

Scrutiny Board

21 February 2024

Time 6.30 pm **Public Meeting?** YES **Type of meeting** Scrutiny

Venue Committee Room 3 - Civic Centre, St Peter's Square, Wolverhampton WV1 1SH

Membership

Chair Cllr Philip Bateman MBE (Lab)

Vice-chair Cllr Ellis Turrell (Con)

Labour

Cllr Val Evans
Cllr Rita Potter
Cllr Susan Roberts MBE
Cllr Barbara McGarrity QN
Cllr Jacqueline Sweetman
Cllr Qaiser Azeem
Cllr Anwen Muston
Cllr John Reynolds
Cllr Jasbinder Dehar

Conservative

Cllr Wendy Thompson
Cllr Simon Bennett

Quorum for this meeting is four Councillors.

Information for the Public

If you have any queries about this meeting, please contact the Scrutiny Team:

Contact Martin Stevens DL

Tel/Email martin.stevens@wolverhampton.gov.uk

Address Scrutiny Team, Civic Centre, 1st floor, St Peter's Square,
Wolverhampton WV1 1RL

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Agenda

Part 1 – items open to the press and public

Item No. *Title*

MEETING BUSINESS ITEMS

- 1 **Apologies for absence and Substitutions**
[To receive any apologies for absence and notification of substitutions].
- 2 **Declarations of interest**
[To receive any declarations of interest].

DISCUSSION ITEMS

- 3 **Local Development Plan - Issues and Preferred Options Consultation** (Pages 3 - 378)
[To consider the Cabinet report on the Local Development Plan – Issues and Preferred Options Consultation. A specific Presentation to Scrutiny Board is also attached].
- 4 **West Midlands Combined Authority Single Settlement Memorandum of Understanding** (Pages 379 - 426)
[To consider a report on the West Midlands Combined Authority Single Settlement Memorandum of Understanding].
- 5 **Forward Plan of Key Decisions** (Pages 427 - 438)
[To consider the Forward Plan of Key Decisions].
- 6 **Scrutiny Work programme** (Pages 439 - 470)
[To consider the Scrutiny Work Programme].

Wolverhampton Local Plan: Issues and Preferred Options Consultation

Scrutiny Board

21 February 2024

Page 3

Agenda Item No: 3

Presenter:

Ian Culley

Lead Planning Manager

wolverhampton.gov.uk

Recommendations for action or decision

The Scrutiny Board is recommended to:

1. Consider the 21 February Cabinet report on the Wolverhampton Local Plan: Issues and Preferred Options Consultation.

Purpose

- In October 2023, Scrutiny Board received a presentation on progress regarding the Wolverhampton Local Plan.
- Scrutiny Board requested to consider the Cabinet Report to approve the Wolverhampton Local Plan Issues and Preferred Options consultation.

Background

- Page 5
- Each local authority must prepare a Local Plan to guide planning decisions and regeneration – current Black Country Core Strategy (2011) is out of date.
 - When work ceased on the Black Country Plan (BCP) in Oct 2022, the Council decided to prepare a Wolverhampton Local Plan (WLP) based on BCP work
 - Work paused in Jan 2023, when Government consulted on changes to national policy which would remove the requirement to review the green belt to meet housing need
 - In Dec 2023 new national policy was published confirming no need to review green belt, and work can now proceed on the WLP without green belt sites

Key information for Scrutiny

Wolverhampton Local Plan Timetable

Date	Actions
21 Feb 2024	Cabinet to approve Issues and Preferred Options Report and Sustainability Appraisal for consultation
26 Feb - 10 Apr 2024	Issues and Preferred Options consultation Summary Leaflet; Press release; Documents on website & in libraries; Mailings; Social Media; Drop-in sessions; Support
Autumn 2024	Cabinet / Full Council approval for Draft Wolverhampton Local Plan consultation and delegation of submission subject to minor modifications
End 2024 / Early 2025	Draft Wolverhampton Local Plan consultation
Mid 2025 – Mid 2026	Submission and Examination of Wolverhampton Local Plan Cabinet / Full Council approval to adopt Wolverhampton Local Plan

