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/> [Date accessed: 29/11/23]

- 2.6.6 CWC operates a Local List of Heritage Assets, including, buildings, structures, parks, gardens, and archaeological sites of local historic importance⁴⁸. Locally Listed Buildings do not meet national criteria for inclusion in the statutory list and are protected in their own right; the Council has compiled a list of these buildings to provide a measure of protection⁴⁹.
- 2.6.7 Areas of High Historic Townscape / Landscape Value (AHHTVs/AHHLVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the HLC. AHHTVs are areas “*where built heritage makes a significant contribution to the local character and distinctiveness*” and have been identified due to their sense of place, street plan and form, streetscape, views and setting, and representation. DLHHVs are “*designed landscapes that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register of Parks and Gardens*” and have been identified due to the date, preservation, aesthetics, and associations with people and past events.
- 2.6.8 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible.
- 2.6.9 It is assumed that designated heritage assets will not be lost as a result of development, unless otherwise specified by the WLP. It is anticipated that the WLP will require a Heritage Statement or Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.
- 2.6.10 In the SA process, cultural heritage is considered under SA Objective 1: Cultural Heritage (see **Appendix A**).

Box 2.5: *Key issues regarding cultural heritage identified during Scoping*

- ⇒ Even though heritage assets will continue to benefit from legislative protection, development in the WLP area may have the potential to lead to effects on historic landscapes and cause direct damage to archaeological sites, monuments and buildings and / or their settings.
- ⇒ Archaeological remains, both seen, and unseen have the potential to be affected by new development areas.
- ⇒ There are six heritage assets in Wolverhampton listed on Historic England’s Heritage at Risk Register, which should be protected from inappropriate development.
- ⇒ The WLP should seek to improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering the retention and re-use, versus their replacement.

⁴⁸ City of Wolverhampton Council (2022). Conservation. Available at:
<https://www.wolverhampton.gov.uk/planning/conservation> [Date accessed: 05/01/24]

⁴⁹ Wolverhampton History and Heritage Society. (No date). Listed Buildings. Available at:
<http://www.historywebsite.co.uk/listed/lbs.htm> [Date accessed: 05/01/24]

2.7 Human health

Air quality

- 2.7.1 As discussed in **section 2.3**, the entirety of the WLP area is designated as AQMA⁵⁰. Development proposals located in close proximity to AQMAs or main roads would be likely to expose site end users to transport associated noise and air pollution, with adverse impacts on health and wellbeing.
- 2.7.2 As all the proposed development within the WLP is located within an AQMA, this is likely to lead to adverse impacts on health and may prevent CWC from achieving air quality targets. It is assumed that new development proposals within Wolverhampton would also result in an increase in traffic and thus traffic-related air pollution. Both existing and future residents would be exposed to this change in air quality.

Healthcare facilities

- 2.7.3 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the WLP should seek to ensure that residents have good access to NHS hospitals and GP surgeries.
- 2.7.4 There is one NHS hospital with an A&E department located within Wolverhampton (New Cross Hospital) and a total of 61 healthcare centres. Ideally, residents should be within an approximate ten-minute walking distance to their nearest GP surgery, whilst a hospital within 5km would be considered a sustainable distance. A large proportion of Wolverhampton is within a sustainable 15-minute walking distance or travel time via public transport to a GP surgery according to accessibility modelling data⁵¹.
- 2.7.5 At this stage, there is not sufficient information available to accurately predict the effect of new development on the capacity of these health facilities.

Green spaces and natural habitats

- 2.7.6 Opportunities to experience a diverse range of natural habitats is beneficial for physical and mental health and well-being. Good access to green/recreational areas can reduce stress, fatigue, anxiety and depression⁵². Good access to green spaces is associated with healthy foetal growth in pregnant women, higher birth weights, healthy microbiomes in babies and reduced rates of obesity and type 2 diabetes. Impacts of access to the natural environment are particularly significant for lower socio-economic groups.

⁵⁰ Black Country Air Quality Supplementary Planning Document (SPD) September 2016. Available at: <https://www.dudley.gov.uk/media/6381/adopted-black-country-air-quality-spd-september-2016.pdf> [Date accessed: 29/11/23]

⁵¹ Unpublished data provided to Lepus by the Council

⁵² Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

- 2.7.7 Providing residents with sustainable access to a diverse range of natural habitats is an effective means of reducing health inequalities in the area. Within the WLP area, there is a rich and diverse range of public open spaces, formal parks, outdoor recreational spaces, as well as the PRow network and the canal system. There are also several Country Parks surrounding the Plan area. All these open spaces positively contribute towards the health and wellbeing of residents, by helping to encourage physical exercise through sports, recreation and active travel. The recreational green spaces combined with the natural green space network would also benefit the mental health and wellbeing of residents.
- 2.7.8 The WLP area supports a network of biodiversity sites, providing local residents with opportunities to visit natural outdoor spaces and view wildlife (see **section 2.4**).
- 2.7.9 In the SA process, human health is considered primarily under SA Objective 12: Health, although there is some degree of overlap with other SA Objectives such as SA Objective 11: Equality (see **Appendix A**).

Box 2.6: *Key issues regarding human health identified during Scoping*

- ⇒ As all the proposed development within the WLP is located within an AQMA, this is likely to lead to adverse impacts on health, without intervention.
- ⇒ The increasing population in the City of Wolverhampton could have place pressure on the capacity of health infrastructure and leisure facilities.
- ⇒ The life expectancy of men and women is anticipated to rise over time, in line with national trends, leading to a greater proportion of older residents with specific needs for housing and services.

2.8 Landscape and townscape

Cannock Chase AONB

2.8.1 Cannock Chase Area of Outstanding Natural Beauty (AONB), also known as 'National Landscape', is a nationally designated landscape, located approximately 7km to the north of the Plan area at its closest point. Whilst new development in the WLP could potentially lead to adverse impacts on the AONB, such as through increased visitor pressures, it is not anticipated that there would be any adverse visual impacts on the AONB as a result of development proposed within the WLP, due to the distance from Wolverhampton's administrative area to the AONB.

Green Belt

2.8.2 The WLP area is heavily urbanised, but also contains some areas within the Black Country Green Belt, which surrounds the West Midlands Conurbation. Although Green Belt itself is not necessarily of high landscape value, it often serves to protect the character and setting of historic towns and support landscape-scale biodiversity networks. New development could potentially increase noise and light pollution and reduce the perception of tranquillity in some areas.

2.8.3 Whilst the Green Belt is not a statutory landscape designation, it is a significant element of landscape protection in the area. The Green Belt is intended to⁵³:

- check the unrestricted sprawl of larger built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.8.4 The Green Belt Study⁵⁴, carried out by LUC, classified parcels of Green Belt land into different 'harm' ratings, based on the assessment of potential harm caused by removing each parcel from the Green Belt based on a range of criteria.

2.8.5 No release of Green Belt land is proposed through the WLP.

⁵³ DLUHC (2023) National Planning Policy Framework Chapter 13: Protecting Green Belt land. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Date accessed: 29/11/23]

⁵⁴ LUC (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 29/11/23]

Landscape character and sensitivity

- 2.8.6 The Black Country Landscape Sensitivity Assessment⁵⁵ assessed the sensitivity of Green Belt land to housing and commercial development. The aim of the study was to identify the extent to which the character and quality of Green Belt land is susceptible to change as a result of future development. Parcels of land were classified ranging from 'high' to 'low' sensitivity.
- 2.8.7 It should be noted that although there is a relationship between the Landscape Sensitivity Assessment and the Green Belt Harm Assessment, the Green Belt Study states that "*there are fundamental distinctions in the purposes of the two assessments, reflecting the fact that landscape quality is not a relevant factor in determining the contribution to Green Belt purposes, or harm to those purposes resulting from the release of land*".
- 2.8.8 There is no evidence available to inform the SA assessments with regard to the landscape character or sensitivity of Wolverhampton's urban areas. Baseline information relating to the historic environment, including the Historic Landscape Characterisation and associated designations, is considered under 'cultural heritage' (see **section 2.6**).
- 2.8.9 In the SA process, landscape and townscape are considered primarily under SA Objective 2: Landscape (see **Appendix A**).

Box 2.7: Key issues regarding landscape and townscape identified during Scoping

- ⇒ Parts of Wolverhampton lie within the West Midlands Green Belt.
- ⇒ The WLP area is amongst the least tranquil areas of the West Midlands.

⁵⁵ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 29/11/23]

2.9 Population and material assets

Population

2.9.1 In Wolverhampton, the population size has increased by 5.7%, from around 249,500 in 2011 to 263,700 in 2021. This is lower than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800. At 5.7%, Wolverhampton's population increase is slightly lower than the increase for the West Midlands (6.2%)⁵⁶.

Equality

2.9.2 The WLP area is an ethnically diverse area, with individuals from many different religions, cultures, communities and backgrounds. According to Census data, it has a growing population from Black and Minority Ethnic communities.

2.9.3 The WLP area is home to a people from a range of socio-economic status who may also experience discrimination, poverty and social exclusion. Child poverty levels are relatively high. In the West Midlands, 22.7% of children are from low-income families⁵⁷.

2.9.4 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England. LSOAs are small areas designed to be of similar population, of approximately 1,500 residents or 650 households. According to the IMD (2019)⁵⁸, out of 317 Local Authorities in England, Wolverhampton is ranked as the 24th most deprived. Overall, deprivation is high across the WLP area, with 33 LSOAs in Wolverhampton ranked among the 10% most deprived in England.

Employment

2.9.5 Wolverhampton City Centre provides a range of retail, office and leisure floorspace. Transport modelling data⁵⁹ indicates that almost the entirety of the WLP area is within a 30-minute travel time to an employment site, either via walking or public transport. The majority of new residents across the Plan area would therefore be expected to be located within a sustainable distance to jobs. New developments in the urban area would be expected to have good sustainable transport connections to nearby employment opportunities.

⁵⁶ Office of National Statistics. Census 2021. Available at:

<https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000031/> [Date accessed: 29/11/23]

⁵⁷ Department for Work and Pensions (2022) Households below average income (HBAI) statistics. Available at:

<https://www.gov.uk/government/collections/households-below-average-income-hbai--2> [Date accessed: 29/11/23]

⁵⁸ Ministry of Housing, Communities and Local Government (2019) The English Indices of Deprivation 2019. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835115/iod2019_Statistical_Release.pdf [Date accessed: 29/11/23]

⁵⁹ Unpublished data provided to Lepus by the Council

Education, skills and training

- 2.9.6 There are a total of 94 primary and 22 secondary schools in the WLP area, and further schools serving the area which are located in adjacent authorities. It is assumed that new residents in the Plan area require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents.
- 2.9.7 There are a number of further and higher education opportunities within the WLP area and adjacent districts including the University of Wolverhampton, Dudley College of Technology and Sandwell College. Within the wider West Midlands, there are several universities including the University of Birmingham, Birmingham City University and Aston University.

Waste

- 2.9.8 The proposed development within the WLP area and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England in 2021⁶⁰.
- 2.9.9 The proportion of local authority collected waste in the West Midlands sent for recycling and composting is below the national levels, whereas the waste managed through incineration is higher than national levels.
- 2.9.10 Although national trends suggest that the volume of household waste produced is decreasing, the Black Country Waste Study⁶¹ indicates that additional capacity for certain types of waste management will be required, taking into account the large amount of projected growth in the area as well as continuing to facilitate the import of waste from other neighbouring authorities.

Housing

- 2.9.11 Government guidance requires local authorities to determine the local housing need figure for their area. The local plan process should then test the deliverability of this housing need figure within the local authority area. The local housing need figure is calculated by summing the national standard method figure. This method uses 2014-based ONS household projections and affordability ratios which are updated annually⁶².

⁶⁰ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

⁶¹ Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf [Date accessed: 29/11/23]

⁶² Black Country Plan. Black Country Urban Capacity Review Update (may, 2021) Accessed at: <https://blackcountryplan.dudley.gov.uk/media/17940/bc-urban-capacity-review-update-2020-may-2021-final-140521.pdf> [Date accessed: 29/11/23]

- 2.9.12 CWC have produced a Strategic Housing Land Availability Assessment (SHLAA)⁶³, which will be updated annually, to assess land with potential for development in order to inform the housing land supply and trajectory. Sites for consideration in the WLP have been identified through the 'call for sites' process.
- 2.9.13 A key element of the WLP's vision is to create a network of cohesive, healthy and prosperous communities. It is assumed that development proposals will provide a good mix of housing types and tenures in order to meet the identified needs for the population, including affordable housing and accessible housing particularly for people aged 65 and over.
- 2.9.14 In the SA process, population and material assets are considered under several SA Objectives. Population is a broad matter, which has been addressed under SA Objective 9: Transport and Accessibility, SA Objective 10: Housing, SA Objective 11: Equality, SA Objective 12: Health, SA Objective 13: Economy and SA Objective 14: Education, Skills and Training. Material assets covers a variety of built and natural assets which are accounted for in a range of SA Objectives, including SA Objective 6: Natural Resources, SA Objective 7: Pollution and SA Objective 8: Waste. The full SA Framework is presented in **Appendix A**.

Box 2.8: Key issues regarding population and material assets identified during Scoping

- ⇒ The population of the City of Wolverhampton is expected to continue to increase, this will have secondary effects.
- ⇒ New business start-ups should continue to be encouraged in the WLP area.
- ⇒ NVQ qualifications in Wolverhampton are generally lower than regional and national percentages.
- ⇒ The employment level for Wolverhampton is lower than that for Great Britain overall.
- ⇒ House prices are expected to increase and demand for housing will remain high.
- ⇒ Energy consumption from industrial and commercial sources in Wolverhampton is high and is expected to increase.
- ⇒ There is a need to increase the proportion of waste sent for reuse, recycling or compost and move away from the use of landfill for waste disposal.
- ⇒ There is a need to identify and support opportunities for renewable energy provision locally.

⁶³ City of Wolverhampton Council (2023) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Update as of April 2022, Published: Published 2023. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-09/Wolverhampton-SHLAA-2022.pdf> [Date accessed: 29/11/23]

2.10 Soil and water resources

Soil

- 2.10.1 Although the majority of Wolverhampton has been urbanised, the WLP area has a diverse underlying soil resource. Soil is an essential and non-renewable resource that provides a range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines. It is also one of the most important natural carbon sinks and is vital in efforts to mitigate climate change.
- 2.10.2 It is therefore important for decision makers to make best efforts to preserve soil resources. Development can potentially have adverse impacts on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients.
- 2.10.3 In accordance with paragraph 180 of the NPPF⁶⁴, development can have an irreversible adverse (cumulative) impact on the finite stock of best and most versatile (BMV) land. Avoiding the loss of BMV land is a priority as mitigation is rarely possible. BMV is usually indicated by Agricultural Land Classification (ALC). The ALC system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as BMV land⁶⁵. The grades are as follows:
- Grade 1 – excellent quality agricultural land
 - Grade 2 – very good quality agricultural land
 - Grade 3 – good to moderate quality agricultural land
 - Subgrade 3a – good quality agricultural land
 - Subgrade 3b – moderate quality agricultural land
 - Grade 4 – poor quality agricultural land
 - Grade 5 – very poor-quality agricultural land
- 2.10.4 The majority of land in the WLP area is ALC 'urban', with pockets of ALC Grade 2, 3 and 4.

⁶⁴ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

⁶⁵ MAFF (1988) Agricultural Land Classification of England And Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 29/11/23]

- 2.10.5 In accordance with the core planning principles of the NPPF, development on previously developed land (PDL) will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land, and is expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- 2.10.6 It should be noted that PDL could also be of environmental value, and as such, potential impacts on natural resources should be considered on a site-by-site basis.
- 2.10.7 Many urban brownfield sites in the WLP area, and some greenfield sites, are affected by the legacy of mining in the area. The exploitation of minerals has led to some localised issues with ground contamination and instability⁶⁶. It is anticipated that development proposals within the WLP will require site-specific assessments of ground contamination and effective remediation of soils affected prior to development.

Water

- 2.10.8 Wolverhampton is supplied with water by Severn Trent Water and South Staffs Water. Sewerage services are also provided by Severn Trent Water and South Staffs Water. Drivers of increased water demand include increase in population, decrease in household occupancy and climate change. Severn Trent Water⁶⁷ and South Staffs Water⁶⁸ plan to manage and meet future demand through encouraging water use efficiency, for example by installing water meters, and reducing leakage. Severn Trent water are currently in the process of creating an updated draft plan that would cover the period 2025-2085⁶⁹. South Staffs Water are aiming to publish their updated plan in 2024⁷⁰.
- 2.10.9 It is assumed that all residential-led development proposals in the WLP will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.
- 2.10.10 The volume of wastewater is likely to increase following development in the WLP area. Wastewater treatment plants will need to ensure there is the capability to withstand the additional capacity and be expanded if necessary, prior to development taking place.

⁶⁶ Mott Macdonald (2009) Black Country JCS Stage 2: Infrastructure and Deliverability Study. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p1/t1p1f/> [Date accessed: 29/11/23]

⁶⁷ Water Resources Management Plan 2019. Available at: <https://www.stwater.co.uk/content/dam/stw-plc/our-plans/severn-trent-water-resource-management-plan.pdf> [Date accessed: 01/12/23]

⁶⁸ South Staffs Water. Water Resources Management Plan 2019. Available at: <https://www.south-staffs-water.co.uk/media/2676/final-wrmp-2019-south-staffs-water.pdf> [Date accessed: 01/11/23]

⁶⁹ Severn Trent Water (2022) Draft Water Resource Management Plan 2024. Available at: <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 29/11/23]

⁷⁰ South Staffs Water (2023) Water Resources Management Plan. Available at: <https://www.south-staffs-water.co.uk/about-us/our-strategies-and-plans/our-water-resources-management-plan> [Date accessed: 29/11/23]

- 2.10.11 Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water⁷¹. Watercourses that pass through the city of Wolverhampton include the River Penk, River Tame and Smestow Brook, in addition to the canal network.
- 2.10.12 An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted⁷². However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. Each development proposal would need to be evaluated according to land use type, size of development and exact location to determine the potential impacts on water quality.
- 2.10.13 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. There are three categories of SPZ⁷³ as follows:
- Zone 1 – Inner Protection Zone: the 50-day travel time from any point below the water table to the source, with a minimum radius of 50m
 - Zone 2 – Outer Protection Zone: the 400-day travel time from a point below the water table to the source, with a minimum radius of 250-500m
 - Zone 3 – Source Catchment Protection Zone: area around a source within which all groundwater recharge is discharged at the source
- 2.10.14 SPZs are present in west of WLP area, which is predominantly SPZ 3, with smaller areas of SPZ 1 and 2.
- 2.10.15 The topic of flooding is relevant to the themes of soil, water and climate change. Flooding has been addressed under climate change in **section 2.5**.
- 2.10.16 In the SA process, soil and water resources are considered primarily under SA Objective 6: Natural Resources and SA Objective 7: Pollution (see **Appendix A**).

⁷¹ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: <https://www.who.int/publications/i/item/0419217304> [Date accessed: 29/11/23]

⁷² Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 29/11/23]

⁷³ Environment Agency (2019) Manual for the production of Groundwater Source Protection Zones – March 2019. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822402/Manual-for-the-production-of-Groundwater-Source-Protection-Zones.pdf [Date accessed: 29/11/23]

Box 2.9: *Key issues regarding soil and water resources identified during Scoping*

- ⇒ Soil is a non-renewable resource that would continue to be lost. The majority of land in the WLP area is ALC 'urban', with pockets of ALC Grade 3 and ALC Grade 4, which may be under threat from new growth areas and associated infrastructure.
- ⇒ The development of new and improved infrastructure to accompany growth has the potential to lead to an increase in soil erosion and soil loss.
- ⇒ A proportion of Wolverhampton contains groundwater SPZs.

3 Assessment methodology and scope of appraisal

3.1 Assessment of reasonable alternatives

3.1.1 Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 3.1** summarises the SA Objectives and their relevance to the SEA themes.

Table 3.1: Summary of SA Objectives

	SA Objectives	Relevant SEA Topic
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance	Cultural heritage
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place	Landscape and cultural heritage
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, flora and fauna
4	Climate change mitigation: Minimise Wolverhampton’s contribution to climate change.	Climatic factors
5	Climate change adaptation: Plan for the anticipated levels of climate change.	Climatic factors, soil, water
6	Natural resources: Protect and conserve natural resources.	Soil, water and material assets
7	Pollution: Reduce air, soil, water and noise pollution	Air, water, soil and human health
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	Material assets
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	Climatic factors and material assets
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	Population
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	Population and human health
12	Health: Safeguard and improve community health, safety and wellbeing.	Population and human health
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	Population and material assets
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	Population

- 3.1.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations⁷⁴. Including the SEA topics in the SA Objectives helps to ensure that all of the environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 3.1.3 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 3.1.4 The purpose of this document is to provide an appraisal of reasonable alternatives, also known as 'options', in line with Regulation 12 of the SEA Regulations⁷⁵:
- 3.1.5 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 3.1.6 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 3.1**).

⁷⁴ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

⁷⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 29/11/23]

Box 3.1: Schedule 1 of the SEA Regulations⁷⁶

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.2 Impact assessment and determination of significance

3.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

3.3 Sensitivity

3.3.1 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

3.3.2 A guide to the range of scales used in determining impact sensitivity is presented in **Table 3.2**. For most receptors, sensitivity increases with geographic scale.

⁷⁶ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 29/11/23]

Table 3.2: *Impact sensitivity*

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

3.4 Magnitude

3.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 3.3**).

Table 3.3: *Impact magnitude*

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> • Likely total loss of or major alteration to the receptor in question; • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

3.5 Significant effects

3.5.1 A single value from **Table 3.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process.

3.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: "*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*".

Table 3.4: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 3.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle⁷⁷ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option.
- 3.5.4 For the assessment of reasonable alternative sites, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full assessments presented in the SA report appendices have been set out per 'receptor'. The methodology used to assess reasonable alternative sites throughout the SA process, which sets out the receptors considered for each SA Objective, is presented in **section 3.8**.
- 3.5.5 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 3.5.6 The level of effect has been categorised as minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 3.5.7 Each reasonable alternative or option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 3.4**. Likely impacts are not intended to be summed.
- 3.5.8 It is important to note that the assessment scores presented in **Table 3.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Chapter 2** and **section 3.8**), offering further insight into how each significant effect score was determined. These should be borne in mind when considering the assessment findings.

3.6 Limitations of predicting effects

- 3.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

⁷⁷ The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

- 3.6.2 It should be noted that for the purpose of this SA report, all assessments have been prepared without consideration of detailed mitigation, which can be factored in at the next stage once the WLP policies have been drafted.
- 3.6.3 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 3.6.4 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 3.6.5 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available. The appraisal of the WLP is limited in its assessment of carbon emissions, and greater detail of carbon data would help to better quantify effects.
- 3.6.6 All data used is secondary data obtained from the Council or freely available on the Internet.

3.7 Methodology for assessment of growth options and policy areas

- 3.7.1 The appraisal of growth options (housing, employment and Gypsy and Traveller), spatial strategy options and policy areas aims to assess the likely significant effects of each proposed option, based on the criteria set out in the SEA Regulations (see **Box 3.1**).
- 3.7.2 **Table 3.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

Table 3.5: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

3.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distill the wide-ranging effects of a broad growth option into one overall impact.

3.7.4 The appraisal of each option should be read alongside the local context and assumptions set out in **Chapter 2**.

3.8 Methodology for assessment of reasonable alternative sites

3.8.1 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites.

3.8.2 The receptors considered for each SA Objective have been discussed within the local context and assumptions set out in **Chapter 2**. The appraisal of reasonable alternative sites should be read in conjunction with this chapter.

3.8.3 The topic-specific methodologies set out in **Boxes 3.1 to 3.14** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 3.4**.

3.8.4 All distances stated in site assessments are measured 'as the crow flies' from the closest point of the site/receptor in question, unless otherwise stated.

3.8.5 **Appendix C** sets out the detailed appraisal of each reasonable alternative site proposed. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives.

SA Objective 1: Cultural heritage

- 3.8.6 Box 3.1 sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.
- 3.8.7 As discussed within **section 2.6**, impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. As such, the level of the impact when considered at the pre-mitigation stage has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question.
- 3.8.8 It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development. Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets⁷⁸ that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

Box 3.2: SA Objective 1: Cultural heritage strategic assessment methodology

Score	Likely impact – Grade I Listed Building
--	Development proposal coincides with, is located adjacent to, or could significantly impact the setting of, a Grade I Listed Building.
-	Development proposal located within the wider setting of a Grade I Listed Building.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.

Notes

Grade I Listed Buildings are considered to be those of exceptional interest.
 Data for heritage assets⁷⁹, including the Heritage at Risk Register⁸⁰, available from Historic England.

Score	Likely impact – Grade II* Listed Building
--	Development proposal coincides with, or could significantly impact the setting of, a Grade II* Listed Building.
-	Development proposal located within the setting of a Grade II* Listed Building.

⁷⁸ Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 29/11/23]

⁷⁹ Historic England (2023) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 29/11/23]

⁸⁰ Historic England (2023) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 29/11/23]

Score	Likely impact – Grade II* Listed Building
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.

Notes

Grade II* Listed Buildings are considered to be those of more than special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Grade II Listed Building
--	Development proposal coincides with a Grade II Listed Building.
-	Development proposal located within the setting of a Grade II Listed Building.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.

Notes

Grade II Listed Buildings are considered to those of special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Scheduled Monument
--	Development proposal coincides with a SM.
-	Development proposal located within the setting of a SM.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.

Notes

Scheduling is the selection of a sample of nationally important archaeological sites.
 Data sourced from Historic England as above.

Score	Likely impact – Registered Parks and Gardens
--	Development proposal coincides with an RPG.
-	Development proposal located within the setting of an RPG.
0	Development proposal not considered likely to impact an RPG or its setting.
+	Development proposal which could potentially enhance an RPG or its setting.

Notes

The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.

Notes

Data sourced from Historic England as above.

Score	Likely impact – Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area.
0	Development proposal not considered to impact a Conservation Area or its setting.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.

Notes

Conservation Area data provided by CWC.
 Information available for Wolverhampton⁸¹ authority.

Score	Likely impact - Archaeological Priority Area
-	Development proposal coincides with an APA.
0	Development proposal does not coincide with an APA.
+	Development proposal which could potentially enhance an APA.

Notes

Archaeology data provided by CWC and detailed within the HLC report⁸².

Score	Likely impact - Historic Landscape Characterisation
-	Development proposal located within an area of high historic landscape or townscape value and/or area designed landscape of high historic value.
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes.
+	Development proposal which could potentially enhance historic character.

Notes

HLC data provided by CWC and detailed within the HLC report⁸³.

⁸¹ City of Wolverhampton Council (2022) Conservation. Available at:
<https://www.wolverhampton.gov.uk/planning/conservation> [Date accessed: 29/11/23]

⁸² Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at:
https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
 [Date accessed: 29/11/23]

⁸³ Ibid

SA Objective 2: Landscape

- 3.8.9 **Box 3.2** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.
- 3.8.10 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.
- 3.8.11 As discussed within **section 2.8**, adverse effects on Cannock Chase AONB are unlikely given the distance from the Plan area, and as such this has not been considered as a receptor within the site assessments. Additionally, there is no landscape / townscape sensitivity or character evidence available to inform the assessment of sites within Wolverhampton’s urban area, beyond the HLC information as discussed under SA Objective 1: Cultural Heritage (see **Box 3.1**).

Box 3.3: SA Objective 2: Landscape strategic assessment methodology

Score	Likely impact – Landscape Sensitivity
--	Development proposals located within areas of ‘moderate-high’ or ‘high’ landscape sensitivity.
-	Development proposals located within areas of ‘low-moderate’ or ‘moderate’ sensitivity.
+/-	Development proposal located outside of the Landscape Sensitivity Assessment study area.
0	Development proposals located within areas of ‘low’ sensitivity.
+	Development proposals which would protect or enhance features of the landscape as identified within the study.

Notes

Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment⁸⁴.

Score	Likely impact – views for local residents
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.
0	Development proposals are not considered to significantly alter views experienced by local residents.
+	Development proposals which could potentially improve the views experience by some local residents.

⁸⁴ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 29/11/23]

Notes

Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps⁸⁵.
Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.

Score	Likely impact - Views from the PRoW network
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRoW network.
0	Development proposals are not considered to significantly alter views experienced by users of the PRoW network.
+	Development proposals which could potentially improve the views experienced from the nearby PRoW network.

Notes

PRoW data provided by CWC.
Views have been identified through the use of aerial photography and Google Maps⁸⁶.

⁸⁵ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

⁸⁶ Ibid

SA Objective 3: Biodiversity, flora, fauna and geodiversity

3.8.12 **Box 3.3** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

3.8.13 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that there is potential for negative effects associated with development to arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

Box 3.4: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology

Score	Likely impact - Habitats site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a Habitats site. Likelihood of direct impacts.
-	Development proposal is located within a recognised ZOI or similar spatial catchment relative to the Habitats site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZOI where, in absence of HRA conclusions, the effect of development is uncertain.
0	Development not anticipated to result in adverse impacts on Habitats sites.
+	Development proposals which would be expected to enhance features within a Habitats site.

Notes

Data for SACs from Natural England⁸⁷.

It should be noted that the HRA will provide further detail relating to potential impacts on Habitats sites within and surrounding the Plan area.

Score	Likely impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI.
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.
+	Development proposals which would enhance features of an SSSI.

⁸⁷ Natural England (2023) Special Areas of Conservation (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcf0_0 [Date accessed: 29/11/23]

Notes

Data for SSSIs and IRZs from Natural England⁸⁸.

Score	Likely impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes

Data for NNRs from Natural England⁸⁹.

Score	Likely impact – ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes

Data for ancient woodlands from Natural England⁹⁰.

Score	Likely impact - SINC
--	Development proposal coincides with a SINC. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SINC.
+	Development proposals which would enhance or create a SINC.

⁸⁸ Natural England (2023) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest, 31 July 2022. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 29/11/23]

⁸⁹ Natural England (2023) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date accessed: 21/12/23]

⁹⁰ Natural England (2023) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdc7e9df7d3/ancient-woodland-england> [Date accessed: 29/11/23]

Notes

Data for SINCs provided by CWC. Including the recently adopted 'Alexander Metals' SINC.

Score	Likely impact - LNR
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes

Data for LNRs from Natural England⁹¹.
 Adopted Wyrley and Essington Canal LNR data from CWC.

Score	Likely impact - SLINC
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SLINC.
+	Development proposals which would enhance or create a SLINC.

Notes

Data for SLINCs provided by CWC.

Score	Likely impact – geological conservation
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.
+	Development proposal anticipated to enhance a geological site.

Notes

Data for geological sites provided by CWC and data for underlying geological context provided by British Geological Survey.

Score	Likely impact – priority habitat
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

⁹¹ Natural England (2022) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date accessed: 29/11/23]

Notes

Data for priority habitats from Natural England⁹².

⁹² Natural England (2023) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 29/11/23]

SA Objective 4: Climate change mitigation

- 3.8.14 **Box 3.4** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.
- 3.8.15 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. The 1% principle as set out in **Box 3.4** is only a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.

Box 3.5: SA Objective 4: Climate change mitigation strategic assessment methodology

Score	Likely impact – carbon emissions
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO ₂ emissions.
+/-	Non-residential or Gypsy and Traveller development where the carbon emissions produced as a result of the proposed development is uncertain
+	Development proposals which include energy saving or renewable energy technologies.
	Development proposals which would reduce reliance on private car use, encourage active travel or the use of public transport.

Notes
<p>Figures calculated using UK local authority CO₂ emissions data⁹³ and the number of people per dwelling⁹⁴, such that proposals for 1,135 homes or more are expected to increase carbon emissions by 1% or more in comparison to the current estimates for Wolverhampton.</p> <p>Proposals for 114 homes or more are expected to increase carbon emissions by 0.1% or more in comparison to current estimates for Wolverhampton.</p>

⁹³ DBEIS (2022) UK local authority and regional carbon dioxide emissions national statistics: 2005-2020. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020> [Date accessed: 29/11/23]

⁹⁴ People per Dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

SA Objective 5: Climate change adaptation

3.8.16 **Box 3.5** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

3.8.17 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

Box 3.6: SA Objective 5: Climate change adaptation strategic assessment methodology

Score	Likely impact – Flood Zones
--	Development proposals which coincide with Flood Zone 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

Notes

Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea)⁹⁵, such that:

- Flood Zone 3: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year;
- Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and
- Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year.

Score	Likely impact – surface water flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures

Notes

Based on the Environment Agency surface water flood risk data⁹⁶, such that:

- High risk: 3.3+% chance of flooding each year;
- Medium risk: between 1% - 3.3% chance of flooding each year; and

⁹⁵ Environment Agency (2023) Flood Map for Planning (Rivers and Sea) – Flood Zone 2 and Flood Zone 3. Available at: <https://www.data.gov.uk/dataset/cf494c44-05cd-4060-a029-35937970c9c6/flood-map-for-planning-rivers-and-sea-flood-zone-2> and <https://www.data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3> [Date accessed: 29/11/23]

⁹⁶ Environment Agency (2013) Risk of flooding from surface water. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff_63d.pdf [Date accessed: 29/11/23]

Notes

- Low risk: between 0.1% - 1% chance of flooding each year.

Score	Likely impact – Indicative Flood Zone 3b
--	Development proposals which coincide with Indicative Flood Zone 3b.
0	Development proposals which do not coincide with Indicative Flood Zone 3b.

Notes

Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)⁹⁷

⁹⁷ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 29/11/23]

SA Objective 6: Natural resources

- 3.8.18 **Box 3.6** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.
- 3.8.19 In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.
- 3.8.20 The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. There are no Mineral Safeguarding Areas or Areas of Search identified within Wolverhampton in the Black Country Minerals Study⁹⁸; as such all proposed development sites would be expected to have a negligible impact on mineral resources based on the current evidence available.

Box 3.7: SA Objective 6: Natural resources strategic assessment methodology

Score	Likely impact - previously developed (brownfield) land / land with environmental value
-	Development proposal located on previously undeveloped land and/or land with potential environmental value.
+	Development proposal located on previously developed land with no environmental value.

Notes

Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF⁹⁹. Assessment of current land use and potential environmental value has been made through reference to aerial photography using Google Maps. It should be noted that this may not reflect the current status of the site, and the nature / layout of proposed development within the site boundary is unknown, so a degree of uncertainty remains.

Score	Likely impact - ALC
--	Development proposals which are situated on Grade 1, 2, or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land comprising less than 20ha.
0	Development proposals located on previously undeveloped land with no environmental value.
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.

⁹⁸ wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date accessed: 17/01/24]

⁹⁹ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/24]

Notes

ALC data available from Natural England¹⁰⁰. Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.

A 20ha threshold has been used based on Natural England guidance¹⁰¹.

¹⁰⁰ Natural England (2019) Agricultural Land Classification o(ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 01/11/23]

¹⁰¹ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 10/01/24]

SA Objective 7: Pollution

- 3.8.21 **Box 3.7** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.
- 3.8.22 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

Box 3.8: SA Objective 7: Pollution strategic assessment methodology

Score	Likely impact - AQMA
-	All development proposals in Wolverhampton are located within an AQMA.
Notes	
UK AQMA data available from Defra ¹⁰² .	

Score	Likely impact – main road
-	Development proposals located within 200m of a main road.
0	Development proposals located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.

Notes	
Road data available from the Ordnance Survey ¹⁰³ .	
A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance ¹⁰⁴ .	

Score	Likely impact – Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

¹⁰² Department for Environment Food and Rural Affairs (2022) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 01/12/23]

¹⁰³ Ordnance Survey (2022) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 01/12/23]

¹⁰⁴ Department for Transport (2023) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 01/12/23]

Notes

Watercourse mapping data available from the Ordnance Survey¹⁰⁵.

A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance¹⁰⁶.

Score Likely impact – groundwater SPZ

- Development proposal coincides with a groundwater SPZ.

0 Development proposal does not coincide with a groundwater SPZ.

Notes

SPZ data available from the Environment Agency¹⁰⁷. Groundwater source catchments are divided into three zones:

- Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;
- Outer Zone (Zone II) – 400-day travel time; and
- Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.

Score Likley impact – increase in air pollution

-- Development proposals which could potentially result in a significant increase in air pollution.

- Development proposals which could potentially result in a minor increase in air pollution.

0 Development would be expected to result in a negligible increase in air pollution.

+/- The air pollution likely to be generated as a result of development proposals is uncertain. Including development proposals for Gypsy and Traveller use.

Notes

It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution¹⁰⁸. Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.

¹⁰⁵ Ordnance Survey (2023) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 01/12/23]

¹⁰⁶ DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 01/12/23]

¹⁰⁷ Environment Agency (2023) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 01/12/23]

¹⁰⁸ Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Date accessed: 01/12/23]

Notes

Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.

SA Objective 8: Waste

- 3.8.23 **Box 3.8** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.
- 3.8.24 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. The 1% principle as set out in **Box 3.8** is only a coarse precautionary indicator, and greater detail of waste data would help to better quantify effects. The amount and type of waste produced will vary depending upon the specific site circumstances and end use and may have differing implications for the management of waste; such detail is not available to inform the assessment of reasonable alternative sites.

Box 3.9: SA Objective 8: Waste strategic assessment methodology

Score	Likley impact - waste
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential or Gypsy and Traveller use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.

Notes
<p>Figures calculated using UK local authority household waste data¹⁰⁹ and the number of people per dwelling¹¹⁰, such that proposals for 1,115 homes or more are expected to increase household waste generation by 1% or more in comparison to the current estimates for Wolverhampton.</p> <p>Proposals for 111 homes or more are expected to increase household waste generation by 0.1% or more in comparison to current estimates for Wolverhampton.</p>

¹⁰⁹ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

¹¹⁰ People per Dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 01/12/23]

SA Objective 9: Transport and accessibility

3.8.25 **Box 3.9** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

Box 3.10: SA Objective 9: Transport and accessibility strategic assessment methodology

Score	Likely impact – access to bus stop
-	Development proposals where the majority of the site is located over 400m from a bus stop
+	Development proposals where the majority of the site is located within 400m of a bus stop

Notes

Bus stop data available from Transport for West Midlands¹¹¹.

Target distance of 400m to a bus stop in line with Barton *et al.* sustainable distances¹¹².

Score	Likely impact – access to railway or metro station
-	Development proposals where the majority of the site is located over 2km from a railway or metro station.
+	Development proposals where the majority of the site is located within 2km of a railway or metro station.

Notes

Railway station data available from Transport for West Midlands.

Target distance of 2km to a railway station in line with Barton *et al.* sustainable distances.

Score	Likely impact – pedestrian access
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.

Notes

Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps¹¹³.

¹¹¹ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 01/12/23]

¹¹² Barton, H., Grant, M. & Guise, R. (2010) *Shaping Neighbourhoods: For local health and global sustainability*, January 2010

¹¹³ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Score	Likely impact – road access
-	Development proposals located in areas which currently have poor access to the surrounding road network.
+	Development proposals which are adjacent to an existing road.

Notes

Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps¹¹⁴.

Score	Likely impact – pedestrian access to local services
-	Development proposals where the majority of the site is located over a 15-minute walk to local services.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to local services.
++	Development proposals where the majority of the site is located within a 10-minute walk to local services.

Notes

Data on fresh food centre locations and accessibility modelling (travel time to fresh food and centres) provided by CWC.

Score	Likely impact – public transport access to local services
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to local services.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to local services.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to local services.

Notes

Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) provided by CWC.

¹¹⁴ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

SA Objective 10: Housing

3.8.26 **Box 3.10** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

Box 3.11: SA Objective 10: Housing strategic assessment methodology

Score	Likely impact – provision of housing
--	Development proposals which result in a significant net decrease in housing.
-	Development proposals which result in a minor net decrease in housing.
0	Development proposals would not impact housing provision.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes

Estimated housing capacity provided by CWC.

At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

SA Objective 11: Equality

3.8.27 **Box 3.11** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

Box 3.12: SA Objective 11: Equality strategic assessment methodology

Score	Likely impact- Index of Multiple Deprivation
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.
0	Development proposals outside most deprived 10 percent LSOAs in England. Development proposals would be expected to have no significant impact on equality.
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.

Notes
UK Indices of Multiple Deprivation (IMD) available from MHCLG ¹¹⁵ . It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

¹¹⁵ Ministry of Housing, Communities and Local Government (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 01/12/23]

SA Objective 12: Health

- 3.8.28 **Box 3.12** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.
- 3.8.29 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRow network.
- 3.8.30 It should be noted that healthcare capacity information has not been available; the assessment is based on accessibility alone.

Box 3.13: SA Objective 12: Health strategic assessment methodology

Score	Likely impact – NHS hospital
-	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.
+	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.

Notes

NHS hospital department data available from the NHS website¹¹⁶, and local hospital data provided by CWC. The target distance of 5km to an NHS hospital with and A&E service has been used in line with Barton et al. sustainable distances¹¹⁷.

Score	Likely impact – pedestrian access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute walk to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute walk to a healthcare location.

Notes

Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.

Score	Likely impact – public transport access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to a healthcare location.

¹¹⁶ NHS (2023) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 01/12/23]

¹¹⁷ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Score	Likely impact – public transport access to GP surgery
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to a healthcare location.

Notes

Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.

Score	Likely impact – access to / net loss of greenspace
-	Development proposals which coincide with greenspace. Development proposals where the majority of the site is located over 600m from greenspace.
0	Development proposals do not coincide with greenspace.
+	Development proposals where the majority of the site is located within 600m of a greenspace.

Notes

Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces¹¹⁸. It is assumed that these greenspaces are publicly accessible.

The target distance of 600m to a public greenspace has been used in line with Barton et al. sustainable distances¹¹⁹.

Score	Likely impact – access to PRow / cycle routes
-	Development proposals where the majority of the site is located over 600m from a PRow and cycle route.
+	Development proposals where the majority of the site is located within 600m from a PRow and/or cycle route.

Notes

PRow data provided by CWC.

Strategic cycle route data available from Transport for West Midlands¹²⁰. The target distance of 600m to a footpath or cycle path has been used in line with Barton *et al.* sustainable distances.

¹¹⁸ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 01/12/23]

¹¹⁹ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

¹²⁰ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 01/12/23]

SA Objective 13: Economy

3.8.31 **Box 3.13** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

Box 3.14: SA Objective 13: Economy strategic assessment methodology

Score	Likely impact – pedestrian access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute walk to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute walk but within a 30-minute walk to a key employment location.
++	Residential development proposals where the majority of the site is located within a 25-minute walk to a key employment location

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – public transport access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute travel time via public transport to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute travel time but within a 30-minute travel time via public transport to a key employment location.

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – employment floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.

Notes

Assessment of current land use has been made through reference to aerial photography and the use of Google Maps¹²¹.

SA Objective 14: Education, skills and training

3.8.32 **Box 3.14** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

Box 3.15: SA Objective 14: Education, skills and training strategic assessment methodology

Score	Likely impact – pedestrian access to primary school
-	Residential development proposals where the majority of the site is located over a 15-minute walk to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a primary school.
++	Residential development proposals where the majority of the site is located within a 10-minute walk to a primary school.

Notes

Data on primary school locations and accessibility modelling (travel time to primary schools) provided by CWC.

Score	Likely impact – pedestrian access to secondary school
-	Residential development proposals where the majority of the site is located over a 25-minute walk to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute walk but within a 25-minute walk to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute walk to a secondary school.

Notes

Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.

Score	Likely impact – public transport access to secondary school
-	Residential development proposals where the majority of the site is located over a 25-minute travel time via public transport to a secondary school.
0	Development proposals for non-residential use.

¹²¹ Google Maps (2023) Available at: <https://www.google.co.uk/maps>

Score	Likely impact – public transport access to secondary school
+	Residential development proposals where the majority of the site is located over a 20-minute travel time via public transport but within a 25-minute travel time via public transport to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute travel time via public transport to a secondary school.
Notes	
Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.	

4 Housing growth options

4.1 Preface

- 4.1.1 Paragraph 61 of the NPPF¹²² states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG¹²³, unless the local authority feel that circumstances warrant an alternative approach.
- 4.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.
- 4.1.3 In April 2022, the housing need figure for Wolverhampton was 1,086 homes per year, according to the national standard method including a 35% uplift which applies to the 20 largest towns and cities. This means that the housing need which the WLP must seek to meet for the Plan period (2022-2042) is 21,720 homes.
- 4.1.4 The 2022 Wolverhampton SHLAA¹²⁴ estimates the current supply of housing land in the Wolverhampton urban area up to 2042. This supply takes into account all identified sites which are currently suitable and deliverable for housing, and also reasonable windfall allowances. The total identified urban housing supply is 9,722 homes, leaving a significant unmet housing need for the Plan period of 11,998 homes.
- 4.1.5 Three options for housing growth have been identified by CWC (see **Table 4.1**). These options include overall housing quanta, and broad direction of growth i.e. the proportion of the housing to be met within Wolverhampton’s urban area and met through exporting through the DtC. In light of the government’s changes to national planning policy¹²⁵, CWC have taken the decision to not review the Green Belt and as such distribution of growth within the Green Belt is not considered to be a reasonable alternative.

¹²² DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 04/01/23]

¹²³ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 01/12/23]

¹²⁴ City of Wolverhampton Council (2022) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Final Report: Update as of April 2022. Published: September 2023. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/housing-site-information> [Date accessed: 04/12/23]

¹²⁵ Paragraph 145 of the NPPF (December 2023) states that “*Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated*”

Table 4.1: Wolverhampton housing growth options identified by CWC

Option	Description of housing growth option	CWC assessment of option
Option H1	Carry forward existing housing allocations which focus housing growth in urban area: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 	<ul style="list-style-type: none"> Shortfall of 11,998* homes against housing need 2022*-42 Sustainable pattern of development
Option H2	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 61 homes on one new allocation (following discount) 524* homes from density uplift and structural change in Wolverhampton City Centre 	<ul style="list-style-type: none"> Shortfall of 11,413* homes against housing need 2022*-42 Highly sustainable pattern of development
Option H3	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres, and export remaining housing need to neighbouring authorities: <ul style="list-style-type: none"> Around 9,722* homes on existing supply in urban area 61 homes on one new allocation (following discount) Around 524* homes from density uplift and structural change in Centres Around 11,413* homes exported through Duty to Cooperate 	<ul style="list-style-type: none"> All of housing need 2022*-42 met Highly sustainable pattern of development Sufficient existing and potential offers from neighbouring authorities which have a strong relationship with Wolverhampton

** subject to amendment at Regulation 19 / Regulation 22 stage due to annual changes in housing need and supply*

4.1.6 **Table 4.2** summarises the likely impacts of each housing growth option in relation to the 14 SA Objectives. The text within **sections 4.2 – 4.15** sets out the accompanying assessment narrative which explains how each overall impact was identified.

4.1.7 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CWC, as well as expert judgement.

4.2 SA Objective 1 – Cultural heritage

4.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. Many of Wolverhampton's remaining open spaces are also of historic importance, such as conservation areas and areas noted within the HLC as AHHLV/AHHTV, including historic field systems and parklands.

- 4.2.2 All three housing growth options propose to deliver around 9,722 homes in the urban area, and as such, it is likely that a large proportion of housing growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of assets and their settings. Options H2 and H3 seek to increase density within Centres, which could potentially place pressure on the historic environment to a greater extent than Option H1. On the other hand, by encouraging growth within these areas, development could also help to promote regeneration, and enhance the cultural heritage value and appreciation of historic features.
- 4.2.3 Overall, as the location, site context and proximity to receptors of the proposed housing growth is unknown, the potential impacts of all the housing growth options on cultural heritage features is uncertain.

4.3 SA Objective 2 – Landscape

- 4.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. According to the Landscape Sensitivity Assessment, the northern and southern Green Belt parcels, and a small section to the south west, are the most sensitive in Wolverhampton, identified as 'moderate-high' sensitivity. According to the Green Belt Study, development in these areas would also lead to 'very high' harm to the purposes of the Green Belt. Although Green Belt is not necessarily an indicator of higher quality landscapes, within Wolverhampton this is generally the case. All three options would protect Green Belt land from development and would focus the majority of growth within the existing urban area.
- 4.3.2 Similarly to the assessment under SA Objective 1, development within urban areas could lead to positive or negative effects on landscape character. All options include at least 9,722 homes within the urban area, with Options H2 and H3 also delivering approximately 524 homes through density uplift in Centres. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local landscape character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.
- 4.3.3 Overall, as the location, site context and proximity to receptors of the proposed housing provision is unknown, the potential impacts of all the housing growth options on landscape is uncertain.

4.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

- 4.4.1 Wolverhampton's biodiversity assets include LNRs, SINCs and SLINCs which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of Wolverhampton's GI network are also likely to serve as important corridors between habitats, facilitating movement of species and linking to the wider countryside including the Green Belt, which supports various elements of the GI network, including habitats and ecological networks such as hedgerows, remnant woodland, trees and green/blue corridors.

- 4.4.2 The proposed development under any of the housing options may have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.
- 4.4.3 All three options seek to focus housing growth in the existing urban area, with no Green Belt release. The options may therefore direct development away from the most sensitive biodiversity features, although it should be noted that urban areas can also support distinctive habitats, species and ecological linkages.
- 4.4.4 It is likely that development under any option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any biodiversity net gain (BNG) provisions at the site level, owing to the large quanta of housing proposed. A minor negative impact is therefore identified for Options H1 and H2 and a major negative impact is identified for H3 that proposes significantly larger housing growth and therefore increased pressure on biodiversity.

4.5 SA Objective 4 – Climate change mitigation

- 4.5.1 The majority of Wolverhampton’s CO₂ emissions are attributed to domestic and transport sources¹²⁶. The lowest number of dwellings is proposed under Option H1, and as such, this option would be likely to lead to the lowest impact with regard to GHG emissions. This option would also focus all development within Wolverhampton’s existing urban areas, in proximity to a range of existing jobs, services, facilities and sustainable transport infrastructure. As such, Option H1 would be likely to perform best with regard to climate change mitigation.
- 4.5.2 In contrast, Option H3 proposes the highest number of dwellings (21,720 homes). Option H3 would lead to greater increase CO₂ and other GHG emissions, as a consequence of the construction and occupation of dwellings. However, Options H2 and H3 would also provide development at a higher density within Centres, which are likely to be highly sustainable locations for growth in terms of accessibility to services and public transport infrastructure.
- 4.5.3 Overall, all housing growth options propose a large quantum of growth, which would be likely to increase CO₂ and other GHG emissions, to some extent, as a consequence of the construction and occupation of dwellings. A minor negative impact is identified for Options H1 and H2 which provide 9,722 and 10,307 homes respectively, and a major negative impact for Option H3 which would provide 21,720 homes in total.
- 4.5.4 The potential of new development under any growth option to draw on renewable or low-carbon energy supplies is not known at this stage of assessment.

¹²⁶ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

4.6 SA Objective 5 – Climate change adaptation

- 4.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time.
- 4.6.2 The focus of development under the three options within the existing urban area may help to reduce the proportion of previously undeveloped land required to deliver the housing, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹²⁷, and helping to alleviate the 'urban heat island' effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.
- 4.6.3 Overall, as the location and site context of the proposed housing provision is unknown, the potential impacts of all housing growth options on climate change adaptation is uncertain.

4.7 SA Objective 6 – Natural resources

- 4.7.1 The majority of Wolverhampton's land is classified as 'Urban' ALC. There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC.
- 4.7.2 It can be assumed that development focused in the existing urban area would not result in the loss of any BMV land. Development focused within the urban area is also likely to provide opportunities for re-use of previously developed land, helping to promote an efficient use of natural resources. Although the exact location of new housing growth under the three options is unknown, it is likely that any development on previously undeveloped land would be small-scale. Therefore, Options H1 and H2 would likely result in a minor positive impact on natural resources, by promoting an efficient use of land. Whereas Option H3 in addition to the development focused in the existing urban area would export growth through DtC, and the exact location of the growth is uncertain and could potentially result in the loss of undeveloped land.

¹²⁷ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 01/12/23]

4.8 SA Objective 7 – Pollution

- 4.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any of the housing options would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 4.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. Development under Option H3 would deliver the most housing growth of the three options; therefore, this option could potentially result in the largest impact on pollution due to the greater potential of the worsening of air, soil and water quality.
- 4.8.3 Overall, all housing options would be expected to expose new residents to pollution to some degree, and generate further pollution owing to the large scale of development proposed. A minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

4.9 SA Objective 8 – Waste

- 4.9.1 All options for housing growth would be likely to increase household waste production. It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England¹²⁸.
- 4.9.2 Option H1 proposes the lowest total housing number (9,722) and so this option could be considered the best performing, followed by H2 (10,307). Option H3 proposes the highest total housing number (21,720) although approximately 11,413 of these homes would be exported through DtC. It can be assumed that the higher the proposed housing number, the higher the number of new residents introduced through each option.
- 4.9.3 Overall, all options would be likely to significantly increase household waste and result in a negative impact on SA Objective 8. When considering the total housing quanta proposed under each option alongside the general national trend of decreased waste over time, a minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

4.10 SA Objective 9 – Transport and accessibility

- 4.10.1 All options aim to focus housing growth within Wolverhampton's existing urban areas, where there is the greatest provision of sustainable transport infrastructure, including active travel links and public transport options such as buses, metro and rail. It is anticipated that new residents in the centres would be more likely to choose sustainable travel options rather than private car use, compared to more dispersed housing.

¹²⁸ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

4.10.2 It should be noted that there is some uncertainty in this assessment in terms of the effect that high density development within centres proposed under all options could potentially have with regard to capacity issues at transport facilities and traffic congestion; the larger amount of development proposed under Option H3 would be likely to have the greatest potential for adverse effects in this regard. Additionally, there is uncertainty in the assessment of Option H3 as the location of the exported proportion of the housing under the option is unknown. Overall, taking into consideration the potential positive and negative impacts of the proposed growth, Options H1 and H2 would provide a major positive impact on transport and accessibility and Option H3 on balance would provide a minor positive impact.

4.11 SA Objective 10 – Housing

4.11.1 Option H3 would be expected to meet the identified housing requirement of 21,720 homes, and therefore, have a major positive impact on housing provision. Whereas, Options H1 and H2 would not deliver enough housing to meet the identified need, with a shortfall of approximately 11,998 and 11,413 homes predicted under Options H1 and H2, respectively. A minor positive impact on housing provision is identified for Options H1 and H2.

4.11.2 The capacity of Wolverhampton’s urban area has been informed through the SHLAA (2022) and emerging Urban Capacity Review. These aspects need to be closely considered as, without careful planning, development solely focused in urban areas could have adverse impacts on loss of employment opportunities, access to greenspaces for health and wellbeing and the capacity of social infrastructure such as education and health facilities to accommodate growth.

4.11.3 At this scale of assessment, the likely contribution of each housing growth option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes. However, options which would deliver a larger quantum of growth may be more likely to provide a range of homes.

4.12 SA Objective 11 – Equality

4.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area.

4.12.2 Growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, this could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. Increased housing in the urban areas may also lead to greater pressure on existing open spaces and potential conversion of non-residential land uses into residential properties.

- 4.12.3 Option H3 meets the identified housing need for Wolverhampton of 21,720 homes. Option H3 may therefore be more likely to ensure provision of a suitable mix of housing types / tenures and allow greater scope to meet the varying needs of the population, such as provision of affordable homes, compared to Options H1 and H2 which would result in a housing shortfall. By not meeting housing needs, Options H1 and H2 could also put pressure on housing and rental costs, which would be likely to lead to poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing.
- 4.12.4 As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of all housing growth options on equality. Overall, Options H1 and H2 would be more likely to lead to a minor negative impact on equality, whereas there is greater uncertainty for Option H3 which could lead to positive or adverse effects.
- 4.12.5 At present, there is no evidence to suggest that any of the housing growth options would disproportionately affect any of the protected characteristics¹²⁹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

4.13 SA Objective 12 – Health

- 4.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation, although new development may put pressure on open spaces under any of the proposed housing growth options.
- 4.13.2 All three options direct growth towards the existing urban area where the majority of existing healthcare facilities are concentrated. The three options may therefore result in a large proportion of new residents being located in areas with good sustainable access to these facilities. Although, it should be noted that the high density development in centres proposed within Options H2 and H3 could potentially lead to capacity issues at healthcare facilities. This could also put pressure on urban greenspaces if land is required for development, with potential negative effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation.
- 4.13.3 Overall, Options H1 and H2 could potentially result in a major positive impact on SA Objective 12 as it would situate the development in sustainable locations. Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at healthcare facilities within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to healthcare. Overall, on balance Option H3 is identified as having a minor positive impact on health.

¹²⁹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

4.14 SA Objective 13 – Economy

- 4.14.1 The options considered in this assessment focus on housing growth only. It is assumed that future housing development would not result in the loss of existing active employment floorspace.
- 4.14.2 In terms of accessibility of proposed new housing growth to employment opportunities, the majority of the WLP area is likely to provide relatively good connections, according to accessibility modelling data. A range of employment opportunities including retail, commercial and office floorspace can be found in the WLP area, particularly the main centres. The WLP area is also well served by public transport to nearby centres such as Birmingham and the wider Black Country.
- 4.14.3 In general, it is expected that development focused within the existing urban area would provide good access to a range of local employment opportunities as well as sustainable transport options to reach employment further afield.
- 4.14.4 Overall, Options H1 and H2 would be likely to result in a major positive impact as all development would be concentrated in the urban area under this option. Whereas there is uncertainty regarding where the development exported to neighbouring authorities under Option H3 would be and if this development would solely be located in urban areas. Overall, considering similar development in the urban area to Options H1 and H2, Option H3 would be likely to have a minor positive impact on the economy.

4.15 SA Objective 14 – Education, skills and training

- 4.15.1 There are many primary and secondary schools located across Wolverhampton, as well as higher education opportunities at the University of Wolverhampton. The majority of the WLP area has good pedestrian and public transport access to schools according to accessibility modelling data.
- 4.15.2 All three housing options seek to focus growth in the existing urban area, with Options H2 and H3 also proposing increased housing density in accessible locations (i.e. the main centres). This approach would be likely to ensure that the majority of new development is situated in areas with good sustainable access to education; however, it is uncertain whether the associated increase in population density would lead to adverse effects in terms of capacity issues at primary and secondary schools.
- 4.15.3 Overall, Option H1 and H2 could potentially result in a major positive impact on SA Objective 14 as they would be likely to situate development in sustainable locations. Option H3 would also situate development in sustainable locations within Wolverhampton itself, however, Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at schools within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to schools and training opportunities. On balance, a minor positive impact is identified for Option H3.

4.16 Conclusions

Table 4.2: Impact matrix of the three housing growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H2	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H3	+/-	+/-	--	--	+/-	+/-	--	--	+	++	+/-	+	+	+

- 4.16.1 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only 'nature', in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.
- 4.16.2 A larger quantum of housing growth would generally have more potential to lead to adverse effects, particularly on environmentally focused SA Objectives. Options H1 and H2 propose significantly smaller housing numbers at 9,722 and 10,307 respectively, compared to Option H3 which proposes 21,720 homes. Development proposed under Options H1 and H2 would be located wholly within Wolverhampton's urban area. Based on the high-level scoring system, Options H1 and H2 have been identified to score the same overall (as shown within **Table 4.2**), however, as Option H1 provides a lower housing supply than Option H2, it has potential to perform slightly better against environmental SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste). Despite this, Options H1 and H2 would both lead to a significant shortfall against the identified housing need; therefore, minor negative impacts have been identified against SA Objective 11 (equality) and minor positive impacts against SA Objective 10 (housing) due to the likely reduced scope for delivering varied and high-quality homes to meet the needs of the population.
- 4.16.3 On the contrary, Option H3 recorded a major positive impact against SA Objective 10 and a minor positive impact against SA Objective 11, where the proposed development would meet the identified housing need of 21,720. However, major negative impacts were identified for Option H3 for SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste) due to the larger quantum of growth proposed under this option having potential to lead to more adverse effects than Options H1 or H2. Approximately half of the growth proposed under Option H3 (11,413 homes) will be exported to neighboring authorities, which has resulted in uncertainty in the expected impacts for the proposed housing growth since the location would be determined through other authorities' local plans.

4.16.4 Overall, whilst Option H1 can be identified as the best performing within several SA Objectives, the three options would deliver a similar level of growth within Wolverhampton itself and as such there is very little separating the options in terms of effects within the Plan area. Options H2 and H3 both seek to deliver the same amount of increased growth in accessible locations and maximise opportunities for sustainable urban growth within Wolverhampton. In order to meet the identified housing needs, it will be necessary to export a proportion of growth to neighbouring authorities as set out in Option H3; however, this is likely to increase potential for adverse effects when compared to pursuing a lower quantum of growth.

4.17 Selection and rejection

4.17.1 CWC's assessment of the housing growth options is set out in **Table 4.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹³⁰.

4.17.2 Considering the housing evidence and the SA findings, CWC consider that "*The Preferred Option H3 is the only one of the three growth options which has the potential to meet housing need for Wolverhampton and meet national guidance on sustainable development*".

¹³⁰ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

5 Gypsy and traveller growth options

5.1 Preface

- 5.1.1 In accordance with the Planning policy for traveller sites¹³¹, Gypsies and Travellers are defined as *"Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such"*.
- 5.1.2 Travelling Showpeople are defined as *"Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above"*.
- 5.1.3 The Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)¹³² assessed accommodation needs for Gypsies, Travellers and Travelling Showpeople across the WLP area and the wider Black Country.
- 5.1.4 Taking into consideration the updated Plan period for the WLP, the identified 5-year Gypsy and Traveller accommodation need for Wolverhampton up to 2032 is 33 pitches.
- 5.1.5 One site is currently allocated in the Stafford Road AAP¹³³ for 12 pitches at the 'Former Bushbury Reservoir, Showell Road' which CWC are seeking to bring forward through the WLP.
- 5.1.6 Two options for Gypsy and Traveller growth have been identified by CWC (see **Table 5.1**). Both options include provision of 12 Gypsy and Traveller pitches at the carried forward 'Former Bushbury Reservoir, Showell Road' site, and regularising two pitches on the currently unauthorised site located on Wolverhampton Road in Heath Town. Option G2 also considers the potential to export growth through DtC.

¹³¹ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date accessed: 01/12/23]

¹³² RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

¹³³ Wolverhampton City Council (2014) Stafford Road Corridor Area Action Plan 2013 – 2026. Available at: https://www.wolverhampton.gov.uk/sites/default/files/2022-02/stafford_road_corridor_aap_adopted_version_0.pdf [Date accessed: 01/12/23]

Table 5.1: *Wolverhampton Gypsy and Traveller pitch options identified by CWC*

Option	Description of option	Assessment of option
Option G1	Make use of existing sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site 	<ul style="list-style-type: none"> • 19 pitch shortfall against Wolverhampton gypsy and traveller pitch need up to 2032
Option G2	Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032: <ul style="list-style-type: none"> • 2 pitches regularised on currently unauthorised site • 12 pitches on existing allocated site • 19 pitches exported through Duty to Cooperate 	<ul style="list-style-type: none"> • No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032

5.1.7 **Table 5.2** summarises the likely impacts of each Gypsy and Traveller growth option in relation to the 14 SA Objectives. The text within **sections 5.2 – 5.15** sets out the accompanying assessment narrative which explains how each overall impact was identified.

5.2 SA Objective 1 – Cultural heritage

5.2.1 The existing allocated site for Gypsy and Traveller use in Wolverhampton at 'Former Bushbury Reservoir, Showell Road' is situated approximately 410m from 'Wolverhampton Locks' CA, and within 500m from several Grade II Listed Buildings along the canal including 'Birmingham Canal No 14 Lock' and 'Viaduct on Stour Valley Line'. The closest heritage asset to the existing unauthorised site is the Grade II Listed Building 'Heath Town Public Baths and Library', situated approximately 130m from the site. The sites are surrounded by built form, and as the proposal is for small-scale Gypsy and Traveller pitches, the proposed development at these locations would be unlikely to significantly affect the setting of nearby heritage assets. Under either growth option, the proposed development would be expected to result in a negligible impact on cultural heritage. There is however greater uncertainty for Option G2 in terms of the location of the 19 pitches proposed to be exported through DtC, the potential effects of which on cultural heritage would need to be explored through the relevant authorities' local plan.

5.3 SA Objective 2 – Landscape

5.3.1 Both proposed Gypsy and Traveller sites are located within the urban area of Wolverhampton, outside of the study area for the Black Country Landscape Sensitivity Assessment. The existing urban area is generally not expected to be sensitive to development, although it should be noted that the study was designed to consider sensitivity of land parcels to housing and employment development (see paras 3.28-3.31 of the Landscape Sensitivity Assessment¹³⁴), rather than Gypsy and Traveller pitches.

¹³⁴ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 01/12/23]

5.3.2 The introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, would be unlikely to significantly change the landscape character, but at the local scale may have a minor adverse impact as a result of the introduction of hardstanding and buildings on the currently undeveloped former reservoir site. The location of exported growth under Option G2 is unknown and as such there is some uncertainty in the overall effect on landscape.

5.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

5.4.1 The existing allocated site, referred to in both Options G1 and G2, coincides with 'Bushbury Junction Reservoir' SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain. The status of the SLINC and any ecological value should be confirmed via site surveys.

5.4.2 Various other biodiversity designations are located in proximity to the Gypsy and Traveller sites, including the emerging 'Wyrley and Essington Canal' LNR located approximately 50m from the existing unauthorised site.

5.4.3 There is potential for a minor negative impact to occur on these local designations, depending on site-specific requirements including potential BNG requirements which may mitigate these effects to some extent. At this stage of the assessment process, a minor negative impact on biodiversity, flora, fauna and geodiversity cannot be ruled out for both options.

5.4.4 The proposed development under either option may also have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

5.5 SA Objective 4 – Climate change mitigation

5.5.1 Both proposed options for Gypsy and Traveller growth relate to small-scale sites. The existing allocation is located along Showell Road in Bushbury. The existing unauthorised site is located on Wolverhampton Road in Heath Town. These local areas have relatively good transport connections, with public transport being a viable option for travel and the sites being well located with respect to many services and facilities to meet day to day needs. This may present positive effects with regard to climate change mitigation, by reducing the need to travel and facilitating more sustainable travel choices.

- 5.5.2 The majority of Wolverhampton's CO₂ emissions are attributed to domestic and transport sources, according to the government published estimates¹³⁵; however, the proportion of this which can be attributed to Gypsies and Travellers is uncertain, as it is unknown how the average emissions from a Gypsy and Traveller household compares to that of a 'brick and mortar' dwelling. The nature and design of the proposed pitches that would be developed is unknown at the time of writing. Therefore, potential increases in carbon emissions as a result of the construction and occupation of Gypsy and Traveller pitches under Options G1 or G2 are uncertain.
- 5.5.3 Option G2 proposes a slightly higher total provision of pitches (19 more) than G1, and so it could be assumed that this option would present a slightly higher potential for adverse effects in terms of climate change mitigation although the location of this exported growth is unknown.

5.6 SA Objective 5 – Climate change adaptation

- 5.6.1 The proposed Gypsy and Traveller development within Wolverhampton under both Options G1 and G2 would locate new residents in Flood Zone 1, away from risk of fluvial flooding. However, a large proportion of the existing allocation at 'Former Bushbury Reservoir, Showell Road' is located in areas at risk of surface water flooding. Without mitigation, both options could lead to a significant adverse effect on climate change adaptation, although the scale of this impact would be relatively small. Overall, a minor negative impact is identified for both options, with greater uncertainty for Option G2 in terms of the location of exported growth with respect to flood risk. It is likely that there would be scope to incorporate SUDS, to reduce or mitigate adverse effects associated with flood risk to some extent.

5.7 SA Objective 6 – Natural resources

- 5.7.1 The proposed Gypsy and Traveller development under both growth options would situate all pitches within Wolverhampton upon land classed as 'Urban' ALC. Therefore, the proposed development would help to prevent the loss of BMV land across the Plan area. However, the existing allocated site at 'Former Bushbury Reservoir, Showell Road' currently comprises scrub and trees on the former reservoir site with potential environmental value, that may be lost or fragmented if developed. Both options propose the development of 12 Gypsy and Traveller pitches at this location which would be likely to involve creating new areas of hardstanding and new infrastructure such as access roads. Overall, Options G1 and G2 would both be expected to have a minor negative impact on natural resources. As Option G2 proposes a higher total number of pitches, to be exported to neighbouring authorities, this option could potentially place greater pressure on undeveloped land and soil resources, although the specific location of exported growth is unknown.

¹³⁵ Department for Energy Security & Net Zero (2023). UK local authority greenhouse gas emissions estimates 2021. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 06/12/23]

5.8 SA Objective 7 – Pollution

- 5.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under either option would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 5.8.2 The existing allocation and the existing unauthorised site are located in close proximity to railway lines, meaning that current and future residents may be exposed to higher levels of noise pollution and vibrations. The unauthorised site is also adjacent to the A4124, and therefore, the proposed development at this site could potentially expose site end users to higher levels of transport associated air and noise pollution.
- 5.8.3 New development may also lead to increased soil and water pollution, as a result of construction and occupation of the development. This will depend on the nature and scale of the proposed Gypsy and Traveller pitches, such as the extent of new hardstanding, and any utilities infrastructure that is introduced.
- 5.8.4 Overall, both Gypsy and Traveller growth options would be expected to expose new residents to pollution and may generate further pollution to some degree. A minor negative impact is therefore identified for both options.

5.9 SA Objective 8 – Waste

- 5.9.1 It is assumed that new residents in the WLP area will have an annual waste production of approximately 409kg per person, in line with the average for England¹³⁶. Waste may also be produced during the construction of the sites.
- 5.9.2 There is a degree of uncertainty in this assessment, as it is unknown how the average waste production from a Gypsy and Traveller household compares to that of a 'brick and mortar' dwelling, although it is likely that both options for Gypsy and Traveller growth would increase household waste production, to some extent. A minor negative impact could occur as a result of both options.
- 5.9.3 Option G2 proposes a slightly higher total provision of pitches than G1, and so it is assumed that this option would present a slightly higher potential for adverse effects in terms of waste generation.

¹³⁶ DEFRA (2023) Statistics on waste managed by local authorities in England in 2021/22. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results-202122/local-authority-collected-waste-management-annual-results-202122#:~:text=England%20Waste%20from%20Households%3A%202021%20and%202021%2F22&text=In%202021%2C%20total%20%27waste%20from,increase%20of%202.4%20per%20cent> [Date accessed: 07/12/23]

5.10 SA Objective 9 – Transport and accessibility

- 5.10.1 The proposed Gypsy and Traveller options would situate new residents in areas with good access to public transport options, including bus services. The existing unauthorised site, and a proportion of the existing allocated site, lie within the sustainable target distance of 2km from Wolverhampton Station.
- 5.10.2 The development at both sites would also be expected to have relatively good access to the pedestrian and cycle networks. Both sites are located within 600m of a PRoW, and the existing allocated site ('Former Bushbury Reservoir, Showell Road') is located within 600m of the cycle network, facilitating active travel. The existing allocated site lies within a 10-minute travel time to local services via public transport, according to accessibility modelling data. Although, the data indicates that the allocated site lies just outside of the 15-minute walking distance to local services, and so residents may be less likely to choose to walk to these services from this proposed site. The existing unauthorised site is located within a 10-minute travel time to local services via public transport, and a 10-minute walking distance to local services, according to accessibility modelling data.
- 5.10.3 Overall, both Gypsy and Traveller growth options would be likely to provide relatively good access to sustainable travel options and may serve to encourage local journeys via active travel, owing to the location of the sites with respect to existing facilities and employment opportunities. A minor positive impact could be expected under either option with regard to transport and accessibility.

5.11 SA Objective 10 – Housing

- 5.11.1 Option G2 would seek to meet the identified Gypsy and Traveller 5-year accommodation need of 33 pitches, and would therefore be expected to result in a major positive impact on housing provision by meeting the needs for this community. Option G1 does not meet the identified Gypsy and Traveller pitch requirements for Wolverhampton, with a 19-pitch shortfall. Option G1 would nevertheless provide 14 pitches and therefore a minor positive impact on housing provision for the needs of this community is identified.

5.12 SA Objective 11 – Equality

- 5.12.1 Both proposed Gypsy and Traveller sites included within the growth options are situated within LSOAs that fall within the 10% most deprived in England, according to the IMD. Directing Gypsy and Traveller growth to these areas could potentially result in positive effects on equality, in terms of helping to facilitate social inclusion, providing accommodation to contribute towards meeting the identified needs, and ensuring that the development is situated in areas with good connectivity to local services, facilities and employment opportunities. On the other hand, increasing provision of pitches in these areas could also lead to exacerbation of existing inequalities by increasing the local population density.
- 5.12.2 The overall effect of both Options G1 and G2 on SA Objective 11 is therefore uncertain, although Option G2 may be expected to perform slightly better than G1 owing to the proposed development meeting the identified need of Wolverhampton's Gypsy and Traveller pitches.

- 5.12.3 Race is a protected characteristic under the Equality Act. The growth options seek to contribute towards the identified accommodation requirements for Gypsies and Travellers which would be likely to have a positive impact on meeting the accommodation needs of this ethnic group.
- 5.12.4 At present, there is no evidence to suggest that either of the Gypsy and Traveller growth options would disproportionately affect any of the other protected characteristics¹³⁷ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

5.13 SA Objective 12 – Health

- 5.13.1 Both the existing allocated site and the unauthorised site are located within a sustainable distance to healthcare facilities, including within a 15-minute walking distance to a GP surgery, and within 5km of New Cross Hospital. The proposed development under either growth option would be likely to facilitate good access to healthcare.
- 5.13.2 There are a range of public open spaces in proximity to the existing allocated site, including the Fowler Playing Fields to the south. The existing unauthorised site is near to greenspaces such as Heath Town Park, which is located approximately 100m from the site. Both options would be expected to provide new residents with access to outdoor space for exercise and recreation, with associated positive effects on health and wellbeing.
- 5.13.3 Overall, the proposed development under both Options G1 and G2 could result in a minor positive impact in terms of access to healthcare and recreational facilities.

5.14 SA Objective 13 – Economy

- 5.14.1 All existing and proposed Gypsy and Traveller sites are located in areas with good sustainable access to employment. The existing allocated site is situated adjacent to several businesses, including those within the Showell Road Industrial Estate. Various employment opportunities can be found in Heath Town Centre, close to the existing unauthorised site. According to accessibility modelling data, both sites are located within a 20-minute walk and public transport journey to an employment location. The development proposed under both options would be likely to ensure that the Gypsy and Traveller community would have good sustainable access to employment opportunities, resulting in a major positive impact on SA Objective 13. The location of exported growth under Option G2 is unknown and as such there is some uncertainty in the overall effect in terms of sustainable access to employment.

¹³⁷ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

5.15 SA Objective 14 – Education, skills and training

5.15.1 The existing allocated site is located in an area with good sustainable access to primary and secondary schools. According to accessibility modelling data, the existing allocated site is largely located within a 15-minute walk to a primary school, with a proportion within a 10-minute walk, and the unauthorised site is located wholly within a 10-minute walk to a primary school. The existing unauthorised site is also within a 20-minute walk to a secondary school, and the existing allocated site within a 25-minute walk. Both sites are within a 20-minute public transport journey to a secondary school. The development proposed under both options would be likely to ensure that the Gypsy and Traveller community would have good sustainable access to education, skills and training, resulting in a minor positive impact on SA Objective 14.

5.16 Conclusions

Table 5.2: Impact matrix of the two Gypsy and Traveller growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Gypsy and Traveller Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
G1	0	-	-	+/-	-	-	-	-	+	+	+/-	+	++	+
G2	0	-	-	+/-	-	-	-	-	+	++	+/-	+	++	+

5.16.1 As both proposed options for Gypsy and Traveller growth relate to the same two sites within Wolverhampton itself, Options G1 and G2 perform similarly overall as shown in **Table 5.2**. However, across several objectives the two options do perform slightly differently as Option G1 does not meet the identified Gypsy and Traveller need whereas Option G2 does, through exporting a proportion of growth to neighbouring authorities.

5.16.2 Both options would give rise to potential adverse effects in terms of the local landscape character (SA Objective 2), biodiversity (SA Objective 3), climate change mitigation (SA Objective 5), natural resources (SA Objective 6), pollution (SA Objective 7), and waste (SA Objective 8). Negative impacts could also be expected in regard to the surface water flood risk (SA Objective 4) present on the existing allocated site, without intervention.

5.16.3 There is some uncertainty regarding the effects of the proposed development on climate change mitigation (SA Objective 4) owing to uncertainty in the scale and nature of development involved, and in terms of equality (SA Objective 11) which is difficult to determine without further site-specific information.

5.16.4 Overall, the proposed introduction of a total of 14 pitches under Option G1, and 33 pitches under Option G2, means that Option G2 would be likely to have a major positive impact against SA Objective 10 (housing) in comparison to Option G1 which is identified as having a minor positive impact. Option G2 would be the favourable option of the two as it would meet the identified 5-year supply of Gypsy and Traveller pitches for Wolverhampton; however, this option is reliant upon exporting 19 pitches to neighbouring authorities. The exported growth of small-scale Gypsy and Traveller pitches would be unlikely to cause significant adverse effects, although uncertainty remains on the likely effects of exported pitches.

5.17 Selection and rejection

5.17.1 CWC's assessment of the Gypsy and Traveller growth options is set out in **Table 5.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹³⁸.

5.17.2 Considering the pitch need evidence and the SA findings, CWC consider that "*The Preferred Option G2 is the only one of the two options which has the potential to provide the required 5 year supply of gypsy and traveller pitches for Wolverhampton and also meet national guidance on sustainable development*".

¹³⁸ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

6 Employment growth options

6.1 Preface

6.1.1 Wolverhampton is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Sandwell and Walsall. The Black Country Economic Development Needs Assessment (EDNA) update (2023)¹³⁹ identifies a need for an additional 533ha of land for employment development for the period 2020/2021 up to 2040/2041 across the FEMA as a whole, including a total need of 116ha for Wolverhampton.

6.1.2 Taking into account completions since April 2020, current Local Plan allocations proposed to be carried forward into the WLP and other sites with planning permission for employment development, Wolverhampton's employment land supply as of April 2022 is 47.4ha.

6.1.3 Three options for employment growth have been identified by CWC (see **Table 6.1**). These options include distributions of employment land across existing allocations taking into account the 47.4ha baseline supply figure, proposed new sites, and potential to export growth through the DtC.

Table 6.1: *Wolverhampton employment growth options identified by CWC*

Option	Description of employment option	Assessment of option
Option E1	Carry forward existing employment allocations: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area (including completions since 2020). 	<ul style="list-style-type: none"> Shortfall of 68.6 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E2	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area 15.3 ha on new allocations 	<ul style="list-style-type: none"> Shortfall of 53.3 ha against employment land need for Wolverhampton up to 2041 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E3	Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and export remaining employment land need to neighbouring authorities: <ul style="list-style-type: none"> 47.4 ha on existing employment land supply in urban area 15.3 ha on new allocations 	<ul style="list-style-type: none"> All of employment land need for Wolverhampton up to 2041 met. Sufficient offers from neighbouring authorities which have a strong relationship with Wolverhampton Contributions from neighbouring areas are available to address employment land need across the Black Country FEMA as a whole.

¹³⁹ Black Country Authorities. Employment Land Needs Assessment 2020 to 2041. Available at: <https://www.dudley.gov.uk/media/scfdohle/black-country-employment-land-needs-assessment-edna-2023.pdf> [Date accessed: 07/12/23]

Option	Description of employment option	Assessment of option
	<ul style="list-style-type: none"> 53.3 ha exported through Duty to Cooperate 	<ul style="list-style-type: none"> Sustainable pattern of development

6.2 SA Objective 1 – Cultural heritage

6.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. All three employment options would focus growth within the existing urban areas, amongst existing employment areas. These are generally clustered in the centre, east and north of the WLP area. It is therefore likely that a large proportion of employment growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of these assets and their settings. Employment floorspace could include large buildings and potentially high-rise development, which may also have potential to affect views of or from heritage assets in the city.

6.2.2 Under Options E2 and E3 the "new allocations" have been assessed as reasonable alternative sites within the SA, presented in **Appendix C**. Of the four allocations, two sites were identified to have potential to negatively impact conservation areas and archaeological priority areas (pre-mitigation). However, as a whole, due to the focus of new growth within areas that area already characterised by employment land uses, the new development under the options is likely to be in keeping with the existing built form and may also help to promote regeneration with benefits to areas with historic interest or architecture. All three options could therefore give rise to positive or negative effects, depending on the specific proposal and location. Furthermore, under Option E3 more uncertainty is present where a large proportion of growth would be exported to neighbouring authorities, the specific location of which is unknown.

6.2.3 Overall, as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three employment growth options on cultural heritage features are uncertain.

6.3 SA Objective 2 – Landscape

6.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. None of the employment growth options seek to release Green Belt land for development, and so it is likely that development would avoid sensitive areas as identified in the Landscape Sensitivity Assessment.

6.3.2 Development within the existing urban areas could lead to positive or negative effects on the landscape / townscape character. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.

6.3.3 Options E1 and E2 propose to incorporate all employment growth within Wolverhampton rather than exporting a proportion to neighbouring authorities as under Option E3. Impacts under Option E3 would be more uncertain than options E1 and E2 due to the exported growth. However, as all options propose the same scale of development within Wolverhampton, and as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three options on landscape are uncertain.

6.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

6.4.1 Wolverhampton's biodiversity assets include LNRs, SINC and SLINC which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of the WLP area's GI network are also likely to serve as important corridors between habitats, facilitating movement of species.

6.4.2 None of the employment growth options seek to release Green Belt land for development, and so it is likely that the majority of development would be directed away from areas of previously undeveloped land where habitats and ecological networks are most prevalent. Although, urban areas can also support distinctive habitats, species and ecological linkages and there may be some loss of previously undeveloped land or brownfield land with ecological value within the city. Several of Wolverhampton's employment sites are situated along the canal network which includes locally designated biodiversity assets, including the 'Birmingham Canal, Wolverhampton Level' SINC which is noted as supporting a wide range of habitat types and associated species, including in parts a diverse and abundant aquatic flora. Increasing or intensifying employment uses in proximity to the canal network may therefore increase the risk of water pollution and other development related threats and pressures to local biodiversity features.

6.4.3 Under Options E2 and E3 "*new allocations*" will provide employment land, and have been assessed in the SA as reasonable alternative sites (presented in **Appendix C**). Of the four sites, one site partially coincides with the 'Birmingham Canal, Wolverhampton Level' SINC and one site wholly coincides with the 'Neachells Lane Open Space' SLINC. Development proposed under the options as a whole could potentially lead to minor negative impacts on these local designations, depending on site-specific requirements including potential for BNG which may mitigate these effects to some extent. At this stage of the assessment process, a minor negative impact on biodiversity, flora, fauna and geodiversity cannot be ruled out for all three employment growth options. There is greater uncertainty regarding the effect of Option E3 than the other two, given the unknown location of exported growth.

6.4.4 The proposed development under these three employment options may have the potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

6.5 SA Objective 4 – Climate change mitigation

- 6.5.1 Owing to the focus of employment development under all three options towards the urbanised areas of Wolverhampton and where existing employment provisions are concentrated, it is likely that these areas will be accessible via sustainable transport methods and close to strategic transport routes. This may help to reduce the number of car journeys required for employees travelling to work, and reduce journey times.
- 6.5.2 However, all three options propose to deliver a large amount of new employment land, including 47.4ha under Option E1, 62.7ha under Option E2, and 116ha under Option E3. All options have potential to result in increased GHG emissions during construction and occupation, potentially including more HGV journeys; although, the emissions likely to be generated as a result of the development would be dependent on the nature and scale of the employment land proposed, and the potential for low- or zero-carbon and renewable energy schemes to be incorporated, which is unknown at present. Option E3 would also export 53.3ha of the total 116ha supply to neighbouring authorities, resulting in greater uncertainty surrounding the potential for associated adverse impacts of the proposed development. The overall impact of Options E1, E2 and E3 on climate change mitigation is therefore uncertain.

6.6 SA Objective 5 – Climate change adaptation

- 6.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time. The majority of the proposed employment growth is expected to be situated away from these areas; however, a proportion of growth is likely to be situated in the employment areas to the south east and northern extents of Wolverhampton where there are some areas within Flood Zones 2 and 3. Depending on the site-specific proposals and land use, employment development may be classed as 'less vulnerable' to fluvial flooding according to the NPPF. However, increasing development or density within areas at risk of flooding can have implications downstream, making it more difficult to adapt to the effects of climate change.

- 6.6.2 The focus of the majority of employment growth within the existing urban area and in some cases on brownfield land would be likely to reduce the proportion of previously undeveloped land required to deliver the development, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹⁴⁰, and helping to alleviate the 'urban heat island' effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.
- 6.6.3 Overall, the precise impacts of development cannot be determined without input from flood risk assessments and knowledge regarding the proposed uses and layout of each employment site. Greater uncertainty arises under Option E3, which would export a proportion of growth to neighbouring authorities, the location of which is unknown. Nevertheless, at this stage of the assessment process, a minor negative impact on climate change adaptation cannot be ruled out for all three options.

6.7 SA Objective 6 – Natural resources

- 6.7.1 The majority of Wolverhampton's land is classified as 'Urban' ALC. There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC. It can therefore be assumed that development focused in the existing urban area would not result in the loss of any BMV land.
- 6.7.2 All three options would focus growth within Wolverhampton's urban areas, amongst existing employment land uses. This is likely to include use of previously developed or under-utilised land, and as such, the majority of the proposed development is likely to represent an efficient use of land, with positive effects in terms of the conservation of natural resources. Although, three of the "new allocations" proposed for development under the options contain some areas of previously developed land, that would present a loss of land with environmental value (see **Appendix C**).
- 6.7.3 Under Option E3, 53.3ha of employment land will be exported to neighbouring areas. Whilst the precise location of this growth is unknown, it is likely that the employment land would be located in urban areas, amongst existing employment land uses to promote sustainable development.
- 6.7.4 There may be some loss of previously undeveloped land, or brownfield land with environmental value, within the city as a result of the proposed employment growth under all three options, although this is likely to be relatively small-scale. Overall, all three options would be likely to result in a negligible impact on natural resources.

¹⁴⁰ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 01/12/23]

6.8 SA Objective 7 – Pollution

- 6.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any of the employment growth options would be likely to expose site end users to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air quality.
- 6.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. None of the employment growth options seek to release Green Belt land for development. As the employment growth would be focused within the existing urban areas, there is likely to be potential for redevelopment of brownfield sites and more efficient use of land compared to development directed outside of the city. This may also help to ensure existing ground contamination issues are addressed, prior to the development. The employment options may lead to benefits in the sense that new development would be directed away from areas of greenfield land and natural features where there is generally higher potential for worsening of air, soil and water quality.
- 6.8.3 Despite the above considerations, there is still potential for the generation of air, soil and water pollution to some extent, depending on the proposed end uses of the new employment land, as well as potential to exacerbate existing poor air quality within the AQMA. Option E3 proposes significantly larger employment growth, proposing 116ha of employment land in comparison to 47.4ha under E1 and 62.7 under E2; therefore, Option E3 has potential to cause greater pollution related impacts as a result of proposing a larger quantity of development. Overall, a minor negative impact is identified for Options E1 and E2 and a major negative impact is identified for Option E3. Although, there is some uncertainty in this assessment owing to the unknown specific site context and proximity to receptors, and the unknown location of exported growth under Option E3.

6.9 SA Objective 8 – Waste

- 6.9.1 As the proposed employment growth under all options would be focused within the existing urban areas, it is likely that the development will be situated in closer proximity to existing waste management infrastructure. This could potentially help to minimise adverse effects in terms of simplifying the management of waste and reducing travel times; however, employment growth may also result in a greater quantity or range of waste associated with more employment floorspace. Under Option E3, employment land would be exported to neighbouring authorities, therefore, the location of the growth and other authorities' waste infrastructure is unknown. At this stage, the specific site context and nature of the proposed development is unknown, and therefore, the volumes and types of waste likely to be generated is uncertain under all three options.

6.10 SA Objective 9 – Transport and accessibility

- 6.10.1 Options E1 and E2 would focus growth within the existing urban areas, amongst existing employment areas which are generally clustered in the centre, east and north of the WLP area. The majority of Wolverhampton's urban areas are well served by sustainable transport infrastructure including public transport options such as buses, metro and rail. Although, some employment areas such as the eastern and northern extents of the WLP area are situated further from rail or metro links. Option E3 in addition to focusing growth within the existing urban areas within Wolverhampton as per Options E1 and E2, will also export a proportion of growth to neighbouring areas; it is uncertain as to how well the exported growth will be served by sustainable transport infrastructure.
- 6.10.2 Active travel links are also relatively good across the WLP area, although the coverage varies depending on the specific location and may be less well connected in more industrialised areas, compared to residential neighbourhoods. There is also potential for large amounts of employment growth in the urban areas to exacerbate congestion.
- 6.10.3 On balance, the broad location of new employment growth within the city would be likely to provide sustainable travel options for employees travelling to work, with a minor positive impact on transport and accessibility identified for all three options.

6.11 SA Objective 10 – Housing

- 6.11.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not result in the loss of existing housing, or compromise housing delivery. The three options would be expected to result in a negligible impact on housing provision in Wolverhampton.

6.12 SA Objective 11 – Equality

- 6.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area. Employment growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to employment opportunities; however, this could also lead to exacerbation of existing inequalities in some instances, for example by leading to densification and greater pressure on existing open spaces to be converted into employment land.
- 6.12.2 Option E3 would meet all of the Black Country FEMA employment land need arising in Wolverhampton between 2020/21 and 2040/41; however, Option E3 would not provide all growth within the WLP area and would instead export 53.3ha of employment land via the DtC, potentially resulting in an increased need to commute to other local authority areas and missing an opportunity to address local unemployment issues. However, under Options E1 and E2 the identified employment need for Wolverhampton would not be met and a shortfall of 68.8ha is expected under Option E1 and a shortfall of 53.3ha is expected under Option E2.

6.12.3 As the specific site context and proximity to receptors of the proposed employment land is unknown at this stage, there is some uncertainty regarding the potential impacts of the three options on equality. Overall, Options E1 and E2 would be more likely to lead to a minor negative impact on equality overall, whereas there is greater uncertainty and potential for positive effects under Option E3.

6.12.4 At present, there is no evidence to suggest that either of the employment growth options would disproportionately affect any of the protected characteristics¹⁴¹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

6.13 SA Objective 12 – Health

6.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation.

6.13.2 Under all three options, development is directed towards the existing urban areas, although under Option E3 53.3ha of development would be exported via the DtC. It is expected that exported development would remain in existing urban areas; however, the specific details of the proposed exported growth is uncertain and will be determined through the relevant authorities' local plans. Development directed towards existing areas under all three options could put pressure on urban greenspaces if land is required for development, with potential adverse effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation. However, this is likely to be small-scale occurrence, if at all.

6.13.3 The three employment options are not expected to increase the provision of healthcare facilities across the Plan area. It is also assumed that future employment development would not result in the loss of healthcare facilities. As a result, overall, the three options would be likely to have a negligible impact in regard to human health.

6.13.4 It should be noted that there is potential for adverse effects on human health associated with poor air quality; these impacts are addressed within SA Objective 7 – Pollution.

6.14 SA Objective 13 – Economy

6.14.1 Options E1 and E2 would not meet the employment land need for Wolverhampton up to 2041, and additionally would result in a shortfall of employment land across the Black Country FEMA as a whole. Option E1 would result in a 68.6ha shortfall and Option E2 would result in a 53.3ha shortfall. Both options could therefore result in a lack of local employment opportunities and exacerbate unemployment issues.

¹⁴¹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

- 6.14.2 Option E3 is the only option that meets all of the employment land need for Wolverhampton up to 2041. Option E3 provides 116ha of employment land, with 53.3ha served through the DtC. The contributions from neighbouring areas would address Wolverhampton's employment land need across the Black Country FEMA as a whole. Although there may be need to commute to neighbouring authorities to reach new employment sites, on the whole, under Option E3 residents of Wolverhampton would be likely to have access to a wider range of employment opportunities than Options E1 and E2.
- 6.14.3 Overall, under the provisions of Options E1 and E2 a minor positive impact would be expected on the economy, and under Option E3 a major positive impact is identified.

6.15 SA Objective 14 – Education, skills and training

- 6.15.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not affect access to schools. However, as all options seek to provide employment land, this could potentially also include opportunities for skill development and training, for example the provision of apprenticeships. All three options may therefore lead to an indirect minor positive impact on SA Objective 14.

6.16 Conclusions

Table 6.2: Impact matrix of the three employment growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Employment Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
E1	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E2	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E3	+/-	+/-	-	+/-	-	0	--	+/-	+	0	+/-	0	++	+

6.16.1 As Options E1 and E2 have a similar urban focus and both fail to meet the employment land need for Wolverhampton, resulting in 47.4ha and 62.7ha of employment land respectively, the overall identified impacts against the SA Objectives are similar, as shown in **Table 6.2**.

6.16.2 All three options would locate new development in central areas of Wolverhampton where there is generally good access via existing transport infrastructure, however Option E3 is the only option that would satisfy Wolverhampton’s identified employment need (although reliant on DtC to achieve this). As a result, a major positive impact has been identified for Option E3 under SA Objective 14 (economy), and there may be greater potential than the other options to achieve positive impacts on equality (SA Objective 11) due to the employment need being met, although the overall effect is uncertain.

6.16.3 On the other hand, Options E1 and E2 could potentially lead to minor negative impacts on pollution (SA Objective 7), in comparison to a major negative impact identified for Option E3, given that less development would take place in total under Options E1 and E2. However, all options would also give rise to potential adverse effects in terms of increasing threats and pressures to local biodiversity assets (SA Objective 3), including the canal network, as well as potentially locating some employment sites in proximity to areas of flood risk (SA Objective 5).

6.16.4 The options are unlikely to significantly affect natural resources (SA Objective 6), owing to a large proportion of development being located within existing urban areas with potential for efficient use of land including brownfield development, although there is some uncertainty in the location of exported growth under Option E3. There is unlikely to be a significant effect from any employment option on housing provision (SA Objective 10).

6.16.5 The effects of the proposed development under any option on climate change mitigation (SA Objective 4) and waste (SA Objective 8) are uncertain, owing to the unknown scale and nature of employment development involved. Furthermore, without knowledge of the specific site proposals and the nature of the employment land to be delivered, it is difficult to determine overall effects on landscape and townscape character (SA Objective 2) and cultural heritage (SA Objective 1) as the growth could give rise to positive or negative effects depending on these factors.

6.16.6 Overall, whilst Option E1 would deliver the smallest quantum of employment growth and could therefore give rise to the least adverse effects against several SA Objectives, there is very little separating any of the three options in terms of growth within Wolverhampton itself. Given that Option E3 would meet Wolverhampton's employment needs within the FEMA, and is likely to provide a greater range of local employment opportunities, this option could be identified as the best performing of the three; however, CWC would have little control as to the location of exported growth and there may be increased potential for adverse effects on some receptors.

6.17 Selection and rejection

6.17.1 CWC's assessment of the employment growth options is set out in **Table 6.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹⁴².

6.17.2 Considering the employment evidence and the SA findings, CWC consider that "*The Preferred Option E3 is the only one of the three growth options which has the potential to meet employment land needs for Wolverhampton, allow Duty to Cooperate requirements to be met for the Black Country FEMA, and meet national guidance on sustainable development*".

¹⁴² City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

7 Assessment of spatial options

7.1 Preface

7.1.1 The spatial options are intrinsically linked to the housing and employment growth options for Wolverhampton, owing to the finite amount of land available for development. The WLP spatial strategy will dictate broadly where new growth will be located in Wolverhampton for the Plan period to 2042.

7.1.2 As outlined in the Issues and Preferred Options consultation document, within Wolverhampton there are limited options available to address the housing and employment growth requirements. The WLP cannot provide sufficient homes to meet all of the housing need, and so there is a reliance on exporting unmet housing need through the DtC.

7.1.3 Seven options for the spatial strategy have been identified by CWC (see **Table 7.1**). These options incorporate elements of the housing and employment growth options as set out in **Chapter 4** and **6**, but provide more detail regarding options for the broad spatial distribution of growth in Wolverhampton as well as some more thematic approaches for consideration. It should be noted that none of these options alone could deliver the required growth within the Plan area.

Table 7.1: *Wolverhampton spatial options identified by CWC*

Option	Description of spatial option	Impact on growth options
Option A	"Business as Usual" – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> As for Option H1 As for Option E1
Option B	Employment-Led - reconfigure uses in the urban area to promote local employment and mixed use; retain and intensify employment land and protect green belt.	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3
Option C	Market-Led – only allocate housing in high demand areas and employment land in most attractive commercial locations	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but without sites in less attractive commercial locations and therefore larger shortfall against employment land need
Option D	Garden Village / Health Promotion – protect all publicly accessible open space; provide lower density, mixed use housing developments with more on-site open space and residential services	<ul style="list-style-type: none"> As for Option H1 but with larger shortfall against housing need As for Options E2 & E3 but with larger shortfall against employment land need
Option E	Minimise Climate Change Impacts – only develop housing in locations with highest sustainable transport access to residential services, and only locate new employment land where good public transport access.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3 but without sites where not good public transport access and therefore larger shortfall against employment land need

Option	Description of spatial option	Impact on growth options
Option F	Infrastructure and Regeneration-Led – Focus development in the central, north and east urban area of Wolverhampton, where development and infrastructure opportunities are concentrated and regeneration benefits can be maximised.	<ul style="list-style-type: none"> As for Options H2 & H3 but with larger shortfall against housing need As for Options E2 & E3
Option G	Balanced and Sustainable Growth – Focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration. Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre.	<ul style="list-style-type: none"> As for Option H2 & H3 As for Options E2 & E3

7.1.4 Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 7.2**. Full explanations and reasonings behind each overall 'score' outlined in **Table 7.2** are set out per SA Objective in the following sections of this appendix. Best performing options have been identified within each SA Objective.

7.1.5 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CWC, as well as expert judgement.

7.2 SA Objective 1 – Cultural heritage

7.2.1 Many of the WLP area's heritage assets are concentrated in the city centre, particularly listed buildings and conservation areas, with other heritage assets associated with the canal and railway networks. In some locations to the west and, to a lesser extent, the south of the area, heritage assets are associated with the Green Belt.

7.2.2 Option G seeks to increase density in accessible locations, with more housing in the city centre. Option A proposes to continue the current approach with growth focused in the urban centres. Option E would direct housing to locations with the best sustainable transport access, and Option F would concentrate development in the central, north and east urban area, which may lead to a similar urban focus for development. Options A, E, F and G may therefore lead to more development in proximity to urban heritage assets, which without careful design principles may have potential to alter their historic settings. However, Options F and G also focus on regeneration-led development, which may provide opportunities to enhance historic character and could potentially rejuvenate buildings (such as buildings on the Heritage at Risk register) and areas of cultural heritage interest.

7.2.3 Option B seeks to retain and intensify employment land in Centres, which may lead to higher density development and more employment development in urban areas, placing more pressure on urban heritage assets, but also protecting heritage assets in the Green Belt and urban fringe from adverse effects associated with new development.

- 7.2.4 Many of Wolverhampton's remaining open spaces are also of historic importance, such as conservation areas, RPGs and areas noted within the HLC as AHHLV/AHHTV, including historic field systems and parklands. Option D seeks to protect all publicly accessible open space, which may safeguard heritage assets within these open spaces, and may also help to conserve views and settings of historic features in the urban area. Conversely, the lower density development proposed under Option D may lead to greater land-take overall including use of other non-accessible open spaces, which could still place pressure on heritage assets depending on the specific location.
- 7.2.5 Option C would see a market-led approach, directing new development to areas of most demand. Under this option, there may be greater potential for adverse effects on heritage assets including change of historic character and settings, through introducing new development into currently undeveloped locations.
- 7.2.6 As the specific location, site context and proximity to receptors of the proposed growth is unknown, there is some uncertainty regarding the potential impacts of all spatial options on cultural heritage. All of the proposed spatial options would be expected to result in a proportion of new development being located in proximity to designated heritage assets, with potential to adversely affect the historic significance of assets and their settings.
- 7.2.7 On balance, Options A, B, E, F and G are identified to result in an overall negligible impact on cultural heritage whereas Options C and D are more likely to result in a minor negative impact. Option F could potentially be the best performing option, as it may present the most opportunities for enhancement of the historic environment owing to its focus on urban regeneration, although elements of this are also incorporated into Option G.

7.2.8 **Best performing – Option F**

7.3 SA Objective 2 – Landscape

- 7.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. According to the Landscape Sensitivity Assessment, the northern and southern Green Belt parcels, and a small section to the south west, are the most sensitive in Wolverhampton, identified as 'moderate-high' sensitivity. According to the Green Belt Study, development in these areas would also lead to 'very high' harm to the purposes of the Green Belt. Although Green Belt is not necessarily an indicator of higher quality landscapes, within Wolverhampton this is generally the case. All spatial options would protect Green Belt land from development.

- 7.3.2 Option A proposes to retain current housing and employment allocations in the urban area. Option E would direct housing growth to locations with the best sustainable transport access. Both could lead to more dense development in existing urban areas. Higher density developments, especially those which include taller buildings, are more likely to alter views of, or from, sensitive and important landscape features. A carefully planned design approach would be required to avoid adverse effects on landscapes. Option G also supports increased density in accessible areas, and Option F seeks to concentrate development in the central, north and east urban area, which could lead to alteration of landscape character in some instances. However, Option F's primary focus is on urban regeneration, and the balanced approach under Option G also supports this approach. Both Options F and G may provide more opportunities to enhance the character and quality of the urban landscape, which may be particularly beneficial in the Centres where local distinctiveness has been lost.
- 7.3.3 An employment-led approach under Option B may be more likely to deliver development that is in keeping with the existing built form in Centres. Although, the proposed intensification could also potentially lead to loss of open spaces and higher density developments within the urban area if there is greater demand for land to be reconfigured to employment uses, with possible localised adverse effects on the townscape.
- 7.3.4 Option D sets out a 'Garden Village' approach, with protection for existing public open spaces and integration of open spaces within new developments. This option may encourage well-designed and coherent neighbourhoods, and create attractive places to live, with benefits in terms of placemaking at the local level. It is possible that distinctive and long-distance countryside views would be altered under Option D, leading to a change in landscape character in previously undeveloped locations; although, the market-led approach proposed under Option C would be more likely to cause adverse effects in this regard as it is expected to result in a similar distribution of development to Option D but does not include the same Garden Village principles.
- 7.3.5 There is some uncertainty in determining likely impacts on landscape, as the specific location, site context and proximity to sensitive receptors of the proposed growth is unknown. All proposed spatial options have potential to cause adverse effects on existing townscapes and landscapes through loss of open space and change to local character and distinctiveness. Conversely, development could also provide opportunities to enhance the character and stimulate investment and regeneration. In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report¹⁴³ should be embraced alongside the National Design Guide¹⁴⁴.

¹⁴³ MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf [Date accessed: 24/11/22]

¹⁴⁴ MHCLG (2021) National Design Guide. Available at:
https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf [Date accessed: 23/11/23]

7.3.6 The support for urban regeneration under Options F and G would be most likely to achieve minor positive impacts overall, with Option F performing the best. Weighing up the positive effects of conserving open spaces, whilst delivering new development in previously undeveloped locations, Option D could lead to an overall negligible impact.

7.3.7 Option B is identified as having a negligible impact on the landscape character overall, owing to the focus on employment-led development which would be more likely to be in keeping with the existing built form.

7.3.8 Options A, C and E could potentially result in a minor negative impact on landscape overall, as under these options development would follow market trends, or be guided by transport infrastructure, potentially leading to higher density development within the urban area but without particular consideration for landscape.

7.3.9 **Best performing – Option F**

7.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

7.4.1 Wolverhampton's biodiversity assets include LNRs, SINCs and SLINCs which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands. Undesignated aspects of the WLP area's GI network are also likely to serve as important corridors between habitats, facilitating movement of species and linking to the wider countryside including the Green Belt which supports various elements of the GI network, including habitats and ecological networks such as hedgerows, remnant woodland, trees and green/blue corridors.

7.4.2 Options A and B would focus new development in Centres, and may therefore direct development away from the most sensitive biodiversity features and areas of highest ecological value¹⁴⁵, although it should be noted that urban areas also can support distinctive habitats, species and ecological linkages. Option G supports increased housing density in accessible locations. Option E seeks to focus development in areas with the best sustainable transport access, and Option F where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in these areas, similarly to Option G and potentially Option A, which would help to reduce the amount of land lost to development in the Plan area. This would also reduce the amount of vegetation cover lost and, in that sense, lead to better conservation of biodiversity. Overall, Options A, B, E, F and G could lead to negligible effects on SA Objective 3.

7.4.3 Option D would protect existing open spaces and provide on-site open spaces within new developments. Open space is beneficial to the local biodiversity network by providing semi-natural habitats and green corridors in an otherwise highly urbanised area, supporting ecosystem services. As such, this option could provide the most opportunities for maintenance and enhancement of the ecological network alongside development. Although, Option D would also involve lower density development and potentially wider-spread loss of undeveloped land, compared to more urban-focused options. Overall, a negligible impact could result, but with potential for positive effects in the longer term.

¹⁴⁵ As identified in 'An Ecological Evaluation of the Black Country Green Belt' (October 2019). Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 28/11/22]

7.4.4 Option C's market-led approach would allocate new development in the highest demand areas, which could potentially see increased pressure on open spaces and ecological networks within the most popular areas, although it is likely that these impacts would be more localised. Option C is considered more likely to result in minor negative impact, when compared to the other spatial options.

7.4.5 It is likely that development under any spatial option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any BNG provisions at the site level, owing to the large quanta of housing proposed. The proposed development under any of the spatial options may also have potential to lead to adverse impacts on Habitats sites, due to increased development related threats and pressures, which will be explored in the HRA.

7.4.6 **Best performing – Options A and B in terms of protection of biodiversity assets, Option D in terms of opportunities for enhancement alongside lower density development.**

7.5 SA Objective 4 – Climate change mitigation

7.5.1 Option E seeks to minimise climate change impacts, by only developing housing in locations with highest sustainable transport access to residential services, and only locating employment development in areas with good public transport access. These measures would help to reduce reliance on private car use and associated emissions, and encourage uptake of sustainable transport methods including active travel for local journeys. As such, Option E would be likely to perform best with regard to climate change mitigation, although the development of new homes and businesses would be likely to lead to GHG emissions, to some extent. On balance, a minor positive impact could be achieved.

7.5.2 Options A and B would focus development within Wolverhampton's existing urban areas, likely to be in closer proximity to a range of existing jobs, services and sustainable transport infrastructure. Similarly, Option F would focus development where infrastructure opportunities are concentrated, which could lead to a large proportion of development within Centres. The balanced growth approach under Option G also supports increased housing density in the most accessible areas, drawing on Options A and E. Options A, B, E, F and G could potentially result in a minor positive impact on climate change mitigation.

7.5.3 Option C would involve provision of housing and employment growth in the most desirable locations, potentially leading to a more dispersed pattern of development, without consideration of transport infrastructure and proximity to services to meet day to day needs. A minor negative impact is identified.

7.5.4 Option D promotes mixed use development which may help to provide some services and jobs in proximity to homes; however, this approach may also lead to a greater dispersal of development and potentially a larger proportion of new residents situated further away from sustainable transport infrastructure. Pursuing this option could consequently lead to higher reliance on private cars and increased need to travel, compared to other options. Option D could therefore lead to a minor negative impact on climate change mitigation, but would be likely to perform better than Option C on the whole.

7.5.5 **Best performing – Option E**

7.6 SA Objective 5 – Climate change adaptation

- 7.6.1 This SA Objective primarily considers the impact that each spatial option could have in relation to flood risk, as well as GI coverage across the Plan area. Soils and vegetation play vital roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas. Furthermore, spatial options which would lead to urban intensification can increase potential for overheating, and make the WLP area less adaptable to the effects of climate change.
- 7.6.2 Option A supports growth focused in the urban area, and Option B seeks to intensify employment land within Centres. Both options would avoid growth within the Green Belt, and as such, would be expected to conserve natural resources and reduce the amount of previously undeveloped land lost to development, with associated minor positive impacts on climate change mitigation.
- 7.6.3 Option D aims to protect open space within the urban area, and deliver new open space within mixed-use developments. Open spaces incorporating GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹⁴⁶, and helping to alleviate the 'urban heat island' effect. However, Option D would also result in lower density development, leading to a greater cumulative loss of previously undeveloped land and flood alleviating soils, compared to more urban-focused options. On balance, a negligible impact on climate change adaptation could be expected.
- 7.6.4 Option C seeks to allocate development towards high-demand areas, which could potentially see increased pressure on open spaces and GI within the most popular areas, although it is likely that these impacts would be more localised. Overall, a minor negative impact is identified for Option C.
- 7.6.5 Option E seeks to minimise climate change impacts by promoting development in areas that are most accessible by sustainable transport. It is likely that the majority growth would occur within the Centres, where there is highest coverage of public transport infrastructure. Similarly, Option F would concentrate development where infrastructure provision is best. Option G combines aspects of the other spatial options, with the majority of development likely to be focused in the urban area where accessibility is best, but also some more dispersal towards the northern and eastern WLP area. The extent of previously undeveloped land that could be lost under Options E, F and G is uncertain, although it is likely to be less than Option C. On balance, negligible impacts could be achieved.
- 7.6.6 **Best performing – Options A and B**

¹⁴⁶ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 25/11/22]

7.7 SA Objective 6 – Natural resources

- 7.7.1 Development focused in the existing urban area would not be expected to result in the loss of BMV land. In Wolverhampton, the majority of land is 'Urban' ALC, with some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC. Previously undeveloped land is likely to contain soils which perform ecosystem services, even if it is not of high agricultural quality. There is little undeveloped land in the WLP area that is not within the Green Belt.
- 7.7.2 Spatial Options A and B state that Green Belt would be protected, with Option A focusing housing and employment growth in the urban area and Option B intensifying employment and mixed-use development in the urban area. Therefore, Options A and B would be expected to result in a minor positive impact on natural resources, through conserving BMV soils and promoting an efficient use of land.
- 7.7.3 Option G includes increased housing density in accessible locations and "*make best use of existing infrastructure*", which would help to promote an efficient use of land. Option E would direct housing to locations with the best sustainable transport access, and Option F would concentrate development in the central, north and east urban area, which may lead to a similar urban focus for development. Although, there may still be some small-scale loss of previously undeveloped land if Options E, F or G are pursued. Overall, a negligible impact would be expected for these three options.
- 7.7.4 Option C proposes a market-led approach, which is likely to require an element of lower density development with greater land-take in desirable suburban areas, leading to loss of undeveloped land and potentially BMV soils. Option D would also result in lower density development, with integrated open spaces which may conserve natural resources to some extent, but still result in greater cumulative loss of undeveloped land compared to more urban-focused options. When considered relative to the other spatial options, a minor negative impact is identified for Options C and D in terms of loss of soil resources; this is due to the lower density development proposed under the options that could lead to greater land-take of undeveloped land.
- 7.7.5 **Best performing – Options A and B**

7.8 SA Objective 7 – Pollution

- 7.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any spatial option would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- 7.8.2 Soil and water pollution impacts will depend on the nature, scale and specific location of development, and so there is a degree of uncertainty regarding the assessment under this SA Objective.

- 7.8.3 Option G supports increased housing density in accessible locations, and Option A supports housing growth in urban areas. Option E seeks to focus housing in areas with the best sustainable transport access, and Option F would focus development where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in similar areas. Option B seeks to retain and intensify employment land in Centres, which may have similar effects.
- 7.8.4 Higher densities of development may help to reduce the quantity of land being built on in the WLP area, which would be likely to minimise the risks of soil, air or water contamination caused by development. However, there is a general trend of air pollution in higher density urban areas having more adverse impacts on human health, compared to lower density areas¹⁴⁷. This is a result of higher pollution emissions due to human activities in densely populated street canyons, combined with taller buildings stagnating air flow. Therefore, Options A, B, E, F and G could potentially result in a minor adverse impact on pollution.
- 7.8.5 Spatial strategies involving lower density development (Option D) or a market-led approach (Option C), would be likely to result in larger proportions of development on previously undeveloped land than the more urban-focused options. Growth outside of the urban centres could potentially result in adverse impacts on pollution associated with the loss of greenfield land and natural features, and potential worsening of air, soil and water quality in these areas.
- 7.8.6 Overall, all options would be expected to expose new residents to pollution to some degree, and generate further pollution owing to the large scale of development proposed. A minor negative impact is recorded for all options, although, pursuing Option D could provide the most opportunities to protect people from adverse impacts associated with pollution, by embracing the 'Garden Village' principles and incorporating open space alongside the mixed-use development.

7.8.7 **Best performing – Option D**

7.9 SA Objective 8 – Waste

- 7.9.1 At the time of writing, there is not sufficient information available to accurately predict the effect that each spatial option would have in terms of minimising waste generation, promoting the sustainable management of waste, or encouraging recycling and re-use of waste. It is likely that all options would increase waste generation and place pressure on existing waste management systems, to some extent.

¹⁴⁷ Yuan, C, Ng, Edwards, Norford, Leslie, K. (2014) Improving air quality in high-density cities by understanding the relationship between air pollution dispersion and urban morphologies, Building and Environment, V71, pp245-258, January 2014

- 7.9.2 Options G supports increased housing density in accessible locations. Option A seeks to retain the current housing and employment allocations with a focus on the urban area, which is expected to locate site end users in similar locations and potentially similar high densities. Option E seeks to focus housing in areas with the best sustainable transport access, and Option F would focus development where infrastructure opportunities are concentrated. Options E and F could therefore lead to higher density development in these areas. Higher densities of development typically place increased demand on local waste management systems due to larger quantities and more diverse waste being generated in smaller areas, potentially leading to sanitation problems if a careful design is not implemented¹⁴⁸. Therefore, Options A, E, F and G could potentially result in a minor negative impact on waste.
- 7.9.3 On the other hand, the focus on infrastructure-led development under Option F, and the balanced growth strategy set out in Option G, could help to maximise the amount of development situated in proximity to existing waste infrastructure. Given its focus on infrastructure-led development, Option F is likely to perform best in this regard.
- 7.9.4 Option B proposes an employment-led strategy with intensification of employment land in the Centres. This option could lead to similar effects to the higher density options discussed above owing to the urban focus, but also may result in a greater quantity or range of waste associated with more employment floorspace, and potentially more diverse employment uses. A minor negative impact on waste could be expected.
- 7.9.5 Option C seeks to direct development to desirable market areas, which has the potential to increase density in certain locations, but could also result in more dispersed development in high-demand suburban locations. Option D seeks to protect and create new open spaces, which could potentially result in more development being directed towards the urban fringe. Options C and D could potentially result in a larger number of new residents located further from existing waste management systems. Therefore, these options could potentially result in a minor negative impact in regard to waste.

7.9.6 **Best performing – Option F**

7.10 SA Objective 9 – Transport and accessibility

- 7.10.1 Option E seeks to ensure that housing development is only delivered in areas with the highest sustainable transport access to residential services, and employment development where there is good public transport access. As such, this option is likely to result in a major positive impact on SA Objective 9 and would be the best performing in terms of transport and accessibility, by facilitating the most sustainable travel choices.
- 7.10.2 Options A, B, F and G would focus new development in the existing urban areas where existing transport provisions are likely to be the best, with Option G promoting higher density development in accessible locations where infrastructure is concentrated. A minor positive impact would be expected for these four options.

¹⁴⁸ London Plan Density Research: Lessons from Higher Density Development. Available at: https://www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf [Date accessed: 01/12/23]

- 7.10.3 Option C promotes development only in the most desirable locations, which is likely to result in more dispersed development. Option D focuses on health promotion and incorporating 'Garden Village' principles, which would be likely to include lower density development owing to the provision of on-site open space and protection of existing open spaces.
- 7.10.4 Under Options C and D, a larger proportion of development is likely to be situated away from sustainable transport options, and potentially further away from jobs and services, resulting in more reliance on private car use than other options. Overall, Options C is identified as having a potential minor negative impact on transport and accessibility. Option D could potentially perform better than C, with a negligible impact identified overall, as there would be opportunities for on-site services to be provided which may reduce the need to travel and improve local accessibility to some extent.
- 7.10.5 It should be noted that there is some uncertainty in this assessment in terms of the effect that increasing development within Centres under all spatial options could potentially have with regard to capacity issues at transport facilities and traffic congestion.

7.10.6 **Best performing – Option E**

7.11 SA Objective 10 – Housing

- 7.11.1 Option G is the only spatial option that would meet the identified housing need for Wolverhampton, although this can only be achieved through exporting a proportion of growth through DtC as per Housing Option H3 (see **Chapter 4**). A major positive impact on housing provision would therefore be expected. At this scale of assessment, the likely contribution of each spatial option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes; however, Option G may provide the most opportunities for this, through varying densities depending on accessibility.
- 7.11.2 Options A, B, C, D, E and F would all lead to a shortfall against housing need, to some extent, leading to a minor positive impact on housing provision.
- 7.11.3 The delivery of housing under Options A, B, C and D would be limited by the capacity of the urban areas. Option B could result in a larger shortfall than Option A, by also restricting housing use in Centres. Option F could lead to similar effects to Option A, by ensuring all housing development is located in areas with highest sustainable transport access. Similarly, Option G seeks to focus development in the central, north and east urban area of Wolverhampton where infrastructure is most concentrated.
- 7.11.4 Under Option C, housing would only be allocated in high demand areas which may help to deliver development in more desirable locations with benefits to the housing market, but again would result in a housing shortfall and would be limited by the available land for development within Wolverhampton.

7.11.5 By protecting all publicly accessible open space and ensuring new development provides on-site open space, Option D could provide higher quality and more desirable housing, but would be likely to result in lower overall housing delivery owing to the lower density development proposed. Option E would avoid development within areas of highest Green Belt harm, which would also limit the overall land available for development.

7.11.6 **Best performing – Option G**

7.12 SA Objective 11 – Equality

7.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area.

7.12.2 Growth directed towards the Centres, such as under Options A, B, E, F and G, could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, these strategies could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. Increased housing in these areas may lead to greater pressure on existing open spaces with adverse implications for quality of life, and more dense living situations may potentially lead to higher crime rates.

7.12.3 Although, there may be opportunities within the regeneration-led Option F to rejuvenate and enhance deprived areas. Similarly, Option G's balanced approach could lead to opportunities for localised benefits in terms of providing access to services and open spaces for recreation and community cohesion, whilst also supporting urban regeneration.

7.12.4 Greater dispersal of development and development situated in more suburban locations, such as under Options C and D could potentially be located away from essential services and employment opportunities but may have better access to open spaces and natural habitats. Although, Option D in particular could present more opportunities for creating development design and layout that seeks to reduce crime and deprivation by adopting the 'Garden Village' principles and incorporating open spaces. Option D could also integrate new local services in the proposed mixed-use schemes, although this would be unlikely to wholly alleviate the need to travel into larger Centres for certain services.

7.12.5 Option G is the only spatial option that would meet all identified housing need, and so may be more likely to ensure provision of a suitable mix of housing types and tenures, and allow greater scope to meet the varying needs of the population including provision of affordable homes. In comparison, by not delivering enough housing to meet demand, the opposite may be true for Options A, B, C, D, E and F.

7.12.6 Options B, F and G would provide enough employment land to meet demand as identified in the latest EDNA (2023), with associated benefits for equality in terms of access to jobs, in contrast to Options A, C, D and E which would lead to a shortfall, potentially increasing unemployment or requiring longer travel times to workplaces elsewhere.

- 7.12.7 Overall, Option G could be identified as the best performing, because the balanced approach would meet identified housing and employment needs, and aims to direct new development towards accessible areas, whilst also supporting urban regeneration. Option F would also be likely to result in positive effects overall owing to its emphasis on regeneration. Although there are likely benefits to pursuing Option D, it would not meet either the housing or employment needs and so on balance, a negligible impact is identified. Options A, B, C, and E would be more likely to lead to overall minor negative impacts, owing to the combination of the shortfall of housing and employment demand and additionally the likelihood of these options resulting in higher density development with adverse implications on equality.
- 7.12.8 At present, there is no evidence to suggest that any of the spatial options would disproportionately affect any of the protected characteristics¹⁴⁹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

7.12.9 **Best performing – Option G**

7.13 SA Objective 12 – Health

- 7.13.1 Option D provides a spatial strategy focused on health promotion, which would protect all publicly accessible open spaces from development and incorporate on-site open spaces within new developments. The presence of open space can have physical and mental health benefits by facilitating residents' access to a diverse range of natural habitats, alongside providing opportunities for outdoor recreational use and attractive routes for active travel. Option D would provide on-site residential services, which would be likely to include healthcare facilities. Therefore, site end users under Option D could expect to be situated in locations with good accessibility to healthcare facilities, although growth under this option may be less well connected to sustainable transport networks than other options with a stronger focus on Centres.
- 7.13.2 Under Option C, a larger proportion of development would be likely to be situated in locations further away from existing services including healthcare facilities, reducing access to sustainable transport options and likely resulting in reliance on private car use. Site end users located in suburban areas would, however, be expected to have good access to the surrounding countryside with associated physical and mental wellbeing benefits. Overall, by protecting existing open spaces, and incorporating new open spaces within developments, Option D would be expected to result in a minor positive impact on health, whilst Option C could result in a negligible impact.

¹⁴⁹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

7.13.3 Although there is less emphasis on open spaces under the other spatial options, several options set out the intention to direct development towards areas with good accessibility to residential services, which would be likely to include healthcare facilities. Option A supports housing and employment growth in the existing urban area, and Option B promotes employment mixed-use developments within the existing urban area. Option E promotes development in locations with the highest sustainable transport access to services. Options F and G promote development in accessible locations where infrastructure is concentrated. Positive effects would be likely for Options A, B, E, F and G in terms of sustainable access to healthcare, whereas negative effects could occur regarding the more limited access to open spaces and potentially more crowded living situations associated with higher density urban development. On balance, a minor negative impact on health may be expected if Options A, B, E, F or G were pursued.

7.13.4 It should be noted that through careful, innovative and high-quality design and layout techniques there is good scope for avoiding or mitigating adverse impacts caused by higher density development, such as by providing well-resourced and high-capacity amenities, and incorporation of GI¹⁵⁰.

7.13.5 **Best performing – Option D**

7.14 SA Objective 13 – Economy

7.14.1 A range of employment opportunities including retail, commercial and office floorspace can be found in the WLP area, particularly the main centres. In general, it is expected that the development focused within the existing urban centres would provide the best access to the greatest range of employment opportunities as well as sustainable transport options to reach employment further afield.

7.14.2 Options B, F and G would meet the identified employment need for Wolverhampton. A major positive impact on the economy would therefore be expected for these three options. Option B is likely to be the best performing in terms of SA Objective 13, as it sets out an employment-led spatial strategy which promotes local employment and mixed-use schemes, which could potentially provide the greatest range of employment opportunities. In terms of access to employment opportunities, Options F and G may lead to a greater need to travel compared to B but would still result in significant benefits to the economy overall.

7.14.3 Option A would retain current employment allocations, and deliver housing growth in the urban areas where there is likely to be the best provision of jobs. Similarly, Option E would direct new housing and employment development to areas with the best accessibility.

7.14.4 Under Option C, employment uses would only be allocated in high demand areas. By directing employment development to desirable areas, it would be likely that sites will provide jobs in areas of highest demand and support economic growth in these areas. However, this option alone would not be able to meet the identified employment need.

¹⁵⁰ Wong, K. W. (2010). Designing for high-density living: High rise, high amenity and high design. In E. Ng (Ed.), Designing high density cities for social and environmental sustainability. London: Earthscan

7.14.5 Option D focuses on health promotion with a lower density approach. Under this option it is likely that development would be more dispersed, and so potentially further from the economic hubs in the Centres, but the inclusion of mixed-use development may also help to provide local job opportunities.

7.14.6 Although Options A, C, D and E would all lead to a shortfall against employment need, to some extent, an overall minor positive impact on the economy would be likely.

7.14.7 **Best performing – Option B**

7.15 SA Objective 14 – Education, skills and training

7.15.1 The extent to which all spatial options would facilitate good education for new residents is dependent on the specific location of development, which is uncertain. Access to education, skills and training (as well as transport infrastructure and safe pedestrian routes) is generally best within the city and town centres according to accessibility modelling data, with longer travel times expected in the periphery such as the north and southern extents of the WLP area. As such, the spatial options which promote urban housing development would be likely to facilitate more positive effects in this regard.

7.15.2 Option B promotes mixed-use developments within the existing urban area and Option A similarly focuses employment and housing growth in these areas in line with the 'business as usual' approach. Option E also focuses on accessibility, with development in locations with the best sustainable transport connections. Options F and G promote development in accessible locations where infrastructure is concentrated. Therefore, Options A, B, E, F and G would be expected to result in positive effects on access to education, skills and training. By only seeking to develop housing in locations with highest sustainable transport access to residential services, which would be expected to include schools, Options E and G would be likely to facilitate the best access and result in a major positive impact on SA Objective 14. Minor positive impacts would be likely for Options A, B, and F as they would deliver similar benefits but to a slightly lesser extent.

7.15.3 Option C promotes development only in the most desirable locations. This is likely to include more dispersed development that is further from schools; and in comparison to the urban areas, there is likely to be a reduced choice of educational facilities and the potential for longer travel times under Option C.

7.15.4 Option D would involve more development with lower density development based on 'Garden Village' principles, likely to be further away from existing schools and transport connections. Although, the incorporation of mixed uses could help to ensure that educational facilities are provided alongside residential growth to serve the development.

7.15.5 Overall, Option C could potentially have a minor negative impact on education, whilst Option D could result in a negligible impact.

7.15.6 **Best performing – Option E**

7.16 Conclusions

Table 7.2: Impact matrix of the seven spatial options

Spatial Option	SA1 Cultural Heritage	SA2 Landscape	SA3 Biodiversity	SA4 CC Mitigation	SA5 CC Adaptation	SA6 Natural Resources	SA7 Pollution	SA8 Waste	SA9 Transport	SA10 Housing	SA11 Equality	SA12 Health	SA13 Economy	SA14 Education
A	0	-	0	+	+	+	-	-	+	+	-	-	+	+
B	0	0	0	+	+	+	-	-	+	+	-	-	++	+
C	-	-	-	-	-	-	-	-	-	+	-	0	+	-
D	-	0	0	-	0	-	-	-	0	+	0	+	+	0
E	0	-	0	+	0	0	-	-	++	+	-	-	+	++
F	0	+	0	+	0	0	-	-	+	+	+	-	++	+
G	0	+	0	+	0	0	-	-	+	++	+	-	++	++

- 7.16.1 It is difficult to determine an overall best performing spatial option, as the performance of each option varies depending on the SA Objective in question. Generally, options which perform better against meeting development needs would also put the most pressure on environmental resources and social facilities. The subsequent paragraphs identify and explain which options perform best and which options perform worst against each SA Objective.
- 7.16.2 It is assumed within these assessments that all options will protect the Green Belt. It is recommended that this is made clear across all options to be consistent with the aims of the WLP in terms of Green Belt protection.
- 7.16.3 Options A and B performed joint best against SA Objectives 3 (biodiversity), 5 (climate change adaptation) and 6 (natural resources) due to the protection of previously undeveloped land. Option B also performed best against SA Objective 13 (economy) as it proposes an employment-led strategy.
- 7.16.4 Option D performed best against SA Objectives 7 (pollution) and 12 (health) owing to the focus on 'Garden Village' principles including the protection of existing open spaces and integration of new open spaces within new developments.
- 7.16.5 Option E performed best against SA Objectives 4 (climate change mitigation), 9 (transport and accessibility) and 14 (education), as this option would direct new development towards areas with the best sustainable transport access.
- 7.16.6 Option F performed best against SA Objectives 1 (cultural heritage) and 2 (landscape) due to its focus on urban regeneration, and SA Objective 8 (waste) due to its emphasis on concentrating development where infrastructure provision is best.

- 7.16.7 Option G performed best against SA Objectives 10 (housing) and 11 (equality), because the balanced approach would meet identified housing and employment needs, and aims to direct new development towards accessible areas, whilst also supporting urban regeneration.
- 7.16.8 The worst performing option could be identified as Option C, as the option was not identified to perform best against any SA Objectives.
- 7.16.9 Overall, Option B performs the best (or joint best) against the most SA Objectives; however, this strategy would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport.

7.17 Selection and rejection

- 7.17.1 CWC's assessment of the spatial options is set out in **Table 7.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹⁵¹.
- 7.17.2 Considering the SA findings and other evidence base information, CWC consider that "*The Preferred Option G: Balanced and Sustainable Growth effectively forms a balance between the other six options and is the option which has the most potential to: provide sufficient land to meet Wolverhampton housing needs (both within Wolverhampton and in neighbouring authorities); provide sufficient employment land within Wolverhampton to meet employment land needs for Wolverhampton and allow Duty to Cooperate requirements to be met for the Black Country FEMA; and meet national guidance on sustainable development*".

¹⁵¹ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

8 Assessment of policy areas

8.1 Preface

- 8.1.1 The WLP will contain strategic planning policies and land allocations to support the growth and regeneration of the City of Wolverhampton up to 2042. The WLP Issues and Preferred Options Consultation (Regulation 18)¹⁵² document presents information relating to proposed policy areas for inclusion in the emerging WLP.
- 8.1.2 Many of the proposed policy areas for the WLP are derived from the ceased BCP. A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- 8.1.3 CWC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the WLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the WLP compared to the former BCP.
- 8.1.4 The results of their review have been presented in Appendix 2 of the Issues and Preferred Options document. The table 'Specific Amendments to Draft Black Country Plan Policies' of the WLP Appendix 2 identifies a suite of 56 draft policies which are likely to form the basis of the emerging WLP.
- 8.1.5 The sustainability performance of each draft policy has been evaluated based on the SA Framework (see **Appendix A**) and the methodology as set out in **Chapter 3**, drawing on the findings of the Draft BCP SA¹⁵³. The assessments are set out in full within **Appendix B**. This chapter summarises the results of these assessments.
- 8.1.6 It should be noted that the strategic policies in the WLP will be supported by a suite of local policies in other Local Plan documents (currently the Wolverhampton UDP and Area Action Plans). The WLP is not intended to cover planning policies for all subject areas, only those considered strategic in nature.

8.2 Overview of policy assessments

- 8.2.1 The impact matrix for all policy assessments is presented in **Table 8.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix B**.

¹⁵² City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options (Regulation 18) February 2024. (Draft version provided to Lepus 13/11/23)

¹⁵³ Lepus Consulting (2021) Sustainability Appraisal of the Black Country Plan, July 2021. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4d/> [Date accessed: 18/01/24]

- 8.2.2 The proposed policies to be included within the WLP are anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WLP are avoided, mitigated or subject to compensatory measures wherever possible and that development proposals are accompanied by relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision making processes.
- 8.2.3 The policies cover the themes of:
- Spatial strategy;
 - Delivery;
 - Health and wellbeing;
 - Housing;
 - The economy;
 - Centres;
 - Transport;
 - Environmental transformation;
 - Climate change;
 - Waste; and
 - Minerals.
- 8.2.4 For the majority of policies, the assessment has identified negligible, minor positive or major positive effects. Negligible impacts are identified where the policy does not directly influence the achievement of that SA Objective, which is the case for many of the more 'thematic' policies.
- 8.2.5 A greater range of potential sustainability effects are identified for policies that have potential to introduce new development such as the housing and economy policies, or set out the broad direction for growth, such as the spatial strategy policies. As such, minor negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.
- 8.2.6 The full assessments, including text narrative to explain the identified impacts against each SA Objective, are set out in **Appendix B**.
- 8.2.7 Opportunities for enhancement may also be secured through policies in the WLP. Where there are opportunities to improve the sustainability performance of draft policies these have been identified in the SA process (see recommendations in **Chapter 10**).

Table 8.1: Summary of policy area assessments

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	0	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

9 Assessment of reasonable alternative development sites

9.1 Preface

9.1.1 The Black Country Call for Sites request first opened in July 2017 and re-opened from 9th July – 20th August 2020¹⁵⁴. Since then, CWC have carried out annual SHLAAs of sites which have the potential to accommodate new housing development. The Wolverhampton Employment Land Supply technical paper sets out up to date information on land availability with potential to accommodate employment development.

9.1.2 A total of 48 sites have been identified by CWC as reasonable alternatives to be assessed as part of the SA, informed by the Call for Sites process and other studies undertaken as part of the evidence base for the WLP, and previously for the ceased BCP. This includes 'carried forward' housing and employment sites, which have previously been previously allocated in the adopted Development Plans. The 48 reasonable alternative sites include:

- 22 sites proposed for residential use;
- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

9.1.3 CWC have undertaken a filtering process (or 'gateway check') of all potential sites identified through the evidence base in order to determine which sites should be considered as reasonable alternatives for the purpose of the SA.

9.1.4 If the following receptors or delivery constraints were present at a site, the Council have rejected such sites from inclusion as a reasonable alternative to be appraised through the SA process:

- Green Belt
- Flood Risk Zone 3
- Site of Special Scientific Interest
- Local Nature Reserve
- Special Area of Conservation
- Site of Importance for Nature Conservation
- Ancient Woodland / Veteran Trees
- Scheduled Monuments
- Registered Parks & Gardens
- Operational Burial Grounds
- Health and Safety Executive (HSE) Inner Zone (for residential)
- Existing residential
- Operational sites (education, leisure, utilities, places of worship, canal network, transport infrastructure)

¹⁵⁴ Black Country Plan (2020). Call for Sites. Available at <https://blackcountryplan.dudley.gov.uk/t2/p3/> [Date accessed: 01/12/23].

- Open Space not surplus against current standards
- Sites <0.25 ha with no "call for site" submitted
- Local authority land with no "call for site" submitted
- Landowner has expressed unwillingness

9.1.5 Identification of a site as a reasonable alternative does not imply that the site is not subject to other constraints or indeed that any receptor listed in para 9.1.4 will not in some way be potentially affected by a reasonable alternative site. Further potential constraints are assessed as part of the SA and plan making process for identified reasonable alternatives, using available evidence derived from publicly accessible data sources and information supplied by the Council.

9.1.6 Further information on the Council's identification and assessment of sites is presented within the WLP Local Plan Site Assessment Report (Regulation 18), February 2024.

9.2 Overview of site assessments (pre-mitigation)

9.2.1 **Section 3.8** sets out the methodology used to appraise the reasonable alternative sites in the SA process, and topic-specific methodologies set out in **Boxes 3.1** to **3.14** explain how the likely impact per receptor has been identified in line with the local context and assumptions as set out in **Chapter 2**.

9.2.2 The assessment of the 48 reasonable alternative sites, including rationale for the recorded impacts, is presented in full in **Appendix C**.

9.2.3 A summary of the impact matrices for all reasonable alternative site assessments pre-mitigation is presented in **Table 9.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C** as well as the topic-specific methodologies and assumptions presented in **Boxes 3.1 - 3.14**.

9.2.4 It should be noted that the site assessments include an overall impact symbol, summarised in **Table 3.4**, for each of the 14 SA Objectives. **Appendix C** documents likely impacts on receptors within each SA Objective, which have been included to provide the reader with contextual information that is relevant to each SA Objective. The overall impact symbol in **Table 9.1** below for each SA Objective is always represented by the lowest common denominator. It may be possible that positive or negligible receptor impacts are relevant to an SA Objective, however, if one of the receptor impacts is identified as a major negative impact, the SA Objective will be identified as major negative overall.

9.2.5 Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. All assessment information excludes consideration of detailed mitigation i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers. Post-mitigation site assessments can be prepared at the next SA stage, with reference to the mitigating influence of WLP policies, once the full policies have been prepared.

9.2.6 The pre-mitigation appraisal of the 48 reasonable alternative sites demonstrated that all development proposals would be likely to result in a range of sustainability impacts as shown in **Table 9.1**.

9.2.7 Positive impacts were identified for many of the reasonable alternative sites in terms of access to social infrastructure, due to their location in areas where accessibility modelling data indicates good sustainable access to local shops, healthcare, schools, transport and employment opportunities. Identified positive impacts also included the impact of reasonable alternative sites on the provision of housing and employment floorspace, contributing to the identified needs. The majority of reasonable alternative sites are located in Flood Zone 1 away from fluvial flood risk, and many sites comprise previously developed land leading to positive effects in terms of encouraging an efficient use of natural resources.

9.2.8 Identified negative impacts included the potential for small-scale loss of soil resources at some sites, impacts on local biodiversity designations, changes to local views, possible alteration of the character or setting of cultural heritage assets, and increased pollution and waste associated with large scale development. The entirety of Wolverhampton is designated as an AQMA, and several sites are located in close proximity to main roads, and as such the proposed development could potentially expose site end users to higher levels of transport-associated air pollution. Identified negative impacts also included the location of reasonable alternative sites in regard to surface water flood risk, where a large proportion of sites are located on areas of vulnerable to surface water flooding.

Table 9.1: Summary impact matrix of all reasonable alternative sites (pre-mitigation)

Site reference	Site use	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H1	Residential	-	+/-	+/-	-	--	+	--	-	++	++	-	++	--	++
H2	Residential	0	-	-	0	-	-	-	0	++	+	-	++	++	++
H3	Residential	-	-	-	0	-	-	--	0	++	++	-	++	++	++
H4	Residential	--	+/-	-	-	-	+	--	-	++	++	-	+	--	++
H5	Residential	-	+/-	-	0	-	+	-	0	+	++	-	++	--	++
H6	Residential	-	+/-	+/-	-	-	+	--	-	++	++	-	++	--	++
H7	Residential	0	+/-	+/-	0	+	+	--	0	++	++	-	++	++	++
H8	Residential	--	-	+/-	-	-	+	--	-	++	++	-	++	++	++
H9	Residential	-	+/-	-	0	+	-	-	0	-	+	0	++	--	-
H10	Residential	-	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
H11	Residential	--	+/-	+/-	0	+	+	-	0	++	+	-	++	++	++
H12	Residential	-	+/-	-	0	-	+	-	0	-	+	-	-	--	++
H13	Residential	-	+/-	-	-	--	+	--	-	++	++	-	++	--	++
H14	Residential	0	-	+/-	0	+	-	--	0	++	++	-	++	-	++
H15	Residential	0	+/-	+/-	0	-	-	-	0	++	+	0	++	+/-	++
H16	Residential	0	-	-	-	-	-	--	-	-	++	-	++	++	++

Site reference	Site use	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H17	Residential	--	-	+/-	0	+	-	-	0	-	+	0	++	+/-	++
H18	Residential	0	-	+/-	0	-	-	-	0	-	+	0	-	++	-
H19	Residential	0	-	+/-	0	-	-	-	0	-	+	0	++	-	++
H20	Residential	0	-	-	0	-	-	-	0	-	+	0	++	+/-	++
H21	Residential	0	-	+/-	0	-	-	-	0	++	+	0	++	++	++
SA-0054-WOL	Residential	0	+/-	--	+/-	-	+	--	+/-	-	++	0	+	--	-
E1	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	+	++	0
E2	Employment	-	+/-	+/-	+/-	--	-	-	+/-	-	0	0	++	++	0
E3	Employment	0	+/-	+/-	+/-	+	+	-	+/-	-	0	-	++	+/-	0
E4	Employment	0	-	+/-	+/-	+	-	-	+/-	-	0	-	++	++	0
E5	Employment	-	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
E6	Employment	-	+/-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E7	Employment	-	+/-	-	+/-	--	-	-	+/-	++	0	0	-	++	0
E8	Employment	-	+/-	-	+/-	-	-	-	+/-	++	0	0	++	++	0
E9	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	++	++	0
E10	Employment	-	+/-	+/-	+/-	--	+	-	+/-	-	0	0	++	++	0
E11	Employment	0	+/-	+/-	+/-	+	-	-	+/-	-	0	0	++	++	0
E12	Employment	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
E13	Employment	0	-	+/-	+/-	+	-	-	+/-	++	0	0	-	++	0
E14	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	-	++	++	0
E15	Employment	-	+/-	-	+/-	-	+	-	+/-	++	0	-	++	+/-	0
E16	Employment	-	+/-	+/-	+/-	+	-	-	+/-	-	0	-	+	++	0
E17	Employment	-	-	--	+/-	-	-	-	+/-	-	0	0	++	++	0
E18	Employment	-	+/-	-	+/-	-	+	-	+/-	-	0	-	++	++	0
E19	Employment	0	-	+/-	+/-	+	-	-	+/-	-	0	0	-	++	0
E20	Employment	0	+/-	-	+/-	+	+	-	+/-	-	0	0	+	++	0
E21	Employment	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
E22	Employment	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E23	Employment	-	-	-	+/-	--	-	-	+/-	++	0	-	++	++	0
E24	Employment	0	+/-	+/-	+/-	+	+	-	+/-	++	0	-	-	++	0
E25	Employment	0	-	-	+/-	-	-	-	+/-	++	0	-	-	++	0
GT1	Gypsy and Traveller	0	-	+/-	+/-	--	-	-	+/-	-	+	-	++	++	++

9.3 Selection and rejection of sites

9.3.1 Planning Practice Guidance (PPG) on SEA states that the SA/SEA process should outline the reasons why alternatives were selected and the reasons the rejected options were not taken forward. An overview of the reasons for site selection and rejection for each of the 48 reasonable alternative sites assessed within this SA Report have been provided by CWC, as summarised in **Table 9.2**.

9.3.2 The decision making of the Council in relation to the sites taken forward reflects the findings of the evidence base documents prepared to support the preparation of the WLP, including the findings of the SA, and the accompanying detailed site assessment proformas prepared by the Council.

Table 9.2: Outline reasons for selection / rejection of reasonable alternative sites for the WLP

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
H1	Blue Bird Industrial Estate and site to rear, Park Lane	Selected for housing	Existing housing allocation in Stafford Road Corridor Area Action Plan. Not consulted on through Draft BCP due to delivery concerns - now considered deliverable.
H2	Former G & P Batteries Site, Grove Street, Heath Town	Selected for housing	Existing allocation in Heathfield Park Neighbourhood Plan. Site has outline planning permission.
H3	East of Qualcast Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission.
H4	West of Qualcast Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Site has outline planning permission. Occupied employment land.
H5	West of Colliery Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land. Additional 1 ha suitable for other commercial uses as part of mixed use scheme.
H6	Dobbs Street, Blakenhall	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Part occupied employment land.
H7	Dudley Road / Bell Place, Blakenhall	Selected for housing	Existing allocation in Wolverhampton City Centre Area Action Plan. Site has full planning permission.
H8	Former Royal Hospital, All Saints	Selected for housing	Site is under construction.
H9	Delta Trading Estate, Bilston Road	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H10	Land at Hall Street / The Orchard, Bilston Town Centre	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan.
H11	Former Pipe Hall, The Orchard, Bilston Town Centre	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to retention and conversion of listed building.
H12	Lane Street / Highfields Road, Bradley	Selected for housing	Operational industrial site adjoining residential and employment, promoted for housing through the call for sites. The employment land evidence indicates that this site is surplus to employment needs and could be released for housing, subject to re-location of the current land owners who occupy the site and operate a steel stockholding company. The sites falls within an Area of High Historic

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
			Townscape Value (AHHTV) in the HLC Study due to the cluster of late 19th and early 20th century industrial buildings surrounding the locally listed Highfield Works building, which also falls within the Bilston Canal Corridor Conservation Area. This building could be suitable for conversion, subject to viability. Carefully designed housing development on adjoining land would not necessarily harm the setting of the Conservation Area. The site is suitable for development for 72 homes, subject to subject to a design which: protects the operation of employment land to the east; retains the locally listed Highfield Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site; provision of off-site improvements to local open space to meet recreational open space needs of new residents.
H13	Greenway Road, Bradley	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H14	Former Loxdale Primary School, Chapel Street, Bradley	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H15	South of Oxford Street, Bilston	Selected for housing	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H16	Former Northcote Secondary School, Northwood Park Road	Selected for housing	Site has full planning permission.
H17	Beckminster House, Beckminster Road	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to retention and conversion of listed building.
H18	Former Rookery Lodge, Woodcross Lane	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Outline permission for care village in 2012.
H19	Former Stowheath centres. Stowheath Lane	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H20	Former Probert Court / Health Centre, Probert Road	Selected for housing	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to relocation of existing GP surgery.
H21	Former Gym, Craddock Street	Selected for housing	Existing housing allocation in Wolverhampton Unitary Development Plan. Not consulted on through Draft BCP as operational gym - now considered deliverable.
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	Rejected for housing	Sites in employment use within an established industrial area, promoted for housing through the call for sites. The sites are unsuitable for residential development as they are surrounded by unregulated employment uses which are important to protect for employment in line with draft BCP evidence and policies. Development of the sites would cause significant harm to the residential amenity of new residents and prejudice the operational capacity of adjoining employment uses to operate.
E1	Wolverhampton Business Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has Local Development Order and secured outline planning permission.

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
E2	Rear of IMI Marstons	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.
E3	Shaw Road (north of Civic Amenity Site)	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E4	Former Strykers, Bushbury Lane	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has outline planning permission.
E5	Gas Holder site, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E6	Mammouth Drive, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E7	Stratosphere Site, Wolverhampton Science Park	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan.
E8	Crown St/Cross St North	Selected for employment	Existing allocation in Stafford Road Corridor Area Action Plan. Site has outline planning permission.
E9	Bentley Bridge Business Park, Well Lane, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has full planning permission.
E10	Tata Steel, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Site has full planning permission.
E11	Phoenix Road, Wednesfield	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints. Part of site has full planning permission.
E12	Land at Neachells lane	Selected for employment	Part of public open space with a SLINC designation. Site located adjoining high quality employment area with good access to the highways network, subject to junction improvements. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the 2018 Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site, subject to investment in local open space to improve quality. Site suitable for employment development subject to mitigation and enhancement for loss of recreational open space and SLINC / nature conservation value. Capacity may be constrained by highways access onto Neachells Lane. Further assessment work is underway which will be reflected in the Publication WLP.
E13	Land rear of Key Line Builders, Neachells Lane / Noose Lane	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E14	Chillington Fields	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Willenhall Road.
E15	Powerhouse, Commercial Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E16	Hickman Avenue	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Hickman Avenue.

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
E17	Former MEB Site, Major Street / Dixon Street	Selected for employment	Vacant land within industrial area, suitable for employment use, subject to remediation as appropriate to address known ground condition issues.
E18	Millfields Road, Etingshall	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E19	Rolls Royce Playing Fields, Spring Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to compensation for loss of playing field / bowling green.
E20	South of Inverclyde Drive	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E21	Rear of Spring Road	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E22	Springvale Avenue	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E23	Bilston Urban Village, Bath Street	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan.
E24	Dale St, Bilston	Selected for employment	Vacant land within industrial area, suitable for employment use, with no known constraints.
E25	South of Citadel Junction, Murdoch Road, Bilston	Selected for employment	Existing allocation in Bilston Corridor Area Action Plan. Subject to remediation and mitigation for loss of nature conservation value.
GT1	Former Bushbury Reservoir, Showell Road	Selected for Gypsy and Traveller	Existing allocation in Stafford Road Corridor Area Action Plan.

10 Recommendations

10.1 Overview

10.1.1 Lepus has prepared a list of recommendations for CWC to consider as the WLP progresses in **Table 10.1**, including specific recommendations for policies (see assessment of proposed policy areas in **Appendix B**), as well as more general recommendations for future plan reviews, and wider Council initiatives.

10.1.2 These recommendations are not exhaustive, nor are they essential. Further recommendations will be provided where appropriate throughout the plan making process.

Table 10.1: SA recommendations for the Wolverhampton Local Plan

SA Objective	Recommendations
1: Cultural Heritage	<ul style="list-style-type: none"> a. Where a development proposal could potentially result in substantial harm to the significance of a historic asset, clear justification should be provided, for example public benefits outweighing the harm to the asset.
2: Landscape	<ul style="list-style-type: none"> a. Ensure development proposals aim to protect and enhance the special qualities of locally designated landscapes. b. Ensure development proposals are in-keeping with the local landscape character and the findings of the most recent Landscape Sensitivity Assessment¹⁵⁵. c. Ensure development proposals are constructed in accordance with appropriate design guides and codes, such as the 'Design: process and tools'¹⁵⁶ government guidance. d. Development proposals which have the potential to significantly adversely affect views, for example those experienced by users of the PRoW network, should incorporate appropriate mitigation.
3: Biodiversity, flora, fauna and geodiversity	<ul style="list-style-type: none"> a. Policy ENV2 or its successor should take into account the findings of the HRA when available. b. Where development proposals have the potential to adversely impact international or European designated sites, reference should be made to the Cannock Chase 'Guidance to mitigate the impact of new residential development'¹⁵⁷ and other relevant documents within the Evidence Base. c. Policies should support development which aims to protect, and where possible provide, supporting habitat to nearby Natura 2000 sites. d. CWC could strive to achieve higher BNG targets than the mandatory 10% through the WLP, for example in strategic developments. CWC could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider

¹⁵⁵ Land Use Consultants (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 21/11/23]

¹⁵⁶ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 21/11/23]

¹⁵⁷ City of Wolverhampton Planning Guidance to Mitigate the Impact of New Residential Development on Cannock Chase Special Area of Conservation (SAC) March 2022 (Updated June 2023). Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-06/Wolverhampton%20Guidance%20to%20Mitigate%20impact%20of%20Residential%20on%20Cannock%20Chase%20SAC%20June%202023.pdf> [Date accessed: 17/01/24]

SA Objective	Recommendations
	<p>range of environmental benefits and ecosystem services than BNG alone, such as for air quality and flood risk management^{158 159}.</p> <ul style="list-style-type: none"> e. Improve resilience and connectivity of biodiversity sites through landscape scale management. f. Ensure reference is made within policies to Wolverhampton’s Tree and Woodland Strategy. g. It is recommended that Evidence Base documents in relation to biodiversity (including the 2010 Birmingham and the Black Country Biodiversity Action Plan) are updated in accordance with the latest guidance.
4: Climate change mitigation	<ul style="list-style-type: none"> a. Provide necessary infrastructure to encourage low carbon options. b. Aim to protect and enhance public space to encourage safe walking and cycling opportunities. c. Where appropriate, site-specific Transport Plans should be prepared. d. Development proposals should aim to be carbon neutral. e. Seek to achieve no biodegradable waste to landfill to reduce emissions, in line with ‘Net Zero the UK’s contribution to stopping global warming’¹⁶⁰. f. Consider retrofitting buildings to make them more energy efficient. g. It is recommended that a Climate Change Strategy is prepared, drawing on CWC’s Climate Commitment¹⁶¹. This could also help to identify the carbon capture and storage potential of the Plan area. h. Consider local partnerships to establish locally appropriate solutions to the climate crisis. i. Protect and enhance the local green and blue infrastructure networks through a specific GI policy. It is recommended that a Green Infrastructure Plan or Strategy is prepared, or that GI principles are incorporated into the emerging Open Space Strategy update.
5: Climate change adaptation	<ul style="list-style-type: none"> a. Using relevant data sources, ensure development proposals incorporate green infrastructure where appropriate. a. Ensure development proposals do not result in the exacerbation of surface water flood risk in surrounding areas. b. Development proposals should be built in accordance with the relevant Surface Water Management Plan¹⁶². It is recommended that the Surface Water Management Plan is updated. c. Ensure capacity of water treatment works is sufficient to serve new development. d. Promote increased water efficiency in new developments.
6: Natural resources	<ul style="list-style-type: none"> j. The retention of trees and other vegetation should be encouraged to help retain the stability of the soil and prevent erosion.

¹⁵⁸ DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 09/01/24]

¹⁵⁹ National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain.> [Date accessed: 09/01/24]

¹⁶⁰ Committee on Climate Change (2019) Net Zero The UK’s contribution to stopping global warming. Available at: <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/> [Date accessed: 21/11/23]

¹⁶¹ City of Wolverhampton Council. Our Climate Commitment. Available at: <https://www.wolverhampton.gov.uk/environment-and-climate/climate-change-and-sustainability/climate-emergency-declaration> [Date accessed: 12/01/24]

¹⁶² Scott Wilson (2009) Black Country Water Cycle Study and Scoping Surface Water Management Plan. Available at: https://blackcountryplan.dudley.gov.uk/media/11668/water_cycle_study_scoping_surface_water_mgmnt_plan.pdf [Date accessed: 21/11/23]

SA Objective	Recommendations
	<ul style="list-style-type: none"> k. Effective management should be in place to help prevent pollution and unnecessary compaction of soils during construction. Consider the requirement for Construction Environmental Management Plans in Planning Conditions. l. Where sites contain bare soil following construction of development, it is recommended that vegetation, in particular native plant species, be used to cover the ground. m. Ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use.
7: Pollution	<ul style="list-style-type: none"> a. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality or for air quality monitoring. b. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. c. Ensure visual and auditory buffers are incorporated at the edge of development proposals located in close proximity to railway lines to help mitigate noise pollution. d. Ensure development proposals which could potentially result in an increase in noise disturbance are adequately mitigated, for example, through efficient layout of development, restrict activities at certain times or the use of noise insulation. e. Development proposals should be built in accordance with recommendations within the Water Cycle Study¹⁶³ and other relevant documents within the Evidence Base, including Water Resource Management Plans, Catchment Flood Management Plan and Basin Management Plans. It is recommended that a Phase 2 Water Cycle Study is carried out.
8: Waste	<ul style="list-style-type: none"> a. Development proposals should demonstrate measures to minimise waste generation during construction. b. Development proposals should integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting.
9: Transport and accessibility	<ul style="list-style-type: none"> a. Ensure all development proposals and Travel Plans (where applicable) aim to reduce reliance on private car use wherever possible and aim to promote access to local facilities and services in a manner which minimises climate change emissions and promotes active travel.
10: Housing	<ul style="list-style-type: none"> a. Ensure all development proposals are built to a high-quality design in line with the 'Design: process and tools'¹⁶⁴ government guidance.
11: Equality	<ul style="list-style-type: none"> a. Ensure residential development proposals incorporate functional private or communal open space, including green space. b. Ensure development proposals provide adequate indoor space in line with the requirements set out in the technical housing standards¹⁶⁵. c. Where appropriate, consider the option for community ownership of some facilities and services. d. Ensure development proposals promote social interaction, including the establishment of strong neighbourhood centres. e. Ensure development proposals take into account privacy, access to sunlight, noise and disturbance, vibration, artificial lighting, odor, crime and safety. f. Ensure development proposals promote safe and accessible neighbourhoods, helping to reduce crime and the fear of crime. g. Consider supporting the use of the 'Secured by Design'¹⁶⁶ scheme in relation to crime prevention.

¹⁶³ JBA Consulting (2019) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. Available at: https://blackcountryplan.dudley.gov.uk/media/17929/watercyclestudy_phs1_scopingstudy.pdf [Date accessed: 20/11/23]

¹⁶⁴ MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 21/11/23]

¹⁶⁵ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 21/11/23]

¹⁶⁶ Secured by Design. Available at: <https://www.securedbydesign.com/> [Date accessed: 21/11/23]

SA Objective	Recommendations
12: Health	<ul style="list-style-type: none"> a. Development proposals should take into consideration the findings of the latest Playing Pitch and Outdoor Sports Strategies, along with other relevant documents within the Evidence Base. b. Where appropriate, planning obligations should be used to secure contributions to tackle poor air quality and for air quality monitoring. c. Development should take into consideration recommendations within the relevant Air Quality Action Plan and the outputs of the Annual Status Reports. d. Improve or enhance the PRoW and cycle network across the Plan area. It is recommended that the Rights of Way Improvement Plan is updated. e. Provide or improve safe pedestrian and cycle access to public greenspaces and open spaces. f. Development proposals should be in accordance with the Open Space Strategy or subsequent updates. g. Ensure development proposals do not result in detrimental impacts to the safety of pedestrians and cyclists.
13: Economy	<ul style="list-style-type: none"> a. Ensure residential-led proposals are located in close proximity to bus stops or other sustainable transport options to reach employment opportunities. b. Improve access to employment opportunities, through provision of bus stops and bus services, and/ or improvements to the local pedestrian and cycle networks.
14: Education	<ul style="list-style-type: none"> a. Increase the provision and capacity of primary and secondary schools across the Plan area in line with the identified need.

11 Conclusions and next steps

11.1 Consultation on the Regulation 18 Issues and Preferred Options SA Report

11.1.1 This Regulation 18 Issues and Preferred Options SA Report will be subject to consultation alongside the WLP Issues and Preferred Options consultation document and other evidence base documents between 26th February and 8th April 2024.

11.1.2 This report represents the latest stage of the SA process. Any comments received on this report during the consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.

11.2 Responding to the consultation

11.2.1 All responses on this consultation exercise should be made via the CWC website using the comments form provided at <https://wolverhampton.gov.uk/planning/planning-policies> or sent to:

Post:

Wolverhampton Local Plan,
City Planning,
City of Wolverhampton Council,
St Peter's Square,
Wolverhampton,
WV1 1RP

Email: localplan@wolverhampton.gov.uk

Phone: 01902 551155

11.3 Next steps

11.3.1 Once CWC have reviewed Regulation 18 consultation comments, the next stage of plan making will begin.

11.3.2 The next iteration of the WLP will comprise the Regulation 19 'Publication' version of the WLP. At the Regulation 19 stage, preparation of an Environmental Report will begin, also known as a 'sustainability appraisal report' in PPG. The Environmental Report will include all the legal requirements set out in Regulation 12 and Schedule 2 of the SEA Regulations, enabling the Councils to meet the legal requirements set out in sections 19 and 39 of the Planning and Compulsory Purchase Act 2004.

Appendix A – SA Framework

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	a) Preserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) Preserve or enhance archaeological sites/remains? c) Preserve or enhance the setting of cultural heritage assets? d) Improve the energy efficiency of historic buildings?	<ul style="list-style-type: none"> Number and type of features and areas of historic designations in the WLP area. Statutory and non-statutory sites in the Historic Environment Record (HER). Number of historic assets on the Heritage at Risk register.
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	a) Safeguard and enhance the character of the landscape and local distinctiveness and identity? b) Protect and enhance visual amenity, including light and noise pollution? c) Reuse degraded landscapes/townscapes? d) Compromise the purpose of the Green Belt e.g. lead to coalescence of settlements and/or urban sprawl?	<ul style="list-style-type: none"> National Character Area. Tranquillity rating of area. Re-use of derelict buildings or re-use of buildings in a prominent location. Landscape sensitivity.
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	a) Maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) Support positive management of local sites (SLINCs and SINCS) designated for nature conservation and geodiversity value? c) Link up areas of fragmented habitat contribute to habitat connectivity? d) Increase awareness of biodiversity assets?	<ul style="list-style-type: none"> Number and diversity of European Protected Species, and NERC Act Section 41 species in the area. Area and condition of priority habitats. Area and condition of sites designated for biological and geological interest.
4	Climate change mitigation: Minimise Wolverhampton's contribution to climate change.	a) Help reduce the per capita carbon footprint of Wolverhampton? b) Encourage renewable energy generation or use of energy from renewable sources?	<ul style="list-style-type: none"> Proximity to public transport links. Frequency of nearby public transport services. Distance to local services and amenities. Energy efficiency of buildings and transport. Percentage of energy in the area generated from renewable sources.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
5	Climate change adaptation: Plan for the anticipated levels of climate change.	a) Avoid development in areas at high risk of flooding? b) Increase the area and connectivity of Green Infrastructure (GI)? c) Promote use of technologies and techniques to adapt to the impacts of climate change?	<ul style="list-style-type: none"> Number of properties at risk of flooding. Area of new greenspace created per capita. Connectivity of GI. Implementation of adaptive techniques, such as SUDS and passive heating/cooling.
6	Natural resources: Protect and conserve natural resources.	a) Utilise previously developed, degraded and under-used land? b) Lead to the loss of the best and most versatile agricultural land? c) Lead to the loss or sterilisation of mineral resources, or affect mineral working?	<ul style="list-style-type: none"> Re-use of previously developed land. Area of best and most versatile agricultural land lost to development. Groundwater Source Protection Zone. Proposed Mineral Safeguarding Area(s).
7	Pollution: Reduce air, soil, water and noise pollution.	a) Maintain and improve air quality? b) Maintain soil quality or help to remediate land affected by ground contamination? c) Maintain and improve water quality? d) Help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	<ul style="list-style-type: none"> Provision of GI. Remediation of contaminated land. Proximity to watercourses with poor quality status. Percentage change in pollution incidents. Development with potential to generate a significant increase in road traffic emissions or other air pollutants.
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	a) Encourage recycling/re-use/composting of waste? b) Minimise and where possible eliminate generation of waste?	<ul style="list-style-type: none"> Number and capacity of waste management facilities. Re-use of recycled and recyclable materials. Management of local authority collected waste.
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	a) Reduce the need to travel and/or reduce travel time? b) Provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?	<ul style="list-style-type: none"> Distance to place of work. Distance to local amenities and key services. Distance to existing or proposed bus routes. Frequency of bus services. Proximity and connectivity of walking and cycling links. Distance to train or metro station.
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	a) Provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) Provide housing suitable for the growing elderly population? c) Provide decent, affordable and accessible homes?	<ul style="list-style-type: none"> Varied housing mix. Percentage of dwellings delivered as affordable housing. Number of extra care homes.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	<ul style="list-style-type: none"> a) Help achieve life-long learning and increase learning participation and adult education? b) Enable communities to influence the decisions that affect their neighbourhoods and quality of life? c) Reduce crime and the fear of crime? d) Advance equality of opportunity? e) Foster good community relations? f) Eliminate unlawful discrimination, victimisation and harassment on individuals or groups in the community including consideration of age, disability, gender, race, religion, gender re-assignment, maternity, sexual orientation, marriage and civil partnership, and human rights? 	<ul style="list-style-type: none"> • No. of people with NVQ2 qualifications. • Percentage of adults surveyed who feel they can influence decisions affecting their own local area. • % respondents very or fairly satisfied with their neighbourhood. • Crime Deprivation Index. • Education, Skills & Training Deprivation Index. • Availability of libraries. • Index of Multiple Deprivation
12	Health: Safeguard and improve community health, safety and wellbeing.	<ul style="list-style-type: none"> a) Improve access for all to health, leisure and recreational facilities? b) Improve and enhance Wolverhampton's GI network? c) Improve road safety? d) Reduce obesity? e) Consider the needs of Wolverhampton's growing elderly population? 	<ul style="list-style-type: none"> • Travel time by public transport to nearest health centre and sports facilities. • Provision and accessibility of open greenspace and GI. • Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	<ul style="list-style-type: none"> a) Increase accessibility of suitable employment within Wolverhampton? b) Encourage business start-ups in the area? c) Support the health of established centres? d) Protect and create jobs? 	<ul style="list-style-type: none"> • Number of residents working within Wolverhampton. • Number of employment opportunities in professional occupations. • Number of new business start-ups as a result of the development. • Total amount of employment land. • Number of vacant units in strategic centres. • Amount of additional retail, office and leisure floorspace completed in established centres.
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	<ul style="list-style-type: none"> a) Improve access for all to education and training opportunities? b) Encourage a diversity of education and training opportunities? 	<ul style="list-style-type: none"> • Distance to education and training, particularly primary schools and secondary schools. • Provision of new education and training facilities and opportunities. • Accessibility of education and training facilities by public transport. • Capacity of local schools to meet demand from new development.

Appendix B – Assessment of proposed WLP policy areas

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B.1 Overview

B.1.1 Introduction

- B.1.1.1 This appendix provides an assessment of the proposed policy areas as set out within the Wolverhampton Local Plan (WLP) Issues and Preferred Options Consultation (Regulation 18)¹ document.
- B.1.1.2 Many policies are derived from the ceased Black Country Plan (BCP). A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- B.1.1.3 CWC have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the WLP area, in light of consultation responses received during the BCP Regulation 18 consultation, and the smaller geographic area considered within the WLP compared to the former BCP.
- B.1.1.4 The results of CWC's review have been presented in Appendix 2 of the Issues and Preferred Options document². The table 'Specific Amendments to Draft Black Country Plan Policies' of the WLP Appendix 2 identifies a suite of 56 draft policies which are likely to form the basis of the emerging WLP.
- B.1.1.5 The SA Framework (see **Appendix A**) has been used to evaluate the sustainability performance of each draft policy. Full details of the assessment methodology are presented in the SA Main Report (**Chapter 3**). For ease of reference the scoring system is summarised in **Table B.1.1**.

¹ City of Wolverhampton Council (2023) Wolverhampton Local Plan Issues and Preferred Options (Regulation 18). (Draft version provided to Lepus 13/11/23)

² Ibid

Table B.1.1: Presenting likely impacts

Likely impact	Description	Impact symbol
Major Positive Impact	The proposed option contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed option has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed option prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option prevents the achievement of the SA Objective to a significant extent.	--

B.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. All impact matrices are accompanied by an assessment narrative which describes the findings of the appraisal and provides the rationale for the recorded impact values.

B.1.2 Overview of policy assessments

B.1.2.1 The impact matrices for all proposed policy area assessments are presented in **Table B.1.2** below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

Table B.1.2: Summary of policy area assessments

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0
CSP3	0	-	+/-	0	0	0	0	0	+	+	+	+	+	0
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.2 Spatial Strategy

B.2.1 Policy CSP1 – Development Strategy

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	0	+/-	+/-	+	0	0	-	-	+	+	+	+	++	+

B.2.1.1 Policy CSP1 will provide the overarching spatial strategy for Wolverhampton, setting out the scale and distribution of new development for the Plan period to 2042. The preferred overall spatial approach to be set out in the policy has evolved from consideration of several spatial distribution and growth options (as assessed in the SA, see **Chapters 4 – 7**), with CWC’s preferred option known as Option G: Balanced Growth (see **Chapter 7**). The WLP policy will amend the version presented in the Draft BCP, removing measures that would support release of Green Belt land and development within Neighbourhood Growth Areas.

B.2.1.2 Under Policy CSP1, the majority of development will likely be located within the existing urban areas. The preferred spatial strategy supports the redevelopment of brownfield land which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas, and supporting urban regeneration. Although, under the preferred spatial strategy, a proportion of growth will be exported to neighbouring areas which may include development on previously undeveloped land, and there may be some small-scale loss of previously undeveloped land within Wolverhampton’s urban area. On balance, Policy CSP1 will be likely to have a negligible impact on natural resources (SA Objective 6).

B.2.1.3 For housing growth, the preferred option would see all of the overall identified housing need of 21,720 homes³ for the Plan period up to 2042 met, with 10,307 homes supplied within Wolverhampton, and the remaining proportion exported through potential contributions through Duty to Co-operate from neighbouring authorities which have a strong relationship with Wolverhampton. For employment growth, all identified employment land requirements would be provided within Wolverhampton. A major positive impact is therefore predicted in relation to the economy (SA Objective 13), and a minor positive impact in relation to housing (SA Objective 10) as the proposed housing option would lead to achievement of this SA Objective.

B.2.1.4 The balanced approach to growth which will be proposed through Policy CSP1 is likely to have a minor positive impact on equality (SA Objective 11) in terms of accessibility to key

³ Subject to amendment at Regulation 19 / Regulation 22 stages due to annual changes in housing need and supply

services and facilities, employment opportunities and access to housing, including affordable housing, distributed in an inclusive manner across the WLP area.

- B.2.1.5 The preferred spatial strategy seeks to protect green spaces including the Green Belt and ‘wedges’ of open land, and promote regeneration within the urban areas. However, the large quantum of growth proposed could also lead to potential changes in the local landscape and townscape character. On balance, it is considered that mixed effects on the landscape (SA Objective 2) would be achieved through this policy.
- B.2.1.6 Development in the urban areas would help to minimise the overall vegetation cover lost to development. Adhering to net gain principles could also deliver positive effects in the longer term. The development strategy also provides opportunities to benefit biodiversity and geodiversity due to the protection of sensitive features, and delivery of development in the existing urban area. Overall, adhering to BNG principles and minimising the loss of environmentally valuable land would expect to have a minor positive impact on local biodiversity (SA Objective 3).
- B.2.1.7 With the addition of approximately 21,720 homes in total, this policy would be expected to increase waste generation. It is however noted that waste generation would be likely to increase with any population increases (either in existing or new homes). Overall, a minor negative impact on waste would be expected (SA Objective 8). Provisions for waste management are set out in other policies.
- B.2.1.8 The addition of 21,720 homes and 73ha of employment land will be likely to increase carbon emissions during construction and operation. The construction, occupation and operation of development is also likely to exacerbate air pollution, including greenhouse gas (GHG) emissions and particulate matter (PM). However, by directing development towards the Strategic Centres and Towns, Policy CSP1 would be likely to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. In determining potential allocations, sites have been assessed in terms of their accessibility by all modes of transport as part of the evidence base for the WLP. This strategy is expected to have a minor positive impact on climate change mitigation (SA Objective 4) and transport and accessibility (SA Objective 9) overall. A minor negative impact is also identified in terms of pollution (SA Objective 7), taking the balance of these considerations into account.
- B.2.1.9 By directing development toward existing urban areas, this policy will be likely to locate the majority of new residents in areas with good access to existing healthcare facilities. The policy will also be expected to ensure residents retain good access to natural habitats and open spaces, with benefits to mental wellbeing. Therefore, a minor positive impact on human health is identified overall (SA Objective 12). Whilst higher density development in urban areas would help to minimise effects on natural resources, this needs to be carefully planned and designed to ensure that there are no adverse impacts on health and wellbeing.
- B.2.1.10 By directing development towards existing urban settlements, it is expected that a large proportion of new residents will be situated in close proximity to a range of educational facilities. In addition, there would likely be opportunities to provide sustainable transport

to assist travelling to these facilities compared to a more dispersed spatial approach. Overall, a minor positive impact on education is identified (SA Objective 11).

- B.2.1.11 Overall negligible effects on the cultural heritage resource of the WLP area (SA Objective 1) and climate change adaptation (SA Objective 5) have been identified on balance where it is considered that the proposed distribution of development would help to avoid or mitigate harm to the historic environment and locate development in lower areas of flood risk, as identified through the Flood Risk Assessment and subsequent policies.

B.2.2 Policy CSP2 – The Strategic Centres and Core Regeneration Areas

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP2	0	+	+	+	0	+	0	0	+	+	+	+	+	0

- B.2.2.1 Policy CSP2 is expected to present the proposed Growth Network within the WLP area, made up of the Strategic Centre of Wolverhampton City Centre and Core Regeneration Areas of Bilston, Wednesfield and Stafford Road, as the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities.
- B.2.2.2 It is anticipated that Policy CSP2 will have a minor positive effect on housing (SA Objective 10) and the economy (SA Objective 13) as the Strategic Centre and Core Regeneration Areas will accommodate the highest proportion of housing and employment growth and have been designed to respond to locally identified needs and encourage continued investment, taking into account the findings of the latest Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR).
- B.2.2.3 Policy CSP2, in line with the preferred spatial strategy, will support the redevelopment of brownfield land within the Strategic Centre and Core Regeneration Areas. A minor positive effect is anticipated in terms of natural resources (SA Objective 6) and landscape (SA Objective 2), owing to the primary focus on regeneration of existing urban areas and high-quality design.
- B.2.2.4 The Strategic Centre and the Core Regeneration Areas are already served by an extensive transport system and therefore provide suitable locations for economic and housing growth, although improvements are required to enhance connectivity, accessibility and environmental quality. The policy is expected to encourage improved public transport links and support the development of sustainable communities through implementing local services, active travel routes and GI networks. By placing a large proportion of new residents in these areas, it would be expected that residents would have good access to employment by foot, bicycle or public transport. A minor positive effect on transport and

accessibility (SA Objective 9), health (SA Objective 12) and climate change mitigation (SA Objective 4) is therefore considered likely under these provisions of Policy CPS2.

B.2.2.5 Policy CSP2 is also expected to set out a range of cultural, leisure and community facilities within appropriate areas, to help boost the local economy and deliver regeneration benefits. This is anticipated to have a positive impact on equality (SA Objective 11) through increased employment opportunities, access to services and community cohesion.

B.2.2.6 Assuming that reference is made to the provision of GI through this policy, it is anticipated to have a minor positive impact on biodiversity (SA Objective 3), however this could be strengthened through setting out specification of GI measures in this policy, links to other relevant policies and / or GI strategies, potentially in the supporting text.

B.2.2.7 A negligible effect is recorded for the remaining SA Objectives.

B.2.3 Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP3	0	0	+/-	0	0	0	0	0	+	+	+	+	+	0

B.2.3.1 Policy CSP3 will set out the approach to the Towns within the WLP area, which make up most of the existing urban area and are where the majority of residents live. The overall land use pattern is not expected to alter greatly by 2042, but there will be some incremental change through a mix of permitted and allocated sites, windfall developments and town centre regeneration activities. The WLP policy will amend the version presented in the Draft BCP, removing measures that would support release of Green Belt land and development within Neighbourhood Growth Areas.

B.2.3.2 Under Policy CSP3, the majority of development will likely be located within the existing urban areas. The preferred spatial strategy supports the redevelopment of brownfield land which represents an efficient use of land in accordance with the NPPF, by locating the majority of housing within the existing urban areas, and supporting urban regeneration. Although, under the preferred spatial strategy, a proportion of growth will be exported to neighbouring areas which may include development on previously undeveloped land, and there may be some small-scale loss of previously undeveloped land within Wolverhampton’s urban area. On balance, Policy CSP3 will be likely to have a negligible impact on natural resources (SA Objective 6).

B.2.3.3 The extent of impacts on biodiversity features is dependent on the development location and ecological characteristics of the area in question, as well as the potential for mitigation to avoid or minimise impacts as well as enhancement. This policy does however have the potential to deliver strategic GI alongside development although the extent to which this may be achieved is uncertain at this stage. Overall, mixed positive and negative effects

are therefore identified in relation to biodiversity (SA Objective 3). Negligible effects are identified in relation to climate change adaptation (SA Objective 5) due to the approach to avoiding areas at significant risk from fluvial flooding in the site selection process.

B.2.3.4 The WLP will seek to provide strong links between the Growth Network and the Towns and Neighbourhood Areas, through high-quality design and transport investment. This policy is expected to set out support for improvements to access and design and ensure integration of existing and new communities, which will help to improve residents’ access to services and facilities. In addition, the policy provides an opportunity to promote a network of GI alongside the centres and facilities. Overall, this policy will be likely to have minor positive impacts in regard to transport and accessibility, equality and health (SA Objectives 9, 11 and 12).

B.2.3.5 Despite the majority of development under Policy CSP3 being located within the existing urban area, there could be potential for adverse impacts on existing landscape resources, although there is some potential to integrate development into the existing built form and to locate development in areas of lower landscape sensitivity wherever possible, taking a balance of sustainability considerations into account. Such areas have been identified through the Landscape Sensitivity Study. Employment allocations are not subject to individual site allocation policies and are covered under the ‘umbrella’ of Policy EMP2 (Strategic Employment Areas) as well as the overarching Spatial Strategy Policies (CSP1-5, GB1-2) and Employment Policies.

B.2.3.6 It is envisaged that opportunities would be sought to integrate high quality multi-functional GI into the designs and strengthen a wider GI network for all developments. This would also be beneficial to the local landscape by providing distinctive views of green space and natural features, which help to define local character whilst also delivering benefits to mental health and wellbeing. The provision of new open and green spaces can also help create attractive places to live and strengthen sense of place. It is anticipated that Policy CPS3 will seek to facilitate a network of GI alongside the centres and community facilities. Overall, a negligible impact on landscape resources (SA Objective 2) is predicted.

B.2.4 Policy CSP4 – Achieving well-designed places

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP4	+	+	+	+	+	0	+	0	+	0	+	+	0	0

B.2.4.1 Policy CSP4 will help to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built and historic environment. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.2.4.2 It is expected that Policy CSP4 will seek to ensure development protects and enhances the historic character and local distinctiveness within Wolverhampton. The implementation of

high-quality design would help to ensure that new development does not have an adverse impact on, and where possible enhances, any surrounding heritage assets. Therefore, a minor positive impact on cultural heritage is identified (SA Objective 1).

B.2.4.3 This policy should help to ensure that building design is carefully considered to provide appropriate size, scale and type of development depending on the local characteristics, which would help to reduce potential adverse impacts of new development and ensure development is in keeping with the existing landscape character. A minor positive impact in relation to landscape will be likely (SA Objective 2).

B.2.4.4 Well-designed places should emphasise the importance of biodiversity features and making space for nature, including green and blue infrastructure within the urban area. Policy provisions relating to the protection and enhancement of habitats and corridors could include reference to the canal network and the promotion of a multi-functional open space network alongside development. Overall, assuming such provisions will be included, a minor positive impact on biodiversity is identified (SA Objective 3).

B.2.4.5 This policy will be likely to encourage climate change resilience and help reduce carbon emissions associated with development, by promoting energy efficient design. The use of modern and sustainable technologies is likely to have minor positive impacts on carbon emissions and flood risk (SA Objectives 4 and 5).

B.2.4.6 Under this policy, well-connected layouts would likely be encouraged, including public transport provisions, which will help to reduce private car use and lead to benefits in terms of carbon emissions, air pollution and congestion. This would be expected to result in a minor positive impact on climate change mitigation, pollution, transport and accessibility (SA Objectives 4, 7 and 9).

B.2.4.7 By focusing on design, it is likely that Policy CSP4 will help to promote natural surveillance to reduce the fear of crime and encourage social interaction within the local community. Therefore, a minor positive impact on equality could be achieved (SA Objective 11).

B.2.4.8 It is assumed that the policy will support the provision of pedestrian and cycling routes within developments, to facilitate active travel and provide open space for outdoor exercise and personal reflection. Furthermore, the policy’s focus on providing high quality design could potentially result in improved living conditions with benefits to human health. Policy CSP4 could help to encourage residents to live healthy lifestyles, and therefore, a minor positive impact on health is identified (SA Objective 12).

B.2.5 Policy CSP5 – Cultural Facilities and the Visitor Economy

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP5	+	+	0	+	0	0	0	0	+	0	+	+	+	0

- B.2.5.1 Policy CSP5 will focus on the protection, enhancement, promotion and expansion of cultural, tourist and leisure facilities within Wolverhampton. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP, other than the addition of a point stating *“An assessment should be undertaken (as part of the design of new developments likely to attract large numbers of people) to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate”*.
- B.2.5.2 Policy CSP5 will be likely to have a minor positive impact on the economy through the safeguarding and promotion of cultural and leisure sites and by enhancing the tourism potential of the WLP area.
- B.2.5.3 A minor positive impact on climate change mitigation, transport and accessibility and health (SA Objectives 4, 9 and 12) could be achieved through provisions to maximise accessibility and secure necessary supporting infrastructure, facilitating linkages to centres including via public transport.
- B.2.5.4 By aiming to enhance cultural and tourist facilities, it is likely that the policy will also help to ensure developments are of high-quality design, create attractive areas, and promote the use of local features. Therefore, Policy CSP5 is likely to have a minor positive impact in relation to landscape (SA Objective 2). In addition, through seeking to ensure cultural facilities are protected and enhanced the policy could potentially facilitate engagement and local awareness of the WLP area’s heritage resources and cultural history. This would be likely to have a minor positive impact on cultural heritage (SA Objective 12).
- B.2.5.5 The proposed additional text relating to addressing potential security and crime-related vulnerabilities within this policy will be likely to have benefits to the community and promote social inclusion. The policy in of itself would also be likely to promote a sense of local identity through promoting enhancement of cultural facilities and boosting tourism. A minor positive impact on equality is therefore identified (SA Objective 11).

B.2.6 Policy GB1 – The Black Country Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB1	+/-	+	+	+/-	+/-	+	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

- B.2.6.1 Policy GB1 will set out CWC’s approach to the Green Belt. The decision has been taken by CWC to not review the Green Belt through the emerging WLP, and as such, the Green Belt will largely remain protected from development other than exceptional circumstances as set out in the NPPF.

- B.2.6.2 Paragraph 137 of the NPPF⁴ states *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.
- B.2.6.3 Wolverhampton’s Green Belt comprises open countryside surrounding the urban area to the north and south, and a green corridor following the Smestow Brook and Staffordshire and Worcestershire Canal. The policy should seek to ensure opportunities are sought to enhance the value and function of the Green Belt. Overall, it is considered likely that this policy would have a minor positive impact on the landscape, owing to the protection of Green Belt land from inappropriate development, with consequent benefits relating to the conservation of the countryside and previously undeveloped land (SA Objective 2).
- B.2.6.4 The majority of the WLP area is identified as ‘urban’ Agricultural Land Classification (ALC), however, some areas of Wolverhampton’s Green Belt have been identified as Grade 2 or 3 ALC, which could potentially represent some of Wolverhampton’s ‘best and most versatile’ (BMV) agricultural land (as current broad-scale regional mapping does not distinguish between Grade 3a and Grade 3b land). Policy GB1 would protect BMV land, as well as ecologically or environmentally valuable soils, through the protection of the Green Belt. Therefore, a minor positive impact on natural resources is identified (SA Objective 6).
- B.2.6.5 Policy GB1 is expected to include provisions to enhance biodiversity features and additionally would protect ecological networks by directing development away from the Green Belt. Overall, a minor positive impact on local biodiversity could be expected (SA Objective 3).
- B.2.6.6 At present, an uncertain impact has been identified on the remaining SA Objectives (1, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14). The extent of impacts on these objectives will be dependent on the specific wording of the new policy for the WLP including any criteria for permitted development within the Green Belt.

B.2.7 Policy GB2 – Extensions and Replacement Buildings in the Green Belt

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
GB2	0	0	0	0	0	0	0	0	0	0	+	0	+	0

⁴ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/11/23]

- B.2.7.1 Policy GB2 concerns extensions and replacement buildings in the Green Belt. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.2.7.2 Paragraph 149 of the NPPF⁵ states "*a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are ... c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces*". In accordance with the NPPF, Policy GB2 will support the extension or replacement of existing buildings in the Green Belt where appropriate. Extensions should be of the same scale and design of the surrounding built environment and in keeping with the local character.
- B.2.7.3 The policy is expected to ensure that commercial, educational and community uses located within the Green Belt can continue to grow and support the local community and economy. As local businesses and facilities with value to the community would likely be supported under this policy, minor positive impacts would be likely in relation to equality of the local community and the local economy (SA Objectives 11 and 13).
- B.2.7.4 Development under this policy is unlikely to significantly impact the local landscape or historic environment due to the small scale of development which could come forward. Therefore, negligible impacts regarding cultural heritage and landscape would be expected (SA Objectives 1 and 2).

⁵ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/11/23]

B.3 Delivery

B.3.1 Policy DEL1 – Infrastructure Provision

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL1	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.3.1.1 Policy DEL1 will set out the requirements to ensure that all new developments are supported by necessary infrastructure, both on and off site, to promote sustainable development. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.1.2 This policy is expected to help ensure development proposals do not result in adverse impacts on environmental features and are situated in sustainable locations. However, without providing specific details of how development proposals will meet these criteria the overall effects of the policy are difficult to determine. Therefore, whilst this policy is not be expected to result in any direct positive impacts on any of the SA Objectives, this policy will likely help to prevent development proposals resulting in adverse impacts. Overall, negligible impacts are identified for all SA Objectives at this stage of assessment.

B.3.2 Policy DEL2 – Balance between employment land and housing

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0

B.3.2.1 Policy DEL2 will aim to support the development of windfall sites on previously developed land, subject to meeting certain criteria. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.2.2 By supporting windfall development, this policy will be likely to have a minor positive impact on the provision of housing and employment land within Wolverhampton (SA Objectives 10 and 13).

B.3.2.3 Development directed toward brownfield land would be classed as an efficient use of land and would help to prevent the unnecessary loss of soil within the WLP area. Therefore,

Policy DEL2 is likely to have a minor positive impact on natural resources (SA Objective 6).

B.3.2.4 It is expected that, in accordance with Policy DEL2, windfall development will be permitted in sustainable locations, and therefore, this will be expected to ensure site end users have good access to sustainable transport options. This could potentially result in a minor positive impact on transport and accessibility (SA Objective 9).

B.3.3 Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0

B.3.3.1 Policy DEL3 will support the provision of Fibre to the Premise (FTTP) for development of ten or more dwellings and 5G networks in principle. The promotion of such infrastructure will be likely to help ensure that development proposals can meet the needs of the current and future population. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.3.3.2 With the development of FTTP and roll-out of 5G within Wolverhampton promoted under this policy, residents will be likely to have greater access to essential services from home and workplaces. This would provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By increasing coverage of high-speed internet and improving online employment opportunities, the policy could potentially also lead to a minor positive impact on equality (SA Objective 11).

B.3.3.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use for commuting to workplaces, and in turn, reduce local congestion. This policy could therefore lead to an indirect minor positive impact on climate change mitigation and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4 and 9).

B.4 Health and Wellbeing

B.4.1 Policy HW1 – Health and Wellbeing and Policy HW3 – Health Impact Assessment (HIA)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1 & HW3	0	+	+	+	+	0	+	0	+	+	+	++	0	0

- B.4.1.1 Policy HW1 will outline the strategic approach to promoting health and wellbeing across all new development proposed within the WLP. The WLP policy will amend the version presented in the Draft BCP, to set out the requirement for applicants to demonstrate that proposals have a positive effect on health and wellbeing in line with other WLP policies, rather than setting out detailed criteria.
- B.4.1.2 The policy will also set out detail on “*restrictions to hot food takeaways, shisha bars, off licenses, licensed premises, betting shops and other uses with a potential negative effect on public health*”. This would be expected to help encourage healthier lifestyles, and could also help to avoid developments that harm the local townscape character.
- B.4.1.3 Policy HW1 is proposed to be merged with Policy HW3, which sets out the requirement for development proposals to undertake a Health Impact Assessment (HIA) to help to ensure that opportunities for promoting healthy lifestyles are maximised. The new combined policy will set out further clarification compared to the version presented in the Draft BCP for when HIA is required, including a full HIA for development over 100 dwellings / 5,000sqm, or a HIA screening for those between 20-100 dwellings / 1,000-5,000sqm.
- B.4.1.4 By requiring some developments to submit an HIA, this policy is likely to help ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy will also be likely to have a minor positive impact in relation to equality (SA Objective 11).
- B.4.1.5 The policy is expected to incorporate measures which aim to protect and enhance green and blue infrastructure within the WLP area, which will likely lead to a minor positive impact on the quality and character of the landscape (SA Objective 2). Furthermore, the protection and enhancement of green and blue spaces will likely result in a minor positive impact in regard to biodiversity through the potential provision of wildlife habitats and improved connectivity (SA Objective 3).

- B.4.1.6 Enhanced green and blue infrastructure can have many benefits in helping communities adapt to the changing climate. This includes mitigation of extreme temperatures and flooding, as well as carbon storage and filtration of pollutants due to enhanced vegetation coverage. Therefore, the policy could potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- B.4.1.7 It is assumed the policy will also seek to address health and wellbeing within homes, by promoting energy efficiency and affordable warmth, as well as high quality buildings which are future-proofed to the effects of climate change. If all new homes are energy efficient, the implementation of this policy would decrease the volume of greenhouse gases (GHGs) emitted, including carbon, and as such, have a minor positive impact on climate change mitigation (SA Objective 4), as well as a minor positive impact on housing (SA Objective 10). This would also be likely to address fuel poverty and health inequalities.
- B.4.1.8 The policy is expected to ensure proposals address potential impacts affecting new development including air, noise, water and ground pollution, to ensure healthy living situations. A minor positive impact on pollution would be expected (SA Objective 7).
- B.4.1.9 A key element of healthy populations is promoting active lifestyles. The policy is expected to promote active travel and sustainable transport options, which could potentially encourage people to engage in higher levels of daily physical activity. This would also be likely to help reduce reliance on private car use. This could also result in consequent benefits in terms of reducing the emission of road transport-associated pollutants which can be harmful to health, potentially leading to minor positive impacts regarding climate change mitigation, pollution and transport (SA Objectives 4, 7 and 9).
- B.4.1.10 This policy will be likely to provide residents with access to a diverse range of natural habitats. Access to open and natural spaces would be expected to have benefits to mental and physical wellbeing. Facilitating active travel would be expected to encourage residents to live healthier lifestyles and provide opportunities for outdoor exercise, resulting in benefits to health and wellbeing. As the policy may contribute towards reduced air and noise pollution, this could also help to protect residents within Wolverhampton from health problems associated with pollution. Overall, a major positive impact in relation to human health would be expected (SA Objective 12).

B.4.2 Policy HW2 – Healthcare Infrastructure

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW2	0	0	0	+	0	0	+	0	+	0	+	++	0	0

- B.4.2.1 Policy HW2 will seek to ensure that all new healthcare facilities are well designed and accessible, and that sufficient healthcare infrastructure is in place to support the existing

population and future growth in Wolverhampton. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.4.2.2 By protecting existing health facilities, and ensuring residential developments are assessed against the capacity of surrounding facilities and new facilities, the policy will be expected to help ensure all new residents have good access to healthcare facilities, and as such, a major positive on health is likely (SA Objective 12).
- B.4.2.3 By identifying and addressing accessibility gaps, this policy will also be expected to promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality is identified (SA Objective 11).
- B.4.2.4 This policy should help to ensure that healthcare developments are located in areas with good public transport access, and that where possible, healthcare facilities are co-located alongside other community services to serve nearby residential development. This policy could potentially reduce the need to travel and reduce the volume of visitors arriving at facilities via private car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, assuming the policy places focus on sustainable transport and accessibility, a minor positive impact on climate change mitigation, pollution and transport could potentially be achieved (SA Objectives 4, 7 and 9).

B.5 Housing

B.5.1 Policy HOU1 – Delivering Sustainable Housing Growth

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	+/-	+/-	+/-

B.5.1.1 Policy HOU1 will set out the housing need and supply figures for Wolverhampton over the Plan period to 2042. This is expected to include the delivery of a high quantum of residential development of 21,720 net new homes over the Plan period, including a housing supply for the WLP of 10,307 homes. A major positive impact on housing provision would be expected (SA Objective 10).

B.5.1.2 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendices (see **Appendix C** for the assessment of reasonable alternative sites).

B.5.2 Policy HOU2 – Housing Density, Type and Accessibility

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU2	0	0	0	+	0	0	+	0	+	+	+	+	0	0

B.5.2.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

B.5.2.2 Policy HOU2 will aim to ensure that residential developments meet the local housing need, supporting the current and future requirements of the population in terms of housing type and size. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.5.2.3 The policy will set out criteria for accessibility standards, which would be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping, and promotes social inclusion in the community. This will be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).
- B.5.2.4 Due to the anticipated requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy could potentially help to reduce emission of road transport associated GHGs and air pollutants. Therefore, a minor positive impact would be anticipated on climate change mitigation and pollution (SA Objectives 4 and 7).
- B.5.2.5 By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).

B.5.3 Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0

- B.5.3.1 Policy HOU3 will seek to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy is also expected to set out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable.
- B.5.3.2 The policy will help to ensure that, throughout the Plan area, the WLP delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy will set out the requirements for affordable housing delivery, to contribute towards meeting the social and economic needs of the population.
- B.5.3.3 Future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs. Policy HOU3 will be likely to help ensure residential developments allow for the safe and convenient access for all residents, including older people and wheelchair users.
- B.5.3.4 This policy will also address the needs of those wishing to build their own homes by setting out self-build housing requirements. This would help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents.
- B.5.3.5 Overall, Policy HOU3 is anticipated to result in minor positive impacts in relation to housing, equality and human health (SA Objectives 10, 11 and 12).

B.5.4 Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+	+	+	+/-	+

- B.5.4.1 Policy HOU4 will set out the Gypsy and Traveller and Travelling Showpeople accommodation need and supply figures for Wolverhampton over the Plan period to 2042 in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)⁶ and any subsequent updates.
- B.5.4.2 The current Wolverhampton Gypsy and Traveller pitch need up to 2032 is 33 pitches and the current supply figure for the emerging WLP is 14 pitches. DtC contributions will therefore be sought from neighbouring authorities for 19 pitches to address unmet need. The remaining need for the rest of the Plan period to 2042 is expected to be met through windfall development.
- B.5.4.3 This policy will be expected to meet the identified pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs as set out in the GTAA. Therefore, this policy would be likely to have a minor positive impact on housing (SA Objective 10).
- B.5.4.4 The policy is also likely to have a minor positive impact on equality, as the provision of Gypsy and Traveller pitches will help to ensure that a diverse range of residents in the WLP area have access to appropriate accommodation to suit their needs (SA Objective 11).
- B.5.4.5 Policy HOU4 is expected to set out criteria which will require all development proposals for pitches and plots to have good access in accordance with Policy HOU2, integrate with neighbouring communities, include play areas and access roads, and have adequate access to on site services including water supply, power, drainage, sewage and waste disposal. These requirements would be expected to result in minor positive impacts in regard to transport and accessibility, equality, health and education (SA Objectives 9, 11, 12 and 14).
- B.5.4.6 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics and the provisions within the fully worded policy, when available. The proposed Gypsy and Traveller sites are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report and supporting appendix (**Appendix C**).

⁶ RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

B.5.5 Policy HOU5 – Education Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU5	0	0	0	+	0	0	+	0	+	0	+	0	+	++

B.5.5.1 Policy HOU5 will support the development or expansion of education facilities secured through a range of funding measures, including s.106 agreements. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. It is expected that the policy will set out criteria to ensure that new facilities are in suitable and accessible locations to meet needs. The policy will also help to protect and enhance existing facilities. A major positive impact on education is therefore likely (SA Objective 14).

B.5.5.2 Improved access to education will also be likely to have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable in many employment opportunities. The policy is expected to address accessibility gaps and ensure all residents have good access to educational facilities via public transport. Therefore, this policy will be likely to have a minor positive impact on transport and accessibility, equality and the local economy (SA Objectives 9, 11 and 13).

B.5.5.3 Assuming the policy promotes new education facilities that are accessible via public transport and active travel measures, this could potentially result in a minor positive impact on climate change mitigation and pollution, by reducing reliance on travel via car and consequently reducing emission of GHGs and harmful pollutants (SA Objectives 4 and 7).

B.5.6 Policy HOU6 – Houses in Multiple Occupation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU6	0	0	0	0	0	0	0	0	+	+	+	+	0	0

B.5.6.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy HOU6 will set out support for the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy will be likely to provide a range of housing options to residents of Wolverhampton, and therefore, is expected to have a minor positive impact on housing and equality (SA Objectives 10 and 11). In addition, the policy seeks to ensure

the development of any HMOs would not significantly impact cultural heritage, landscape or biodiversity features.

- B.5.6.2 This policy will help to ensure that development proposals for the creation of HMOs are located in areas with good access to public transport and active travel infrastructure. This would be expected to have a minor positive impact on transport and accessibility and could potentially encourage outdoor exercise and active travel, with benefits to human health and wellbeing (SA Objectives 9 and 12).

B.6 The Economy

B.6.1 Policy EMP1 – Providing for Economic Growth and Jobs

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP1	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-

B.6.1.1 CWC seeks to allocate sufficient employment land for the WLP period to 2042 to meet the employment land need for Wolverhampton of 116ha as identified in the EDNA (2023). Policy EMP1 will set out the employment need and supply figures and will be updated as of April 2024 for the Publication and Submission stages to ensure the latest evidence is considered.

B.6.1.2 A major positive impact on the economy (SA Objective 13) would be expected, by ensuring that sufficient employment land is provided to meet identified needs.

B.6.1.3 The impact on the remaining SA Objectives is uncertain, as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. These are assessed in the SA process through the assessment of reasonable alternatives, as documented in this SA report (see **Appendix C** for assessment of reasonable alternative sites).

B.6.2 Policy EMP2 – Strategic Employment Land

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP2	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+	+/-

B.6.2.1 Policy EMP2 will relate to Strategic Employment Land within the WLP area. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The Strategic Employment Areas correspond to areas of highest market demand and as such development or redevelopment within these areas will be likely to have benefits to the local economy, as employment land would be located in desirable areas and would provide technology to enable businesses to thrive.

- B.6.2.2 The policy will help to ensure that Strategic Employment Areas are highly accessible to ensure residents have good access to employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility is identified (SA Objective 9).
- B.6.2.3 At present, the impact for the remaining SA Objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12 and 14).

B.6.3 Policy EMP3 – Local Employment Areas

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-

- B.6.3.1 Policy EMP3 will seek to allocate Local Employment Areas to support the provision of industrial, logistics and commercial activities which will be likely to result in benefits for the local economy and provision of local employment opportunities. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. A minor positive impact on the economy will be likely (SA Objective 13).
- B.6.3.2 The policy is expected to provide for a range of industries including waste collection, transfer and recycling, which could lead to a minor positive impact on waste (SA Objective 8).
- B.6.3.3 The impact on the remaining SA Objectives is uncertain, due to the unknown site-specific contextual factors.

B.6.4 Policy EMP4 – Other Employment Sites

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP4	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+	+/-	+/-	+	+/-

- B.6.4.1 Policy EMP4 regards employment sites that are not designated as either Strategic Employment Areas or Local Employment Areas, but comprise existing occupied employment land. The policy will support new employment uses or extensions within these sites. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to ensure that where proposals involve redevelopment of land currently in employment use to non-employment use, they will ensure:

- “if the site is vacant, that it has been marketed for employment use for a period of at least 6 months, including by site notice and through the internet or as may be agreed by the local planning authority;
- if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation; and
- if the site forms part of a larger area occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area’.

B.6.4.2 The policy will be likely to increase the provision of employment floorspace across the WLP area, and result in a minor positive impact on employment opportunities and the economy (SA Objective 13).

B.6.4.3 This policy will support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10).

B.6.4.4 At present, the specific proposals and locations of the allocations to be set out through this policy is unknown. Therefore, the impact of Policy EMP4 on the remaining SA Objectives is uncertain.

B.6.5 Policy EMP5 – Improving Access to the Labour Market

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	0	0	+	+	+	+

B.6.5.1 Policy EMP5 will aim to support proposals for new employment development, so long as the employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of the WLP area. The development of new employment sites is expected to have a minor positive impact on the economy (SA Objective 13). Ensuring the associated employment opportunities are available for all residents within the Plan area will be likely to have a minor positive impact in relation to equality (SA Objective 11) and health and wellbeing (SA Objective 12).

B.6.5.2 Furthermore, this policy will be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. Therefore, a minor positive impact on education is identified (SA Objective 14).

B.7 Centres

B.7.1 Policy CEN1 – The Black Country Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN1	+/-	+/-	+/-	+	+/-	+/-	+/-	+/-	+	+/-	+	+	+	+/-

- B.7.1.1 Policy CEN1 will set out the hierarchy of centres and relevant thresholds for impact tests. The policy will aim to ensure centres in the WLP area provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The strategic centre (Tier One) for the WLP area is Wolverhampton City Centre. There are two town centres (Tier Two): Bilston and Wednesfield, and several district and local centres (Tier Three).
- B.7.1.2 The retail hierarchy as set out under this policy will be likely to ensure a range of facilities are provided at appropriate locations to meet the local need. Furthermore, the policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to state that *“In order to have a successful evening economy it is important that a variety of facilities, appealing to a wide range of age and social groups, are provided in such a way to ensure a safe, accessible and inclusive environment and any anti-social behaviour is discouraged”*. As such, the policy is expected to have benefits to the local community, ensuring all residents have access to essential services, and the local economy, through encouraging economic regeneration. Therefore, Policy CEN1 will be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- B.7.1.3 The policy is expected to ensure that development proposals within centres are accessible via a variety of sustainable travel options, in particular public transport, walking and cycling. This policy will be likely to encourage residents to live healthy lifestyles by supporting active travel. By encouraging residents to use public transport, this could subsequently reduce the number of cars on the road network, with likely benefits for carbon emissions, congestion and air quality in terms of human health (SA Objectives 4, 9 and 12).
- B.7.1.4 The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities and approach to centres. There is also uncertainty about the impact and recovery of centres in the light of the COVID-19 pandemic. Therefore, at this stage, the impact development proposals may have on the remaining SA Objectives is unknown. At present, the likely impact is recorded as uncertain (SA Objectives 1, 2, 3, 5, 6, 7, 8, 10 and 14).

B.7.2 Policy CEN2 – Strategic Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN2	0	0	0	+	0	0	+	0	++	+	+	+	+	+

- B.7.2.1 Policy CEN2 will support development and diversification within the Strategic Centre of Wolverhampton City Centre. Development proposals which would increase retail provision, jobs and services will be supported under this policy. Policy CEN2 will seek to ensure that development within Strategic Centres includes a balanced mix of uses to support different industries.
- B.7.2.2 The specifications of Policy CEN2 will be likely to provide improved employment opportunities and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education and healthcare, by providing community uses within centres. Overall, this policy will be likely to have minor positive impact in relation to equality, health, economy and education (SA Objectives 11, 12, 13 and 14).
- B.7.2.3 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to provide further detail regarding accessibility to Wolverhampton Strategic Centre, including that it “*should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial, leisure and business development that require a Transport Statement within Wolverhampton Strategic Centre boundary shall evidence the means to which they are compatible with achieving sustainable development*”.
- B.7.2.4 Furthermore, the policy is proposed to provide clarity on the proportionate nature and scope requiring proposals to demonstrate compatibility with, and contribute towards, accessibility and sustainable development in the light of issues raised in Draft BCP consultation responses and the Black Country Parking Study (2023).
- B.7.2.5 Overall, a major positive impact on transport and accessibility could be achieved (SA Objective 9), with a potential minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the focus on sustainable travel, which would help to encourage a modal shift away from private car use and consequently a reduction in transport-associated emissions.
- B.7.2.6 The amended policy for the WLP will also emphasise the importance of housing provision for Wolverhampton City Centre, and for the City Centre housing target to reflect up to date and robust evidence to inform the Wolverhampton City Centre Supplementary Plan. A minor positive impact on housing provision (SA Objective 10) will therefore be likely.

B.7.3 Policy CEN3 – Tier Two Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN3	0	0	0	0	0	0	0	0	+	+	+	+	+	0

B.7.3.1 The aim of Policy CEN3 is to help direct appropriate development to the Town Centres as identified under Policy CEN1. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.7.3.2 The policy will support the development of retail, office, leisure, residential, community, education and cultural facilities within the Town Centres. This will be expected to ensure there is adequate supply of employment opportunities within these areas. In addition, this policy will be likely to support a diverse range of services and facilities within Town Centres, ensuring good accessibility for existing local residents and promoting community cohesion. The policy could potentially direct some residential development to these areas, further ensuring that new residents would also have good access to services, and boosting the local economy. This will be expected to have minor positive impacts in relation to accessibility, housing, equality, health and the economy (SA Objectives 9, 10, 11, 12 and 13).

B.7.4 Policy CEN4 – Tier Three Centres

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN4	0	0	0	0	0	0	0	0	+	0	+	0	+	0

B.7.4.1 Policy CEN4 seeks to support development within district or local centres that would serve communities, including food stores and day-to-day services. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy could potentially help to encourage social interaction and community cohesion, and help to meet the needs of the community within the local area, reducing the need to travel. This will be likely to have a minor positive impact in relation to local accessibility and equality (SA Objectives 9 and 11).

B.7.4.2 By supporting development within district and local centres and providing job opportunities, this policy will also be likely to have a minor positive impact on the local economy (SA Objective 13).

B.7.5 Policy CEN5 – Proposals of Small-Scale Local Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN5	0	0	0	+	0	0	+	0	+	0	+	+	+	0

B.7.5.1 Policy CEN5 aims to support the development of small-scale centre-uses outside of centres to meet the needs of community, where such proposals meet a number of criteria outlined in the policy. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The small-scale development proposals supported by the policy will be expected to have benefits to the local economy and the local population by encouraging community cohesion, social inclusion and ensuring residents have good access to essential services in close proximity to their homes. The policy will also seek to retain existing services. Therefore, a minor positive impact in regard to equality and the economy is identified (SA Objectives 11 and 13).

B.7.5.2 The policy will also seek to ensure proposals are located within walking distance of new or improved facilities. The policy will be likely to ensure good access, whilst encouraging active travel, and reduce reliance on private cars, with subsequent benefits to local air quality and GHG emissions. This could lead to a minor positive impact on climate change, transport and accessibility and health (SA Objectives 4, 7, 9 and 12).

B.7.6 Policy CEN6 – Edge-of-Centre and Out-of-Centre Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN6	0	0	0	+	0	0	+	0	+	0	0	+	+	0

B.7.6.1 This policy will set out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy could potentially have benefits to the local economy, by encouraging development in centres which are highly sustainable locations. A minor positive impact on the economy is expected (SA Objective 13).

B.7.6.2 This policy will encourage development in centres which are likely to be highly sustainable locations, and will require all development proposals to be assessed for accessibility via public transport, walking and cycling. These measures will be expected to ensure all residents and visitors have safe access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy

lifestyles. By providing adequate access via public transport, there could potentially be a reduction in car use, with benefits to the climate, air pollution and congestion. Therefore, as the policy will prioritise development in centres, and assuming the assessments outlined in the policy would ensure sustainable access to out-of-centre developments is prioritised, this policy will be likely to have minor positive impacts in relation to climate change, air quality, transport and health (SA Objectives 4, 7, 9 and 12).

B.8 Transport

B.8.1 Policy TRAN1 – Priorities for the Development of the Transport Network and Policy TRAN2 – Safeguarding the Development of the Key Route Network

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1 & TRAN2	0	0	0	+	0	0	+	0	++	0	0	+	0	0

B.8.1.1 Policy TRAN1 will outline the priorities for Wolverhampton’s transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail, rapid transit and interchanges. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to reflect current key transport projects and investment plans of relevance to Wolverhampton whilst providing flexibility for changes which may occur in the lifetime of the WLP. This will include reference to current investment plans such as City Region Sustainable Transport Settlement (CRSTS), West Midlands Rail Strategy, and Bus Service Improvement Plan (BSIP), as well as to the emerging West Midlands Local Transport Plan (LTP) and the need to decarbonise transport in line with national and local targets.

B.8.1.2 For the WLP, Policy TRAN1 is proposed to be merged with Policy TRAN2, to clarify that development of the Key Route Network (KRN) is part of the development of the overall transport network.

B.8.1.3 New development within Wolverhampton as proposed within the WLP, as well as growth within neighbouring authorities in the West Midlands, will be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. The policy will seek to ensure that the West Midlands KRN is effectively managed in order to support the level of growth proposed in the WLP over the Plan period.

B.8.1.4 The transport projects identified within this policy will be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion, and improving traffic flows. The policy will be expected to ensure that suitable mitigation measures are identified and put in place regarding any potential adverse impacts on the road network. Furthermore, the policy will help to ensure that transport connectivity is improved, through requiring liaison between CWC and Transport for West Midlands. The policy could potentially encourage coordination and streamlining of transport systems including public transport

such as rapid transit and bus routes. Overall, a major positive impact on transport is likely (SA Objective 9).

B.8.1.5 The policy is expected to ensure all modes of travel are promoted including walking, cycling and public transport. The promotion of active travel and public transport improvements within key transport corridors will be likely to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from private car use towards public transport and active travel would be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy TRAN1 could potentially result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.1.6 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy TRAN1 could potentially improve the physical and mental wellbeing of residents. Ensuring that road safety and pedestrian access are considered when designing new development will be likely to encourage more people to choose these forms of travel, encouraging physical exercise and social interaction. A minor positive impact on health is therefore anticipated (SA Objective 12).

B.8.2 Policy TRAN3 – Managing Transport Impacts of New Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN3	0	0	0	0	0	0	0	0	+	0	0	0	0	0

B.8.2.1 Policy TRAN3 will set out the requirement for any development proposals which are likely to have adverse effects regarding transport to be accompanied by mitigation schemes to address accessibility and safety, in accordance with an agreed Transport Assessment. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. A minor positive impact on transport is anticipated (SA Objective 9).

B.8.3 Policy TRAN4 – The Efficient Movement of Freight

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	+	0

B.8.3.1 Policy TRAN4 will set out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport where possible. The policy is not proposed to be changed

significantly compared to the version presented in the Draft BCP, other than to add wording in policy to promote more innovative freight modes and smaller logistics requirements with further detail in justification text.

- B.8.3.2 Road transport is a major source of air pollution and GHG emissions in the UK⁷. Transporting freight via rail and waterways will be expected to result in lower emissions and higher energy efficiency compared to road transport using heavy goods vehicles (HGVs)⁸. By encouraging the movement of freight via rail and waterways, Policy TRAN4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport is identified (SA Objective 9).
- B.8.3.3 Furthermore, this policy could potentially result in more cost-effective and efficient movement of freight, which would help to improve economic productivity. The proposed promotion of innovative freight modes within the WLP policy will also be likely to have benefits in this regard. As such, this policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- B.8.3.4 The policy will also support the use of waterways and existing and disused railway lines for freight transport. In Wolverhampton and the wider Black Country, canals and disused railway lines often form part of the ecological network in an otherwise heavily urbanised area, for example, the 'Wyrley and Essington Canal' and 'Staffordshire and Worcestershire Canal' Sites of Importance for Nature Conservation (SINCs), 'Shropshire Union Canal' Site of Local Importance for Nature Conservation (SLINC) and the 'Dudley to Priestfield Disused Railway' SLINC, amongst others. The conversion of these routes back into regular use for freight transport could potentially result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

B.8.4 Policy TRAN5 – Creating Coherent Networks for Cycling and Walking

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0

- B.8.4.1 Policy TRAN5 will seek to ensure that walking and cycling infrastructure networks are developed and maintained across the WLP area to encourage sustainable travel choices.

⁷ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date accessed: 19/12/22]

⁸ Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date accessed: 19/12/22]

The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.8.4.2 The policy will require the development of safe cycle and walking links and infrastructure such as cycle parking. These factors will be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on private car use. Therefore, a minor positive impact on transport is expected (SA Objective 9). This could also contribute towards a reduction in GHG emissions with benefits for local air quality, and as such, minor positive impacts have been identified for climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.4.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health will be likely (SA Objective 12).

B.8.5 Policy TRAN6 – Influencing the Demand for Travel and Travel Choices and Policy TRAN7 – Parking Management

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN6 & TRAN7	0	0	0	+	0	0	+	0	+	0	0	0	+	0

B.8.5.1 Policy TRAN6 will promote the holistic management of traffic across Wolverhampton and the wider area and seek to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to “*tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly*”⁹.

B.8.5.2 Policy TRAN6 is proposed to be merged with Policy TRAN7 for the WLP, which sets out the approach to parking management including the type, location and standards for parking in or near to town centres and will add reference to a fuller range of parking measures. The new combined policy will also be amended to reference innovative practices of influencing demand, including demand responsive transport and micro-mobility, and cross-reference zero emission vehicles in justification text.

B.8.5.3 By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, the policy will be expected to encourage people to choose more sustainable travel modes where possible. The policy

⁹ Department for Transport (2022) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date accessed: 19/12/22]

will also aim to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport is anticipated (SA Objective 9).

B.8.5.4 Assuming the policy will seek to ensure that the type of parking is appropriate to the location, this could potentially help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

B.8.5.5 This policy will be expected to encourage the development of better-connected public transport systems and deliver more widespread changes to the transport network. The promotion of public transport and active travel will be likely to reduce reliance on private car use and consequently reduce the emission of GHGs and other air pollutants. A minor positive impact could be achieved in relation to climate change mitigation and pollution (SA Objectives 4 and 7).

B.8.6 Policy TRAN8 – Planning for Low Emission Vehicles

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0

B.8.6.1 Policy TRAN8 will promote development proposals which support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles¹⁰. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.8.6.2 This policy will help to encourage the use of LEVs within the WLP area, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy will also encourage the exploration of alternative low emission vehicle technologies. Overall, these measures will be likely to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

¹⁰ SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date accessed: 19/12/22]

B.9 Environmental Transformation

B.9.1 Policy ENV1 – Nature Conservation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

B.9.1.1 Policy ENV1 will aim to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites. The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to make clear the expectation that development should not harm species which are legally protected, in decline, rare or identified in Biodiversity Action Plans.

B.9.1.2 Furthermore, requirements will be added to the policy to ensure that where planning applications may affect any designated site or any important habitat, species or geological feature, they must include a data search from the Local Records Centre, and for a Local Sites Assessment to be submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation (SINC) or a Site of Local Importance for Nature Conservation (SLINC).

B.9.1.3 The policy will be expected to ensure that designated sites and important species and habitats are protected, and will require all future development to positively contribute to the local natural environment. Therefore, a major positive impact on biodiversity is expected (SA Objective 3).

B.9.1.4 Biodiversity assets, such as Local Nature Reserves (LNRs) and SINC, are often key features of local landscapes. By protecting and potentially enhancing biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, this policy will be likely to have a minor positive impact on the local landscape (SA Objective 2).

B.9.1.5 Vegetation provides several ecosystem services to the Plan area, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation) and filtering air pollutants (pollution). The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance the provision of these essential ecosystem services. This policy could potentially result in minor positive impact on SA Objectives 4, 5 and 7.

B.9.1.6 The protection and enhancement of the natural environment will be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. These measures will therefore be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

B.9.2 Policy ENV2 – Development Affecting Special Areas of Conservation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV2	0	0	++	+	0	0	+	0	0	0	0	+	+	0

- B.9.2.1 Policy ENV2 will set out CWC’s approach to the protection of Special Areas of Conservation (SACs), including Cannock Chase SAC, against future development. Any development within 15km of Cannock Chase SAC which would result in a net increase in residential units will be required to undertake an appropriate assessment under this policy. The appropriate assessment will indicate if the development would be likely to result in an adverse impact on the integrity of the SAC, and if so, the developer will be required to ensure sufficient measures are in place to avoid or mitigate the identified impact.
- B.9.2.2 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to ensure that air quality modelling is carried out to determine the potential impact of traffic arising from WLP developments on the integrity of Fens Pools, Cannock Extension Canal and Cannock Chase SACs. If analysis shows that there will be likely significant effects (either alone or in combination with other plans), Natural England and relevant local authorities will be liaised with to develop policies which will mitigate these impacts.
- B.9.2.3 The requirements set out in Policy ENV2 will be expected to protect SACs from inappropriate development, and therefore, a major positive impact on biodiversity is likely (SA Objective 3).
- B.9.2.4 Future development which could potentially increase nitrous oxide (NO_x) deposition, and as such impact the integrity of a SAC, will be required to undertake an appropriate assessment, which may require developers to ensure sufficient measures are in place to avoid or mitigate the impact. This will be likely to conserve the integrity of SACs within and surrounding the WLP area, whilst also having a minor positive impact on pollution by helping to improve local air quality (SA Objective 7). Furthermore, the mitigation of impacts arising from NO_x deposition within this policy could potentially help to combat the causes of climate change, leading to a minor positive impact on SA Objective 4.
- B.9.2.5 Cannock Chase SAC is a popular tourist destination, with activities including mountain biking, camping and ‘Go Ape’ adventure park. Although the SAC itself is located some 11.5km to the north east of the Wolverhampton boundary, protecting the SAC from inappropriate development could potentially have benefits in relation to tourism in the wider area and have a minor positive impact on the local economy (SA Objective 13). Cannock Chase SAC and Fens Pools SAC also form part of the wider GI network, providing space for outdoor recreation and exercise for residents and visitors. By preserving and enhancing these sites, the policy could potentially have a minor positive impact on physical and mental health (SA Objective 12).

B.9.3 Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- B.9.3.1 Paragraph 174 of the NPPF¹¹ states that *"planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"*. Mandatory requirements for delivering at least 10% biodiversity net gain, maintained for at least 30 years, are expected to come into force in January 2024.
- B.9.3.2 Policy ENV3 will require all development to deliver a minimum of 10% biodiversity net gain as part of development proposals and is expected to ensure that all developments contribute towards the delivery of the emerging Local Nature Recovery Strategy (LNRS). The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to *"Ensure accordance with current national guidance and legislation and make clear that the Policy will relate to the emerging Black Country Local Nature Recovery Map and Strategy until the adoption of the West Midlands Combined Authority Local Nature Recovery Strategy, which will have a statutory role"*. The policy will also be updated to clarify that biodiversity net gain requirements are separate to protections for Habitats sites and irreplaceable habitats.
- B.9.3.3 Consequently, this policy will provide opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy is expected to have a major positive impact on biodiversity (SA Objective 3).
- B.9.3.4 Biodiversity net gain could potentially contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. A minor positive impact on climate change mitigation and pollution could therefore be achieved (SA Objectives 4 and 7).
- B.9.3.5 Increased biodiversity and green cover are likely to help reduce water runoff rates and as such, reduce the risk of both fluvial and surface water flooding. Improvements to the quality and quantity of the green network will also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide

¹¹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 12/12/23]

opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding is expected (SA Objective 5).

B.9.3.6 Enhanced biodiversity and green cover across the WLP area will be likely to have positive impact on residents’ wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. A minor positive impact on human health and wellbeing is therefore expected (SA Objective 12).

B.9.3.7 Furthermore, the enhancement of the green network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. This will be likely to result in a minor positive impact on the local landscape quality (SA Objective 2).

B.9.4 Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV4	+	+	+	+	+	+	+	0	0	0	0	+	0	0

B.9.4.1 Policy ENV4 will aim to create, retain and protect trees, woodlands and hedgerows, including ancient trees, ancient woodlands and veteran trees across the Plan area. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.9.4.2 Where the loss of a tree is unavoidable, this policy will require the planting of three appropriate native trees in replacement of every tree lost. This policy will require an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. Ecological surveys will also be required to identify the ecological importance of hedgerows. These measures will be expected to help prevent the inappropriate loss of vegetation. The policy will also ensure that Tree Preservation Orders (TPOs) are used to protect individual or groups of trees that contribute to the character of the local area, and encourage habitat creation and biodiversity net gain. Trees, woodlands and hedgerows support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species. Therefore, this policy will be likely to result in a minor positive impact on biodiversity (SA Objective 3).

B.9.4.3 The retention and enhancement of trees and woodland supported under this policy will be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This could also potentially help to reduce residents’ exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy could potentially help to mitigate anthropogenic climate change. A

minor positive impact on the climate change mitigation and pollution objectives area therefore identified (SA Objectives 4 and 7). These measures could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats is also expected to benefit mental wellbeing. Therefore, a minor positive impact is also expected in terms of human health (SA Objective 12).

B.9.4.4 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy will be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this will also be expected to enhance natural water storage and help to reduce the risk of fluvial and surface water flooding, with a minor positive impact on climate change adaptation (SA Objective 5).

B.9.4.5 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees, hedgerow and woodland will likely help to protect and enhance historic character. Therefore, this policy could potentially result in minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

B.9.5 Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0

B.9.5.1 Policy ENV5 is expected to help ensure that heritage assets are conserved in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are not adversely impacted by development. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.9.5.2 Where development proposals could potentially affect the significance of a heritage asset, this policy will require an accompanying statement to be produced, to ensure that the impact can be adequately assessed. The policy will seek to enrich the historic environment, by requiring development proposals to enhance local distinctiveness, retain and enhance built assets and their settings, historic townscape value and archaeological potential. Overall, this policy will be likely to have a major positive impact on cultural heritage (SA Objective 1).

- B.9.5.3** It is assumed that the policy will ensure the scale and design of new development will be informed by consideration of the local character and distinctiveness, which would be expected to benefit the character, appearance and distinctiveness of local landscapes and townscapes. This policy will help to protect and enhance urban landscape features and encourage the appropriate re-use of historic buildings, and therefore, have a minor positive impact on the local landscape (SA Objective 2).
- B.9.5.4** Furthermore, the policy will ensure that development proposals have regard to locally distinctive features including public open spaces and local landmarks. This could potentially benefit the local community by encouraging a sense of belonging and promoting social inclusion, and therefore, a minor positive impact on equality is expected (SA Objective 11). Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment¹². The policy could potentially result in a minor positive impact on the economy (SA Objective 13).
- B.9.5.5** Policy ENV5 will also be expected to promote the conservation and enhancement of geologically significant sites within the UNESCO Black Country Geopark; therefore, a minor positive impact on biodiversity and geodiversity could be expected (SA Objective 3).

B.9.6 Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+

- B.9.6.1** Policy ENV6 will help to protect and enhance geodiversity sites across the WLP area. Of particular importance is the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. This policy will be likely to have a minor positive impact on local geodiversity (SA Objective 3).
- B.9.6.2** Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including Wolverhampton’s, and the wider Black Country’s, industrial heritage. By protecting the local geodiversity, this policy will also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

¹² Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date accessed: 21/11/23]

B.9.6.3 The protection and enhancement of geologically important sites including the UNESCO Global Geopark is likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark¹³. As such, Policy ENV6 could potentially have a minor positive impact on education (SA Objective 14).

B.9.7 Policy ENV7 – Canals

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0

B.9.7.1 Policy ENV7 will aim to protect and enhance Wolverhampton’s canal network. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP. The policy will require all development proposals to safeguard the functional waterways and encourage reinstating and/or upgrading towpaths and link them into high-quality, wider pedestrian and cycle networks. This will be expected to ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9). Furthermore, enhancing the canal towpath network for use by pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

B.9.7.2 Policy ENV7 will also require development proposals to protect and enhance the special historic, architectural, archaeological and cultural significance of the canal network, as well as recognise the nature conservation value. Furthermore, development proposals will be required to consider the visual amenity of developments in proximity to the canal network. These requirements are likely to result in minor positive impacts in relation to cultural heritage, landscape, biodiversity and pollution (SA Objectives 1, 2, 3 and 7).

B.9.7.3 The policy will also seek to ensure that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This will be likely to have a minor positive impact on the local economy (SA Objective 13).

B.9.7.4 This policy will support the development of residential moorings within the WLP area, which could potentially have a minor positive impact on the overall provision of accommodation (SA Objective 10).

¹³ Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date accessed: 21/11/23]

B.9.8 Policy ENV8 – Open Space, Sport and Recreation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV8	+	+	+	+	+	0	+	0	+	0	+	++	0	0

B.9.8.1 Policy ENV8 will seek to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents.

B.9.8.2 The policy for the WLP is expected to be updated compared to the version presented in the Draft BCP, to separate out the playing field and built sports facility elements of Policy ENV8 and justification text into the following new policy which reflects national guidance and Sport England best practice:

B.9.8.3 *“Existing playing fields and built sports facilities should be retained unless:*

- 1) *an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for the existing or alternative sports provision) at the local and sub-regional level; or*
- 2) *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- 3) *the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or*
- 4) *The proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.*

B.9.8.4 *New built sports facilities should be:*

- 1) *demonstrated to accord with identified needs to ensure provision of appropriate facilities in a suitable location to meet that need;*
- 2) *well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and*
- 3) *well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.”*

B.9.8.5 Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation.

B.9.8.6 Access to sports, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy will support the development of new sports facilities within the Plan area, in accordance with identified needs and with reference to the Wolverhampton Playing Pitch Strategy (2022). This policy will ensure current playing fields and built sports facilities are retained, unless there is clear justification that they are

surplus to requirements, as well as contribute to the development of new facilities and ensure residents have good access to outdoor space. Therefore, this policy will be likely to have a major positive impact on the health and wellbeing of residents (SA Objective 12). This policy also encourages the developments to ensure links are provided to public transport infrastructure, footpaths and cycle networks, with benefits to local accessibility (SA Objective 9).

B.9.8.7 Furthermore, through ensuring new built sports facilities have good access, and are “*well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities*” this policy could potentially help to fill gaps in accessibility for vulnerable or disadvantaged groups. Therefore, a minor positive impact on equality is identified (SA Objective 11).

B.9.8.8 Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas. This could also benefit the local landscape by creating attractive open spaces within the area. This policy will aim to improve the public realm and incorporate high quality landscaping, which has potential to contribute towards the preservation and enhancement of archaeological heritage and diversity in the natural and built environment. As a result, it is expected that this policy will have a minor positive impact on local cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).

B.9.8.9 Potential new or enhanced open spaces, and associated GI, would be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy could potentially contribute towards the mitigation of anthropogenic climate change. GI could also potentially provide natural filtration to reduce residents’ exposure to air pollution, for example from emissions associated with road transport. Furthermore, this policy will place focus on ensuring sports facilities are accessible via sustainable methods, which will help to reduce reliance on private car use. A minor positive impact on climate change and pollution will therefore be expected (SA Objectives 4 and 7). Enhanced open space and GI could also potentially help to reduce water runoff rates, and as such, have a minor positive impact by reducing the risk of flooding (SA Objective 5).

B.9.9 Policy ENV9 – Design Quality

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV9	+	+	+	+	+	+	+	0	+	0	+	+	0	0

B.9.9.1 Policy ENV9 will focus on ensuring high design quality, including implementation of the National Design Guide, and incorporation of various criteria including the ‘Building for a Healthy Life’ and ‘Manual for Streets’ principles, amongst others, to help ensure that new development is designed and constructed in a sustainable way. The policy is not proposed

to be changed significantly compared to the version presented in the Draft BCP, other than the incorporation of part 1a) of BCP Policy CC1 'Increasing Efficiency and Resilience' which states that:

- 1) *"Development should be designed to mitigate climate change impacts and provide adaptations that will help communities and individuals to continue to avoid or mitigate adverse effects on human health. Proposals for development will need to demonstrate how they have been designed to maximise resistance and resilience to climate change through addressing the following requirements: -
 - a) *Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation and to reduce exposure to wind and other elements"*.*

- B.9.9.2 Effective design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.
- B.9.9.3 Encouraging new development to pursue high-quality design will help to ensure that new development does not have an adverse impact on any surrounding heritage assets. This policy will set out criteria to help ensure future development proposals protect Wolverhampton's townscapes and heritage assets. Therefore, a minor positive impact on the historic environment would be expected (SA Objective 1).
- B.9.9.4 The policy will require development proposals to create a strong sense of place and include high-quality landscaping. This is likely to result in a minor positive impact on the local landscape, by helping to ensure that future development does not adversely affect the existing landscape character and where appropriate, enhances visual amenity and sense of place in the area (SA Objective 2).
- B.9.9.5 This policy is expected to ensure that major developments contribute towards GI. This will be likely to deliver additional habitats for wildlife and present opportunities to better connect biodiversity features, with potential to have a minor positive impact on biodiversity (SA Objective 3). GI can also have benefits such as enhancing natural water storage and flow functions. In addition, this policy will be expected to promote the use of flood management, including Sustainable Drainage Systems (SuDS), with benefits for local surface water flooding issues. This will be likely to have a minor positive impact on climate change adaptation (SA Objective 5).
- B.9.9.6 This policy will be likely to encourage climate change resilience and help reduce carbon emissions associated with development, due to the promotion of energy efficient design, and ensuring that *"Wherever feasible, new buildings will be orientated to maximise opportunities for both natural heating and ventilation"*. Therefore, a minor positive impact on climate change mitigation is expected (SA Objective 4).
- B.9.9.7 Future development must meet the water efficiency requirements as stated in the Building Regulations. Encouraging an efficient use of water and energy will be expected to have a minor positive impact on natural resources (SA Objective 6).
- B.9.9.8 The policy will also help to ensure that future development does not result in detrimental impacts on the living environment in regard to artificial lighting, vibrations, dust, fumes,

smell and noise. Urban greening encouraged within this policy will also be expected to help to buffer developments against these pollutants. These measures will be likely to have a minor positive impact in relation to pollution (SA Objective 7).

B.9.9.9 By ensuring that development proposals follow the 'Manual for Streets', the policy will be likely to provide an attractive, safe and permeable movement network, leading to a minor positive impact for local accessibility (SA Objective 9).

B.9.9.10 This policy will be likely to make a positive contribution towards reducing crime and fear of crime in the local area, which would be expected to create safe and cohesive communities and help to improve quality of life for residents. Furthermore, the policy will be likely to ensure sufficient internal space is provided, in line with the Nationally Described Space Standards¹⁴. An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. Residents with more space, and therefore better quality of life, are likely to be part of a more vibrant and interactive community, and as such, benefits for the wellbeing of residents are likely. The policy will be likely to have a minor positive impact on equality and health (SA Objectives 11 and 12).

¹⁴ Ministry of Housing, Communities and Local Government (2015) Technical housing standards – nationally described space standards. Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf [Date accessed: 21/11/23]

B.10 Climate Change

B.10.1 Policy CC1 – Increasing Efficiency and Resilience

B.10.1.1 The aim of Draft BCP Policy CC1 was to ensure that development proposals seek opportunities for adaptation to, and mitigation of, climate change. The requirements of this policy are to be incorporated within other WLP policies, including Policy ENV9 (see **section B.9.9**), and so Policy CC1 is proposed to be deleted for the WLP, to remove unnecessary duplication.

B.10.2 Policy CC2 – Energy Infrastructure

B.10.2.1 The aim of Draft BCP Policy CC2 was to encourage the use of decentralised energy sources within development proposals and, where appropriate, the use of communal heating systems to reduce GHG emissions. For the WLP, this requirement is proposed to be added to Policy CC7 (see **section B.10.8**) and the remainder of Policy CC2 deleted in light of issues raised by Draft BCP consultation responses.

B.10.3 Policy CC3 – Managing Heat Risk

B.10.3.1 The aim of Draft BCP Policy CC3 was to ensure development proposals address heat risk, in terms of internal heat gain and the impacts of urban heat islands (UHIs), as well as promoting energy efficient designs and passive heating and cooling systems. Several of these principles are set out within other policies, and as such, Policy CC3 is proposed to be deleted in light of issues raised by Draft BCP consultation responses.

B.10.4 Policy CC4 – Air Quality

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC4	0	0	+	+	0	0	++	0	+	0	0	+	+	0

B.10.4.1 Air pollution is a significant concern internationally and locally. The City of Wolverhampton is designated as an Air Quality Management Area (AQMA). Development within an AQMA would make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.

B.10.4.2 Policy CC4 will require development proposals to promote the use of pedestrian and cycle routes, access to rail, the metro and bus transport networks, plus provide electric car charging points. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

- B.10.4.3** These measures will be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy will be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- B.10.4.4** Where a development proposal is situated in a location that does not currently meet national objectives, the policy will require an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, the policy will be expected to have a major positive impact on air pollution (SA Objective 7).
- B.10.4.5** The requirements to be set out in Policy CC4 could potentially help to minimise the Plan area’s contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact is therefore also be expected for climate change mitigation (SA Objective 4).
- B.10.4.6** As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods and electric car charging points will be likely to have a minor positive impact on transport and accessibility (SA Objective 9).
- B.10.4.7** Policy CC4 will aim to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy will seek to increase the provision of green and open spaces across the WLP area. This will be likely to facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, this policy is likely to have a minor positive impact in regard to human health (SA Objective 12).
- B.10.4.8** Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy will help to prevent deterioration of air quality and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 3).
- B.10.4.9** In addition, by seeking to ensure that development proposals are situated in a sustainable location to minimise commuter distance and time, this policy will be likely to situate residents in close proximity to a range of job opportunities, and therefore, have a minor positive impact on the local economy (SA Objective 13).

B.10.5 Policy CC5 – Flood Risk

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC5	0	0	+	0	++	0	+	0	0	0	0	+	0	0

- B.10.5.1 Policy CC5 will seek to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.10.5.2 The policy will set out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This policy will be expected to ensure that all future development proposals do not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. In accordance with the policy, all development proposals should incorporate SuDS to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption is anticipated (SA Objective 5).
- B.10.5.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies¹⁵. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas will therefore be expected to have benefits to human health (SA Objective 12).
- B.10.5.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments would be expected to benefit water quality, biodiversity and amenity interest through integration into the wider green and blue infrastructure networks and promoting natural management of flood water. Developments should, where possible, naturalise urban watercourses and open underground culverts, with likely benefits to biodiversity in terms of improving habitat connectivity and allowing natural filtration of pollutants. Therefore, Policy CC5 will be likely to have a minor positive impact on biodiversity and pollution (SA Objectives 3 and 7).

B.10.6 Proposed New Policy – Water Quality

- B.10.6.1 CWC propose to include a new policy for the WLP on water quality in line with Environment Agency advice, to address current River Basin Management Plan and Water Framework Directive priorities relevant to the Wolverhampton area, supported by updated Water Cycle Study evidence as required.
- B.10.6.2 Depending on the specific wording of the policy, which is not available at this stage, it is likely that this will lead to positive effects on the ecological and chemical status of watercourses (SA Objectives 3 and 6), improving flood resilience (SA Objective 5) and conserving natural resources (SA Objective 6), owing to the protection and enhancement of water quality in the WLP area.

¹⁵ Public Health England (2014) Flooding and the public's health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/>
[Date accessed: 21/11/23]

B.10.7 Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC6	0	0	0	0	+	0	0	0	0	0	0	0	0	0

B.10.7.1 Policy CC6 will set out guidelines for future development with respect to Sustainable Drainage and Surface Water Management. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.10.7.2 The policy would require developments to incorporate SuDS designed in line with the Black Country Local Standards for SuDS which will be anticipated to help reduce the risk of surface water flooding. The policy will further require surface water drainage strategies to be prepared for all major developments, to take into account all sources of flooding. This policy is expected to have a minor positive impact on climate change adaptation (SA Objective 5).

B.10.8 Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CC7	0	0	0	+	+	0	+	0	0	0	0	+	0	0

B.10.8.1 Policy CC7 will promote on-site renewable or low carbon technologies incorporated within new development in Wolverhampton, which would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs emitted into the atmosphere. This in turn would reduce the Plan area’s contribution towards the causes of climate change. The policy would require all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards¹⁶. The policy is expected to ensure that development proposals achieve full credits for category Wat 01 (water efficiency).

¹⁶ BREEAM (2018) New Construction Technical Standards. Available at: <https://www.breeam.com/discover/technical-standards/newconstruction/> [Date accessed: 21/11/23]

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- B.10.8.2 The policy is proposed to be amended compared to the version presented in the Draft BCP, to incorporate the requirement of BCP Policy CC2 to “*require all major developments to demonstrate that they will link into any existing decentralised energy network close to the site, or that this is not practical and viable, in the energy assessment*”.
- B.10.8.3 More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a decrease in GHG emissions released through the generation of energy. This policy will be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4). By identifying and improving energy networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5).
- B.10.8.4 In addition, through improved energy efficiency, this policy will be likely to result in health benefits. This is due to a reduction in GHG emissions, which can cause poor air quality and impact human health, primarily due to particulate matter pollution. Therefore, this policy will be likely to have a minor positive impact in regard to pollution and human health (SA Objectives 7 and 12).
- B.10.8.5 The policy is also proposed to be amended to remove the requirement for all major developments to deliver a 19% carbon reduction improvement above Part L of Building Regulations, in light of changes to the Building Regulations which have introduced a higher improvement of c.31%, compared to the previous figure of 19%.

B.11 Waste

B.11.1 Policy W1 – Waste Infrastructure: Future Requirements

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W1	0	0	0	0	0	0	0	++	0	0	0	0	0	0

B.11.1.1 Policy W1 will set out the strategy for waste management within the Plan area, as well as the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period. The policy is proposed to be amended compared to the version presented in the Draft BCP, to update waste figures to reflect Black Country Waste Study (2022), relate to Wolverhampton only, and cover a Plan period up to 2042.

B.11.1.2 Policy W1 will support the minimisation of waste production and re-use and recovery of materials, in accordance with the waste hierarchy, and help to ensure that there is sufficient capacity to accommodate forecast waste arisings as set out in the latest Waste Study. Overall, the policy will be expected to help reduce the volume of waste generated in the WLP area and improve the management and disposal of waste. Therefore, a major positive impact on waste is identified (SA Objective 8).

B.11.2 Policy W2 – Waste Sites

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W2	0	0	0	0	0	0	0	+	0	0	0	0	0	0

B.11.2.1 The aim of Policy W2 is to safeguard and retain capacity of the existing waste facilities. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.2.2 The policy will be expected to ensure that housing proposals or sensitive land uses are not permitted in the vicinity of waste management sites where this could lead to conflicts. The policy will be likely to help ensure appropriate waste management continues in the WLP area and the wider Black Country and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste is likely (SA Objective 8).

B.11.3 Policy W3 – Preferred Areas for New Waste Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W3	+/-	+/-	+/-	+/-	+/-	+/-	+/-	++	+/-	0	0	0	0	0

B.11.3.1 Policy W3 will identify allocations for new waste management infrastructure. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.3.2 The provision of waste management facilities will be likely to have a major positive impact on waste by ensuring there are adequate facilities and capacity within Wolverhampton, and the wider Black Country, to effectively manage waste production (SA Objective 8).

B.11.3.3 At present, the scale and location of the proposed waste management facilities in unknown. Seeking to manage Wolverhampton’s waste rather than exporting to surrounding areas could potentially result in some benefits, although the likelihood and extent of these benefits are unknown. Overall, the likely impact in relation to environmental objectives is uncertain (SA Objectives 1, 2, 3, 4, 5, 6, 7 and 9).

B.11.3.4 The provision of waste management facilities will not be expected to significantly impact housing, equality, health, economy or education (SA Objectives 10, 11, 12, 13 and 14).

B.11.4 Policy W4 – Locational Considerations for New Waste Facilities

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

B.11.4.1 Policy W4 will set out criteria to which new waste management facilities should be in accordance with. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.

B.11.4.2 Waste management facilities will only be supported where there is an identified need for the facility. This will be likely to help fill any gaps in infrastructure and meet the locally identified waste management needs. A minor positive impact on waste is therefore expected (SA Objective 8).

B.11.4.3 The policy will ensure that consideration is given to potential impacts of the development on visual amenity, environmental and public health, noise and other disturbances when

allocating waste management facilities. These criteria will be expected to help prevent adverse impacts, and therefore, negligible impacts are identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12).

B.11.5 Policy W5 – Resource Management and New Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

- B.11.5.1 Policy W5 will set out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation. The policy is not proposed to be changed significantly compared to the version presented in the Draft BCP.
- B.11.5.2 The policy will require all new developments to minimise waste, and maximise the use of secondary and recycled materials and locally sourced products wherever possible. This policy will be expected to promote sustainable and efficient waste management and use of materials across all new development in the WLP area and limit the generation of waste as much as is feasible. Furthermore, Policy W5 will help to ensure that development design takes into account the need for waste management, when occupied. Overall, a major positive impact on waste is expected (SA Objective 8).
- B.11.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy W5 will be expected to result in a minor positive impact on natural resources (SA Objective 6).
- B.11.5.4 Policy W5 will also be expected to ensure that environmental impacts as a result of resource management and new development are minimised. The policy will encourage the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors will be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

B.12 Minerals

B.12.1 Policy MIN1 – Minerals Production: Requirements

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

B.12.1.1 Policy MIN1 will set out requirements for the production of construction aggregate and industrial minerals in the WLP area. The policy is proposed to be amended compared to the version presented in the Draft BCP, to clarify that primary mineral production in Wolverhampton is not available and remove references to Primary Land Won Sand and Gravel, Brick Clay Etruria Marl and fireclay, as reserves are not available in Wolverhampton.

B.12.1.2 The policy will be expected to help ensure the efficient use of mineral resources in the WLP area and promote use of recycled products to help reduce reliance on quarried products. This policy will be likely to have a minor positive impact on natural resources (SA Objective 6). This policy will also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13).

B.12.2 Policy MIN2 – Minerals Safeguarding

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

B.12.2.1 Policy MIN2 is proposed to be amended compared to the version presented in the Draft BCP, to remove references to Mineral Safeguarding Areas (MSAs), as there are no MSAs in Wolverhampton. Instead, the policy will focus on ensuring that any mineral deposits that are identified as being of economic importance outside of MSAs are safeguarded from unnecessary sterilisation. The policy will help to ensure that development proposed in proximity to existing mineral sites or infrastructure do not result in unacceptable impacts on their continued operation. This policy will be expected to protect mineral resources and therefore have a minor positive impact on natural resources (SA Objective 6).

B.12.3 Policy MIN3 – Preferred Areas for New Minerals Development

B.12.3.1 The aim of Draft BCP Policy MIN3 was to identify areas for mineral extraction. The policy is proposed to be deleted for the WLP, as there is no potential for new mineral development in Wolverhampton.

B.12.4 Policy MIN4 – Managing the Effects of Mineral Development

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN4	0	0	0	0	0	0	0	0	0	0	0	0	0	0

B.12.4.1 Policy MIN4 is proposed to be amended compared to the version presented in the Draft BCP, to remove criteria relating to types of mineral development, for which there is no potential in Wolverhampton. Instead, the policy will focus on requirements for any mineral-related infrastructure to ensure that potential adverse effects on the environment, built and historic environment, pollution, transport and land use conflicts are addressed. Therefore, the policy is expected to ensure adverse effects are minimised, rather than introducing and positive effects. Negligible impacts are identified across all SA Objectives.

Appendix C – Reasonable Alternative Site Assessments

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C.1 Introduction

C.1.1 Overview

C.1.1.1 A total of 48 reasonable alternative sites have been identified by the City of Wolverhampton Council (CWC) within the Wolverhampton Local Plan (WLP) area (see **Table C.1.1**). This includes:

- 22 sites proposed for residential use;
- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

C.1.1.2 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix A**). Likely sustainability impacts have been set out in **Tables C.2.1 – C.14.1** within each SA Objective chapter, in accordance with the topic-specific methodology set out in **Chapter 3** of the main SA Report.

C.1.1.3 This Regulation 18 SA Report has considered all reasonable alternative sites in the same way using the SA Framework, irrespective of their size or location. At this stage, the assessment has been carried out using the red line boundary and site proposal information provided by CWC, as set out in **Table C.1.1**. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation.

C.1.1.4 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the Council, as well as expert judgement.

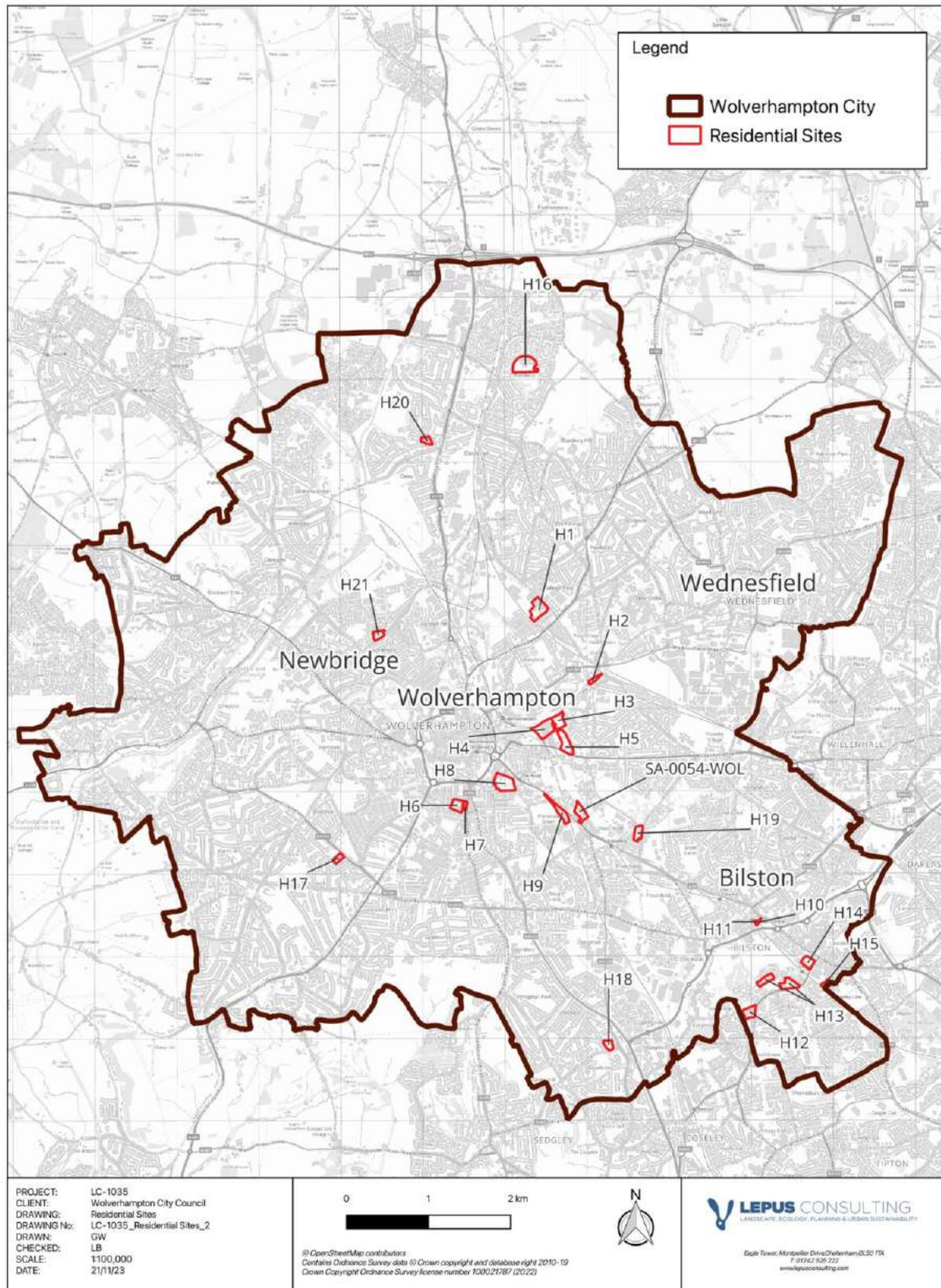


Figure C.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton

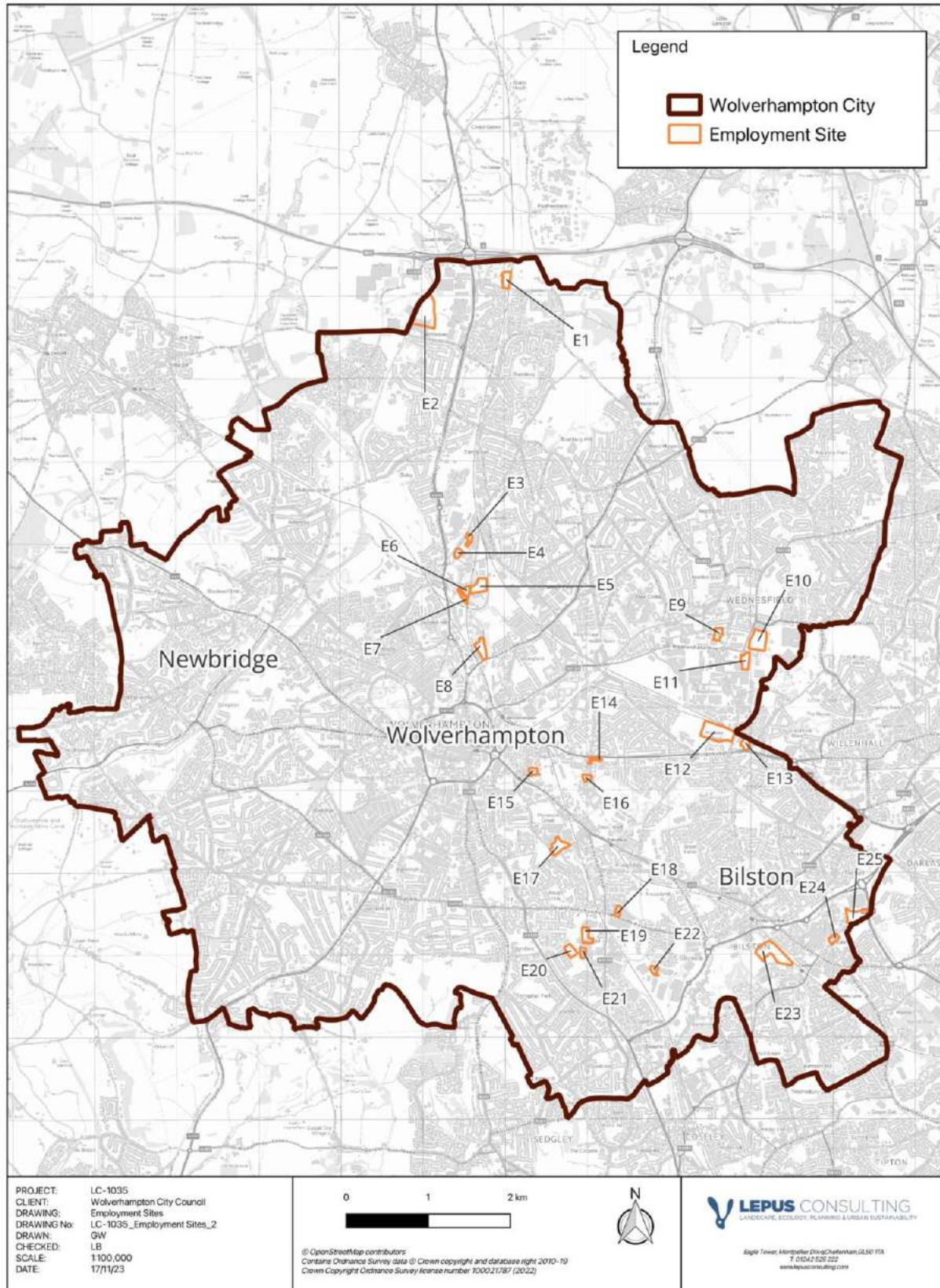


Figure C.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton

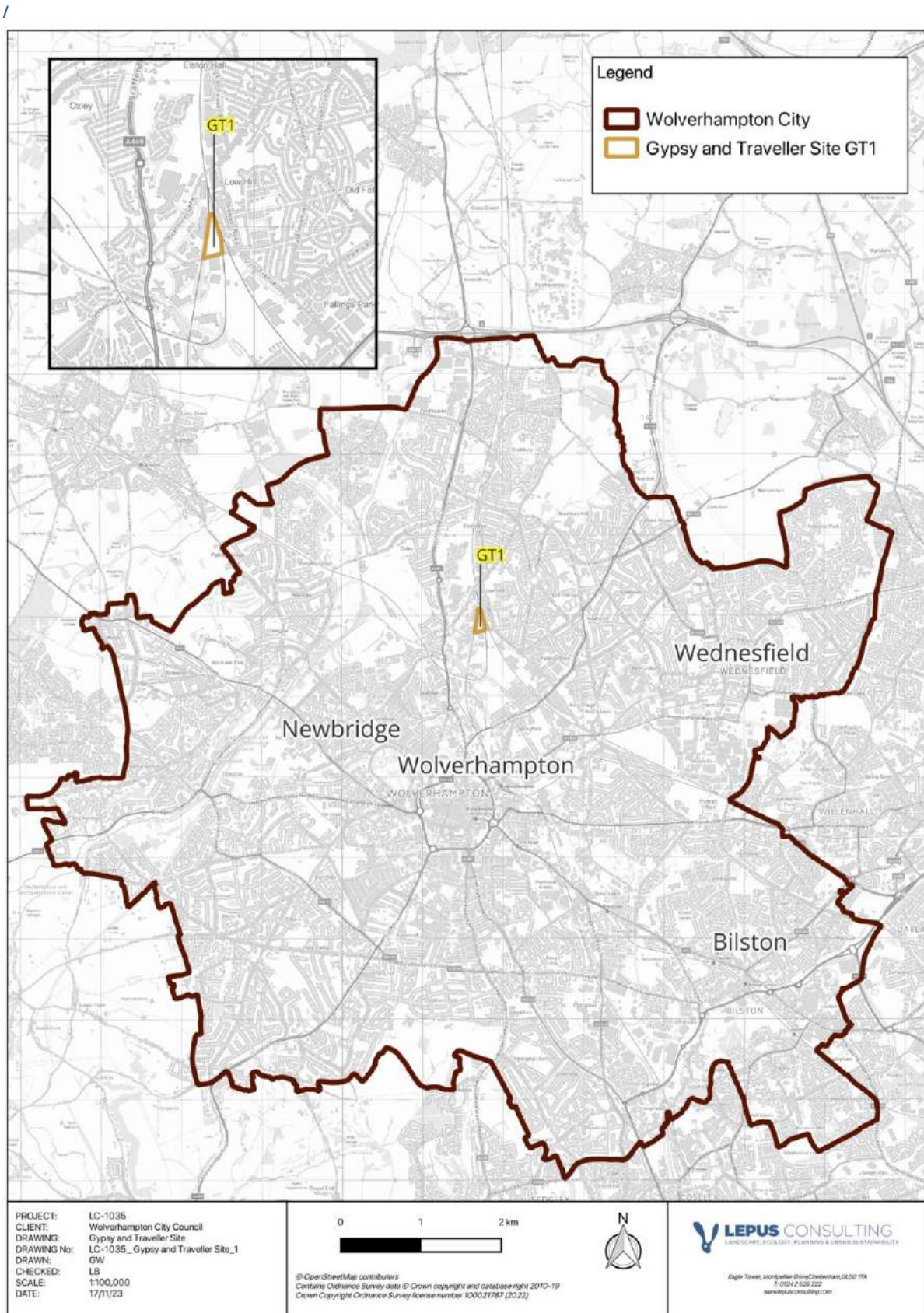


Figure C.1.3: Reasonable alternative sites proposed for Gypsy and Traveller use in Wolverhampton

Table C.1.1: Reasonable alternative sites in Wolverhampton

Site reference	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
H1	Blue Bird Industrial Estate and site to rear, Park Lane	3.10	Residential	130
H2	Former G & P Batteries Site, Grove Street, Heath Town	0.79	Residential	56
H3	East of Qualcast Road	2.00	Residential	101
H4	West of Qualcast Road	3.25	Residential	119
H5	West of Colliery Road	2.00	Residential	90
H6	Dobbs Street, Blakenhall	1.35	Residential	266
H7	Dudley Road / Bell Place, Blakenhall	0.68	Residential	100
H8	Former Royal Hospital, All Saints	4.11	Residential	192
H9	Delta Trading Estate, Bilston Road	2.00	Residential	80
H10	Land at Hall Street / The Orchard, Bilston Town Centre	0.12	Residential	21
H11	Former Pipe Hall, The Orchard, Bilston Town Centre	0.13	Residential	38
H12	Lane Street / Highfields Road, Bradley	1.79	Residential	72
H13	Greenway Road, Bradley	4.00	Residential	180
H14	Former Loxdale Primary School, Chapel Street, Bradley	1.30	Residential	100
H15	South of Oxford Street, Bilston	0.45	Residential	20
H16	Former Northcote Secondary School, Northwood Park Road	4.94	Residential	178
H17	Beckminster House, Beckminster Road	0.25	Residential	15
H18	Former Rookery Lodge, Woodcross Lane	0.25	Residential	16
H19	Former Stowheath centres. Stowheath Lane	1.00	Residential	53
H20	Former Probert Court / Health Centre, Probert Road	0.88	Residential	35
H21	Former Gym, Craddock Street	1.20	Residential	48
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	1.50	Residential	100-150
E1	Wolverhampton Business Park	1.77	Employment	N/A
E2	Rear of IMI Marstons	7.20	Employment	N/A
E3	Shaw Road (north of Civic Amenity Site)	0.80	Employment	N/A
E4	Former Strykers, Bushbury Lane	0.80	Employment	N/A
E5	Gas Holder site, Wolverhampton Science Park	2.60	Employment	N/A
E6	Mammouth Drive, Wolverhampton Science Park	0.80	Employment	N/A
E7	Stratosphere Site, Wolverhampton Science Park	0.70	Employment	N/A
E8	Crown St/Cross St North	2.10	Employment	N/A
E9	Bentley Bridge Business Park, Well Lane, Wednesfield	1.20	Employment	N/A
E10	Tata Steel, Wednesfield	4.30	Employment	N/A
E11	Phoenix Road, Wednesfield	1.80	Employment	N/A

Site reference	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
E12	Land at Neachells lane	6.70	Employment	N/A
E13	Land rear of Key Line Builders, Neachells Lane / Moose Lane	1.20	Employment	N/A
E14	Chillington Fields	0.60	Employment	N/A
E15	Powerhouse, Commercial Road	0.90	Employment	N/A
E16	Hickman Avenue	0.70	Employment	N/A
E17	Former MEB Site, Major Street / Dixon Street	2.50	Employment	N/A
E18	Millfields Road, Ettingshall	0.70	Employment	N/A
E19	Rolls Royce Playing Fields, Spring Road	1.80	Employment	N/A
E20	South of Inverclyde Drive	1.40	Employment	N/A
E21	Rear of Spring Road	0.70	Employment	N/A
E22	Springvale Avenue	0.70	Employment	N/A
E23	Bilston Urban Village, Bath Street	6.00	Employment	N/A
E24	Dale St, Bilston	0.90	Employment	N/A
E25	South of Citadel Junction, Murdoch Road, Bilston	3.20	Employment	N/A
GT1	Former Bushbury Reservoir, Showell Road	0.30	Gypsy and Traveller	12 pitches

C.2 SA Objective 1: Cultural Heritage

C.2.1 Grade I Listed Buildings

C.2.1.1 There are two Grade I Listed Buildings in Wolverhampton, 'Wightwick Manor' and 'Church of St Peter'. All of the reasonable alternative sites in Wolverhampton would be unlikely to significantly impact either of the Grade I Listed Buildings, therefore a negligible impact has been identified for these sites.

C.2.2 Grade II* Listed Buildings

C.2.2.1 There is a relatively small number of Grade II* Listed Buildings within Wolverhampton, mostly concentrated in Wolverhampton city centre, with fewer located towards the outer edges of the city. All reasonable alternative sites within Wolverhampton are separated from Listed Buildings by existing built form and therefore are unlikely to significantly impact any Grade II* Listed Buildings. A negligible impact has been identified for these sites.

C.2.3 Grade II Listed Buildings

C.2.3.1 There are many Grade II Listed Buildings throughout Wolverhampton, generally clustered within the built-up areas and particularly within the city centre and Tettenhall, and along the canal network. Sites H08, H11 and H17 coincide with Grade II Listed Buildings 'Royal Hospital', 'Top Cats Night Spot' and 'Beckminster House and Gateway' respectively. Despite the likely retention (and opportunities for sensitive redevelopment) of the Grade II Listed Buildings, in line with the precautionary principle it is considered that the proposed development at these three sites could potentially have a direct major negative impact on these Grade II Listed Buildings. A further six reasonable alternative sites within Wolverhampton are either adjacent to or in close proximity to various Grade II Listed Buildings. The proposed development at these six sites could potentially have a minor negative impact on the settings of these Grade II Listed Buildings. The remaining reasonable alternative sites within Wolverhampton are likely to have a negligible impact on the setting of Grade II Listed Buildings, primarily due to being separated by existing built form.

C.2.4 Conservation Area

C.2.4.1 Wolverhampton contains 31 Conservation Areas (CAs), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of the sites within Wolverhampton are unlikely to significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. However, five sites are located wholly or partially within one of these CAs, including four residential sites (H8, H10, H11, H12) and one employment site (E15). Site H8 is located wholly within 'Cleveland Road' Conservation Area, Sites H10 and H11 are located wholly within 'Bilston Town Centre', Site H12 is partially located within 'Bilston Canal Corridor' and Site E15 is located wholly within the 'Bilston Canal Corridor' CA. A further 12 sites are located adjacent or in close proximity to a CA. Therefore, the

proposed development at these 17 sites could potentially result in a minor negative impact on the character or setting of CAs in Wolverhampton.

C.2.5 Scheduled Monument

C.2.5.1 There are four Scheduled Monuments (SMs) within Wolverhampton, all of which cover small historical features. All reasonable alternative sites are separated from nearby SMs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of SMs.

C.2.6 Registered Park and Garden

C.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Wolverhampton: 'West Park' and 'Wightwick Manor' RPGs. All reasonable alternative sites are separated from nearby RPGs by existing built form, and therefore, would be expected to result in a negligible impact on the setting of RPGs.

C.2.7 Archaeological Priority Area

C.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Wolverhampton, mainly found in the urban areas. Four sites within Wolverhampton coincide wholly or partially with APAs (H10, H11, E10 and E16). The proposed development at these four sites could potentially alter the setting of APAs, and as a result have a minor negative impact on the historic environment. The remaining sites are not located in close proximity to APAs, and therefore, would be expected to have a negligible impact on the setting of APAs.

C.2.8 Historic Landscape Characterisation

C.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study¹ has identified a range of Historic Environment Area Designations within the Black Country. In Wolverhampton, these designations are mainly restricted to the small parcels of Green Belt as well as a number of features within the urban areas.

C.2.8.2 Three reasonable alternative sites are located wholly or partially within an area of High Historic Landscape Value (HHLV) or High Historic Townscape Value (HHTV): Sites H1, H6, and H12. The proposed development at these three sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, would be expected to have a negligible impact on the local historic environment.

¹ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf
[Date accessed: 04/01/24]

Table C.2.1: Sites impact matrix for SA Objective 1 – Cultural heritage

Site Use	Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Residential	H1	0	0	0	0	0	0	0	-
Residential	H2	0	0	0	0	0	0	0	0
Residential	H3	0	0	0	-	0	0	0	0
Residential	H4	0	0	0	-	0	0	0	0
Residential	H5	0	0	0	-	0	0	0	0
Residential	H6	0	0	-	0	0	0	0	-
Residential	H7	0	0	0	0	0	0	0	0
Residential	H8	0	0	--	-	0	0	0	0
Residential	H9	0	0	0	-	0	0	0	0
Residential	H10	0	0	-	-	0	0	-	0
Residential	H11	0	0	--	-	0	0	-	0
Residential	H12	0	0	0	-	0	0	0	-
Residential	H13	0	0	0	-	0	0	0	0
Residential	H14	0	0	0	0	0	0	0	0
Residential	H15	0	0	0	0	0	0	0	0
Residential	H16	0	0	0	0	0	0	0	0
Residential	H17	0	0	--	0	0	0	0	0
Residential	H18	0	0	0	0	0	0	0	0
Residential	H19	0	0	0	0	0	0	0	0
Residential	H20	0	0	0	0	0	0	0	0
Residential	H21	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	0	0	0	0	0	0	0	0
Employment	E1	0	0	0	0	0	0	0	0
Employment	E2	0	0	0	-	0	0	0	0
Employment	E3	0	0	0	0	0	0	0	0
Employment	E4	0	0	0	0	0	0	0	0
Employment	E5	0	0	-	0	0	0	0	0
Employment	E6	0	0	-	-	0	0	0	0
Employment	E7	0	0	-	-	0	0	0	0
Employment	E8	0	0	-	-	0	0	0	0
Employment	E9	0	0	0	0	0	0	0	0
Employment	E10	0	0	0	0	0	0	-	0
Employment	E11	0	0	0	0	0	0	0	0
Employment	E12	0	0	0	0	0	0	0	0
Employment	E13	0	0	0	0	0	0	0	0
Employment	E14	0	0	0	0	0	0	0	0
Employment	E15	0	0	0	-	0	0	0	0
Employment	E16	0	0	0	0	0	0	-	0
Employment	E17	0	0	0	-	0	0	0	0

Site Use	Site Ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Employment	E18	0	0	0	-	0	0	0	0
Employment	E19	0	0	0	0	0	0	0	0
Employment	E20	0	0	0	0	0	0	0	0
Employment	E21	0	0	0	0	0	0	0	0
Employment	E22	0	0	0	0	0	0	0	0
Employment	E23	0	0	0	-	0	0	0	0
Employment	E24	0	0	0	0	0	0	0	0
Employment	E25	0	0	0	0	0	0	0	0
G&T	GT1	0	0	0	0	0	0	0	0

C.3 SA Objective 2: Landscape

C.3.1 Landscape Sensitivity

C.3.1.1 The Black Country Landscape Sensitivity Assessment² identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Wolverhampton, Green Belt is restricted mainly to the north and west, and alongside the Smestow Brook and the Staffordshire and Worcestershire Canal. All 48 reasonable alternative sites identified for the WLP lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of each site on sensitive landscapes are scored as uncertain.

C.3.1.2 Information relating to the historic environment which has strong links with landscapes/townscapes in Wolverhampton, including the Historic Landscape Characterisation and associated designations, has been assessed under SA Objective 1 (Cultural Heritage) (see **Chapter C.2**).

C.3.2 Alter Views for PRow Network Users

C.3.2.1 The PRow network in Wolverhampton is fragmented, with the majority of remaining footpaths found in the Green Belt parcels. The proposed development at six reasonable alternative sites (H2, H16, E5, E12, E25 and GT1), could potentially alter the views of open space currently experienced by users of the PRow network, and result in a minor negative impact on the landscape. Sites which contain existing development, or are separated from PRow by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

C.3.3 Alter Views for Local Residents

C.3.3.1 The development proposed at a large proportion of sites in Wolverhampton are considered to have the potential to alter the views currently experienced by local residents primarily due to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these 22 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites would be unlikely to result in a significant impact on views.

² LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:
https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 12/01/24]

Table C.3.1: Sites impact matrix for SA Objective 2 – Landscape

Site Use	Site Ref	Landscape Sensitivity Assessment ^t	Alter Views for PRoW Network Users	Alter Views for Local Residents
Residential	H1	+/-	0	0
Residential	H2	+/-	-	-
Residential	H3	+/-	0	-
Residential	H4	+/-	0	0
Residential	H5	+/-	0	0
Residential	H6	+/-	0	0
Residential	H7	+/-	0	0
Residential	H8	+/-	0	-
Residential	H9	+/-	0	0
Residential	H10	+/-	0	0
Residential	H11	+/-	0	0
Residential	H12	+/-	0	0
Residential	H13	+/-	0	0
Residential	H14	+/-	0	-
Residential	H15	+/-	0	0
Residential	H16	+/-	-	-
Residential	H17	+/-	0	-
Residential	H18	+/-	0	-
Residential	H19	+/-	0	-
Residential	H20	+/-	0	-
Residential	H21	+/-	0	-
Residential	SA-0054-WOL	+/-	0	0
Employment	E1	+/-	0	-
Employment	E2	+/-	0	0
Employment	E3	+/-	0	0
Employment	E4	+/-	0	-
Employment	E5	+/-	-	0
Employment	E6	+/-	0	0
Employment	E7	+/-	0	0
Employment	E8	+/-	0	0
Employment	E9	+/-	0	-
Employment	E10	+/-	0	0
Employment	E11	+/-	0	0
Employment	E12	+/-	-	-
Employment	E13	+/-	0	-
Employment	E14	+/-	0	-
Employment	E15	+/-	0	0
Employment	E16	+/-	0	0
Employment	E17	+/-	0	-
Employment	E18	+/-	0	0
Employment	E19	+/-	0	-
Employment	E20	+/-	0	0
Employment	E21	+/-	0	0

Site Use	Site Ref	Landscape Sensitivity Assessment ^t	Alter Views for PRoW Network Users	Alter Views for Local Residents
Employment	E22	+/-	0	-
Employment	E23	+/-	0	-
Employment	E24	+/-	0	0
Employment	E25	+/-	-	-
G&T	GT1	+/-	-	-

C.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

C.4.1 Habitats Sites

C.4.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no Habitats sites located within Wolverhampton, with the nearest being 'Fens Pools' SAC located approximately 5km to the south of the city, and 'Cannock Chase' SAC located approximately 12km to the north east. A small proportion in the north of the city lies within the identified 15km Zone of Influence (ZoI) where recreational impacts to Cannock Chase SAC may arise as a result of new development. No ZoI has currently been identified for Fens Pools SAC or other surrounding Habitats sites.

C.4.1.2 Within Wolverhampton, two sites proposed for residential use (Site H16 and H20) are located within the 15km ZoI for recreational impacts at Cannock Chase SAC, and therefore, the proposed development at these sites could potentially have a minor negative impact on the designated features of this Habitats site. At the time of writing, the likely impact of development at the remaining sites on other Habitats sites, including Fens Pools SAC, is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

C.4.2 Sites of Special Scientific Interest

C.4.2.1 There are no Sites of Special Scientific Interest (SSSI) within Wolverhampton, with the nearest being 'Wren's Nest' SSSI located approximately 1.4km south of the city in Dudley.

C.4.2.2 Within Wolverhampton, one site proposed for residential use (H16) is located within an IRZ which states that "*Strategic solutions for recreational impacts are in place. Please contact your Local Planning Authority as they have the information to advise on specific requirements*". Therefore, the proposed development at Site H16 could potentially have a minor negative impact on nearby SSSIs (the SSSI components of Cannock Chase SAC) and Natural England should be consulted. The remaining sites within Wolverhampton are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact.

C.4.3 National Nature Reserves

C.4.3.1 There are no National Nature Reserves (NNR) within Wolverhampton City, with the nearest being 'Wren's Nest' NNR located approximately 1.4km south of the city in Dudley. There are no sites within Wolverhampton located within close proximity to this NNR, and therefore the proposed development at all sites within Wolverhampton would be expected to have a negligible impact.

C.4.4 Ancient Woodland

- C.4.4.1 There are four areas of ancient woodland within Wolverhampton: 'Tettenhall Wood', 'Ashen Coppice', 'Park Coppice' and one unnamed stand of woodland, all of which are found in the south west of the city. All reasonable alternative sites within Wolverhampton are not in close proximity to any areas of ancient woodland, and therefore a negligible impact is identified.

C.4.5 Local Nature Reserves

- C.4.5.1 Within Wolverhampton, there are two Local Nature Reserves (LNRs): 'Smestow Valley' and the more recently adopted 'Wyrley and Essington Canal' LNR. Other nearby LNRs include 'Waddens Brook, Noose Lane' LNR which is located adjacent to the north eastern city boundary, in Walsall. Sites H2, H3, H4, and H5 are all located adjacent to the 'Wyrley and Essington Canal' LNR. Development at these four sites could potentially have a minor negative impact on the LNR. All of the remaining reasonable alternative sites in Wolverhampton are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form.

C.4.6 Sites of Importance for Nature Conservation

- C.4.6.1 There are 43 Sites of Importance for Nature Conservation (SINCs) found throughout Wolverhampton, including 'Birmingham Canal, Wolverhampton Level' SINC which runs throughout the central city area. A small proportion of Site SA-0054-WOL coincides with 'Monmore Green Disused Railway' SINC. A small proportion of Site E17 coincides with 'Birmingham Canal, Wolverhampton Level' SINC. The proposed development at these two sites could potentially have direct major negative impacts on these SINCs.
- C.4.6.2 Additionally, 11 sites are located adjacent to SINCs. Sites H9, E7, E8, E15 and E18 are located adjacent to the 'Birmingham Canal, Wolverhampton Level' SINC which runs through the centre of Wolverhampton. Sites H2, H3, H4, H5, H13, and E2 are also located adjacent to SINCs, including the 'Birmingham Canal, Wednesbury Oak Loop', 'Staffordshire and Worcestershire Canal' and the 'Wyrley and Essington Canal' SINCs. The proposed development at these 11 sites could potentially have a minor negative impact on the SINCs, due to an increased risk of development related threats and pressures.

C.4.7 Sites of Local Importance for Nature Conservation

- C.4.7.1 A total of 58 Sites of Local Importance for Nature Conservation (SLINCs) can be found throughout Wolverhampton, many of which comprise semi-natural open spaces within the highly urbanised area.
- C.4.7.2 Three sites coincide with SLINCs, including Site E7 with 'Wolverhampton Science Park' SLINC, Site E12 with 'Neachells Lane Open Space' SLINC, and Site E25 with 'Land East of Dale Street' SLINC. Additionally, three sites are located adjacent to SLINCs: Site H12 is located adjacent to 'Dudley to Priestfield Disused Railway' SLINC, and Sites E20 and E21 are located adjacent to 'Taylor Road' SLINC. The proposed development at these six sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures.

- C.4.7.3 Site GT1 coincides with 'Bushbury Junction Reservoir' SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain.
- C.4.7.4 The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

C.4.8 Geological Sites

- C.4.8.1 Geological sites have been identified throughout the city, which form part of the Black Country Global Geopark³. These sites include a range of notable geological features and formations. In Wolverhampton, these include 'Stafford Road Cutting SINC', 'Wightwick Manor and Smestow Valley' and 'Northycote Farm'. None of the reasonable alternative sites in Wolverhampton are located in close proximity to any identified areas of geological importance, and therefore, the proposed development at all sites would be expected to have a negligible impact.

C.4.9 Priority Habitats

- C.4.9.1 Despite being largely urbanised, there are some sections of priority habitats present within Wolverhampton, with 'deciduous woodland' in particular found along the canals, as well as 'coastal and floodplain grazing marsh' alongside the Smestow Brook, with a smaller proportion of 'good quality semi-improved grassland' in the north east.
- C.4.9.2 Sites E1, E2, E5 and E23 coincide with areas of priority habitat, including coastal and floodplain grazing marsh and/or deciduous woodland. The proposed development at these four sites could potentially result in the loss or degradation of these habitats, and therefore result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

³ Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/>
[Date accessed: 04/01/24]

Table C.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Site Use	Site Ref	Habitats Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRS	SINCS	SLINCS	Geological Sites	Priority Habitats
Residential	H1	+/-	0	0	0	0	0	0	0	0
Residential	H2	+/-	0	0	0	-	-	0	0	0
Residential	H3	+/-	0	0	0	-	-	0	0	0
Residential	H4	+/-	0	0	0	-	-	0	0	0
Residential	H5	+/-	0	0	0	-	-	0	0	0
Residential	H6	+/-	0	0	0	0	0	0	0	0
Residential	H7	+/-	0	0	0	0	0	0	0	0
Residential	H8	+/-	0	0	0	0	0	0	0	0
Residential	H9	+/-	0	0	0	0	-	0	0	0
Residential	H10	+/-	0	0	0	0	0	0	0	0
Residential	H11	+/-	0	0	0	0	0	0	0	0
Residential	H12	+/-	0	0	0	0	0	-	0	0
Residential	H13	+/-	0	0	0	0	-	0	0	0
Residential	H14	+/-	0	0	0	0	0	0	0	0
Residential	H15	+/-	0	0	0	0	0	0	0	0
Residential	H16	-	-	0	0	0	0	0	0	0
Residential	H17	+/-	0	0	0	0	0	0	0	0
Residential	H18	+/-	0	0	0	0	0	0	0	0
Residential	H19	+/-	0	0	0	0	0	0	0	0
Residential	H20	-	0	0	0	0	0	0	0	0
Residential	H21	+/-	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	+/-	0	0	0	0	--	0	0	0
Employment	E1	+/-	0	0	0	0	0	0	0	-
Employment	E2	+/-	0	0	0	0	-	0	0	-
Employment	E3	+/-	0	0	0	0	0	0	0	0
Employment	E4	+/-	0	0	0	0	0	0	0	0
Employment	E5	+/-	0	0	0	0	0	0	0	-
Employment	E6	+/-	0	0	0	0	0	0	0	0
Employment	E7	+/-	0	0	0	0	-	-	0	0
Employment	E8	+/-	0	0	0	0	-	0	0	0
Employment	E9	+/-	0	0	0	0	0	0	0	0
Employment	E10	+/-	0	0	0	0	0	0	0	0
Employment	E11	+/-	0	0	0	0	0	0	0	0
Employment	E12	+/-	0	0	0	0	0	-	0	0
Employment	E13	+/-	0	0	0	0	0	0	0	0
Employment	E14	+/-	0	0	0	0	0	0	0	0
Employment	E15	+/-	0	0	0	0	-	0	0	0
Employment	E16	+/-	0	0	0	0	0	0	0	0
Employment	E17	+/-	0	0	0	0	--	0	0	0

Site Use	Site Ref	Habitats Sites	SSSIs and IRZs	NNRS	Ancient Woodland	LNRs	SINCs	SLINCs	Geological Sites	Priority Habitats
Employment	E18	+/-	0	0	0	0	-	0	0	0
Employment	E19	+/-	0	0	0	0	0	0	0	0
Employment	E20	+/-	0	0	0	0	0	-	0	0
Employment	E21	+/-	0	0	0	0	0	-	0	0
Employment	E22	+/-	0	0	0	0	0	0	0	0
Employment	E23	+/-	0	0	0	0	0	0	0	-
Employment	E24	+/-	0	0	0	0	0	0	0	0
Employment	E25	+/-	0	0	0	0	0	-	0	0
G&T	GT1	+/-	0	0	0	0	0	+/-	0	0

C.5 SA Objective 4: Climate Change Mitigation

C.5.1 Potential Increase in Carbon Footprint

- C.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. 37 sites are proposed for the development of 113 dwellings or less. The proposed development at these sites would be likely to result in a negligible contribution towards Wolverhampton’s total carbon emissions.
- C.5.1.2 Six sites are proposed for the development of 114 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Wolverhampton’s total, by more than 0.1%. Therefore, a minor negative impact on Wolverhampton’s carbon emissions would be expected at these six sites.
- C.5.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain as the likely extent of carbon emissions is unknown.
- C.5.1.4 The carbon emissions likely to be generated as a result of employment-led development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.
- C.5.1.5 The nature and design of Gypsy and Traveller pitches which could be developed is unknown at present. Therefore, potential increases in carbon emissions as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.5.1: Sites impact matrix for SA Objective 4 – Climate change mitigation

Site Use	Site Ref	Potential Increase in Carbon Footprint
Residential	H1	-
Residential	H2	0
Residential	H3	0
Residential	H4	-
Residential	H5	0
Residential	H6	-
Residential	H7	0
Residential	H8	-
Residential	H9	0
Residential	H10	0
Residential	H11	0
Residential	H12	0
Residential	H13	-
Residential	H14	0
Residential	H15	0
Residential	H16	-

Site Use	Site Ref	Potential Increase in Carbon Footprint
Residential	H17	0
Residential	H18	0
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	+/-
Employment	E1	+/-
Employment	E2	+/-
Employment	E3	+/-
Employment	E4	+/-
Employment	E5	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E8	+/-
Employment	E9	+/-
Employment	E10	+/-
Employment	E11	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E19	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

C.6 SA Objective 5: Climate Change Adaptation

C.6.1 Flood Zones

C.6.1.1 Flood Zones 2, 3a and 3b within Wolverhampton occur alongside the Smestow Brook in the west, the Waterhead Brook in the north and also a significant area in the south east of the city covering some existing residential areas, close to the River Tame and Walsall Canal.

C.6.1.2 Three sites (E2, E23, and E25) in Wolverhampton are located partially within Flood Zone 3a and/or 3b, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Wolverhampton. A small proportion of Site H19 is located within Flood Zone 2, and therefore, the proposed development at this site could potentially have a minor negative impact on flooding. The remaining sites which are located wholly within Flood Zone 1 would be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

C.6.2 Indicative Flood Zone 3b

C.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen due to climate change, areas of which have been identified in the north and the south east of Wolverhampton. Three sites (E2, E23 and E25) partially coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Wolverhampton. All remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

C.6.3 Surface Water Flood Risk

C.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in Wolverhampton is prevalent, and in particular affects roads and pathways within the urban area. The proposed development at seven sites within Wolverhampton which coincide with areas of high SWFR could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate surface water flood risk in surrounding locations. The proposed development at 27 sites in Wolverhampton which coincide with areas of low and/or medium SWFR could potentially have a minor negative impact on surface water flooding. The remaining sites which do not coincide with any significant areas of SWFR would be expected to have a negligible impact on surface water flooding.

Table C.6.1: Sites impact matrix for SA Objective 5 – Climate change adaptation

Site Use	Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Residential	H1	+	0	--
Residential	H2	+	0	-
Residential	H3	+	0	-
Residential	H4	+	0	-
Residential	H5	+	0	-
Residential	H6	+	0	-
Residential	H7	+	0	0
Residential	H8	+	0	-
Residential	H9	+	0	0
Residential	H10	+	0	0
Residential	H11	+	0	0
Residential	H12	+	0	-
Residential	H13	+	0	--
Residential	H14	+	0	0
Residential	H15	+	0	-
Residential	H16	+	0	-
Residential	H17	+	0	0
Residential	H18	+	0	-
Residential	H19	-	0	-
Residential	H20	+	0	-
Residential	H21	+	0	-
Residential	SA-0054-WOL	+	0	-
Employment	E1	+	0	-
Employment	E2	--	--	-
Employment	E3	+	0	0
Employment	E4	+	0	0
Employment	E5	+	0	-
Employment	E6	+	0	-
Employment	E7	+	0	--
Employment	E8	+	0	-
Employment	E9	+	0	-
Employment	E10	+	0	--
Employment	E11	+	0	0
Employment	E12	+	0	-
Employment	E13	+	0	0
Employment	E14	+	0	-
Employment	E15	+	0	-
Employment	E16	+	0	0
Employment	E17	+	0	-
Employment	E18	+	0	-
Employment	E19	+	0	0
Employment	E20	+	0	0
Employment	E21	+	0	--
Employment	E22	+	0	-

Site Use	Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Employment	E23	--	--	--
Employment	E24	+	0	0
Employment	E25	--	--	-
G&T	GT1	+	0	--

C.7 SA Objective 6: Natural Resources

C.7.1 Previously Undeveloped Land / Land with Environmental Value

- C.7.1.1 Wolverhampton is predominately urban with pockets of undeveloped land and greenspace scattered throughout the communities, including areas of Green Belt in the south and north west of the city.
- C.7.1.2 16 sites in Wolverhampton wholly comprise previously developed land which would be likely to have little or no environmental value. The proposed development at these sites would be expected to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- C.7.1.3 The majority of reasonable alternative sites in Wolverhampton wholly or partially comprise undeveloped land, and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these 32 sites could potentially have a minor negative impact on natural resources due to the loss of previously undeveloped land and/or land with potential environmental value.

C.7.2 Agricultural Land Classification

- C.7.2.1 Within Wolverhampton, Agricultural Land Classification (ALC) indicates largely 'Urban' land, with some areas of Grade 2, 3 and 4 land found in the southern and northern sections of the city. ALC Grade 2, and potentially Grade 3, represents some of Wolverhampton's 'best and most versatile' (BMV) land.
- C.7.2.2 Site E1 is wholly located on Grade 3 land and the proposed development at this site could potentially lead to a small-scale loss of BMV land, therefore, a minor negative impact on natural resources is expected.
- C.7.2.3 31 reasonable alternative sites are located on areas of 'Urban' land, and therefore, the proposed development at these sites could potentially have a minor positive impact on natural resources as development at these sites would help to prevent the loss of BMV land across the Plan area.
- C.7.2.4 The proposed development at the 16 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

Table C.7.1: Sites impact matrix for SA Objective 6 – Natural resources

Site Use	Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
Residential	H1	+	0
Residential	H2	-	+
Residential	H3	-	+
Residential	H4	+	0
Residential	H5	+	0
Residential	H6	+	0
Residential	H7	+	0
Residential	H8	+	0
Residential	H9	-	+
Residential	H10	-	+
Residential	H11	+	0
Residential	H12	+	0
Residential	H13	+	0
Residential	H14	-	+
Residential	H15	-	+
Residential	H16	-	+
Residential	H17	-	+
Residential	H18	-	+
Residential	H19	-	+
Residential	H20	-	+
Residential	H21	-	+
Residential	SA-0054-WOL	+	0
Employment	E1	-	-
Employment	E2	-	+
Employment	E3	+	0
Employment	E4	-	+
Employment	E5	-	+
Employment	E6	-	+
Employment	E7	-	+
Employment	E8	-	+
Employment	E9	-	+
Employment	E10	+	0
Employment	E11	-	+
Employment	E12	-	+
Employment	E13	-	+
Employment	E14	-	+
Employment	E15	+	0
Employment	E16	-	+
Employment	E17	-	+
Employment	E18	+	0
Employment	E19	-	+
Employment	E20	+	0
Employment	E21	-	+
Employment	E22	-	+

Site Use	Site Ref	Previously Undeveloped Land / Land with Environmental Value	ALC Grade
Employment	E23	-	+
Employment	E24	+	0
Employment	E25	-	+
G&T	GT1	-	+

C.8 SA Objective 7: Pollution

C.8.1 Air Quality Management Area

C.8.1.1 Wolverhampton City is wholly designated as 'Wolverhampton Air Quality Management Area' (AQMA). All of the reasonable alternative sites within Wolverhampton are located wholly within this AQMA. Several of the sites are also located within 200m of neighbouring AQMAs including 'Walsall AQMA' to the east, 'Sandwell AQMA' to the south east and 'Dudley AQMA' to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

C.8.2 Main Road

C.8.2.1 Wolverhampton contains many major roads, including a large ring road in the city centre, where several main roads meet such as the A41, A449 and A454. The M54 motorway passes adjacent to the city in the north. 30 sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads would be expected to have a minor negative impact on air quality and noise at these sites. On the other hand, the proposed development at the remaining sites which are over 200m from a main road would be expected to have a negligible impact on transport associated air and noise pollution associated with main roads.

C.8.3 Watercourse

C.8.3.1 Wolverhampton's watercourse network largely comprises the canal system, with fewer rivers/streams. Notable watercourses include the Smestow Brook, Waterhead Brook and the River Tame, as well as sections of the Staffordshire and Worcestershire Canal and Birmingham to Wolverhampton Canal. 12 sites coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

C.8.3.2 Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses however each site would need to be evaluated according to land use type, size of development and exact location. At this stage, the potential effects of these 36 sites on water quality are uncertain and would depend upon implementation.

C.8.4 Groundwater Source Protection Zone

C.8.4.1 Source Protection Zones (SPZs) for groundwater within Wolverhampton are located to the west and covering a large area of the city. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. 12 sites in Wolverhampton are located wholly or partially within the total catchment (zone 3) of this SPZ. The proposed

development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

C.8.5 Potential Increase in Air Pollution

- C.8.5.1 10 sites are proposed for the development of 100 or more dwellings. The proposed development at these sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact is identified.
- C.8.5.2 12 sites are proposed for the development of between ten and 99 dwellings, and 14 sites are proposed for employment-led end use and comprise between one and 10ha. Therefore, the proposed development at these 26 sites could potentially have a minor negative impact on air pollution in the local area.
- C.8.5.3 11 sites are proposed for employment-led end use and comprise less than 1ha. The proposed development at these 11 sites would be expected to have a negligible impact on local air pollution.
- C.8.5.4 The nature and design of Gypsy and Traveller pitches which could be developed at each site is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.8.1: Sites impact matrix for SA Objective 7 – Pollution

Site Use	Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
Residential	H1	-	-	+/-	0	--
Residential	H2	-	-	-	0	-
Residential	H3	-	0	-	0	--
Residential	H4	-	-	-	0	--
Residential	H5	-	-	-	0	-
Residential	H6	-	-	+/-	0	--
Residential	H7	-	-	+/-	0	--
Residential	H8	-	-	+/-	0	--
Residential	H9	-	-	-	0	-
Residential	H10	-	-	+/-	0	-
Residential	H11	-	-	+/-	0	-
Residential	H12	-	0	+/-	0	-
Residential	H13	-	0	-	0	--
Residential	H14	-	-	+/-	0	--
Residential	H15	-	-	+/-	0	-
Residential	H16	-	0	+/-	-	--
Residential	H17	-	0	+/-	-	-

Site Use	Site Ref	AQMA	Main Road	Watercourse	Groundwater SPZ	Potential Increase in Air Pollution
Residential	H18	-	-	+/-	0	-
Residential	H19	-	0	+/-	0	-
Residential	H20	-	-	+/-	-	-
Residential	H21	-	0	+/-	-	-
Residential	SA-0054-WOL	-	-	+/-	0	--
Employment	E1	-	-	+/-	-	-
Employment	E2	-	0	-	-	-
Employment	E3	-	0	+/-	-	0
Employment	E4	-	-	+/-	-	0
Employment	E5	-	0	+/-	-	-
Employment	E6	-	0	+/-	-	0
Employment	E7	-	-	-	-	0
Employment	E8	-	-	-	0	-
Employment	E9	-	-	+/-	0	-
Employment	E10	-	-	+/-	0	-
Employment	E11	-	-	+/-	0	-
Employment	E12	-	-	+/-	0	-
Employment	E13	-	-	+/-	0	-
Employment	E14	-	-	+/-	0	0
Employment	E15	-	-	-	0	0
Employment	E16	-	0	+/-	0	0
Employment	E17	-	0	-	0	-
Employment	E18	-	-	-	0	0
Employment	E19	-	-	+/-	0	-
Employment	E20	-	0	+/-	0	-
Employment	E21	-	0	+/-	0	0
Employment	E22	-	0	+/-	0	0
Employment	E23	-	-	+/-	0	-
Employment	E24	-	0	+/-	0	0
Employment	E25	-	-	+/-	0	-
G&T	GT1	-	0	+/-	-	+/-

C.9 SA Objective 8: Waste

C.9.1 Potential Increase in Household Waste Generation

- C.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. 15 sites are proposed for the development of 111 dwellings or less. The proposed development at these sites would be expected to have a negligible impact on household waste generation in comparison to current levels.
- C.9.1.2 Six sites (H1, H4, H6, H8, H13, and H16) are proposed for the development of 111 dwellings or more. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.9.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain. However, the proposed development at this site would be expected to have a negative impact on household waste to some extent.
- C.9.1.4 The waste likely to be generated as a result of employment-led development is uncertain.
- C.9.1.5 The nature and design of Gypsy and Traveller pitches which could be developed at Site GT1 is unknown at present. Therefore, potential increases in household waste generation as a result of the construction and occupation of dwellings at Site GT1 is uncertain.

Table C.9.1: Sites impact matrix for SA Objective 8 – Waste

Site Use	Site Ref	Increase in household waste generation
Residential	H1	-
Residential	H2	0
Residential	H3	0
Residential	H4	-
Residential	H5	0
Residential	H6	-
Residential	H7	0
Residential	H8	-
Residential	H9	0
Residential	H10	0
Residential	H11	0
Residential	H12	0
Residential	H13	-
Residential	H14	0
Residential	H15	0
Residential	H16	-
Residential	H17	0
Residential	H18	0

Site Use	Site Ref	Increase in household waste generation
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	+/-
Employment	E1	+/-
Employment	E2	+/-
Employment	E3	+/-
Employment	E4	+/-
Employment	E5	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E8	+/-
Employment	E9	+/-
Employment	E10	+/-
Employment	E11	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E19	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

C.10 SA Objective 9: Transport and Accessibility

C.10.1 Bus Stop

C.10.1.1 Throughout Wolverhampton, there are many bus stops which would be expected to provide good public transport access to the local and wider community, especially throughout the city centre. Site E22 is located wholly outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to sustainable transport. The remaining 47 sites are largely located amongst existing settlements and are all situated within 400m of a bus stop; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport.

C.10.2 Railway Station

C.10.2.1 Wolverhampton Station is located in the city centre, providing access to rail services as well as the West Midlands Metro Line, of which there are six stations located in the south eastern area providing tram services towards Birmingham. Access to rail and metro services in the outer areas of the city is likely to be more restricted. 11 sites are situated wholly or partially outside of the sustainable distance of 2km from a station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 37 sites are located within 2km of a railway station and are therefore identified as having a minor positive impact on access to rail services.

C.10.3 Pedestrian Access

C.10.3.1 Sites with good pedestrian access can be described as those with connections to existing pavements or pathways which are segregated from traffic use in the area, which is likely to be the case for most of the built-up areas of Wolverhampton. All of the reasonable alternative sites are well connected to the existing footpath network, and therefore, the proposed development at these 48 sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created.

C.10.4 Road Access

C.10.4.1 There are many major and minor roads which run through Wolverhampton allowing for good access for road traffic in the local area and nationally. All of the reasonable alternative sites in Wolverhampton are adjacent to existing roads, and therefore the proposed development at all sites would be expected to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

C.10.5 Pedestrian Access to Local Services

C.10.5.1 Sustainable pedestrian access to local fresh food and services in Wolverhampton can be attributed to being within a 15-minute walking distance, according to accessibility modelling data. Within Wolverhampton, a total of 45 local services have been identified. The areas with the best pedestrian access to services are generally found towards the north west, with somewhat restricted access in the south east and in the outskirts of the city.

C.10.5.2 20 sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. Whereas 16 sites are identified to be within 10-minute walking distance and therefore, the proposed development at these sites would be expected to have a major positive impact on sustainable access to local services. 12 sites are identified to be within 15-minute walking distance and therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to local services.

C.10.6 Public Transport Access to Local Services

C.10.6.1 Accessibility modelling data shows that almost the entirety of Wolverhampton is located within a sustainable travel time of 15 minutes via public transport to local fresh food and services. The majority of sites meet these criteria. The proposed development at 31 sites which are located within a sustainable travel time of 10 minutes via public transport would be expected to have a major positive impact on the access of site end users to local services, based on existing infrastructure. 16 sites are located within a sustainable travel time of 15 minutes via public transport, and would be expected to have a minor positive impact on the access of site end users to local services.

C.10.6.2 However, Site H19 is located outside of this sustainable travel time via public transport to these local services, and therefore, the proposed development at this site could potentially have a minor negative impact on transport and accessibility.

Table C.10.1: Sites impact matrix for SA Objective 9 – Transport and accessibility

Site Use	Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
Residential	H1	+	+	+	+	+	++
Residential	H2	+	+	+	+	++	++
Residential	H3	+	+	+	+	++	+
Residential	H4	+	+	+	+	++	+
Residential	H5	+	+	+	+	+	+
Residential	H6	+	+	+	+	++	++
Residential	H7	+	+	+	+	++	++
Residential	H8	+	+	+	+	++	++
Residential	H9	+	+	+	+	-	++
Residential	H10	+	+	+	+	++	++

Site Use	Site Ref	Bus Stop	Railway Station	Pedestrian Access	Road Access	Pedestrian Access to Local Services	Public Transport Access to Local Services
Residential	H11	+	+	+	+	++	++
Residential	H12	+	+	+	+	-	+
Residential	H13	+	+	+	+	+	++
Residential	H14	+	+	+	+	+	++
Residential	H15	+	+	+	+	+	++
Residential	H16	+	-	+	+	++	++
Residential	H17	+	-	+	+	++	++
Residential	H18	+	+	+	+	-	+
Residential	H19	+	+	+	+	-	-
Residential	H20	+	-	+	+	++	++
Residential	H21	+	+	+	+	++	++
Residential	SA-0054-WOL	+	+	+	+	-	+
Employment	E1	+	-	+	+	-	+
Employment	E2	+	-	+	+	-	++
Employment	E3	+	-	+	+	+	++
Employment	E4	+	-	+	+	+	++
Employment	E5	+	+	+	+	-	++
Employment	E6	+	+	+	+	-	++
Employment	E7	+	+	+	+	+	++
Employment	E8	+	+	+	+	++	++
Employment	E9	+	-	+	+	++	++
Employment	E10	+	-	+	+	+	++
Employment	E11	+	-	+	+	-	++
Employment	E12	+	+	+	+	-	+
Employment	E13	+	+	+	+	+	++
Employment	E14	+	+	+	+	-	+
Employment	E15	+	+	+	+	+	++
Employment	E16	+	+	+	+	-	+
Employment	E17	+	+	+	+	-	+
Employment	E18	+	+	+	+	-	++
Employment	E19	+	+	+	+	-	+
Employment	E20	+	+	+	+	-	+
Employment	E21	+	+	+	+	-	+
Employment	E22	-	+	+	+	-	+
Employment	E23	+	+	+	+	++	++
Employment	E24	+	+	+	+	+	++
Employment	E25	+	+	+	+	++	+
G&T	GT1	+	-	+	+	-	++

C.11 SA Objective 10: Housing

C.11.1 Housing Provision

C.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less would be expected to result in a minor positive impact on housing provision.

C.11.1.2 Site GT1 is proposed for the development of 12 Gypsy and Traveller pitches. The proposed development at this site would be expected to contribute towards meeting the accommodation needs of Gypsies and Travellers, and result in a minor positive impact on housing provision.

C.11.1.3 Employment-led sites in Wolverhampton would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.

Table C.11.1: Sites impact matrix for SA Objective 10 – Housing

Site Use	Site Ref	Housing Provision
Residential	H1	++
Residential	H2	+
Residential	H3	++
Residential	H4	++
Residential	H5	+
Residential	H6	++
Residential	H7	++
Residential	H8	++
Residential	H9	+
Residential	H10	+
Residential	H11	+
Residential	H12	+
Residential	H13	++
Residential	H14	++
Residential	H15	+
Residential	H16	++
Residential	H17	+
Residential	H18	+
Residential	H19	+
Residential	H20	+
Residential	H21	+
Residential	SA-0054-WOL	++
Employment	E1	0
Employment	E2	0
Employment	E3	0
Employment	E4	0

Site Use	Site Ref	Housing Provision
Employment	E5	0
Employment	E6	0
Employment	E7	0
Employment	E8	0
Employment	E9	0
Employment	E10	0
Employment	E11	0
Employment	E12	0
Employment	E13	0
Employment	E14	0
Employment	E15	0
Employment	E16	0
Employment	E17	0
Employment	E18	0
Employment	E19	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	0
Employment	E24	0
Employment	E25	0
G&T	GT1	+

C.12 SA Objective 11: Equality

C.12.1 Index of Multiple Deprivation

C.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁴. Out of 317 Local Authorities in England, Wolverhampton is ranked as the 24th most deprived⁵. Overall deprivation is relatively high, with 33 of the LSOAs in Wolverhampton ranked among the 10% most deprived in England. In general, the most deprived areas of Wolverhampton are those surrounding the city centre and particularly towards the north around Bushbury South and Low Hill.

C.12.1.2 24 sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites in Wolverhampton may have a negligible impact on equality.

C.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

Table C.12.1: Sites impact matrix for SA Objective 11 – Equality

Site Use	Site Ref	IMD 10% Most Deprived
Residential	H1	-
Residential	H2	-
Residential	H3	-
Residential	H4	-
Residential	H5	-
Residential	H6	-
Residential	H7	-
Residential	H8	-
Residential	H9	0
Residential	H10	-
Residential	H11	-
Residential	H12	-
Residential	H13	-
Residential	H14	-
Residential	H15	0

⁴ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 04/01/24]

⁵ Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/indices-of-multiple-deprivation-2019/> [Date accessed: 04/01/24]

Site Use	Site Ref	IMD 10% Most Deprived
Residential	H16	-
Residential	H17	0
Residential	H18	0
Residential	H19	0
Residential	H20	0
Residential	H21	0
Residential	SA-0054-WOL	0
Employment	E1	0
Employment	E2	0
Employment	E3	-
Employment	E4	-
Employment	E5	0
Employment	E6	0
Employment	E7	0
Employment	E8	0
Employment	E9	0
Employment	E10	0
Employment	E11	0
Employment	E12	0
Employment	E13	0
Employment	E14	-
Employment	E15	-
Employment	E16	-
Employment	E17	0
Employment	E18	-
Employment	E19	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	-
Employment	E24	-
Employment	E25	-
G&T	GT1	-

C.13 SA Objective 12: Health

C.13.1 NHS Hospital with Accident & Emergency Department

C.13.1.1 New Cross Hospital is located within Wolverhampton, to the north east, and provides an Accident and Emergency (A&E) department. Other nearby hospitals with A&E departments include Manor Hospital, situated approximately 3.7km to the east of the city, in Walsall. 46 sites are located within 5km of these hospitals and could therefore potentially have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. However, two sites (H12 and H18) are located over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

C.13.2 Pedestrian Access to GP Surgery

C.13.2.1 There are 72 GP surgeries within Wolverhampton serving the local communities, although certain areas of the city (such as Finchfield and Wergs, in the west) have less coverage, and as such these areas could potentially have somewhat restricted access to healthcare. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. Sustainable pedestrian access to these services is considered to be under a 15-minute travel time.

C.13.2.2 Nine sites in Wolverhampton are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare. On the other hand, 18 sites in Wolverhampton are located within a 10-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a major positive impact on access to healthcare, based on existing infrastructure. The remaining 21 sites are within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites would be expected to have a minor positive impact on access to healthcare.

C.13.3 Public Transport Access to GP Surgery

C.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey, and according to accessibility modelling data, there are only small pockets of the city where these criteria would not be met. All of the reasonable alternative sites within Wolverhampton are located in areas within this travel time to a GP surgery via public transport. 38 sites are located within a 10-minute journey and would therefore be expected to have a major positive impact on sustainable access to healthcare. The remaining 10 sites are located within a 15-minute journey and would therefore be expected to have a minor positive impact on sustainable access to healthcare.

C.13.4 Access to Greenspace

C.13.4.1 Greenspaces are distributed throughout the city, including parks, allotments, playing fields and sports facilities. All sites in Wolverhampton are located within 600m of one or more

greenspaces. Therefore, a minor positive impact would be expected at the majority of sites, as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

C.13.5 Net Loss of Greenspace

C.13.5.1 One reasonable alternative site, Site E19, wholly coincides with 'Bowling Green' greenspace located adjacent to Loverose Way, according to OS Open Greenspaces data⁶. Information provided by the Council indicates the 'Bowling Green' has not been used for over 15 years and is not a public greenspace, and as such a negligible impact is identified.

C.13.5.2 Site E12 does not coincide with any OS Open Greenspaces⁷, however, information provided by the Council has indicated that the entirety of the site coincides with public open space. The proposed development at Site E12 could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

C.13.6 Public Right of Way/Cycle Path

C.13.6.1 The majority of sites in Wolverhampton are located within 600m of the PRow and/or cycle network. The proposed development at these 47 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

C.13.6.2 Conversely, Site E22 is located wholly over 600m from the cycle network and is partially located within 600m to PRow, however, the majority of the site is located outside 600m of the PRow. Therefore, the proposed development at the site could potentially have a minor negative impact on pedestrian and cycle access.

⁶ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 01/12/23]

⁷ Ibid

Table C.13.1: Sites impact matrix for SA Objective 12 – Health

Site Use	Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Residential	H1	+	+	++	+	0	+
Residential	H2	+	++	++	+	0	+
Residential	H3	+	+	++	+	0	+
Residential	H4	+	+	+	+	0	+
Residential	H5	+	+	++	+	0	+
Residential	H6	+	++	++	+	0	+
Residential	H7	+	++	++	+	0	+
Residential	H8	+	++	++	+	0	+
Residential	H9	+	++	+	+	0	+
Residential	H10	+	++	++	+	0	+
Residential	H11	+	++	++	+	0	+
Residential	H12	-	++	++	+	0	+
Residential	H13	+	+	++	+	0	+
Residential	H14	+	+	++	+	0	+
Residential	H15	+	+	++	+	0	+
Residential	H16	+	++	++	+	0	+
Residential	H17	+	++	++	+	0	+
Residential	H18	-	++	++	+	0	+
Residential	H19	+	+	++	+	0	+
Residential	H20	+	++	++	+	0	+
Residential	H21	+	++	++	+	0	+
Residential	SA-0054-WOL	+	+	+	+	0	+
Employment	E1	+	+	+	+	0	+
Employment	E2	+	+	++	+	0	+
Employment	E3	+	+	++	+	0	+
Employment	E4	+	+	++	+	0	+
Employment	E5	+	-	++	+	0	+
Employment	E6	+	-	++	+	0	+
Employment	E7	+	-	++	+	0	+
Employment	E8	+	+	++	+	0	+
Employment	E9	+	++	++	+	0	+
Employment	E10	+	++	++	+	0	+
Employment	E11	+	++	++	+	0	+
Employment	E12	+	+	++	+	-	+
Employment	E13	+	-	++	+	0	+
Employment	E14	+	+	++	+	0	+
Employment	E15	+	+	++	+	0	+
Employment	E16	+	+	+	+	0	+
Employment	E17	+	++	++	+	0	+
Employment	E18	+	+	++	+	0	+

Site Use	Site Ref	NHS Hospital with A&E Department	Pedestrian Access to GP Surgery	Public Transport Access to GP Surgery	Access to Greenspace	Net Loss of Greenspace	PRoW/ Cycle Path
Employment	E19	+	-	+	+	0	+
Employment	E20	+	+	+	+	0	+
Employment	E21	+	-	++	+	0	+
Employment	E22	+	-	+	+	0	-
Employment	E23	+	++	++	+	0	+
Employment	E24	+	-	++	+	0	+
Employment	E25	+	-	++	+	0	+
G&T	GT1	+	+	++	+	0	+

C.14 SA Objective 13: Economy

C.14.1 Employment Floorspace Provision

- C.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- C.14.1.2 There are 25 reasonable alternative sites proposed for employment use, 23 of which currently comprise areas of undeveloped land. Therefore, the proposed development at these 23 sites would be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Sites E3 and E15 currently coincide with various employment sites including 'Auto Body Wolverhampton', 'AB Service', 'CL Refurbishments' and 'ADT Furnishings'. At this stage, it is uncertain whether the proposed development at these two sites would result in a net change in employment floorspace.
- C.14.1.3 10 sites proposed for residential use coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at two of these sites (H14 and H19) could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at eight of these sites could potentially have a major negative impact due to the possible loss of a large area of employment land.
- C.14.1.4 Sites H15, H17 and H20 coincide with a yard area that could still be an active employment site, office space, and Probert Court Nursing Home, respectively; however, it is uncertain whether these land uses are currently active employment land. It is uncertain whether the proposed development at these three sites would result in a net change in employment floorspace.
- C.14.1.5 The remaining residential and Gypsy and Traveller site are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

C.14.2 Pedestrian Access to Employment Opportunities

- C.14.2.1 Wolverhampton would be expected to provide a range of employment opportunities for new and current residents. Accessibility modelling data shows the distribution of employment locations, with a total of 136 mapped locations, generally clustered within the city centre and the large industrial/retail estates in the south, north and east of the city. According to the data, sustainable pedestrian access to employment opportunities (within a 30-minute walk) can be expected throughout the city, with the exception of a small proportion close to the western boundary. All residential sites and the singular Gypsy and Traveller site are located within 20-minute walk to employment locations and would therefore be expected to have a major positive impact on pedestrian access to employment opportunities.

C.14.3 Public Transport Access to Employment Opportunities

C.14.3.1 Accessibility modelling data indicates that the whole of Wolverhampton is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All proposed residential / Gypsy and Traveller sites in Wolverhampton are wholly within a 20-minute journey. Therefore, development at all sites would be expected to have a major positive impact on sustainable access to employment opportunities.

Table C.14.1: Sites impact matrix for SA Objective 13 – Economy

Site Use	Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
Residential	H1	--	++	++
Residential	H2	0	++	++
Residential	H3	0	++	++
Residential	H4	--	++	++
Residential	H5	--	++	++
Residential	H6	--	++	++
Residential	H7	0	++	++
Residential	H8	0	++	++
Residential	H9	--	++	++
Residential	H10	0	++	++
Residential	H11	0	++	++
Residential	H12	--	++	++
Residential	H13	--	++	++
Residential	H14	-	++	++
Residential	H15	+/-	++	++
Residential	H16	0	++	++
Residential	H17	+/-	++	++
Residential	H18	0	++	++
Residential	H19	-	++	++
Residential	H20	+/-	++	++
Residential	H21	0	++	++
Residential	SA-0054-WOL	--	++	++
Employment	E1	++	0	0
Employment	E2	++	0	0
Employment	E3	+/-	0	0
Employment	E4	++	0	0
Employment	E5	++	0	0
Employment	E6	++	0	0
Employment	E7	++	0	0
Employment	E8	++	0	0
Employment	E9	++	0	0
Employment	E10	++	0	0
Employment	E11	++	0	0
Employment	E12	++	0	0

Site Use	Site Ref	Employment Floorspace Provision	Pedestrian Access to Employment Opportunities	Public Transport Access to Employment Opportunities
Employment	E13	++	0	0
Employment	E14	++	0	0
Employment	E15	+/-	0	0
Employment	E16	++	0	0
Employment	E17	++	0	0
Employment	E18	++	0	0
Employment	E19	++	0	0
Employment	E20	++	0	0
Employment	E21	++	0	0
Employment	E22	++	0	0
Employment	E23	++	0	0
Employment	E24	++	0	0
Employment	E25	++	0	0
G&T	GT1	0	++	++

C.15 SA Objective 14: Education, Skills and Training

C.15.1 Pedestrian Access to Primary School

C.15.1.1 There are 94 primary schools distributed throughout Wolverhampton. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of primary schools and areas within a sustainable travel time to these schools for pedestrians. Some small areas of the city lie outside of the sustainable 15-minute walk to a primary school, whereas the majority of the city would be expected to meet these criteria.

C.15.1.2 23 sites proposed for residential / Gypsy and Traveller use are located within a 15-minute walking distance to a primary school. Of these 23 sites, the majority (19 sites) are located within a 10-minute walking distance to a primary school, therefore, the proposed development at these 19 sites would be expected to have a major positive impact on pedestrian access to primary schools. The remaining four sites are located within a 15-minute walking distance to a primary school; therefore, the proposed development at these four sites could potentially have a minor positive impact on pedestrian access to primary schools.

C.15.2 Pedestrian Access to Secondary School

C.15.2.1 There are 22 secondary schools in Wolverhampton, and similarly to primary schools, almost the entirety of the city is identified as being within a sustainable travel time for pedestrians.

C.15.2.2 Two residential sites (H9 and SA-0054-WOL) are situated in the areas of the city outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education. Conversely, 21 residential / Gypsy and Traveller sites in Wolverhampton are within a 25-minute walk to a secondary school, and 14 of these are located within a 20-minute walk to a secondary school, and would therefore be expected to encourage pedestrian access to secondary schools and have a major positive impact on education, skills and training. The remaining seven sites are located within a 25-minute walk to a secondary school, and would therefore be expected to encourage pedestrian access to secondary schools and have a minor positive impact on education, skills and training.

C.15.3 Public Transport Access to Secondary School

C.15.3.1 Existing public transport within Wolverhampton is widespread and would be likely to provide current and future residents in most areas with suitable access to secondary schools in the local and surrounding area, according to the accessibility modelling data.

C.15.3.2 The majority of proposed residential / Gypsy and Traveller sites (22) are located within a 25-minute public transport journey to a secondary school, and of these 22 sites 18 are located within a 20-minute public transport journey to a secondary schools; therefore, the proposed development at these 18 sites would be expected to have a major positive impact

on sustainable access to education, based on current infrastructure. The remaining four sites are located within a 25-minute public transport journey to secondary schools; therefore, the proposed development at these sites would be expected to have a minor positive impact on sustainable access to education, based on current infrastructure.

C.15.3.3 However, Site H18 is located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at the site could potentially have a minor negative impact on new residents’ access to education, based on current infrastructure.

Table C.15.1: Sites impact matrix for SA Objective 14 – Education, skills and training

Site Use	Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
Residential	H1	++	++	++
Residential	H2	++	++	++
Residential	H3	++	++	++
Residential	H4	++	++	++
Residential	H5	++	+	++
Residential	H6	++	++	+
Residential	H7	++	++	+
Residential	H8	++	+	++
Residential	H9	+	-	++
Residential	H10	++	++	++
Residential	H11	++	++	++
Residential	H12	++	++	+
Residential	H13	++	++	+
Residential	H14	+	+	++
Residential	H15	++	+	++
Residential	H16	++	+	++
Residential	H17	++	++	++
Residential	H18	++	+	-
Residential	H19	++	++	++
Residential	H20	++	++	++
Residential	H21	++	++	++
Residential	SA-0054-WOL	+	-	++
Employment	E1	0	0	0
Employment	E2	0	0	0
Employment	E3	0	0	0
Employment	E4	0	0	0
Employment	E5	0	0	0
Employment	E6	0	0	0
Employment	E7	0	0	0
Employment	E8	0	0	0
Employment	E9	0	0	0
Employment	E10	0	0	0
Employment	E11	0	0	0
Employment	E12	0	0	0
Employment	E13	0	0	0

Site Use	Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Public Transport Access to Secondary School
Employment	E14	0	0	0
Employment	E15	0	0	0
Employment	E16	0	0	0
Employment	E17	0	0	0
Employment	E18	0	0	0
Employment	E19	0	0	0
Employment	E20	0	0	0
Employment	E21	0	0	0
Employment	E22	0	0	0
Employment	E23	0	0	0
Employment	E24	0	0	0
Employment	E25	0	0	0
G&T	GT1	+	+	++

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Eagle Tower

Montpellier Drive

Cheltenham

GL50 1TA

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELTENHAM



Lepus Consulting
Eagle Tower
Montpellier Drive
Cheltenham
Gloucestershire GL50 1TA

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com

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Wolverhampton Local Plan

Issues & Preferred Options Consultation Summary Leaflet (text only)

We are preparing the Wolverhampton Local Plan and would like to hear your views

Introduction

City of Wolverhampton Council is consulting on a new Plan for Wolverhampton. This Plan is designed to support the growth and regeneration of the City and to protect and enhance the characteristics that make Wolverhampton a special place to live, work and visit.

To do this, the Plan will set out where new housing and employment development and infrastructure investment will take place up to 2042, areas of the City where development will be restricted, and areas of environmental and historic importance which will be priorities for conservation and enhancement. The Plan will also include a set of 'policies' – the rules which are used to determine planning applications for a wide range of development proposals.

This leaflet summarises the main proposals in the “Issues and Preferred Options” consultation for the Wolverhampton Local Plan. More information is available at www.wolverhampton.gov.uk/localplan and at Wolverhampton Civic Centre and all of Wolverhampton’s libraries - please turn to the final pages of this leaflet for further details.

What is a Local Plan?

All Councils are legally required to write and consult on a Local Plan that decides where the new development that is needed for the next 15 years will be located, how development will be designed and managed and which areas will be protected from development.

The Plan must consider the amount of land required to support future jobs and provide new housing, and where any other development is needed. The Plan also details where any extra infrastructure is needed to support development, such as schools, green space, health services, public transport, cycle routes and highway improvements.

The Plan will go through two stages of consultation. This Issues & Preferred Options consultation is the first stage and the second stage is called the Publication Plan. It is then submitted to the Government and an independent Planning Inspector is appointed to carry out a public examination of the Plan. If the Planning Inspector concludes that the Plan has been correctly prepared, then it can be adopted by the Council. When adopted, the Plan is used to help decide planning applications, alongside a range of national policy and guidance.

Do we have a Local Plan in place now?

Yes, Wolverhampton has a Local Plan which is made up of a number of documents:

- The Black Country Core Strategy (BCCS) (2011)
- Area Action Plans (AAPs) (2014-16) for the main regeneration areas in the City
- Parts of the Wolverhampton Unitary Development Plan (2006)

These Plans together provided the framework to allocate development to meet Wolverhampton's needs up to 2026. These allocations were made through the Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre AAPs.

In addition to the Wolverhampton Local Plan, two Neighbourhood Plans were prepared by local community groups covering Tettenhall and Heathfield Park. These Neighbourhood Plans can only be updated by the local community and are not part of the Wolverhampton Local Plan work.

Why are we preparing the Wolverhampton Local Plan?

The Local Plan for Wolverhampton is now over five years old. The Government requires Councils to have Local Plans that are less than five years old and based on up-to-date information. We need to prepare the Wolverhampton Local Plan now to ensure that we can plan for new homes and jobs in the right places.

When did we start preparing the Wolverhampton Local Plan?

Between 2017 and 2022 City of Wolverhampton Council worked with Dudley, Sandwell and Walsall Councils to prepare a Black Country Plan which would replace the Black Country Core Strategy. This work included an Issues and Options consultation, invitations for developers and landowners to submit potential development sites, and consultation took place in summer 2021 on a Draft Black Country Plan supported by a comprehensive range of evidence. There were a large number of responses to this consultation.

In October 2022, work ceased on the Black Country Plan and the four Councils decided to prepare separate Local Plans. Wolverhampton Council decided to prepare a Wolverhampton Local Plan (WLP) which builds on the significant work and consultation which has already taken place on the Black Country Plan.

The WLP Issues and Preferred Options consultation takes full account of the planning issues raised in the Draft Black Country Plan consultation responses (where these relate to Wolverhampton) and draws on the most up-to-date evidence and national policy.

What does the Wolverhampton Local Plan need to plan for?

The WLP will guide and manage development in Wolverhampton up to 2042. The Plan will decide where larger housing and employment developments will be located across Wolverhampton.

The WLP will also provide new planning policies for Wolverhampton covering a range of planning issues, such as climate change, environment, design, centres, transport

and waste. When the WLP has been adopted it will replace the BCCS and parts of the AAPs, for the purposes of planning in Wolverhampton.

The WLP will make some key decisions about the future development of Wolverhampton, to address these **big issues**:

- **Climate Change** - How can we help reduce carbon emissions and adapt to climate change?
- **A growing and changing population** – How do we meet the needs of a diverse and ageing population that is expected to grow by 10% by 2042? How much housing is needed, of what type and where should it go?
- **Health and wellbeing** - How can we create healthy and safe places?
- **Economic recovery and growth** - Where does employment land need protection? How much new employment land is needed and where should it go?
- **Town Centres and Shopping** - How can we ensure town centres are vibrant and attractive?
- **Transport and connectivity** – How do we strengthen the transport network and promote active travel and public transport?
- **Natural and built environment** - How will our heritage and wildlife be protected and improved? How can we provide the most sustainable and beautiful development possible served by high quality green spaces?
- **Supporting infrastructure** - What improvements to infrastructure such as digital networks will be needed to support new development?

<p>Question A: Do you agree with the “big issues” identified for the Wolverhampton Local Plan to address?</p>
--

The WLP needs to identify enough land to meet our future employment needs and provide sufficient homes for new households. Evidence shows that we need 116 hectares (ha) of additional employment land to provide enough jobs to meet the growth needs of our existing and future businesses.

Legislation requires us to use Government housing targets when preparing our Local Plan. The Government predicts there will be 16,100 extra households by 2042. In order to provide each of these new households with a new home and also provide an extra 35% (because we are one of the 25 largest towns and cities in England) the Government target is to provide enough land to build 21,700 homes by 2042. This would require a 55% increase in the number of homes built each year in Wolverhampton (from 700 to 1,085 homes). There is not enough developable land in Wolverhampton to physically provide this much housing.

What is the Wolverhampton Local Plan “Preferred Option” that we are consulting on?

The City has high housing and employment growth needs. However, Wolverhampton is a very constrained and densely developed urban area with valuable pockets of green belt. We have considered a number of different options for the Plan.

In order to meet our legal requirements, deliver a balanced amount of sustainable development and protect areas of environmental value, our Preferred Option will:

- **Protect and retain all of our valuable Green Belt**
- **Protect and enhance our natural and historic environment**
- **Deliver 10,300 new homes by 2042** on 190 hectares (ha) of land (the equivalent of 285 football pitches), which will continue current rates of housing delivery across the City to meet local needs. Most of this land already has planning permission or is allocated in existing Plans.
- **Make most efficient use of land and boost regeneration**, by locating 44% of new homes in Wolverhampton City Centre and 97% on brownfield land, and building at a high average density of 55 homes per ha (compared to 40 homes per ha on a normal housing estate).
- **Support the recovery and growth of the economy**, particularly in high quality manufacturing, and identify 63 ha of land (equivalent to 95 football pitches) for the employment development that Wolverhampton needs.
- In light of the challenges facing our high streets, particularly vacancies, **help to rejuvenate and diversify our centres** as places to live, work, shop and visit.
- **Minimise the amount of waste generated** across all sectors and increase the re-use, recycling, and recovery rates of waste material.
- **Ensure enough physical, social and environmental infrastructure (such as transport and green space) is delivered** to meet identified needs and support growth.

Where will the growth take place?

Our Preferred Spatial Option – Urban and Brownfield First

The Preferred Option will deliver 10,300 new homes in the urban area - making best use of brownfield sites, vacant properties and poor quality industrial land, and building at high densities whilst protecting local character and providing a mix of house types to meet local needs. Infrastructure (e.g. transport, education, health and public open space) will be strengthened where needed to serve new residents.

New housing will be broadly distributed across the City as set out below:

- 44% in Wolverhampton City Centre – encouraging City Centre living by significantly increasing the creation of new homes
- 22% in regeneration areas around town centres and along transport corridors – including surplus, poor quality industrial land
- 33% in existing residential areas – assuming that small sites (such as building conversions and garage sites) will keep coming forward at current rates

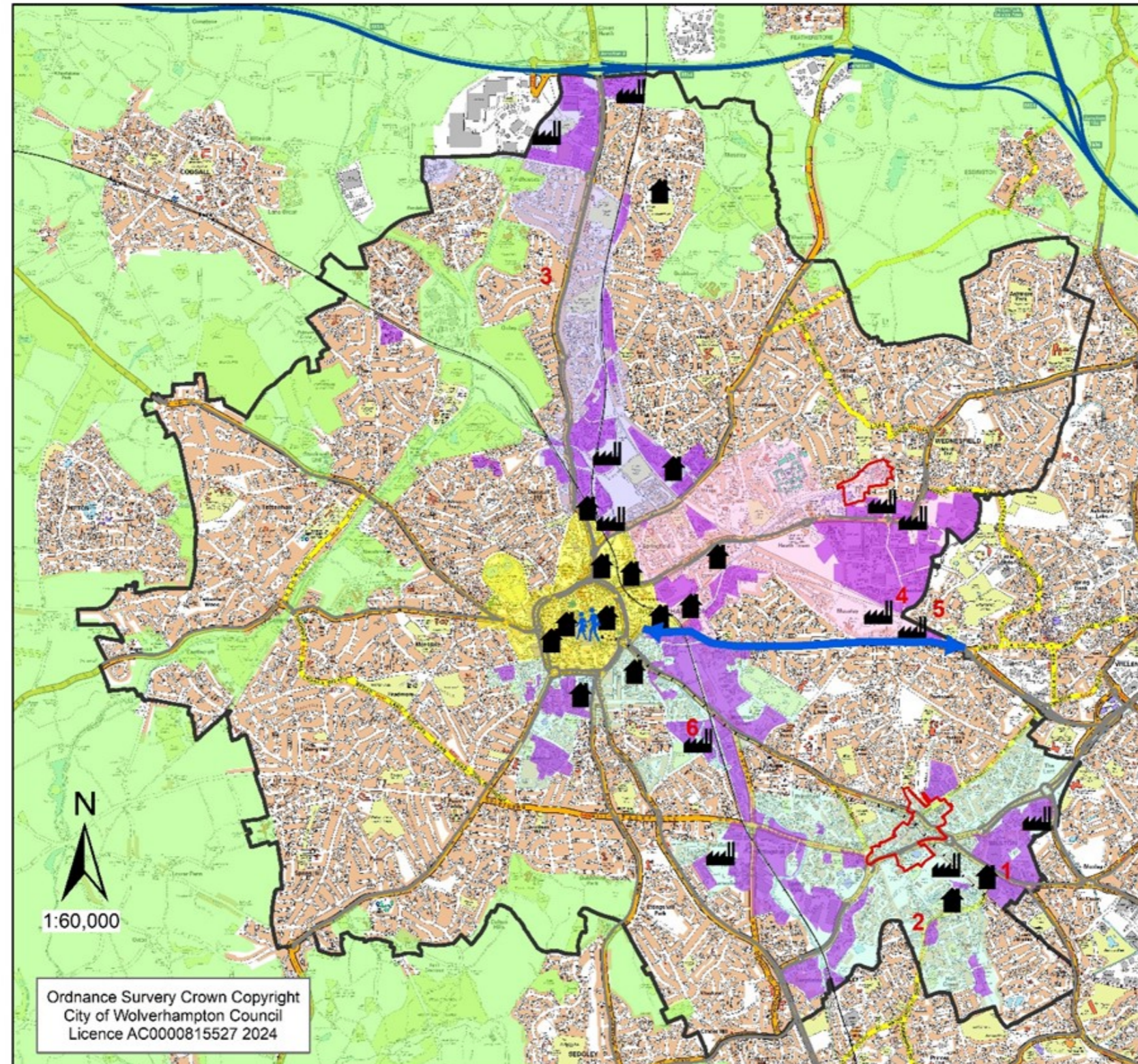
The Preferred Option will also deliver 63ha of new employment development, 100% of which would be in regeneration areas around town centres and along transport corridors. The map overleaf shows the Preferred Spatial Option, which will deliver Balanced and Sustainable Growth.

<p>Question B: Do you agree with the Preferred Spatial Option for the Wolverhampton Local Plan?</p>
--

Which sites will be developed?

This map shows where the larger proposed housing and employment development sites are located. Detailed boundaries and guidance on the individual sites is contained in the main document at www.wolverhampton.gov.uk/localplan

We have worked hard to identify more brownfield land for housing and employment development in the urban area, pushing up densities and maximising housing capacity in the City Centre, town centres and regeneration areas.



Most of the identified sites have already been granted planning permission or are allocated in other Plans. New sites are proposed on surplus Council and industrial land at:

- 1. Former Loxdale Primary School, Chapel Street, Bradley (100 homes)**
- 2. Factory site at Lane Street / Highfields Road, Bradley (72 homes)**
- 3. Former Probert Court/ Health Centre, Probert Road (35 homes)**
- 4. Land at Neachells Lane off Willenhall Road (6.7 ha employment land)**
- 5. Land at Neachells Lane off Noose Lane (1.2 ha employment land)**
- 6. Former MEB site, Major Street / Dixon Street (2.5 ha employment land)**

The location of these sites are identified on the map by **red** site numbers **1 - 6**.

It should be noted that it is never possible to identify every piece of brownfield land which may come forward for housing over a 15 year period – the job of the Plan is to identify the larger sites and to make an estimate of how much housing is likely to come forward on smaller sites.

What has changed since the Draft Black Country Plan consultation?

Our Preferred Option is to completely protect the whole of Wolverhampton's Green Belt. This means we are **not** proposing to develop any Green Belt sites, which includes:

- Land at Bushbury
- Land at Fallings Park
- Former Wolverhampton Environment Centre (WEC), Westacre Crescent
- The 'Seven Cornfields' (land at Pennwood Farm)

We have listened carefully to planning issues raised during consultation on the Draft Black Country Plan in 2021 and looked at new evidence. As a result, we are **not** proposing to develop these greenfield sites in the urban area:

- Grapes Pool (Moseley Road Open Space)
- Former St Luke's Junior School, Goldthorn Road
- Open Space at Wrenbury Drive, The Lunt (Alexander Metals)

Question C: Do you agree with the proposed site allocations for the Wolverhampton Local Plan?
--

Are we able to build all the housing and employment development that we need in Wolverhampton?

No. We need to find enough land to build 21,700 homes and 106ha of employment land to meet the Government's target but the preferred option would deliver only 10,300 homes, leaving a shortfall of 11,400 homes, and 63ha of employment land, leaving a shortfall of 53ha. In this situation we are legally required to ask neighbouring Councils, such as South Staffordshire, Lichfield and Shropshire, to provide more housing and employment land in their area to help meet the Wolverhampton shortfalls and such discussions are on-going.

What changes will we make to planning policies?

The Preferred Option will strengthen some of our existing policies **to address the Climate Crisis, improve the environment and tackle local health issues:**

- promotion of sustainable and active transport
- higher renewable energy, energy efficiency and water efficiency standards for development
- protection of existing trees and providing new trees through development
- addressing the health impacts of development, including hot food takeaways, betting shops and shisha bars
- protection of water quality and air quality
- making sure new homes have enough internal space

Question D: Do you agree with the preferred approach to policies in the Wolverhampton Local Plan?

Question E: Do you have any other comments to make about the Wolverhampton Local Plan?

What happens next?

Have your say - we welcome your views

Please visit the website: www.wolverhampton.gov.uk/localplan

On the website you will find this leaflet, the Issues & Preferred Options main document, evidence documents, an interactive map and access to online response forms.

We would encourage you to use the short online survey that is designed to be quick and easy to complete, where you can answer the questions in this leaflet and make any other comments about the Wolverhampton Local Plan. A longer response form about the more detailed Issues & Preferred Options main document is also available.

Paper copies of this leaflet, response forms and the main documents (for reference) are available at:

- Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1RP (at the business reception by the mayoral entrance)
- All of Wolverhampton's libraries

Drop-in: you can view the consultation documents and speak to Planning Officers at the following drop-in sessions:

Wednesday 6th March, 9am – 5pm

Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1SH

Thursday 7th March, 3pm – 7pm and

Saturday 9th March, 10am – 2pm

Wolverhampton Central Library, Snow Hill, Wolverhampton WV1 3AX

Tuesday 12th March, 10am - 1pm

Wednesfield Library, 2 Well Lane, Wednesfield WV11 1XT

Wednesday 13th March, 4pm - 7pm

Bilston Library, Mount Pleasant, Bilston WV14 7LU

Thursday 14th March, 2pm – 5pm

Tettenhall Library, St Michael's Parish Centre, Upper Street, Tettenhall, WV6 8QF

If you need help understanding the documents, completing the response forms, or would like to discuss with Planning Officers, please contact the Wolverhampton Local Plan Team at: localplan@wolverhampton.gov.uk or Tel: 01902 551155

Please send paper responses to Wolverhampton Local Plan, City Planning, City of Wolverhampton Council, Civic Centre, St Peter’s Square, Wolverhampton WV1 1RP

Or hand them in at Wolverhampton Civic Centre

What is the deadline for responses?

The consultation will end at **5:00 pm on Wednesday 10 April 2024**
Please provide your response to us by this date.

How will my response be used?

We will use your response to inform the preparation of next stage of the Plan, which is called the Publication Wolverhampton Local Plan. Please note that the content of responses will be made public.

Wolverhampton Local Plan Timetable

Issues and Preferred Options Consultation	26 February – 10 April 2024
Publication Consultation	Dec 2024 – Jan 2025
Submission to Government	June 2025
Independent Examination by Planning Inspector	June 2025 – Spring 2026
Adoption by City of Wolverhampton Council	Mid 2026

You can get this information in large print, Braille, audio or in another language by calling 01902 551155 or requesting a copy at wolverhampton.gov.uk/customerservices

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Wolverhampton WV1 1SH

Wolverhampton Local Development Scheme 2024-2027

February 2024

**CITY OF
WOLVERHAMPTON
COUNCIL**

1. Introduction

- 1.1 This Local Development Scheme (LDS) has been prepared in accordance with the requirements of The Planning and Compulsory Purchase Act 2004 (as amended) and sets out:
- The Local Development Documents (LDDs) which are to be Development Plan Documents (DPDs);
 - The subject matter and geographical area to which each DPD is to relate;
 - Which DPDs are to be prepared jointly with one or more other local planning authorities;
 - The timetable for the preparation and revision of the DPDs
- 1.2 The LDS sets out the timetable for the preparation or revision of any LDDs covering the Wolverhampton area for the period 2024-2027, and supersedes all previous versions of the Wolverhampton LDS.

2. Wolverhampton Development Plan Documents

- 2.1 The Local Development Documents covering the City of Wolverhampton Council local authority area which are to be defined as Development Plan Documents through this LDS are:
- Wolverhampton Unitary Development Plan – adopted 2006 (saved policies)
 - Black Country Core Strategy – adopted 2011
 - Wolverhampton Local Plan (to be prepared to replace the Black Country Core Strategy)
 - Bilston Corridor Area Action Plan – adopted 2014
 - Stafford Road Corridor Area Action Plan – adopted 2014
 - Wolverhampton City Centre Area Action Plan – adopted 2016
- 2.2 The Wolverhampton Unitary Development Plan was the single plan covering the Wolverhampton area when it was adopted in 2006. It included both strategic and local policies and all allocations and designations.
- 2.3 The Black Country Core Strategy is a strategic plan prepared jointly by the Black Country authorities (Dudley, Sandwell, Walsall and Wolverhampton) to cover the Black Country area (Dudley, Sandwell, Walsall and Wolverhampton) for the period 2006-2026. The Core Strategy addresses strategic priorities for the Black Country, covers all subject areas at a strategic level and indicates broad locations for development on a key diagram. The Core Strategy replaced various policies and allocations in the Wolverhampton Unitary Development Plan when it was adopted in 2011.
- 2.4 The three Area Action Plans were prepared to set out local policies, allocations and designations for the three key regeneration areas identified in the Black Country Core Strategy. These Area Action Plans replaced various policies and

allocations in the Wolverhampton Unitary Development Plan when they were adopted in 2014 / 2016.

3. Timetable for Preparation and Revision of Wolverhampton Development Plan Documents

- 3.1 The NPPF requires all local planning authorities to complete a review of DPDs which have been adopted for five or more years and to decide either:
- that their policies do not need revising and publish their reasons for this decision; and/ or
 - that one or more policies do need revising, and update their LDS to set out the timetable for this revision.

3.2 This LDS fulfils the requirements of the NPPF in this regard, as set out below:

DPD	Years since adoption	Need for revision during 2024-27?	Reasons for decision
Wolverhampton UDP (saved policies)	18	No	All parts of the UDP which currently required updating have been replaced through subsequent adoption of the Black Country Core Strategy and Area Action Plans.
Black Country Core Strategy (BCCS)	13	Yes	A review of the BCCS which took place in 2017 confirmed the need for updating. This update was progressed by the four Black Country Councils during 2017-22 in the form of the Black Country Plan (BCP) review. This included Issues and Options consultation in 2017 and Regulation 18 Draft Plan consultations in 2021 and 2022. In autumn 2022 a decision was taken by the Black Country authorities not to continue the BCP. For Wolverhampton, the review and updating of the BCCS will be taken forward through the Wolverhampton Local Plan with a preparation timetable included in this LDS.
Bilston Corridor Area Action Plan	10	No	Preparation of the Wolverhampton Local Plan will review and replace any policies and allocations which require revising.

DPD	Years since adoption	Need for revision during 2024-27?	Reasons for decision
Stafford Road Corridor Area Action Plan	10	No	Preparation of the Wolverhampton Local Plan will review and replace any policies and allocations which require revising.
Wolverhampton City Centre Area Action Plan	8	No	The WLP will not include allocations for that part of the Wolverhampton City Centre AAP area which falls within the defined Strategic Centre. As the new national planning system does not permit the preparation / review of an Area Action Plan, a Wolverhampton City Centre Supplementary Plan will instead be prepared to make any required additional housing allocations in Wolverhampton City Centre (Strategic Centre), to ensure that sufficient housing allocations are made to deliver WLP housing targets. The timetable for this is set out in this LDS (subject to national legislation and guidance when available).

Wolverhampton Local Plan

3.3 City of Wolverhampton Council is currently working on preparation of a Wolverhampton Local Plan (WLP) which will build on the work undertaken to date on the Black Country Plan review and ultimately replace the Black Country Core Strategy for Wolverhampton, and housing and employment site allocations included in the Bilston Corridor AAP, Stafford Road Corridor AAP and parts of the City Centre AAP which do not fall within the Strategic Centre boundary. The subject matter scope of the new Plan will therefore be wider than the existing BCCS, including new site allocations and a review of existing allocations. The new Plan will include all of the strategic policies for Wolverhampton, as defined in the National Planning Policy Framework (NPPF). The Issues and Preferred Options consultation will seek views on the preparation of a WLP, building on work undertaken for the BCP and substantially taking forward the vision, spatial strategy, policies and site allocations of the Regulation 18 Draft Black Country Plan (BCP), with a number of proposed amendments in response to issues raised during the Draft BCP consultation, and up-to-date evidence, national legislation and guidance.

- 3.4 The timetable for the review is set out below (including those stages of the Black Country Plan review which remain relevant to preparation of the WLP). This review will take place under the current Local Plan system, with submission due to take place by June 2025 in accordance with transitional arrangements set out in the Levelling-up and Regeneration Act (2023).

Wolverhampton Local Plan Preparation Timetable

Stage	Timescale
Black Country Plan Issues and Options Consultation (Regulation 18)	July – September 2017
Draft Black Country Plan Consultation (Regulation 18)	August – October 2021
Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18)	February – April 2024
Wolverhampton Local Plan Publication Consultation (Regulation 19)	December 2024 – January 2025
Submission	Mid 2025
Examination	Mid 2025 – Mid 2026
Adoption	Mid 2026

Wolverhampton City Centre Supplementary Plan

- 3.5 Following adoption of the WLP, there will be a need to review the existing housing commitments and allocations for Wolverhampton City Centre and to prepare a Wolverhampton City Centre Supplementary Plan under the new national planning system in order to provide any additional housing allocations required to meet WLP housing targets. The stages for preparation of a Supplementary Plan under the new system are not yet known, however an indicative timetable is set out below:

Wolverhampton City Centre Supplementary Plan Indicative Timetable

Stage	Timescale
Preparation	Mid – Late 2026
Consultation	Late 2026
Submission and Examination	2027
Adoption	2028

- 3.6 No other DPDs are currently programmed for review or preparation during 2024-2027.

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CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	West Midlands Combined Authority Single Settlement Memorandum of Understanding	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Stephen Simkins Leader of the Council	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	David Pattison, Chief Operating Officer	
Originating service	Policy and Strategy	
Accountable employee	Laura Collings Tel Email	Head of Policy and Strategy 01902550414 laura.collings@wolverhampton.gov.uk
Report to be/has been considered by	Strategic Executive Board Scrutiny Board	30 January 2024 21 February 2024

Recommendation for decision:

Cabinet is recommended to:

1. Consider and ratify the Single Settlement Memorandum of Understanding (MoU) (Appendix 1).

Recommendations for noting:

Cabinet is asked to note:

1. The high-level next steps for Single Settlement negotiations and implementation between the West Midlands Combined Authority and His Majesty's Government.
2. Working with the West Midlands Combined Authority and other constituent members the Council will seek to secure the best possible single settlement for the region which tackles inequalities and drives economic growth.
3. That a presentation and report on the Single Settlement was received by Scrutiny Board on the 21 February 2024.

1.0 Purpose

- 1.1 The purpose of this paper is to consider and ratify the single settlement memorandum of understanding (MoU) between the West Midlands Combined Authority (WMCA) and His Majesty's Government (HMG).

2.0 Background

- 2.1 On the 6 September 2023 Cabinet formally endorsed the West Midlands Combined Authority Trailblazer Deeper Devolution Deal (the deal) and agreed to receive further reports as the detailed requirements of the deal developed.
- 2.2 The single settlement represents a significant change in how the region will receive funding from HMG. It will provide the region with multi-year certainty over a consolidated funding allocation. This consolidated funding will replace the individual, short-term and restrictive grants the region currently receives from HMG, ending competitive, time- and capacity-intensive bidding where relevant. This will enable a long-term, joined-up approach to funding delivery, which will support the delivery of local priorities.
- 2.3 WMCA will secure significant additional flexibilities over the funding they receive through the single settlement. This will allow WMCA and constituent authorities to deliver projects and programmes more closely aligned to local needs and opportunities. Empowering local decision making and representing a major power shift from Ministers in Westminster to local leaders in the West Midlands.
- 2.4 A draft of the single settlement MoU was considered and agreed in-principle by Mayor and Portfolio Leaders (MPL) on 3 November 2023. The final version was published by HMG on 22 November 2023 at the Autumn Statement. Constituent local authorities of the WMCA will seek to individually consider the single settlement MoU through their own governance processes.
- 2.5 This item was considered by Scrutiny Board on the 21 February 2024.

3.0 Overview of the Single Settlement

- 3.1 At every Spending Review, WMCA will be allocated a single funding settlement for local transport, adult skills, housing and regeneration, local growth and place, and retrofitting buildings¹.
- 3.2 The funding WMCA receives will cover the length of Spending Review periods and be calculated using allocation formulae. The quantum of single settlement funding WMCA will receive will be confirmed as part of the Spending Review. WMCA will retain the right to refuse the single settlement.

¹ Funding for retrofitting buildings is included on the basis of a pilot arrangement. The scope of retrofit is the subject of on-going negotiations with HMG.

- 3.3 WMCA expect to receive the first single settlement at the beginning of the first financial year after the next Spending Review, likely to be 1 April 2025, but this is subject to HMG confirmation.
- 3.4 Where an individual fund is within scope of the single settlement, WMCA and its constituent local authorities will not need to – nor be able to – bid to government for an additional share beyond what WMCA will be directly allocated as part of the Spending Review process. WMCA and LAs will continue to be able to bid into HMG for competitive funds where they are outside of the scope of the functions of the single settlement.
- 3.5 As set out in the MoU, the single settlement will not include any funding lines that fall within the scope of the local government finance settlement, or which directly underpin local authority statutory and/or core responsibilities.
- 3.6 The above represents only a summary of some of the main features of the MoU. The full MOU is attached at appendix 1 to this report.

4.0 Did anything substantive change in the MoU between MPL and publication?

- 4.1 A draft version of the MoU was agreed ‘in principle’ by MPL on 3 November 2023 and a final version published by HMG on 22 November 2023 at the Autumn Statement. No substantive policy changes to the MoU were made between the MPL decision and publication of the MoU.
- 4.2 The following two items of note arose between MPL and the MoU being published:
- WMCA did not reach an agreement with HMG over the breadth of the retrofit / net zero function of the single settlement. Therefore, a decision on the final scope of the retrofit / net zero pillar of the single settlement was deferred until March 2024 to allow further negotiation to occur.
 - The Department for Transport (DfT) confirmed its position, which was tentative in the MoU draft at MPL, that prior DfT approval will be required for business cases of transport schemes estimated to cost above £200 million funded through the single settlement. This is still a significant increase on the point at which DfT call in business cases as part of the current City Region Sustainable Transport Settlement.

5.0 Next Steps and Further Negotiations with Government

- 5.1 The MoU establishes the basic principles of how the single settlement will operate. However, there will be several further decision points and a lot of work to undertake across the region to prepare for implementation, as below.
- 5.2 The process of implementing the single settlement between now and 1 April 2025 – when WMCA expect to receive the first single settlement allocation will be a complex and significant undertaking for the WMCA and constituent authorities.

- 5.3 Within the region, there will be detailed engagement between the WMCA and LAs during the early part of 2024 to develop, agree and deliver the implementation strategy in the round.
- 5.4 At this early stage in the process, and subject to further conversations with local authorities, WMCA expects the process of implementation to break down into nine broad workstreams and areas of activity:
1. Further negotiations with HMG: The final MoU leaves a number of residual matters to be negotiated with government between now and March 2024, including agreeing: the functional definition of net zero and the terms of the retrofit pilot; the allocation formulae; the details of spending controls; the provisional process for agreeing the outcomes framework; and, potentially, the scope of the business productivity function.
 2. Functional strategies: WMCA's expectation is that strategies for each of the five functions of the single settlement will be agreed by WMCA Board by the end of summer 2024.
 3. Place-based strategies: Work is already underway between WMCA and LAs to scope the development of place-based strategies. WMCA have suggested a three-stage process concluding with a WMCA Board decision by the end of summer 2024, on the basis that place-based strategies will be iterative and can evolve over time.
 4. Single outcomes framework: WMCA are working to agree the process for the outcomes framework by March 2024. The types of outcomes for the single settlement will not be agreed until the next Spending Review, expected to be in November 2024. The region's actual outcome targets would be agreed shortly after the Spending Review, reflecting the quantum of funding confirmed at the Spending Review.
 5. Assurance; strategic finance; and accountability & spending controls: Between now and 1 April 2025 and with multiple milestones in-between, WMCA will, working with LAs, undertake an in-depth review of its internal financial processes and systems to ensure their readiness for the single settlement.
 6. Governance and partnership development: In-depth conversations will be started between the WMCA and LAs in early 2024 about the optimal governance and decision-making structures for the single settlement, as set out in the MoU, taking into account the nature and breadth of the decisions WMCA will have to take collectively and the opportunity presented by the single settlement to strengthen partnership working across the region.
 7. Programme management, integration and delivery: Work is underway now to develop an integrated approach to delivering the single settlement as a 'system', factoring in key decision points for WMCA Board and LAs.

5.5 Working with the West Midlands Combined Authority the Council and the other constituent members of the Council will seek to secure the best possible single settlement for the region.

6.0 Evaluation of alternative options

6.1 Option 1 would be to not ratify the Single Settlement MoU. This would delay or prevent work from progressing between HMG, the WMCA, and local authorities according to the above workstreams.

6.2 Option 2, and the chosen option, is to ratify the Single Settlement MoU in line with the in-principle agreement by Mayoral and Portfolio Leaders on 3 November. This would enable work to progress between HMG, the WMCA, and local authorities according to the above workstreams.

7.0 Reasons for decision(s)

7.1 Cabinet is recommended to consider and ratify the Single Settlement Memorandum of Understanding (MoU) and note the high-level next steps for Single Settlement negotiations and implementation, in order to progress work to receive long-term, consolidated funding, which will replace the individual, short-term and restrictive grants the region currently receives from HMG. This will enable a long-term, joined-up approach to funding delivery, which will, in turn, support the development and delivery of locally-led place-based strategies.

8.0 Financial implications

8.1 At this point in time, the final funding allocation for WMCA's single settlement is unknown. However, as set out in the MoU: "The [funding] formulae [that will be agreed between WMCA and HMG by March 2024] will seek to deliver the principle that the [we will be] no worse off in terms of quantum of funding received than [we] would have been had the single [settlement] not been in place."

8.2 Whilst on the basis of the above, the WMCA does not expect the quantum of funding allocated to the region to significantly increase or decrease, longer term funding certainty, increased flexibility and the direct awards of traditionally competitive funding will enable better strategic financial planning and delivery.

8.3 Uncertainty over the eventual quantum of the single settlement should be set against the backdrop of existing arrangements: the region enjoys no certainty over the funding WMCA will receive via competitive funding processes. Importantly, the WMCA reserves the right to refuse the single settlement as part of its future involvement in the Spending Review process should the region decide the arrangements for the settlement would be detrimental. If WMCA decided to do so, they would be funded through the arrangements in place for other areas (outside of WMCA and GMCA) who are not in receipt of a single settlement.

- 8.4 Beyond the implications relating to the overall funding quantum of the single settlement, should WMCA fail to achieve the outcomes agreed with Government, either through delivery slippage, under performance or by investing in initiatives which do not make a positive contribution towards the agreed outcomes, the WMCA will be subject to a range of ‘interventions’ by HMG².

[AS/01022024/R]

9.0 Legal implications

- 9.1 Although an MoU is not a legally binding agreement, the City of Wolverhampton Council has a responsibility to deliver and adhere to its duties and obligations as set out in the MoU (if any).and, technically, a future government could walk away from it. WMCA’s assessment is that the probability of this occurring is low.
- 9.2 Subject to approval of the recommendation in this report, the City of Wolverhampton Council may be required to enter into the necessary legal agreements for such funding. The Council must therefore ensure that it adheres to all the obligations set out in any legal agreement and legal advice is sought, where appropriate. These obligations may include details of the funds to be provided together with any milestones that must be achieved and any clawback that the Council may be subject to.
- 9.3 That a full audit trail is in place that sufficiently demonstrates the City of Wolverhampton Council’s compliance with the standards as expected.
- 9.4 The Council to ensure that they comply with the applicable statutory and other processes when receiving the funding.
- 9.5 The Council should engage their Monitoring Officer on any potential legal implications of the single settlement for their individual authorities and seek legal advice where appropriate.

[AS/02022024/A]

10.0 Equalities implications

- 10.1 The implementation of the single settlement has the potential to yield a number of positive equalities and socio-economic implications. The Equity Impact Assessment and the Single Assurance Framework process require WMCA to give sufficient care and attention to potential equalities impacts as part of the formulation of individual project business cases.

11.0 All other implications

- 11.1 The single settlement provides a powerful tool to more effectively pursue the vision to deliver on the priorities of our Good Growth strategy for the city. In moving away from delivering target ‘outputs’ from HMG grants over the short-term to delivering target

² See ‘Table A.1 Matrix of Mitigation’ on pages 27 – 28 of the [MoU](#).

'outcomes' under the single settlement over the medium-term, WMCA will have a much greater ability to design interventions, projects, programmes and strategies in line with delivering inclusive growth for the region.

12.0 Schedule of background papers

12.1 [West Midlands Combined Authority Trailblazer deeper devolution deal](#)

13.0 Appendices

13.1 Appendix 1: Memorandum of Understanding for the Single Settlements for Greater Manchester and West Midlands Combined Authorities

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Memorandum of Understanding for the Single Settlements with Greater Manchester and West Midlands Combined Authorities

Memorandum of
Understanding for the Single
Settlements with Greater
Manchester and West
Midlands Combined
Authorities



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PU: 3369

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Introduction

1. At Spring Budget 2023, the Government (HMG) announced the trailblazer devolution deals with Greater Manchester Combined Authority (GMCA) and West Midlands Combined Authority (WMCA). The deals set out HMG's commitment to implement single, departmental style settlements ('single settlements') for GMCA and WMCA ('the MCAs') at the next Spending Review (SR).
2. This Memorandum of Understanding (MoU) sets out the principles under which the single settlements with the MCAs will be agreed and implemented at the next SR. It also outlines the process for agreeing and monitoring outcomes associated with the single settlements and the accountability arrangements. HMG and the MCAs will review this MoU before the end of every SR period to ensure it remains fit for purpose.
3. This MoU covers funding which flows from HMG to the MCAs via the single settlements.¹ It is not intended to apply to funding which flows from HMG to the MCAs via other mechanisms (e.g. Police and Crime Commissioner functions, waste functions or funds outside the scope of the single settlement) or locally-raised funds.

Scope

4. As set out in the trailblazer devolution deals, the single settlements will include HMG funding falling under five thematic policy areas ('themes'). These are: local growth and place; local transport; housing and regeneration; adult skills; and buildings' retrofit² in the MCA areas. As per paragraphs 10-11, buildings' retrofit's inclusion is on a pilot basis for the first single settlements.
5. The MCAs have specific functional responsibilities in each of these themes. Where national HMG funds³ are in scope of the MCAs' functional responsibilities, they will be included in the single

¹The single settlement is an agreement between government, the MCA and its constituent local authorities. However, the MCA Board may decide, at its discretion, to use the single settlement in non-constituent local authority areas if it considers, based on evidence, that doing so would be beneficial to the MCA area.

²This is specifically buildings' retrofit for decarbonisation matters covered by the pilot agreement to devolve retrofit funding set out at paragraphs 212-218 of the trailblazer deeper devolution deals with both MCAs.

³National funds address policy issues and/or opportunities that manifest, potentially to varying degrees, across the country. They do not cover issues and/or opportunities that are demonstrably confined to a limited number of places. As per paragraph 13, the list of funds included and excluded in the single settlement will be confirmed publicly as part of, and on the same day as, the Spending Review.

settlement.⁴ The single settlements will not include any funding lines which fall within the scope of the local government finance settlement, or which directly underpin local authority statutory and/or core responsibilities. The process for determining whether specific funds should be included in the single settlements is set out below.

- a. HMG will use the definitions for functional responsibilities to identify whether a new funding line (whether it be announced at an SR, or between SRs) should be included in the single settlements. If the MCAs have concerns, these should be resolved through the Single Settlements Programme Board ('Programme Board') following the SR. HMG should provide for circumstances in which new funding lines may need to be added to the single settlements following this review.
 - b. HMG will confirm as part of the SR announcements the recommended quantum of the settlements as calculated via formulae linked to the functional responsibilities below. For funding announcements made outside of an SR period, HMG will notify the MCAs in a timely manner as to the consequences for the single settlements.
 - c. Should the MCAs judge this amount and/or the approach taken to conflict with the principles set out in this MoU, they will use the escalation mechanisms detailed at paragraphs 59-64.
 - d. Ultimately, the MCAs reserve the right to reject the settlement in its entirety. In this eventuality, the MCAs would revert to the funding mechanisms and accountability arrangements in place for each individual funding programme.
6. The MCAs' functional responsibilities are outlined below.

Local Growth and Place

- a. Activity that promotes place-based economic development, improves productivity, and aims to reduce inter-and-intra-regional spatial economic disparities.
- b. Coordination and delivery of local programmes to drive business productivity whilst ensuring integration between local and national business support activity, enabling businesses to access support.⁵
- c. Regeneration, place-making, and improvements to local infrastructure.
- d. Activities that promote pride in place, including but not limited to measures to improve social cohesion, the

⁴ If an HMG department changes its name, all the single settlement provisions that applied to the previous department will be transferred to the new department/s.

⁵ As per the trailblazer deeper devolution deals, paragraph 180.

improvement of public facilities and the public realm, for instance on high streets.

Local Transport

- a. Oversight and delivery of the area's transport strategy. This includes developing local transport plans and considering how transport will support wider objectives such as employment, housing and net zero.
- b. Working with their Local Highway Authorities on delivery of local transport capital projects, including but not limited to highways maintenance and small-scale renewals as well as transformational local projects. This excludes strategic national transport infrastructure.
- c. Managing local public transport services, including but not limited to the local bus network, mass transit, local rail integration, integrated multimodal fares, network information and branding, promoting safety and tackling anti-social behaviour.
- d. Delivery of the local active travel strategy and schemes.
- e. Delivery of local transport decarbonisation schemes, such as the local electric vehicle infrastructure funding programmes.
- f. Strategic oversight of the local road network and promotion of road safety.
- g. Undertaking scalable, feasible, and tangible transport innovation, including trialling new transport-related products and processes, improving existing services via technological upgrades, and implementing regulatory changes or best practice.

Adult Skills

- a. All non-apprenticeship adult skills funding and functions⁶, including but not limited to:
 - i. Ensuring that residents aged 19 and over in their area, who are eligible for funding, have access to appropriate education and training
 - ii. Encouraging and providing adults with the skills and learning they need to equip them to progress into, or within, work; or equip them for an apprenticeship or other learning
 - iii. Provision of statutory entitlements to provide free courses for adults⁷

⁶ Subject to consideration of exceptional instances, as per paragraph 133 of the trailblazer deeper devolution deals, and paragraph 66 of this MoU.

⁷ As per The Greater Manchester Combined Authority (Adult Education Functions) Order 2018 ([legislation.gov.uk](https://www.legislation.gov.uk)); The West Midlands Combined Authority (Adult Education Functions) Order 2018 ([legislation.gov.uk](https://www.legislation.gov.uk)); and the Apprenticeships, Skills, Children and Learning Act 2009 and the Adult Skills (Specified Qualifications) Regulations 2010.

Housing and regeneration

- a. Regeneration via enabling and improving local housing supply.
- b. Delivery of capital investments to unlock additional housing and regeneration.
- c. Remediation and development of brownfield sites.

Pilot of buildings retrofit

- a. The MCAs' functional responsibilities will be finalised by spring 2024, and will likely include at a minimum:
 - i. Retrofitting social housing and other residential buildings containing households at risk of fuel poverty in the local area
 - ii. Decarbonising public sector buildings managed by the MCAs and their constituent authorities through the installation of low carbon heat and energy efficiency measures
7. In addition to the scope of the single settlement, which is defined by the functional responsibilities set out above, in the trailblazer devolution deals HMG made commitments to consider whether additional funding streams may be included in future iterations of the single settlement, with reference to the topics listed below:
 - a. funding relating to prevention⁸ early intervention and/or multiple – social, economic and health – disadvantages⁹
 - b. future affordable homes provision¹⁰
 - c. funding for business support programmes¹¹
8. HMG and the MCAs will discuss whether to include these additional funding lines, alongside others relating to specific commitments in the trailblazer deals, reflecting the need to reach an agreement on each of the areas above at different points in time.
9. In GMCA's trailblazer deeper devolution deal, HMG committed to engaging GMCA and its constituent authorities about whether GMCA's allocation of future funding streams relating to prevention, early intervention and/or multiple – social, economic and health – disadvantages could be included in the single settlement. To enable this, this MoU confirms that GMCA will be able to use the provisions at paragraph 16 to present the case for the inclusion of any funding stream it deems in scope of this commitment, to the Programme Board, where HMG will provide a response.

⁸ As per the West Midlands MCA trailblazer deeper devolution deals, paragraph 245.

⁹ As per the Greater Manchester MCA trailblazer deeper devolution deal, paragraphs 243-244.

¹⁰ As per the trailblazer deeper devolution deals, paragraphs 108-110.

¹¹ As per the trailblazer deeper devolution deals, paragraph 180.

Buildings' retrofit pilot

10. The inclusion of buildings' retrofit is a pilot for the first single settlement. Its inclusion does not represent a commitment to permanent inclusion of buildings' retrofit in the single settlements. Whether or not buildings' retrofit continues to be included will be contingent on an assessment of the impact of the pilot. For the duration of the pilot, the buildings' retrofit functional responsibilities will form part of the single settlement and will be subject to the processes outlined in this MoU. The expected duration of the buildings' retrofit pilot is 2025/26 to 2027/28. As a pilot, it may be necessary to have additional conditions on delivery and reporting which will be set out in the section 31 grant, and which will be legally binding.
11. By Spring 2024, we will agree further details on monitoring and evaluation arrangements for the retrofit pilot, as part of the wider work on the outcomes framework. The data and reporting requirements for annual monitoring reports should support the principle of the pilot, gathering sufficient data to effectively compare the pilot's performance with HMG's equivalent schemes.

Determining the quantum at Spending Reviews

12. The trailblazer deals set out that the single settlements represent a change to the wiring and flexibility of funding from central government rather than necessarily to the quantum that the MCAs would have received in the absence of single settlements at a SR. The single settlements' quantum will be determined by a formulaic process and the formulae will take this principle into account. The formulae will provide the MCAs with a share of funds in the single settlement and seek to deliver the principle that they are not worse off than had single settlements not been in place. HMG and the MCAs will agree an annex to this MoU setting out the formulae by Spring 2024. The final single settlements' quantum can only be set at the SR, when the funds in scope are confirmed.
13. Alongside agreement of departments' funding lines through the SR process, there will be a joint process between relevant departments and HMT to identify the nation-wide departmental funds in scope for the single settlement, based on the agreed functional responsibilities of the MCAs. In agreement with the relevant government departments for each theme, HMT will then apply the relevant formula(e) to determine the quantum of funding in each relevant department's budget that is to be included in the single settlements, and this will be included in settlement letters to departments. This will include an assessment of the quantum that

- will become part of the MCAs' single settlements from that department. HMG will set out publicly, as part of the announcement of the SR, details of how the settlement has been calculated, which funds the MCAs will and will not be able to access during the SR period, the total quantum in each theme, the funding profile over financial years, and the resource (RDEL) and capital (CDEL) split.
14. Following the process to determine the single settlements' quantum, at the start of each financial year the relevant departments (i.e. the departments that own the funding lines being transferred to the single settlements and devolved) will carry out a budget cover transfer (BCT) to the Department for Levelling Up, Housing, and Communities (DLUHC) for the single settlements quantum that has been captured in their budgets, as agreed through the SR. This BCT would be authorised via the Main Estimates process and would mean that the single settlement funding would flow through DLUHC's Main Estimate.
 15. DLUHC will then formally allocate the aggregated single settlements to WMCA and GMCA through a Section 31 grant. Where necessary, this grant will come with conditions related to specific controls (see spending controls paragraphs 30-37).
 16. Where there are new relevant funds that are made available during the SR period, HMT, DLUHC and the relevant government department will determine whether new funds are in scope of the single settlements based on the functional responsibilities set out in this MoU, at paragraph 6. This includes new national budgets or programmes announced during the SR period, as well as any increases to competitive pots that the MCAs have been excluded from. HMG will then apply the relevant formulae to these funds to determine the MCAs' allocative share, where appropriate. The MCAs can proactively identify programmes they believe to be within scope of the single settlements for discussion at the Programme Board, set out in paragraph 49.
 17. The MCAs and their constituent local authorities will not be permitted to bid into competitive programmes for which the MCAs have already received an allocation through the single settlements. As set out in the trailblazer deals, the MCAs and their constituent local authorities will retain the right to bid into new competitive programmes which are not included in the defined list of funds the MCAs will not be able to access during the SR period.
 18. The MCAs reserve the right to refuse the single settlements, in which case the MCAs would be funded through arrangements in place for other areas who are not in receipt of the single settlements.

Determining the formulae

19. The quantum for the MCAs' single settlements will be set using formulae applied to relevant departmental budgets. The formulae will be used to determine the MCAs' allocative share of relevant funds.
20. Whilst the detail of the formulae will follow in an updated annex, there are some core principles that will underpin the approach, which are outlined below.
 - a. The formulae will be based on objective criteria to ensure the MCAs receive their share of funding to enable them to deliver on their functional responsibilities and meet the outcomes set out in the outcomes framework.
 - b. The formulae will seek to deliver the principle that the MCAs are no worse off in terms of quantum of funding received than they would have been had the single settlements not been in place.
 - c. The formulae and any changes to the formulae will be public.
 - d. HMT will agree the formulae and any subsequent revisions with relevant departments (including, but not limited to, the Department for Energy Security and Net Zero (DESNZ); the Department for Transport (DfT); the Department for Education (DfE); and DLUHC) and the MCAs to ensure there is an agreed and consistent approach.
 - e. For non-competitive funding programmes, where there is an existing formula or similar allocative process to determine the geographic distribution of funds associated with one or more functional responsibilities, this formula or process will be used.
 - f. The formulae will be linked to individual functional responsibilities, or groups thereof, or themes. The highest possible level of aggregation will be used, within the constraints of HMG and local policy objectives in different policy areas.
21. HMG and the MCAs agree that the aim is to streamline and simplify the formulae over time and will look at this for the next SR. HMG and the MCAs will agree an annex to this MoU setting out the detailed approach to the formulae by Spring 2024.
22. The formulae will be reviewed as part of the holistic review of the MoU set out in paragraph 2. Where appropriate, HMG and the MCAs will look to ensure that the formulae reflect national policy priorities, and the specific needs of GMCA and WMCA.

Flexibility

Moving funding within each of the five themes

23. The MCAs will have full flexibility within the themes of the single settlements to design and implement policy to meet mutually agreed outcomes. HMG will transfer the annual amount agreed for the single settlements at the SR each year as part of a section 31 grant, as per paragraph 15. The MCAs will be able to allocate funding within each theme at their own discretion and will be empowered to use funding under these devolved functions to invest in any lawful way associated with achievement of the outcomes agreed with HMG. This includes the necessary and proportionate resourcing of regional and local capacity, as per the flexibilities set out in paragraph 27.
24. The MCAs will need to make a formal notification in writing to HMG to reallocate funding in line with their agreed limits for each flexibility set out below.

Moving funding between the five themes

25. The MCAs will be able to move funding between themes. The quantum they will be able to move will be capped at 10% of the annual quantum for the theme they are moving the money out of, apart from Local Growth and Place where there is no cap on moving funding into other themes. This flexibility will allow the MCAs to spend these funds to support the delivery of the single settlements outcomes at their discretion. As per paragraph 28, HMG reserves the right to reduce the level of flexibility if there is underperformance against the outcomes agreed in the outcomes framework and will provide guidance on this following further work with the MCAs. The MCAs will be responsible for ensuring that they do not exceed the 10% cap. This flexibility will allow the MCAs to use their local expertise to best meet their outcomes.

Moving funding between years

26. The MCAs will have some flexibility to move funding between years. HMG and the MCAs will look to define this position on flexibility based on the principle that, at minimum, the MCAs have no less flexibility than they have at the time of publication of this MoU for specific functional responsibilities and, where possible, have further flexibility to move funding between years across the single settlements' themes. HMG and the MCAs will agree a final position by Spring 2024, for inclusion in the additional spending controls annex.

Moving funding between RDEL and CDEL and vice versa

27. The MCAs will be able to move up to 10% of CDEL funding within each theme to RDEL, and 100% of RDEL funding within each theme to CDEL. This will work as follows:
- a. The MCAs will receive funding for each theme on an annual basis as set out in paragraph 23
 - b. The split of RDEL and CDEL per theme will be agreed at the SR (and updated if and when additional funds in scope of the single settlements are announced) and the MCAs will receive their annual allocations on this basis
 - c. As per paragraph 25, MCAs will be able to move money between themes in-year. Where money is moved in this manner, it will retain its original classification (either as CDEL or RDEL)
 - d. The MCAs will then be able to move funds between CDEL and RDEL within themes. Specifically, the MCAs will be permitted to move funds from CDEL to RDEL, with the total moved capped at 10% of the theme's quantum of CDEL. The 10% cap will be applied to the theme's quantum after accounting for funding flexed to or from other areas
 - e. For example, having moved 5% of transport CDEL to skills CDEL, the MCAs could then move 10% of the (now higher) skills CDEL budget to skills RDEL, but not to another theme. The MCAs could move 100% of skills RDEL to skills CDEL
 - f. To manage the impact on the public accounts, HMG will profile the flexible amount of funding as RDEL
28. Whilst the MCAs will be able to use the flexibility between funding themes at their discretion, the MCAs should manage this through a systematic centralised process to ensure that the terms in this MoU are being adhered to. The use of flexibility should be reported on as part of wider reporting of outcomes as per paragraphs 48-53 and included in reporting on the outcomes framework and accountability mechanisms.
29. The percentage of flexibility between themes will be reviewed again prior to the next-but-one SR, with a view to increasing flexibility in line with evidence of successful delivery, as part of the wider review of the MoU referenced in paragraph 2.

Spending control

30. The single settlements include a single, systematised approach to spending controls. This will provide an appropriate amount of flexibility for the MCAs to plan and sequence programmes funded through the single settlements while ensuring that effective risk mitigation tools are available in case of delivery or financial failure. HMG and the MCAs will agree an annex to this MoU setting out the spending controls that will be applied to the single settlements by

Spring 2024. This will include but is not limited to our approach to savings exercises and contingent liabilities. Paragraph 32 below sets out where we have agreed an approach already on future financial commitments and business cases, which will be reflected in the section 31 grant agreements.

31. The single spending controls framework must be consistent with provisions from the following, pre-existing, spending and accountability frameworks:
 - a. The English Devolution Accountability Framework, which requires MCAs to ensure they are delivering value for money
 - b. Managing Public Money (MPM), which requires departments (in particular, DESNZ, DfE, DfT) to exercise their thematic Accounting Officer (AO) duty as per chapter 7 of MPM through ensuring they are confident that the accountability, monitoring, and evaluation system set up for the single settlements is sufficiently robust. Further detail on DLUHC's role as systems AO is set out in paragraph 73
32. To meet these requirements, the single settlements will be subject to some spending controls, including:
 - a. The MCAs will notify HMG before making financial commitments funded by the single settlements beyond the SR period and inform HMG of the nature of the commitment
 - b. The MCAs will not be required to submit formal business cases to HMG for projects that are funded as part of the single settlement, nor will delegated expenditure limits apply to funding through the single settlement, except those set out in paragraph 34
 - c. The MCAs will ensure that robust and appropriate systems are in place to ensure the value for money of all single settlement expenditure. The outcomes framework and associated accountability and controls arrangements will be the mechanism through which HMG retains oversight of the single settlement
33. HMG may introduce additional spending controls in the event of delivery issues. See paragraphs 48-58 for more detail on the processes and structures by which these controls would be enacted.
34. HMG and the MCAs may deliver very large transport investment programmes through the single settlement structure. These will require additional oversight, as follows:
 - a. Any scheme with a capital value of under £50m over its lifetime, which does not otherwise meet the criteria in (b) or (c), will not be subject to any further spending controls
 - b. For any scheme with a capital value of more than £50m over its lifetime and which is not captured by the criteria in (c), the MCA will publish the business case which underpinned the decision to invest to support local transparency and accountability.
 - c. Where schemes cost over £200m over the life of the scheme or require integration into the national transport network

because otherwise they risk causing significant disruption, the scheme can only proceed with the agreement of the Department for Transport through its representative on the Programme Board. This will normally be through agreement of a business case

35. Schemes which are nationally significant infrastructure projects because they cross multiple boundaries beyond those of the constituent and non-constituent authorities of the MCA, or cost over £1 billion, will by default be out of scope of the single settlement.¹² There may nonetheless be consideration on a case-by-case basis as to whether to deliver such schemes through the single settlement framework.
36. To prepare for and provide assurance of readiness for the settlement, DLUHC will request external confirmation of readiness via a 'readiness check'. The terms of the check will be agreed between DLUHC, the MCAs, and the independent, external appointee. HMG will judge whether the MCAs have acted sufficiently upon any requirements set out for improvement.
37. The MCAs will be responsible for updating their Single Pot Assurance Framework, and then enacting both this framework and other systems of internal control.

Agreeing outcomes and targets

38. The MCAs will be held to account for the outcomes associated with the functional responsibilities set out in paragraph 6. The outcome targets that GMCA and WMCA agree with HMG may be different to reflect local priorities.
39. To facilitate this, HMG and the MCAs will agree an outcomes framework at the SR. HMG will work with the MCAs to agree the provisional process for setting the outcomes framework by Spring 2024. In preparation for the first single settlement, HMG and the MCAs will now commence preparatory work to consider potential outcomes and indicators, with the objective of ensuring that the outcomes framework can be agreed quickly after the next SR. This work will include consideration of what the outcomes and indicators would have been had the single settlements been in place during the current SR period.
40. The primary objective of the outcomes framework is to set outcome-based targets for local and central government scrutiny, to:
 - a. provide a single, streamlined approach to accountability and reporting with HMG
 - b. align local priorities and national priorities

¹²As per the trailblazer deeper devolution deals, paragraph 48.

- c. monitor activity which can be genuinely influenced within the single settlements' themes whilst moving away from existing programme and project specific monitoring of inputs and outputs that HMG track
 - d. facilitate local flexibility within themes and across themes in moving away from inputs and outputs
 - e. provide sufficient evidence to inform delivery performance within the SR period
41. HMG and the MCAs will agree an outcomes framework that balances local and national priorities.¹³ To agree the corresponding outcomes and targets, HMG and the MCAs will work together to set out indicators based on the following suitability criteria:
- a. The outcomes and corresponding metrics will, wherever possible, be:
 - i. directly linked to the functional responsibilities of the MCAs (set out in the earlier section, 'Scope of the single settlement')
 - ii. reflective of national outcomes held by the relevant HMG department and of local priorities identified by the MCAs
 - iii. specific, measurable, achievable, realistic, and time-bound
 - iv. spatially relevant
 - v. based on existing data where possible¹⁴
 - b. The targets, wherever possible, will be:
 - i. set against an existing baseline
 - ii. achievable and measurable in the SR time period
 - iii. set against quantum in the quarter following the SR
 - iv. where reflecting national outcomes, proportional to the national outcome held by the relevant HMG department
42. As the outcomes framework will set outcomes-based targets for the MCAs to deliver under the single settlements and the realisation of outcomes goals can be difficult to assess over the shorter term, where necessary, the single settlement's outcome targets may be supplemented by target output indicators to provide HMG assurance of MCA delivery during the SR period. However, to enable the MCAs to design strategic policy interventions over multiple years, and realise the policy delivery benefits of the single settlement's increased flexibility, the target output indicators will be:
- a. developed and agreed with the above principles in mind
 - b. proportionate

¹³ It may be necessary in the first iteration of the single settlement to collect additional data for the retrofit pilot to meet legal requirements. This could include criteria to be applied, limited, specific outputs, quality standards to be met and provision of information.

¹⁴ The breadth of data that will be available to the MCA is contingent on HMG and the MCA agreeing the Data Partnership as set out in the trailblazer deeper devolution deals.

- c. indicative of progress toward (an) outcome(s)
 - d. the minimum needed to assure HMG of the MCAs' delivery against a specific target outcome or specific target outcomes
43. Further details of how target output indicators could be used to assess the MCAs' delivery against the target outcomes will be agreed in Spring 2024.
44. The outcomes will be confirmed at the SR alongside the quantum. HMG will work with the MCAs to agree the baseline and target following the SR. The MCAs will reconcile their delivery plans against the quantum confirmed at the SR and the outcome targets confirmed thereafter, outlining how they will deliver the targets over the SR period.
45. Some funds in scope of the single settlements have minimum statutory requirements attached to them, such as the Adult Education Budget. HMG will set out expectations for use of this funding as part of agreeing the final quantum and through the outcomes framework. This will not constitute a formal ringfence within each theme and will be set out as part of the section 31 grant agreement. The status of the funding for the retrofit pilot will be set out in a supplementary annex.
46. Where a new funding line is devolved to the MCAs through the single settlements during the SR period, or a quantum is changed, the MCAs and HMG will agree any necessary changes to the outcomes framework and outcomes targets in line with the principles above.
47. There may be exceptional circumstances when it might be appropriate to renegotiate the single settlements' outcome targets, for example where unavoidable and significant external shocks (such as pandemics or excessive inflation) will impact the MCA's ability to deliver. It is anticipated that these circumstances arising would be very unusual, and HMG is under no obligation to change the targets. If the MCAs wish to renegotiate targets, they should bring proposals to the Programme Board for consideration. HMG and the MCAs expect the outcomes framework will be subject to iteration, evolution, and simplification as the settlements progress.
48. HMG will work with the MCAs to explore how the outcomes framework will align with the Office for Local Government's (Oflog) processes, including which site the outcomes framework is hosted on and who is responsible for the publication of data.

Governance arrangements for monitoring and evaluation

49. The MCAs are responsible for ensuring that delivery via the single settlements is on track and that plans remain ambitious and provide value for money as set out in the English Devolution Accountability Framework.
50. MCAs' delivery of the agreed outcomes will be overseen by a Programme Board that will be chaired by DLUHC senior officers and attended by the MCAs, HMT senior officials, and senior officials from other government departments (OGDs) that have devolved funding in the single settlement. The Programme Board will act as the default point of contact for the MCAs on all delivery questions, concerns, and conversations, with other bilateral conversations with OGDs about delivery of the single settlements taking place only under exceptional circumstances, or as part of streamlined working level conversations with DLUHC. HMG will agree a Terms of Reference (ToR) for the Programme Board with the MCAs and publish this as an annex to this MoU before the start of the next SR period.
51. The MCAs will send six-monthly monitoring reports to the Programme Board, including:
 - a. RAG (Red, Amber, Green) rating that provides an assessment of progress towards achieving the targets by the end of the SR
 - b. spend profile, including spend to date against outputs/outcomes
 - c. forecast underspends at the end of the financial year (capital and revenues totals), for information purposes only
 - d. risk management, if necessary
 - e. a short narrative update highlighting any key changes (including any quantum moved between themes), progress and highlights
52. The MCAs and HMG will agree a structure for how these reports will work as part of the ToR. However, the MCAs and HMG agree that these reports will be designed based on the following principles:
 - a. monitoring reports should help the MCAs and HMG better understand how the outcomes could be delivered more effectively
 - b. delivery assessment should be balanced and holistic
 - c. the data and reporting requirements for annual monitoring reports will be proportionate, reflecting the minimum needed to provide HMG with assurance of the MCAs' performance against the outcomes

53. Where a target is rated amber or red, the MCAs will provide further quantitative and qualitative data to explain the rating and set out the 'path to green'. Reports must be signed off by the MCA Chief Finance Officer. To support with mitigating any delivery issues, HMG will employ a matrix of mitigations, set out in Annex A. This matrix will be reviewed following agreement of the outcomes framework to ensure it remains proportionate and fit for purpose. This matrix will be considered by the Programme Board and outlines the options for mitigating different levels of delivery issues. If the Programme Board considers that the 'path to green' set out in monitoring reports is inadequate, they may consider appropriate mitigations or interventions, drawing on the matrix in Annex A. Mitigations in relation to specific themes will be signed off by the thematic lead and DLUHC AO, and coordinated via the Programme Board. HMG will then give notice via a published letter to the MCA that they will intervene, setting out the measures being employed and why. The MCA will then be given a period to submit a formal response on proposed mitigations. If this response is deemed unsatisfactory by HMG, the Programme Board will be empowered to set up task and finish groups to oversee interventions and progress.
54. Conversely, if the MCAs are overperforming on their outcomes targets, HMG will not introduce additional targets for the remaining funding or seek to claw it back.
55. Government will work with the MCAs to develop a robust approach to evaluating the impact of the single settlements, in co-ordination with the development of evaluation processes for the wider trailblazer deals and to enable the comparison of WMCA's and GMCA's delivery under the single settlements against the delivery of national schemes in other areas of the country that have not been devolved.
56. The evaluation will measure whether the single settlements, as part of the trailblazer deal, have achieved their aims, and how their impact compares to areas without a single settlement.
57. The government will continue to work closely with the MCAs on the direction of the evaluation. This will include aligning with or building upon evaluation processes that the MCAs have in place or are developing.
58. Where possible, the government will seek to use publicly or centrally available data that is provided in a sufficiently timely manner to meaningfully report against during the SR period, to avoid placing additional or unnecessary burdens on the MCAs. Where such data is not available, the Data Partnership agreed through the trailblazer devolution deals will be used to explore options for improving access to datasets.

Risk management and dispute resolution

59. If an MCA is not making progress towards the realisation of an outcome, evidence will be discussed at the Programme Board, and following this, an agreed matrix of mitigation, assessment and escalation will be followed based on the targets set out at the SR (Annex A). Changes to the section 31 grant funding agreement may occur if HMG judges there is a significant decline in delivery of outcomes from the MCAs. Similarly, the grant funding agreement may change if there are changes to departmental funding lines, or other departmental changes in policy or legislation (e.g., on statutory entitlements) that impact the single settlement.
60. The Programme Board will also discuss disputes or concerns regarding propriety in relation to the single settlements. As systems AO, DLUHC will have clear responsibilities in such cases to follow the standards set out in the Local Government Accountability Framework (LGAF) and the English Devolution Accountability Framework (EDAF) and will follow the matrix of mitigations and interventions where needed.
61. In the first instance, the MCAs and HMG should seek to resolve any disputes between officers and officials, coordinated by DLUHC at a working level. If this is not possible, disputes will be formally discussed and agreed at the Programme Board. Where this appears likely to happen, the Programme Board secretariat should be consulted at an early stage to prepare papers for the meeting.
62. When the secretariat is formally notified of a disagreement, and the next scheduled meeting is longer than one month from referral, the Programme Board secretariat will organise a meeting within two weeks.
63. Through this process, the Programme Board will seek agreement on the facts, provide an opportunity for the parties to set out their positions and facilitate discussion of shared interests, options for resolving the disagreement and criteria for an agreed outcome.
64. Should the disagreement continue past consideration at the Programme Board, the Board Secretariat will organise political engagement between HMG and the MCAs.
65. If the dispute is not resolvable through this engagement, the MCAs should officially communicate their disagreement through a published letter to the DLUHC Secretary of State. The Secretary of State must then respond through a published letter to the Chair of the Combined Authority (the Mayor) and the Levelling Up Select Committee, outlining the reasons for the decision.

HMG direction under exceptional circumstances

66. In exceptional circumstances, for example during national emergencies or where MCAs' activities significantly undermine national government's ability to deliver its priorities in areas outside of the MCAs' functional responsibilities, HMG may direct the MCAs to use, or not use, funding from within the single settlements in a specific way.¹⁵
67. The circumstances in which such a direction may be used are:
- a. where the MCAs' approach to delivery of the single settlements, either in whole or in part, is demonstrably undermining national government's ability to deliver its priorities in areas outside of the MCAs' functional responsibilities
 - b. where all mechanisms for discussion and dispute resolution set out in this document have been exhausted
68. Any direction must be published as a letter to the Chair of the Combined Authority (the Mayor) and the Levelling Up Select Committee. The MCAs will be given a period to submit a formal response with proposed mitigations and interventions.
69. If HMG deem this response to be unsatisfactory, HMG will employ the matrix of mitigation, set out in Annex A.

Accountability arrangements

70. The single settlements will be supported by the establishment of a streamlined, overarching, single assurance framework coordinated by DLUHC rather than multiple frameworks administered by different departments. This will build on, and will be incorporated into future editions of, the EDAF.

¹⁵This provision is intended to mirror Section 143 of the Greater London Authority Act 1999 (legislation.gov.uk), regarding transport functional responsibilities, and the adult skills condition set out in the trailblazer deeper devolution deals as follows: 'There will be specific instances when the national government needs to direct the design of adult skills provision or allocation of adult skills funding - as such, the Secretary of State for Education will retain the ability to do so in the next Spending Review period and beyond. However, this will be the exception rather than the rule, where the scale or urgency are such that a national response is judged required to deliver the required outcomes or where there are national skills priorities that the government believes are not being met sufficiently by the skills system.'

71. The arrangements outlined in this MoU will supersede the existing arrangements for the devolved funding covered by the single settlement, except in the specific case of the first round of the City Region Sustainable Transport Settlements (CRSTS1) which will continue past the first settlement, until 2027; the existing CRSTS1 arrangements will be superseded by this MoU at the point where the associated funding lines come to an end.
72. As per paragraphs 38-48, the MCAs will be held to account for delivery under the single settlements through the outcomes framework agreed with all relevant departments, HMT, and the MCAs.
73. As the single settlements include devolved funding from departments across HMG, there will be three core roles to administer the single settlement: the systems Accounting Officer (the DLUHC AO), the MCA CEO, and the thematic leads (AOs from contributing departments).

The role of DLUHC Permanent Secretary, as “systems” AO

74. To provide a single point of contact, DLUHC’s AO will act as the ‘systems’ AO for the single settlement. DLUHC’s AO will be responsible for ensuring institutional propriety, upholding governance structures, approving a local assurance framework, and overseeing the approach to securing value for money. DLUHC’s AO will assume responsibility for the core accountability process to Parliament, including setting out the spending controls listed in paragraphs 32-33.
75. DLUHC will also sign off on the outcomes, any target / output indicators and mitigations for the local growth and place, and housing and regeneration functions.

The role of the MCA Chief Executive

76. Within the MCAs, core accountability processes will be carried out by the Chief Executive, who will be responsible for agreeing outcomes with HMG, local outcome delivery and value for money, as well as upkeep of their local assurance framework, internal processes, and capability resourcing.

The role of DfE, DESNZ and DfT Permanent Secretaries, as “thematic” leads

77. Other government departments (OGDs) who have functions covered by the single settlements will sign off on the outcomes and targets which are relevant to their functions and will receive monitoring and evaluation information on their function via the Programme Board. OGD leads will sign off mitigations in their function, as per the matrix of mitigation set out in Annex A. This will be managed via the Programme Board and will require coordination with DLUHC AO as the ‘systems’ AO. In some

exceptional circumstances, an OGD would lead a specific action working directly with the MCAs.

Parliamentary and select committee scrutiny

78. Although the MCAs should consider their primary accountability to be to their local residents, HMG has a responsibility to ensure that devolved funding supports the delivery of the outcomes framework and that the MCAs have the structures in place to deliver value for money as set out in paragraph 73. Therefore, the single settlements will be subject to Parliamentary scrutiny as follows:
- a. DLUHC AO will be responsible to Parliament for reporting on the delivery of the single settlements. Where necessary, the Public Accounts Committee will scrutinise DLUHC's AO for upholding the governance structures and securing value for money. HMG will recommend that the relevant select committee invites the MCAs' Chief Executives for evidence on local delivery.
 - b. DLUHC will recommend that Ministers and mayors as appropriate both be invited to select committees, when relevant, with an increased focus on the role of local leaders in delivering the single settlements.

Local scrutiny

79. As set out in the trailblazer deeper devolution deal, the MCAs have committed to greater scrutiny including by residents through Mayor's Question Time, by constituent councils when requested and by local MPs at regular broadcast sessions.
80. The MCAs have also committed to raising the profile and resources available to the Overview and Scrutiny committee and implementing the Scrutiny Protocol (as per the EDAF).
81. The Mayor and relevant other Members or Portfolio Holders of the Combined Authority should be prepared to speak to the single settlements at both the Mayor's Question Time and the Overview and Scrutiny committee.

Local risk management and governance assurance

82. The MCAs are expected to put in place the necessary governance and assurance arrangements and to ensure that all legal and other statutory obligations and consents will be adhered to, which may include, but is not limited to, state aid and subsidy control, equalities duties, procurement, health and safety and fraud.
83. To evidence readiness for the single settlement, the MCAs will be subject to a readiness check. HMG will work with the MCAs to agree the process and criteria for the check. Any concerns highlighted in this process will need to be addressed before the full settlement flexibility is granted, as per the matrix of mitigations in Annex A.
84. Ownership of risk will be transferred to the MCAs. The MCAs will be responsible for mitigation of any risks that arise throughout the delivery of the single settlements.

85. The MCAs will complete their own Fraud Risk Assessment to ensure the safe administration of grants and that appropriate measures are put in place to mitigate against the risk of both fraud and payment error.
86. The MCAs will also be responsible for setting and managing any Novel, Contentious or Repercussive (NCR) spend and business cases, via existing MCA mechanisms (such as WMCA/GMCA's Single Assurance Framework). As per paragraph 34, there may be specific situations where additional processes are required regarding business cases.
87. The MCAs will also be responsible for overseeing the development and maintenance of the MCAs' local assurance framework, governance, and financial monitoring report, as well as drafting and delivery of the local outcome delivery plan, and reporting on progress via submissions to the Programme Board.

Audit arrangements

88. The single settlements will be subject to formal external audit by the Comptroller and Auditor General to the extent required as part of their audit of DLUHC and other departments. Information access requirements to facilitate this will be set out as part of any grant agreement. MCA expenditure will remain subject to their own existing external audit requirements.
89. The Comptroller and Auditor General will also have the right, should they so choose, to conduct Value for Money examinations on the single settlements, and the MCAs will be expected to cooperate and provide information necessary to DLUHC or the National Audit Office (NAO) to facilitate this.
90. The MCAs will be responsible for ensuring that their own internal audit functions are sufficient to manage risks to public money.
91. Further details on audit arrangements will be provided alongside the outcomes framework.

Local context on implementation

92. WMCA will use the opportunity presented by the single settlement to develop and deliver transformational place-based strategies. The strategies will serve as strategic, long-term frameworks to guide the prioritisation of single settlement funding, and other policy levers and resources, below the regional level while delivering the outcomes framework agreed with HMG. Place-based strategies will be coordinated by WMCA, agreed collectively by the WMCA Board and developed by local authorities.
93. WMCA will engage and consult across the region to make sure its governance structures and processes reflect the opportunity presented by the single settlement to further empower local leaders and drive collective decision-making for the benefit of the region.

94. Since its inception GMCA has used devolved powers and flexibilities to drive growth and deliver key improvements to the economy, services, and infrastructure. The ten constituent local authorities of Greater Manchester have worked together voluntarily for many years on issues that affect everyone in the region, like transport, regeneration, and attracting investment. GMCA also works in partnership with other public services, businesses, local communities, and the voluntary sector to address issues that affect the whole city-region.
95. GMCA's strategic ambition is set out in the Greater Manchester Strategy (GMS), underpinned by a range of supporting strategies on areas such as the economy/innovation, work/skills, spatial development and growth locations, housing, transport, and the environment. GMS is a medium-term strategy which sets out clear outcomes/commitments and a route to deliver the vision of a greener, fairer, and more prosperous Greater Manchester by 2031. The single settlement and the wider trailblazer deal will enable GMCA to deliver in line with the GMS, try innovative new policy approaches, drive forward the local economy, and to be better held to account for delivery.

Next steps

96. There are several areas throughout this MoU where the government and the MCAs have committed to work together to confirm further details by spring 2024. These details will be agreed and published as annexes to this. This will include annexes outlining:
- a. the formulae to determine the MCAs' allocative share of funding
 - b. the provisional process for setting the outcomes framework, including further detail on the retrofit pilot as per paragraphs 10-11
 - c. further detail on the spending controls HMG will employ for the single settlement

A.1.1 Annex A: Matrix of mitigation, assessment, and escalation

Where delivery falls below the agreed baseline, or there are wider concerns around failure to deliver value for money, evidence will be discussed at the Programme Board, and where necessary, the below matrix of assessment and mitigation will be followed. Mitigations in relation to specific themes will be determined and signed off by the thematic lead and coordinated with DLUHC. This matrix will be reviewed once the outcomes framework is agreed and targets are confirmed, to ensure it remains proportionate and fit for purpose. This matrix should also be seen in the wider context of the MoU, the principles for governance of the settlement set out in this MoU, the intention of the single settlement to devolve greater local responsibility and accountability, and the MCAs' primary accountability to local residents.

To note: the inspection and intervention processes outlined in the [English Devolution Accountability Framework](#) set out the process where there are very serious concerns of bad governance, poor value for money or inadequate services for residents. This draft matrix solely looks at mitigations to be made in case of failure to deliver progress on the outcomes or value for money for the single settlement.

Table A.1 Matrix of Mitigation

		Minor	Moderate	Major
Evidence and indicators	Institutional propriety	Where the Secretary of State has concerns that an authority is failing to carry out its functions in compliance with its best value duty, the Local Government Act 1999 provides significant powers for the Secretary of State to inspect and, subject to there being sufficient evidence, to intervene in that authority.		
	Target output indicators	Slippage in a small number of metrics. Limited impacts in overall delivery of outcomes (to discuss in Spring 2024)	Slippage in numerous metrics. Significant predicted impact on meeting outcomes (to discuss in Spring 2024)	Slippage in most metrics. Major impact on delivery of outcomes (to discuss in Spring 2024)
	Outcome delivery	Limited progress shown against a small number of outcomes. Overall progress against outcomes is satisfactory.	Limited progress shown against some outcomes.	Progress not shown against most outcomes.
	Insufficient reporting requirements	Some gaps in reporting data. Low data quality.	Significant lack of relevant data provided to prove progress against targets.	Reporting requirements not met – no data provided as evidence of progress.
	Maintenance of local outcome delivery plan	Sections of the local outcome delivery plan out of date when reviewed.	Significant portion of the local outcome delivery plan out of date when reviewed.	Out of date local outcome delivery plan that does not show current state of play or projects.
	External reports	3 rd line of defence (independent audit) raises some issues with delivery with an Amber rating. No adverse publicity on delivery of the settlement.	3 rd line of defence (independent audit) raises significant issues with delivery with an Amber/Red rating. Concerns raised by some constituent councils. Public criticism over spend or delivery of the settlement.	3 rd line of defence (independent audit) raises major issues with delivery with a red rating. Majority of constituent councils have issues with how the fund is delivered. Serious allegations over spending. Parliamentary questions raised.

Proposed mitigations
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	Minor	Moderate	Major
	<ul style="list-style-type: none"> Escalation of M&E (Monitoring & Evaluation) processes, to be negotiated on a case-by-case basis Re-evaluation of outcome indicator and/or target output indicators The MCA will be required to write to the DLUHC SRO or the thematic lead (for the theme where there is a delivery concern) setting out why delivery has fallen, and steps being taken to remedy it. 	<ul style="list-style-type: none"> Escalation of M&E processes, to be on a case-by-case basis Re-evaluation of outcome indicators and/or target output indicators Re-drafting of delivery plans in the theme/s where there are delivery concerns and alignment with outcomes framework The MCA will be required to write to the Permanent Secretary of DLUHC and the Permanent Secretary of the relevant thematic department setting out why there are delivery issues, and immediate steps being taken to remedy the situation. The thematic lead may require the MCA CEO to meet the thematic lead department ministers or Permanent Secretary to explain how they will improve delivery in that area. 	<ul style="list-style-type: none"> Reintroduction of delegated authority limits, and/or ringfences, in the theme/s where there are delivery concerns DLUHC publicly announces that the AO does not think an investment decision will deliver VfM MCA CEO explains reasons delivery failure and provides materials on plan to mitigate, including how they will factor in any mitigations Suspending settlement Clawback funding Withdrawing funding lines from settlement Deep dive on M&E to determine if VfM/institutional failure - if so, DLUHC can investigate using the Best Value Duty. Request for independent review from the NAO

HM Treasury contacts

This document can be downloaded from www.gov.uk

If you require this information in an alternative format or have general enquiries about HM Treasury and its work, contact:

Correspondence Team
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

Tel: 020 7270 5000

Email: public.enquiries@hmtreasury.gov.uk

CITY OF WOLVERHAMPTON COUNCIL	Cabinet 21 February 2024
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Report title	Determined Admission Arrangements for Community and Voluntary Controlled Schools 2025-2026	
Decision designation	AMBER	
Cabinet member with lead responsibility	Councillor Jacqui Coogan Jobs, Skills and Education	
Key decision	Yes	
In forward plan	Yes	
Wards affected	All Wards	
Accountable Director	Alison Hinds, Director of Children's Services	
Originating service	Children's Services	
Accountable employee	Dave Kirby	Service Manager, School Organisation and Support
	Tel	01902 554152
	Email	David.Kirby@wolverhampton.gov.uk
Report has been considered by	Education Leadership Team	18 January 2024
	Strategic Executive Board	30 January 2024

Recommendations for decision:

The Cabinet is recommended to:

1. Approve the Co-ordinated Admission Schemes for secondary and primary school admissions at the normal year of entry for 2025-2026 and that the Secretary of State be notified by 28 February 2024.
2. Approve the proposed admission arrangements for community and voluntary controlled schools for 2025-2026, including the reduction of 15 places at Lanesfield Primary School. There are no proposed changes to any other aspect of the arrangements.

Recommendation for noting:

The Cabinet is asked to note:

1. The outcome of the external consultation in relation to the Determined Admission Arrangements for Community and Voluntary Controlled Schools 2025-2026 included in section 5 of this report.

1.0 Purpose

- 1.1 To approve the schemes for co-ordinated school admission arrangements for secondary and primary schools and the admission arrangements for community and voluntary controlled schools for 2025-2026 (please see Appendix 1).
- 1.2 To approve the reduction of 15 places at Lanesfield Primary School, commencing from Reception entry 2025.

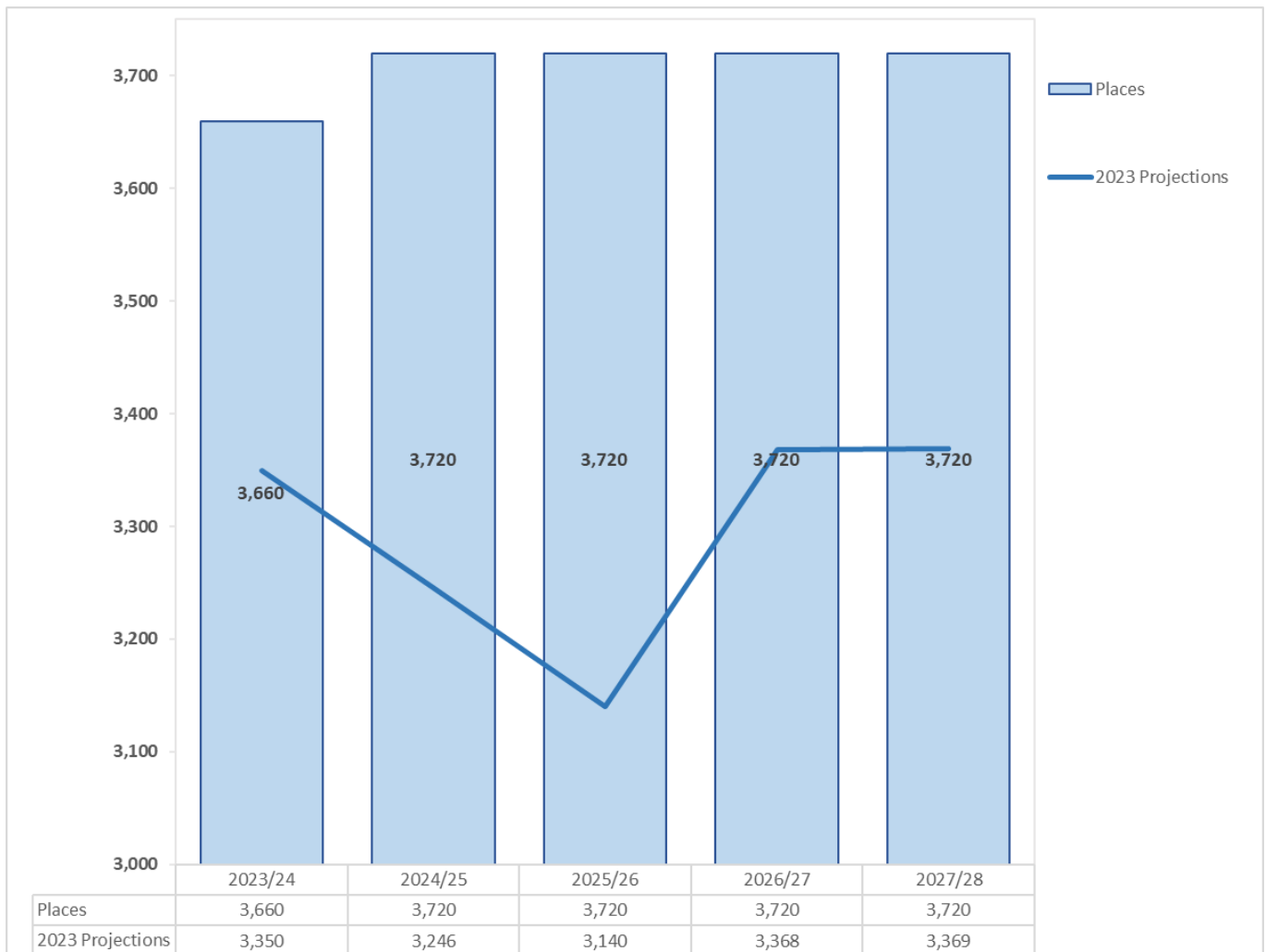
2.0 Background

- 2.1 In accordance with legislation and the Schools Admission Code 2021, each Local Authority (LA) is required to draw up a scheme (or schemes) for co-ordinating admission arrangements for all mainstream, maintained schools (community, voluntary controlled, voluntary aided, foundation and academies) within their area.
- 2.2 Each Admission Authority is required to determine admission arrangements every year. The City of Wolverhampton Council's (CWC) responsibility in this regard is for the Community and Voluntary Controlled Schools in Wolverhampton. For academies the academy trust(s) are the admitting authority not CWC, however some academies follow CWC admission arrangements.
- 2.3 The School Admissions Code (2021) instructs that when drawing up admission arrangements, admission authorities must set a Published Admission Number (PAN) for each 'relevant age group', i.e., the number of school places that the admission authority must offer. Admission authorities must consult where they propose a decrease to the PAN.
- 2.4 Code compliant School Admissions Arrangements (SAA) help contribute to the Council Plan as an overarching link to Strong families where children grow up well and achieve their full potential as the start of a child's educational journey begins with the school application process.

3.0 Proposed change to admission arrangements

- 3.1 Lanesfield Primary School is a Community School, and it is proposed that the PAN for Reception September 2025 onwards be reduced by 15 places (i.e., from 45 to 30). There will be no change to existing cohorts in the school that will remain at a PAN of 45. The PAN of 30 from September 2025 onwards is on the premise of a reduction in pupil demand and in accordance with the CWC Education Place Planning document in relation to a PAN of 45.
- 3.2 Vertical Grouping (or the employment of mixed age classes) is commonly employed in primary schools with intakes of 45 and can work successfully in schools. However, the use of this structure can increase the complexity of planning and delivering the curriculum.

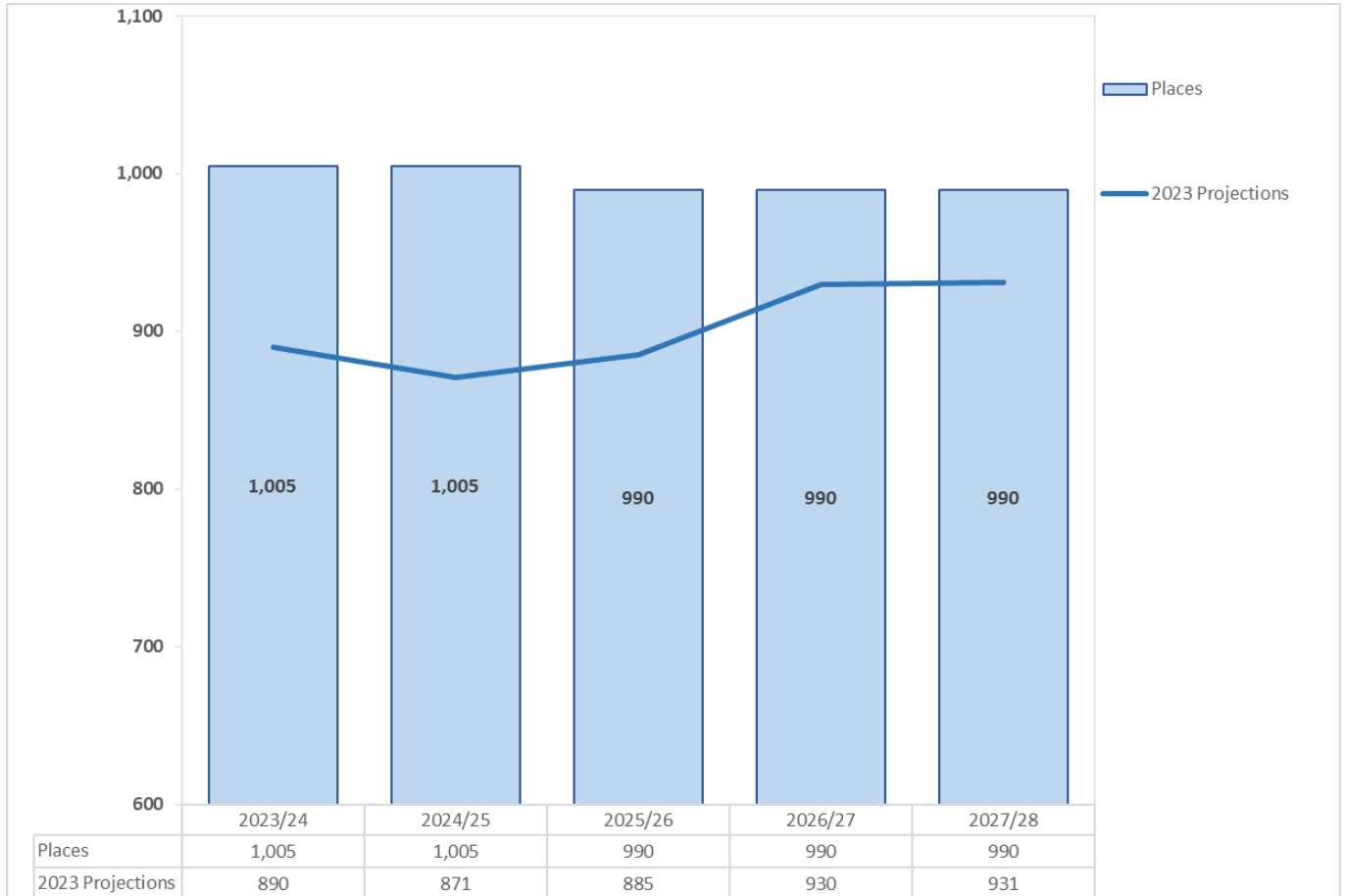
- 3.3 When an opportunity or need arises (based on demand) consultation will be undertaken to consider increasing or reducing admission limits in schools with an existing PAN of 45.
- 3.4 CWC produce pupil projections on an annual basis, using an externally validated and verified methodology. Pupil projections take into account birth data, pupil yield from housing developments, parental preference analysis, cross border movement and migration. The projections for Academic Year 2022-23 indicated 99.7% accuracy for Reception.
- 3.5 Figure 1 provides citywide primary pupil projections for academic years 2023-24 to 2027-28 and indicates the number of planned places, based on the most recent pupil projections (Summer 2023).
- 3.6 Although demand for Reception fluctuates in the short to medium term, there are sufficient places to meet demand at a citywide level.
- 3.7 **Figure 1: Citywide Primary Pupil Projections (2023)**



Source: CWC Projections (School Organisation Team)

3.8 For the purposes of primary school place planning in Wolverhampton, the City is divided into four planning areas; this enables a more precise identification of local circumstances and a clearer definition of local needs. Lanesfield Primary School is situation in Primary Planning Area 3.

3.9 **Figure 2: Planning Area 3 Primary Pupil Projections (2023)**



Source: CWC Projections (School Organisation Team)

3.10 Figure 2 illustrates that there is anticipated to be sufficient provision in the Planning Area to meet need, even with the proposed reduction of 15 places at Lanesfield Primary School from 2025.

3.11 A level of surplus is essential to offer increased opportunity for parental preference to be reflected in allocations, to allow for fluctuations in demand and to offer flexibility to cater for in year admissions. Too few surplus places can result in reduced opportunity for parental preference, increased travel times, and increased class sizes. However, too many surplus places can lead to the inefficient use of resources.

3.12 There is a balance to be found between sufficient school places, supporting schools with low pupil numbers, and meeting parental preference.

3.13 By reducing the PAN at Lanesfield Primary School, this will help ensure there is not an oversupply of school places and will assist in reducing the complexity of planning and delivering the curriculum.

4.0 Current Admission Arrangements

4.1 All schools must have admission arrangements that clearly set out how children will be admitted, and the PAN for each 'relevant age group', i.e., the number of school places that the admission authority must offer. Admission authorities must consult where they propose a decrease to the PAN.

4.2 The current SAA adheres to the code; however, it is proposed that the PAN for Lanesfield Primary School for Reception September 2025 onwards be reduced by 15 places (i.e., from 45 to 30).

4.3 CWC has consulted stakeholders in accordance with the requirements stipulated in The School Admissions Code 2021 regarding the PAN reduction for Lanesfield Primary School. Please see section 5 for the outcome of consultation.

4.4 The LAs within the West Midlands and beyond operate an inter-Local Authority scheme for primary and secondary admissions. There are no proposals to change the schemes in this regard.

5.0 Consultation

5.1 Strategic Executive Board approved the commencement of a seven-week external consultation on 10 October 2023.

5.2 External consultation commenced on 16 October 2023 and ended on 01 December 2023.

5.3 The School Admissions Code has been adhered to by consulting with statutory consultees and other interested parties, which included:

- Over 200 Headteachers, Principals, Governors and education stakeholders of Infant, Junior, Primary, Secondary, Pupil Referral Units, Special Schools and maintained nurseries in Wolverhampton
- Diocesan Authorities
- Multi Academy Trusts and Academy Trust CEO's
- All Councillors
- Parents via school newsletters, communications, websites and information in school.

5.4 Stakeholders could respond directly to the consultation by sending their views in by email or by post.

5.5 No responses were received with regards to the proposed reduction in PAN for Lanesfield Primary School.

5.6 A response was received from Sandwell Borough Council on a procedural matter relating to the transfer of children from Infant School to the corresponding Junior School.

5.7 In response to the comment received, CWC's SAA was updated to ensure the corresponding Infant to Junior feeder schools are named in the document.

6.0 Evaluation of alternative options

6.1 An alternative option would be to approve the admissions arrangements without the proposed reduction in PAN for Lanesfield Primary School. This would result in an oversupply of school places and continued complexity of planning and delivering the curriculum.

7.0 Reasons for decision(s)

7.1 Due to the outcome of consultation, it is recommended that the reduction in PAN of 15 places at Lanesfield Primary School be included in the CWC SAA for maintained & voluntary controlled schools for 2025-26. No responses or concerns were received in respect of this proposal.

7.2 Approval of the admission arrangements without the proposed change may result in an oversupply of school places, leading to inefficient use of resources and increased complexity of planning and delivering the curriculum.

7.3 It is also recommended that the proposed CWC School Admission Arrangements for 2025-26 be approved as proposed as all comments have been considered and addressed.

8.0 Financial implications

8.1 There are no direct financial implications from the recommendations of this report. The activities detailed within the report will be met from existing budgets within Education.
[PG/26122024/D]

9.0 Legal implications

9.1 The CWC School Admission Arrangements are consulted on every seven years in line with current statutory requirements. The next consultation (should there be no proposed changes by CWC or in statutory requirements in the meantime) will be due in 2032-33, which would be conducted in 2030.

9.2 School admission arrangements are heavily regulated by the School Standards and Framework Act 1998 as amended by the Education and Skills Act 2008. Regulations also apply and the CWC is required to comply with the School Admissions Code in relation to admission arrangements.

- 9.3 The Schemes for co-ordinated admissions and the admission arrangements for Wolverhampton community schools, voluntary controlled schools, free schools and academies comply with the current relevant legislation.
[SZ/26012024/P]

10.0 Equalities implications

- 10.1 The current SAA and the proposed SAA must be compliant with the School Admissions Code (2021) that adheres to and references the Equality Act 2010.
- 10.2 There are no changes to the SAA in terms of how children are allocated to VC and Community schools. The only change is the reduction in the number of places available at Lanesfield Primary School; however, this will not disadvantage families as there are sufficient school places in the local area.
- 10.3 An equality analysis template was completed and shared with EDI to incorporate the rationale for the proposed reduction of PAN for Lanesfield Primary School and to capture the consultation and relevant legislative matters. A copy of the Equality Analysis can be found at Appendix 2.

11.0 All other implications

- 11.1 The City of Wolverhampton school admission arrangements allow for a child with an Education Health and Care Plan which names the school to be admitted.
- 11.2 The oversubscription criterion includes children and young people in care and children and young people previously in care as the highest criterion. This includes children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.
- 11.3 The criterion allows for medical and social claims for a preferred school to be considered.

12.0 Schedule of background papers

- 12.1 [School Admissions Code 2021](#)
- 12.2 [School Admissions Regulations 2012](#)

13.0 Appendices

- 13.1 Appendix 1: School Admission Arrangements 2025-2026
- 13.2 Appendix 2: Equality Analysis

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School admission arrangements 2025 - 2026

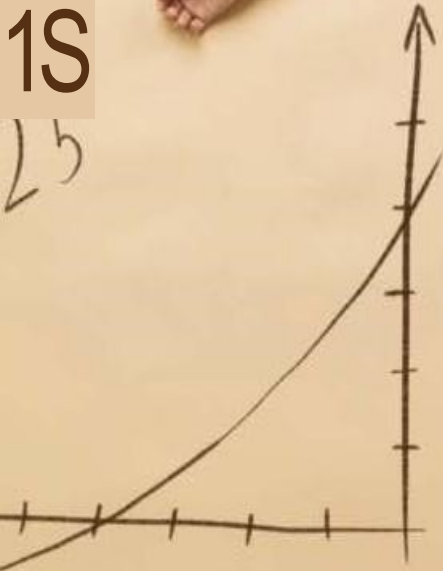
$$P(x) = 2x \cdot 50$$

$$2x^3 + 8^4 + 4 = 245x$$

kb

1S

2b



$$\frac{1}{6} v (S_1 + 4S_2 + S_3)$$

$$K = \frac{V_2}{V_1} = \sqrt{\frac{P_2}{P_1}}$$

mod p=
p=
q=27

S=
S=
S=

$K_a \cdot K_b \cdot K_c$

$$S = \frac{a \cdot v}{2}$$

$$40 - 3 = 15$$

$(\frac{3}{2})$



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Definitions

1

Overview of the application process

The scheme is an “Inter-Local Authority” scheme whereby Birmingham, Dudley, Sandwell, Shropshire, Staffordshire, Telford and Wrekin, Walsall and Wolverhampton Local Authorities have agreed to co-ordinate applications for their schools to ensure that each child receives the best possible single offer of a place at a school, based upon parents’ preferences.

In brief terms:

- Parents whose child has an Education and Health Care Plan follow separate admission procedures through the Statutory Assessment or Annual Review process.
- Parents will only have to fill in one application form, on which they will state their school preferences and reasons for those preferences. Applications are made online.
- Five preferences are invited.
- Initially, all preferences are treated as equal, and sent out as equal to other admission authorities as appropriate (i.e. voluntary aided and academy schools in Wolverhampton, and other participating Local Authorities as detailed above).
- After over-subscription criteria have been applied (where appropriate), if more than one school place can potentially be offered, the single offer is for the available school the parent ranked highest on the preference form.

2

Primary admissions

Including admission into Reception Year and transfer from Infant to Junior education.

Admission into reception year

If your child was born between 1/09/2020 and 31/08/2021 you must apply for a place in Reception Year before the 15 January 2025.

The online application will go live in November 2024, hard copies of the form will only be made available on request. Parents are invited to name and give reasons for applying for up to 5 preferred schools, ranked in order of preference, by 23:59 **15 January 2025**. Parents should name all schools (to a Maximum of 5), for which they wish their child to be considered for a place, including any Voluntary-Aided schools, Academies or Free schools and/or any school outside the Wolverhampton area.

By **14 February 2025**, the admissions and appeals team will send other Local Authorities and own Admitting Authority Schools details of applicants for their schools. These details will not reveal the order of preference. All Own Admitting Authority schools will apply their over-subscription criteria and return their complete ranked list of applicants to the admissions and appeals team who will then compare the potential offer lists. If more than one school place can potentially be offered, a place will be allocated at the available school that the parent ranked highest on their application.

On **16 April 2025** parents who made their applications online will be able to view their allocation via the online admissions facility. The admissions and appeals team will also write to every applicant resident in Wolverhampton telling them of their allocated school place.

Parents will be required to respond to any offers made within 10 school days.

Transfer from infant to junior education

There are two Infant Schools in Wolverhampton which cater for children up to the age of seven.

Christ Church (Church of England) Infant and Nursery School is the feeder school for Christ Church (Church of England) Junior School.

Westacre Infant School is the feeder school for Uplands Junior School.

Parents of children attending a Wolverhampton Infant School will need to submit an application for a place at the corresponding feeder Junior should they wish to by 15 January 2025. Parents will receive a letter from the Local Authority in advance of the application window opening with further details.

Parent may also wish to express a preference for any school (i.e. not the corresponding feeder Junior School) should they wish to, by submitting an application via the online application system by 15 January 2025.

Primary school application timeline

2024

By 10 Nov Online application is made live

2025

15 Jan Closing date for application forms to be submitted

12 Feb The final date for late applications

14 Feb City of Wolverhampton Council sends/receives unranked preferences to/from other authorities

3 Mar Schools submit final lists of applicants in ranked order

10 Mar Wolverhampton provisionally allocates places

By 28 Mar Final data exchange with co-ordinating authorities

16 Apr Allocation day

3

Secondary school applications

Children born between 1/9/2013 and 31/8/2014 will commence secondary education in September 2025. Parents must apply for a secondary school place before 31 October 2024.

The online application is made live in **September 2024**. Applications should be made online; hard copies of the form will only be made available on request. Parents are invited to name and give reasons for applying for up to 5 preferred schools, ranked in order of preference, by 23:59 **31 October 2024**. Parents should name all schools (to a Maximum of 5), for which they wish their child to be considered for a place, including any Voluntary-Aided schools, Academies or Free schools and/or any school outside the Wolverhampton area, with the exception of any independent schools.

By **18 November 2024**, the admissions and appeals team will send other Local Authorities and Own Admission Authority Schools details of applicants for their schools. These details will not reveal the order of preference. All admission authorities will apply their over-subscription admission criteria including any selection tests and return their complete ranked list of applicants to the admissions and appeals team who will then compare the potential offer lists. If more than one school place can potentially be offered, they will allocate a place at the available school that the parent ranked highest on their application.

On **3 March 2025** parents who made their applications online will be able to view their allocation via the online admissions facility. The admissions and appeals team will also write to every applicant resident in Wolverhampton telling them of their allocated school place. **Parents will be required to respond to any offers made within 10 school days.**

Secondary school application timeline

2024

By 9 Sep	Online application is made live
31 Oct	Closing date for application forms to be submitted
18 Nov	City of Wolverhampton Council sends/receives unranked preferences to/from other authorities
29 Nov	The final date for late applications

2025

13 Jan	Schools submit final lists of applicants in ranked order
27 Jan	Wolverhampton provisionally allocates places
By 12 Feb	Final data exchange with co-ordinating authorities
3 Mar	Allocation day



4

Admission criteria for community and voluntary controlled schools

The Published Admission Number (PAN) for community and voluntary controlled schools can be found at Appendix A.

A child with an Educational Health and Care Plan (EHCP) which names the school will be admitted. Remaining places are allocated as detailed below.

Where there are less applicants than the PAN, all children will be admitted. In the event the school is oversubscribed, the admission authority will apply the following oversubscription criteria in order of priority.

1. **Children and Young People in Care and previous Children and Young People in Care**

Children and young people in care are children who are in (a) in the care of the local authority, or (b) being provided with accommodation by a local authority in the exercise of the social services functions (see the definition in Section 22(1) of the Children Act 1989) at the time the application is made to school. Previously looked after children are children who were looked after, but ceased to be so because they were adopted (or became subject to a child arrangements order or special guardianship order) immediately following having been looked after and those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.



Supporting evidence

If the child is in the care of a local authority or provided with accommodation by that authority this must be indicated on the common application form and evidence (e.g. evidence of child in care from the placement authority) to support this claim must be submitted with the common application form. If the child has previously been in the care of a local authority or provided with accommodation by them and has subsequently been adopted, or is subject to a child arrangements order or special guardianship order this must be indicated on the

common application form and evidence (e.g. adoption certificate/copy of court order) to support this claim must be submitted with the common application form. For children in state care outside of England who ceased to be in state care as a result of being adopted the relevant legal document(s) must be supplied.

2. Children attending the corresponding feeder Infant School (Infant to Junior transfers only)

3. Medical/social

Whether there are specific medical or social circumstances that can be met only by the child's attendance at the preferred school.



Supporting evidence

If parents believe there are specific reasons, medical or social, for claiming priority for their child to attend a particular school these special factors must be indicated on the form and evidence (e.g. a letter from a registered health professional such as a doctor or a social worker) to support this claim must be submitted with the common application form. The information submitted must state clearly the effects of the condition/illness and why the preferred school is the only school that can meet their child's needs. This is necessary because parents would be asking the Authority to assess their child as having a stronger case than many other children, even some who live closer to the school in question than they do. The information provided will be used to prioritise the request for a particular school. Please note that only in exceptional cases are places prioritised in respect of a child's/parent's medical/social grounds.

4. Siblings

Whether siblings attend the school (or the associated Infant / Junior School) and will be attending the school in September 2025. See definition of a sibling on page 21.

5. Religious reasons for voluntary controlled schools (PRIMARY ONLY)

To a child and family who has religious reasons for attending the preferred voluntary controlled school and for whom it can be demonstrated by the faith leader that s/he has current strong religious connections. This reason will only be taken into consideration if the preferred school is the nearest Church of England (voluntary controlled or voluntary aided) school to the child's home address (measured by a straight line from the home address to the school using the Local Authority's software).



Supporting evidence

A Supplementary Information form will be provided for parents and your faith leader to complete, to enable them to demonstrate your child and family's current strong religious connections.

6. Children whose parent/carer is a member of staff employed at the school

This applies where the parent/carer has been employed by the school for two or more years at the time at which the application of admission to the school is made, and/or where the member of staff is recruited to fill a vacant post at the school for which there is a demonstrable skills shortage. This criterion applies to all permanent staff members, and excludes staff employed on a casual/temporary contract.

7. Distance

How close the child lives to the school requested with those living closest to the school getting the highest priority. The distance from the applicant's home address is taken in a straight line between the mid-point of the respective school's address and the child's home address. The distance is measured using the Local Authority's software. If there are a limited number of spaces available and we cannot distinguish between applicants using the above criteria, children who live in the same block of flats will be offered the available spaces randomly selected by drawing lots.

Where multiple births (twins and triplets etc.) from the same family are tied for the final place for Reception we will admit them all, as permitted by infant class size legislation, in accordance with the School Admissions Code (2021).

5

Additional arrangements and information

Applications for children to be admitted outside their normal age group

Parents who wish for their child to be considered for admission to a class outside of their normal age group must make an application for the normal age group in the first instance by 31 October 2024 for Secondary school applications and 15 January 2025 for Primary school applications.

This will include parents of a “summer born child” that may choose not to send that child to school until the September following their fifth birthday and may request that they are admitted out of their normal age group – to Reception in September 2026 rather than Year 1.

This will also include parents whose child is currently being educated outside of their normal age group but where the child has reached the normal age of transition to secondary school (i.e. normal age group is Year 6; however child is being educated in Year 5). Parents may request that the child continues to be educated outside of their normal age group and be admitted to Year 7 in September 2026 rather than Year 8.

Any parent wishing to make such a request must put the request in writing to the Admissions and Appeals section no later than 31 October 2024 (Secondary school applications) and 15 January 2025 (Primary school applications).

This request should be in the form of a written letter of application outlining the reasons why they wish for their child to be admitted into a class outside of their normal age group and enclosing any supportive evidence and documentation that they wish to be taken into account as part of that request.

Requests will be considered on an individual basis and decisions will be reached by taking account of the parent’s views; information about the child’s academic, social and emotional development; where relevant, their medical history and the views of a medical professional; whether they have previously been educated out of their normal age group; and whether they may naturally have fallen into a lower age group if it were not for being born prematurely. The view of the head teacher of the school concerned will also be sought as part of the decision-making process.



If the request is agreed and the year group for which the parents have requested a place is for a future year group, i.e. Reception or Year 7 in September 2026, then the original application is withdrawn, and the parents must submit a fresh application for a school place in September 2026 when applications open in the autumn term of 2025.

Please note that parents only have the right to defer their application and re-apply for a place.

Where the decision is to agree the request for an application in Reception or Year 7 the following year, that application is considered alongside all other applications received and parents will be advised of the outcome of that application on national offer day. **No place is reserved or held for the child in advance.**

Parents should be aware that if the request is agreed and the child is admitted outside of their normal age group in September 2026, the child will remain with their adopted cohort and be educated outside of their normal age group for the remainder of their education at the school. However, should a request be made to transfer from the allocated school to an alternative school, parents will need to apply to the admission authority of the new school to request that the child continues to be educated outside of their normal age group.

Before any application is submitted it is strongly recommended that parents/carers also read the DfE guidance which can be found at: <https://www.gov.uk/government/publications/summer-born-children-school-admission>



Changes of address (occurring during the allocation process)

In these circumstances - or if a query arises in respect of your child's place of residence - you will be required to supply evidence of your new address. This would need to be validated by documentary evidence such as a solicitor's letter confirming the completion of a house purchase or rent book confirming tenancy.

Deferred entry

A child's parents may defer the date at which their child, below compulsory school age, is admitted to the school until later in the school year, but not beyond the point at which they reach compulsory school age and not beyond the first day of the summer term 2026. A child may take up a part-time place until later in the school year, but not beyond the point at which the child reached compulsory school age. Upon receipt of the offer of a place a parent should notify the school, as soon as possible, that they wish to either defer their child's entry to the school or take up a part-time place.

Financial implications

There is no charge or cost related to the admission of a child to a Wolverhampton school.

Fraudulent or misleading applications

The Local Authority will follow up any reports they receive that allege that a fraudulent or misleading application has been made.

Parents can alert the Local Authority of any potential fraudulent applications by contacting the Admissions and Appeals team. Contact details are published in the composite prospectuses.

Late applications

Applications received after the closing date will be treated as late.

Applications received after the closing date and before the final date for late submissions with approved written evidence will only be incorporated into the initial allocation process if the late submission is for a valid reason or parents can demonstrate a material change of circumstances (see page 16).

When submitting late applications parents must give reasons in writing and supporting documentary evidence for the late submission. The appropriate admission authority will give consideration to the reasons, following which the application will be:

Either 1) incorporated into the initial allocation and assessed against the over-subscription criteria for the school(s) concerned

Or 2) considered only after all other applications.

Late applications received before the final date for late submissions without written reasons, or received after the final date for late submissions, will only be considered after all other applications and the notification may be sent shortly after the national offer day.

Material changes of circumstance

In claiming material changes of circumstances the applicant, at the time of application, must supply documentary evidence to confirm the changes. An example of material changes of circumstances is a house move that necessitates a change of preferences. This would need to be validated by documentary evidence such as a solicitor's letter confirming the completion of a house purchase or rent book confirming tenancy. An impending change of circumstances should not delay the submission of the preference form.

If applicants' circumstances change during the course of making the application that relate to any of the published criteria it is the applicant's responsibility to provide evidence to the Admissions and Appeals Team as this may affect the outcome of the application.

Sixth form admission arrangements for academy and community schools

Applications for admission to Sixth form will be dealt with by the school in accordance with the school's published admission arrangements.

Each school which admits pupils into Year 12 is required to publish in the school prospectus the minimum requirements for entry into sixth form.

Pupils already in school will not be required to apply formally for places in Year 12 but should have reached the minimum entry qualifications for admission into the sixth form.



Minimum entry requirements are the same for internal and external applications.

External applicants must not be refused the opportunity to make an application, or advised that they can only be placed on a waiting list rather than make a formal application

Pupils will be considered for entry into Year 12 based on their academic attainment and/or individual subject grade criteria and the availability and suitability of courses at the school. Entry to Year 12 is not dependent upon attendance, behaviour records, and perceptions of attitude or motivation.

Schools must not interview children or their families for entry to Year 12, although meetings can be held to provide advice on options and entry requirements for particular courses.

Any applicant refused a place in year 12 is entitled to appeal to an independent appeal panel whether the child is already attending the school or is an external candidate.

Special educational needs

The admission of children with an Education and Health Care Plan (EHCP) will be agreed between the Local Authority's SEN Statutory Assessment and Review Team, parents and school in accordance with parental preference, as far as possible, and the child's individual needs. Children with an EHCP are given overall priority to the named school. This will reduce the number of places at the school, which are available for allocation in accordance with the above criteria.

Supplementary information forms

In order to assess the application for Voluntary Aided schools and Academies parents are required to provide additional information to that collected on the preference form and should complete a "supplementary information form". For Wolverhampton schools these forms will be made available on the City of Wolverhampton Council website, and they should be returned to the relevant school(s) by the specified date. In the case of Voluntary Controlled schools the supplementary information form must be returned to the Local Authority. Please note if the school is over-subscribed the additional information gathered will be used to determine the allocation of school places.

Parents who are applying for schools outside of Wolverhampton are advised to contact the appropriate Local Authority to determine whether any Supplementary Information Forms are required, their submission date and to whom they must be submitted.

Parents should be aware that where a Supplementary Information Form is completed it will not be regarded as a valid application unless the Local Authority has also received a completed application showing an expressed preference for the school concerned.

Similarly, if applicants are required to sit school tests, they will be required to complete an "entrance examination registration" form.

Tie breakers for over-subscribed schools

If there are an insufficient number of places to accommodate all the children of a particular criterion, the next criterion will be used to assess the applications concerned in order to prioritise applications.

Unsuccessful applications and appeals

If the applicant is a Wolverhampton resident and the admissions and appeals team is unable to allocate a place at any of the preferred schools, then a place will be allocated at the nearest Wolverhampton maintained school to the home address that has a place available. Allocations to Own Admitting Authority schools in this case would be made following consultation with the governing body concerned.

For Wolverhampton residents, where preferences cannot be met, the Admissions and Appeals Team will notify parents accordingly, setting out the reasons and advising of the right of appeal, how to lodge an appeal and to whom.

For other applicants for Wolverhampton schools the home Local Authority will notify parents of the reasons why parental preference cannot be met and to whom any appeal should be lodged.

Parents are only entitled to one appeal per year group, per school, per academic year unless there is a material change of circumstances.

Further information can be found at:

<https://www.wolverhampton.gov.uk/education-and-schools/school-admission-appeals>

Waiting lists

If the applicant has not been allocated their first preference, the application will automatically be placed on a waiting list for the preferred Wolverhampton school or schools that were ranked higher than the allocated school.

Unless material changes of circumstances have been demonstrated a child's name will only be included on those lists for schools that were ranked higher on the application than the school allocated to the child and, therefore, if a child is allocated a place at the first preference school the child's name will not be added to the waiting list for any of the other preferred schools.

The waiting lists will be ranked in admission criteria order. As soon as places become vacant the Local Authority on behalf of the admitting authorities will re-allocate those places from the waiting list, even if this is before appeals have been heard.

The Authority will maintain the waiting lists until 31 December 2025, after which the Authority will cleanse each term for the remainder of the academic year to confirm parent wishes to remain on the list.

If a place cannot be offered from the waiting list for the preferred school by 31 August 2026, parents must re-apply for a place by completing the In Year Transfer Form which can be found at [Changing schools | City Of Wolverhampton Council](#)

Requests for inclusion on waiting lists for non-Wolverhampton schools must be made in writing to the relevant local authority for the school concerned for assessment in accordance with their scheme.

A child's position on a waiting list is not fixed. This means that a child's position on the waiting list could go up or down during the time that it is on the list. Any late applications accepted will be added to the waiting list in accordance with the oversubscription criteria.

Withdrawing offer places

Any allegations received by the admission authority of people providing false accommodation addresses when applying for school places shall be fully investigated and, if found to be true, allocated places may be withdrawn, as appropriate.

6

Definitions

Sibling

For admission purposes, a sibling is a child who resides permanently at the same address as the child for whom a place is being requested, and is one of the following:-

- brother/sister
- half-brother/sister (i.e. share one common parent)
- or stepbrother/sister (i.e. related by a parent's marriage)
- any other child for whom it can be demonstrated that they are residing permanently at the same address (e.g. under the terms of a Child Arrangement Order).

The sibling connection only applies where the child concerned has a sibling attending the school at the time of the application as well as at the time of admission, (i.e. for normal year of entry applications siblings are expected to be attending the same school in September 2025). A sibling connection will not be accepted if the original place was obtained by using fraudulent or false information.

Children and young people in care

Children and young people in care are children who are (a) in the care of the local authority, or (b) being provided with accommodation by a local authority in the exercise of the social services functions (see the definition in Section 22(1) of the Children Act 1989) at the time the application is made to school. Previously looked after children are children who were looked after, but ceased to be so because they were adopted (or became subject to a child arrangements order or special guardianship order)

Member of staff

For admission purposes, a member of staff is a parent/carer who is employed by the specific school they are submitting an application for and:

- Is employed on a permanent contract
- Has been employed for two or more years at the time at which the application of admission to the schools is made, and/or
- Has been recruited to fill a vacant post at the school for which there is a demonstrable skills shortage

Home address

Parents are asked to provide their child's home address, i.e. the usual place of residence on weekdays and nights. Please note that childminder's addresses will not be accepted. This applies to both formal childminders and relatives and friends acting in a childminding capacity.

The home address of a pupil is considered to be the permanent residence of a child in a residential property when the place is offered. Documentary evidence relating to house moves taking place between National Offer Days (3 March 2025 and 16 April 2025 respectively) and the start of the academic year in September 2025 will be considered. The address must be the child's only or main residence and is either:

- Owned by the child's parent(s), carer(s) or guardian(s)
- Leased to or rented by the child's parent(s), carer(s) or guardian(s) under lease or written rental agreement.

Documentary evidence of ownership or rental agreement may be required together with proof of actual permanent residence at the property concerned.

Where parents have shared responsibility for the child and the child lives with both parents for part of the week then the main residence will be determined as the address where the child lives for the majority of the school week. If the child equally shares living with both parents, the parents must inform the Local Authority which address should be used for admission purposes and which parent will make the application. Parents will be requested to supply documentary evidence to support the address used for the application.

Community and Voluntary Controlled Schools

Published Admission Numbers (PAN)

Primary Schools

Bantock Park Primary School	60
Bilston Church of England Primary School	60
Bushbury Hill Primary School	30
Castlecroft Primary School	30
Christ Church (Church of England) Infant and Nursery School	60
Christ Church (Church of England) Junior School	64
Claregate Primary School	60
Dovecotes Primary School	45
Eastfield Primary School	60
Fallings Park Primary School	90
Graiseley Primary School	30
Lanesfield Primary School	30
Long Knowle Primary School	30
Loxdale Primary School	60
Merridale Primary School	30
Rakegate Primary School	60
Spring Vale Primary School	60
St Andrew's Church of England Primary School	60
Stow Heath Primary School	60
Stowlawn Primary School	60
Uplands Junior School	96
Westacre Infant School	90
West Park Primary School	30
Whitgreave Primary School	60
Wilkinson Primary School	60
Wodensfield Primary School	60
Wood End Primary School	30

Secondary Schools

Colton Hills Community School	161
St Matthias School	161

You can get this information
in large print, Braille, audio or in another
language by called 01902 551155.

wolverhampton.gov.uk 01902 551155

  WolverhamptonToday  Wolverhampton_Today  @WolvesCouncil

City of Wolverhampton Council, Civic Centre, St. Peter's Square,
Wolverhampton WV1 1SH

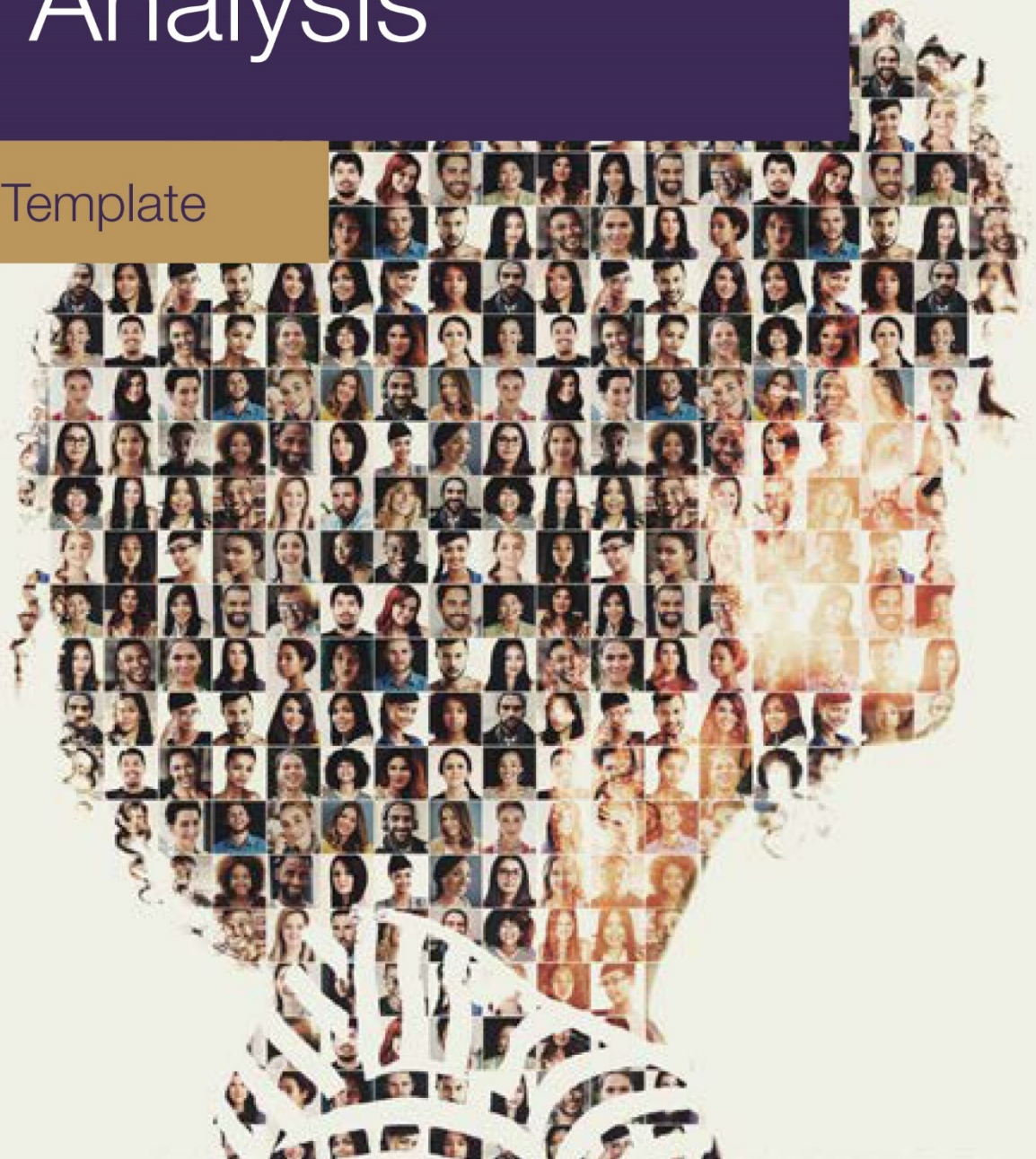
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A Guide to Undertake Equality Analysis

Appendix 2

Equality Analysis Template

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Equality Analysis Template

Page 888

The Equality Analysis (EA) may relate to a service, function, policy, procedure.

1. Officer completing the Equality Analysis (EA):

David Kirby, Service Manager School Organisation and Support

The service, function or policy being analysed:

Determined Admisison Arrangements for Community and Voluntary Controlled Schools

Is the EA being completed for a new service, function or policy or review of an existing service, function or policy:

Yes No

Directorate - Service Area:

If this EA supports a Cabinet Report or similar, please insert title and date of report

Directorate: Families (Education)

Date of Report: Cabinet Meeting 21 February 2024

Determined Admission Arrangements for Community and Voluntary Controlled Schools 2025-2026

Date completed:

10 January 2024

Step 1 - Make sure you have clear aims and objectives on what you are impact assessing – The intended benefits

2. What are the aims of the service, function or policy you are analysing?

Under the School Admissions Code 2021 every Local Authority (LA) is required to draw up a scheme (or schemes) for co-ordinating admission arrangements for all mainstream, maintained schools (community, voluntary controlled, voluntary aided, foundation, free-schools and academies) within their area.

Code compliant School Admissions Arrangements (SAA) help contribute to the Council Plan as an overarching link to Strong Families where children grow up well and achieve their full potential as the start of a child's educational journey begins with the school application process.

Each Admission Authority is required to determine admission arrangements every year. The School Admissions Code instructs that when drawing up admission arrangements, admission authorities must set a Published Admission Number (PAN) for each 'relevant age group', i.e., the number of school places that the admission authority must offer. Admission authorities must consult where they propose a decrease to the PAN.

Lanesfield Primary School is a Community School, and it is proposed that the PAN for Reception September 2025 onwards be reduced by 15 places (i.e., from 45 to 30). This is on the premise of a reduction in pupil demand and in accordance with the CWC Education Place Planning document in relation to a PAN of 45. There is further narrative in relation to this in section 3 of the report with pupil projection graphs (3.7 and 3.9) to confirm sufficient school places at a citywide and local area planning level.

Vertical Grouping (or the employment of mixed age classes) is commonly employed in primary schools with intakes of 45 and can work successfully in schools. However, the use of this structure can increase the complexity of planning and delivering the curriculum.

When an opportunity or need arises (based on demand) consultation will be undertaken to consider increasing or reducing admission limits in schools with an existing PAN of 45.

CWC produce pupil projections on an annual basis, using an externally validated and verified methodology. The projections for Academic Year 2022-23 indicated 99.7% accuracy for Reception. Although demand for Reception fluctuates in the short to medium

term, there are sufficient places to meet demand at a citywide level and within the Local Planning Area, even with the proposed reduction of 15 places at Lanesfield Primary School from September 2025.

By reducing the PAN at Lanesfield Primary School, this will help ensure there is not an oversupply of school places and will assist in reducing the complexity of planning and delivering the curriculum.

Approval of the admission arrangements without the proposed change may result in an oversupply of school places, leading to inefficient use of resources and increased complexity of planning and delivering the curriculum.

There are sufficient school places in the local area so this will not disadvantage children or parents / carers.

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Step 2 – What does the information you have collected, or that you have available, tell you?

3. What impact will or does the service, function or policy have on different equality groups at the moment on:-

Race, Disability, Sex, Gender Re-assignment, Age, Religion or Belief, Sexual Orientation, Maternity/Pregnancy, Marriage/Civil Partnership and other Socially Excluded Communities or Groups)?

There are no perceived negative impacts on different equality groups based on the current policy or the proposed reduction in PAN of 15 places for Lanesfield Primary School. There are sufficient school places in the local area so this will not disadvantage children or parents / carers.

There are no proposed changes to the oversubscription criteria which was previously consulted on last year and approved in February 2023.

Children with an Education Health and Care Plan are given overall priority to the named school, this is a mandatory provision with the School Admissions Code 2021.

Highest priority (again in accordance with the Code) is then given to Children and Young People in Care (as defined by Section 22 of the Children Act 1989). Children and Young People in Care and all previous Children and Young People in Care including those children who appear (to the admission authority) to have been in state care outside of England and ceased to be in state care as a result of being adopted.

The next highest criteria (excluding Infant to Junior School transfers) gives regard to social and medical reasons for attending a specific school.

School admission arrangements are regulated by the School Standards and Framework Act 1998 as amended by the Education and Skills Act 2008.

Admission arrangements must be compliant with the School Admissions Code 2021. Please see extracts from the code below

Appendix 1 – Relevant Legislation

1. This appendix sets out the primary legislation and regulations most relevant to admissions decisions. Admission authorities, Schools Adjudicators, appeal panels, local authorities and maintained schools must comply with the relevant law as well as acting in accordance with the provisions of this Code. This Code and the School Admission Appeals Code (the Codes) are applied to Academies through their Funding Agreements. The information here aims to signpost the relevant law; it does not aim to provide definitive guidance on interpreting the law: that is for the courts.

Equality Act 2010

2. This Act consolidates the law prohibiting discrimination, harassment and victimisation and expands the list of protected characteristics. All schools must have due regard to their obligations under the Act and review their policies and practices to make sure these meet the requirements of the Act, even if they believe that they are already operating in a non-discriminatory way.

3. An admission authority must not discriminate on the grounds of disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; or sexual orientation, against a person in the arrangements and decisions it makes as to who is offered admission as a pupil.

4. An admission authority must not harass a person who has applied for admission as a pupil, in relation to their disability; race; or sex.

5. An admission authority must not victimise a person in relation to a protected act either done, or believed to have been done, by that person (e.g. bringing proceedings under the Equality Act 2010) in the arrangements and decisions it makes as to who is offered admission as a pupil.

6. This Act contains limited exceptions to the prohibition of discrimination on grounds of religion or belief and sex. Schools designated by the Secretary of State as having a religious character are exempt from some aspects of the prohibition of discrimination on the grounds of religion or belief and this means they can make a decision about whether or not to admit a child as a pupil on the basis of religion or belief. Single-sex schools are lawfully permitted to discriminate on the grounds of sex in their admission arrangements.

7. Admission authorities are also subject to the Public Sector Equality Duty and therefore must have due regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity, and foster good relations in relation to persons who share a relevant protected characteristic and persons who do not share it.

8. The protected characteristics for these purposes are: disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

9. Further guidance on the Public Sector Equality Duty is available in the Department for Education's Advice to Schools on the Equality Act 2010, on the website of the Government Equalities Office and from the Equality and Human Rights Commission.

Human Rights Act 1998

10. The Human Rights Act 1998 confers a right of access to education. This right does not extend to securing a place at a particular school. Admission authorities, however, do need to consider parents' reasons for expressing a preference when they make admission decisions, though this may not necessarily result in the allocation of a place. These might include, for example, the parents' rights to ensure that their child's education conforms to their own religious or philosophical convictions (as far as is compatible with the provision of efficient instruction and the avoidance of unreasonable public expenditure).



4. What does the equalities data or evidence you hold tell us about the people or groups who will be affected by the service, function or policy? (positive or negative impact) What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality groups', i.e. race, disability, sex, gender re-assignment, age, religion or belief, sexual orientation, maternity/ pregnancy, marriage/civil partnership and other socially excluded communities or groups) and what does the data tell you? For example, are any groups not using or under-using the service?

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There are no perceived negative impacts on different equality groups based on the current policy or the proposed reduction in PAN of 15 places for Lanesfield Primary School.

There are no proposed changes to the oversubscription criteria which was previously consulted on last year and approved in February 2023.

Children with an Education Health and Care Plan are given overall priority to the named school, this is a mandatory provision with the School Admissions Code 2021.

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5. Engagement and consultation - If we do not hold equality data relevant to this proposal, consultation will help to inform the impact of the proposed service, function and policy? If consultation has taken place, who have we consulted?

Consultation

External consultation commenced on 16 October 2023 and ended on 01 December 2023, adhering to the consultation timelines specified by The School Admissions Code 2021.

The School Admissions Code has been adhered to by consulting with statutory consultees and other interested parties, which included:

- Over 200 Headteachers, Principals, Governors and education stakeholders of Infant, Junior, Primary, Secondary, Pupil Referral Units, Special Schools and maintained nurseries in Wolverhampton
- Diocesan Authorities
- Multi Academy Trusts and Academy Trust CEO's
- All Councillors

Stakeholders could respond directly to the consultation by sending their views in by email or by post.

No responses or concerns were received with regards to the proposed reduction in PAN for Lanesfield Primary School.

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Step 3 – Identify the impact

6. Identifying the impact - from the data you have gathered, and the consultation undertaken to date to inform your decisions, can you please set out below details as to whether the impact or the potential impact is positive and or negative. Where a negative impact is identified, please outline solution to mitigate.

Equality Themes Protected Characteristics	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
Age (including children, young people and older people)	School Admissions Code prescribe the entrance requirements. Code and CWC arrangements mandate age and education out of normal age cohort.		

Equality Themes Protected Characteristics	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
Disability (including carers)	Highest priority must be given (prescribed by the code) to children and young people with an Education Health and Care Plan naming the school. Provision also for medical reasons to attend a specific school.		
Sex (male, female, trans, non-binary)	See relevant legislation in section 4 of this document		
Race (including Gypsies & Travellers and Asylum Seekers)	See relevant legislation in section 4 of this document		
Religion or Belief (including people of no religion or belief)	See relevant legislation in section 4 of this document Faith based oversubscription criteria in schools designated with a religious character is allowed in the code. As with other publicly funded mainstream schools, these schools are required to offer every child who applies, whether of the faith, another faith or no faith, a place at the school if there are places		

Equality Themes Protected Characteristics	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
	available. Schools designated by the Secretary of State as having a religious character (commonly known as faith schools) may use faith-based oversubscription criteria and allocate places by reference to faith where the school is oversubscribed.		
Gender Re-assignment (those that are going or have gone through a transition: male to female or female to male)	See relevant legislation in section 4 of this document		
Pregnancy and Maternity	See relevant legislation in section 4 of this document		
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	See relevant legislation in section 4 of this document		
Marriage and Civil Partnership	See relevant legislation in section 4 of this document		
Human Rights	See relevant legislation in section 4 of this document		

Step 4 – Changes or mitigation actions proposed or adopted

7. What changes have been made, or are proposed to the service, function or policy after implementing the mitigating solutions above, is the service, function or policy more accessible and inclusive?

Having undertaken the analysis are there any changes necessary to the existing service/activity?

What changes or mitigating actions are proposed?

How will you provide this service to ensure it is accessible to all Equality Groups?

No changes proposed. No responses or concerns were received regarding the proposed reduction in PAN for Lanesfield Primary School.

Although demand for Reception fluctuates in the short to medium term, there are sufficient places to meet demand at a citywide level and within the Local Planning Area, even with the proposed reduction of 15 places at Lanesfield Primary School from September 2025.

By reducing the PAN at Lanesfield Primary School, this will help ensure there is not an oversupply of school places and will assist in reducing the complexity of planning and delivering the curriculum.

Approval of the admission arrangements without the proposed change may result in an oversupply of school places, leading to inefficient use of resources and increased complexity of planning and delivering the curriculum.

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Step 5 – Monitoring

8. Monitoring - How are you going to monitor the resulting service, function, policy or procedure?

Each year the School Admissions Code requires CWC to determine (agree) their admission arrangements by 28 February. There is only a requirement to consult every 7 years, unless further changes are proposed. In accordance with CWC constitution they are determined at cabinet each year for transparency and review.

However, there will be careful monitoring of the impact of the arrangements and if required there will be a new consultation and they will also be reviewed every year when they are determined.

Step 6 – To complete Action Plan on progress

9. Action Plan

Barrier	Improvement Action Required	Responsible Officer	Date for completion
No barriers identified but will be reviewed each year in accordance with section 8 of this document	Monitoring	David Kirby	Each October

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10. Equality Analysis approved by (Head of Services):

Date:

Bill Hague

10 January 2024

Please keep a copy of the signed EA with the report for future updates, reviews etc.

11. Date of review:

October 2025

Please upload your completed Equality Analysis form by following the link to: Equality, Diversity and Inclusion (sharepoint.com).

This function is not available until June 2022.

Please email your completed Equality Analysis form to: EDI@wolverhampton.gov.uk

A word version of this template for larger and complex Equality Analysis is available.

It is important to retain a copy of your completed Equality Analysis for future reference

Additional notes

You can get this information in large print, braille, audio or in another language by calling 01902 551155

wolverhampton.gov.uk 01902 551155

  WolverhamptonToday  Wolverhampton_Today  @WolvesCouncil

City of Wolverhampton Council, Civic Centre, St. Peter's Square,
Wolverhampton WV1 1SH

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