Issues and Preferred Options

Vision and Priorities

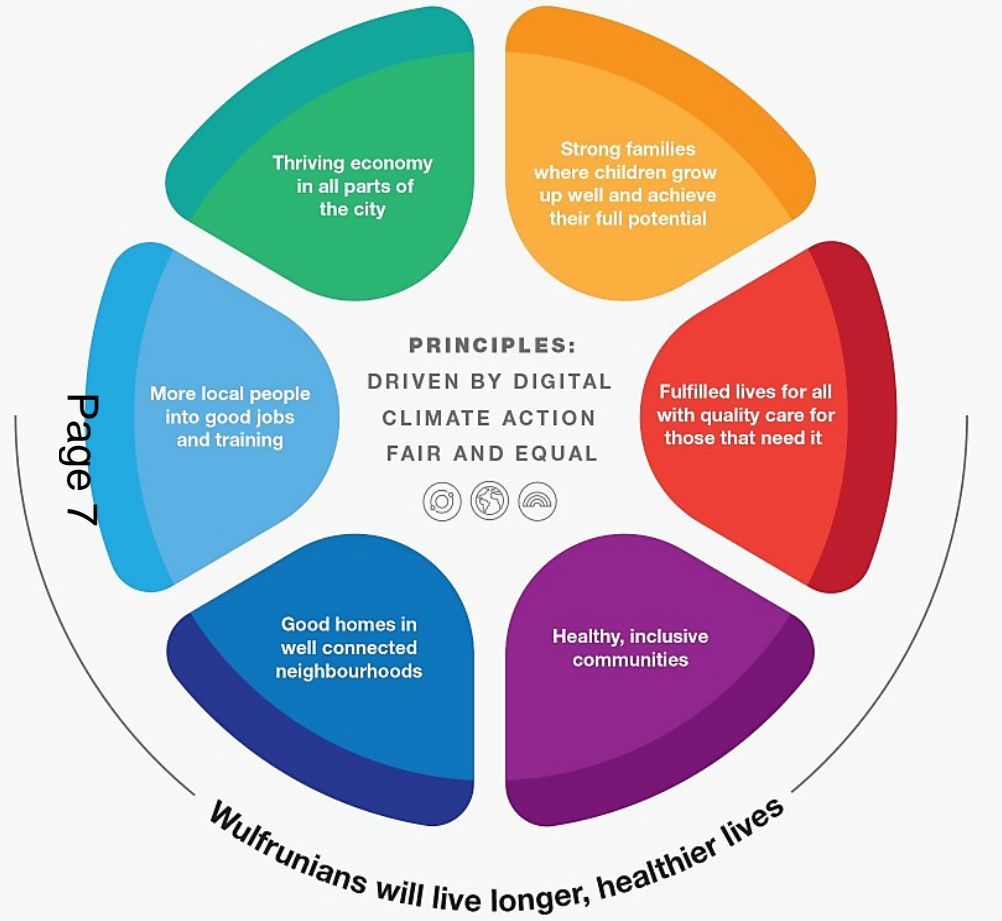
The WLP will be aligned to Our City: Our Plan and other City strategies and priorities.

Our City: Our Plan

Our City: Our Plan will be the “Vision” for the WLP. The WLP will be a key enabler to delivery of four priorities:

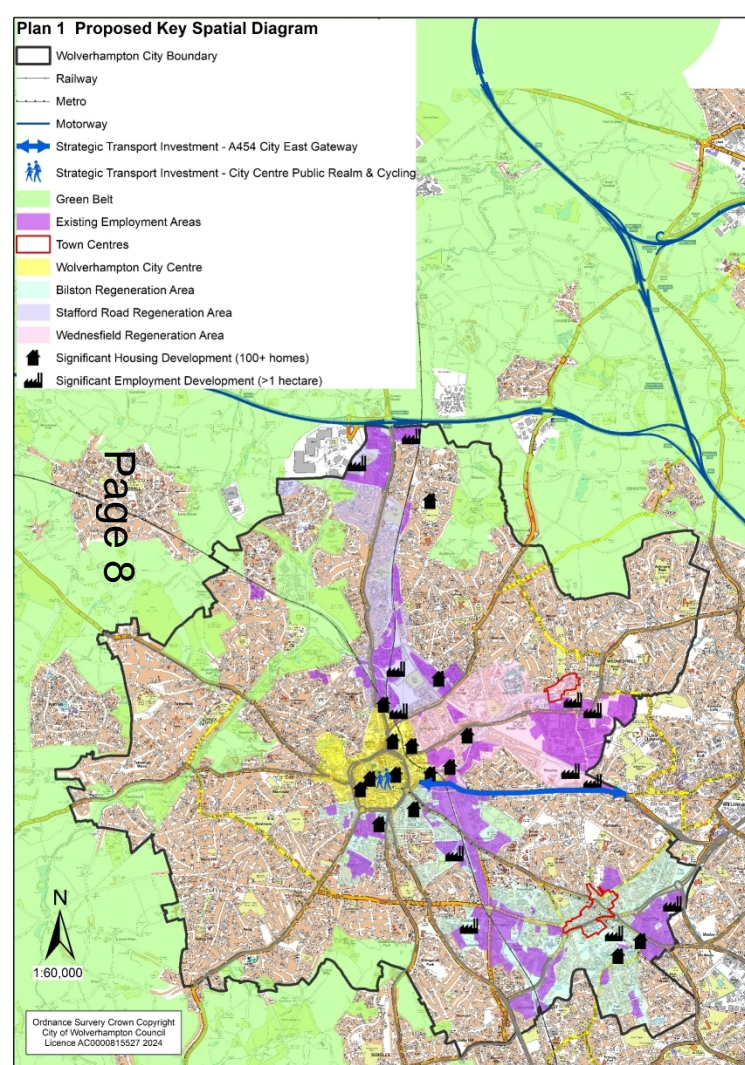
- Healthy, inclusive communities
- Good homes in well-connected neighbourhoods
- More local people into good jobs and training
- Thriving economy in all parts of the City

Fifteen strategic aims will sit under these priorities. These aims will be delivered through the Plan policies and allocations.



Balanced and Sustainable Spatial Strategy

- Safeguard the green belt
- Protect and improve wildlife & heritage
- Promote growth: 10,300 homes / 52 ha employment
- Focus on brownfield land and higher densities
- Focus development in City Centre (44% of housing) and Regeneration Areas (Stafford Road; Bilston; Wednesfield) – good fit with “Levelling Up”
- Accessible locations and environment-friendly design
- Protect character of existing neighbourhoods and support better services e.g. open space
- Support housing renewal in priority locations
- Not enough land to meet all of our local housing, employment or gypsy pitch needs for next 15 years – export shortfalls to neighbours



What's new since the Draft Black Country Plan (2021)?

▪ **No green belt review = no green belt sites**

- Bushbury (inc *Fmr Northcote School playing field, Bushbury La / Legs La)
- Fallings Park (inc *Grassy Lane Open Space)
- *Fmr WEC site, Castlecroft

▪ **Removed four greenfield sites (264 homes)**

- *Grapes Pool / Moseley Road Open Space (large number of objections; protected for open space)
- Fmr St Lukes School (some objections; needed for Royal School)
- *Fmr Nelson Mandela House (viability issues)
- Alexander Metals Open Space, The Lunt (protected for wildlife following recent survey)

▪ **Added four brownfield sites (275 homes)**

- *Fmr Loxdale Primary School, Bradley
- Fmr Probert Court / Health Centre (adjoins Oxley Day Centre Site; subject to GP relocation)
- Bluebird Industrial Estate and land to rear, Park Lane
- Fmr Gym, Craddock Street

* Council-owned

Key Changes to Current Policies

Stronger Climate Crisis policies

- promotion of sustainable transport
- higher renewable energy requirements
- higher energy & water efficiency standards

Stronger Environment & Health policies

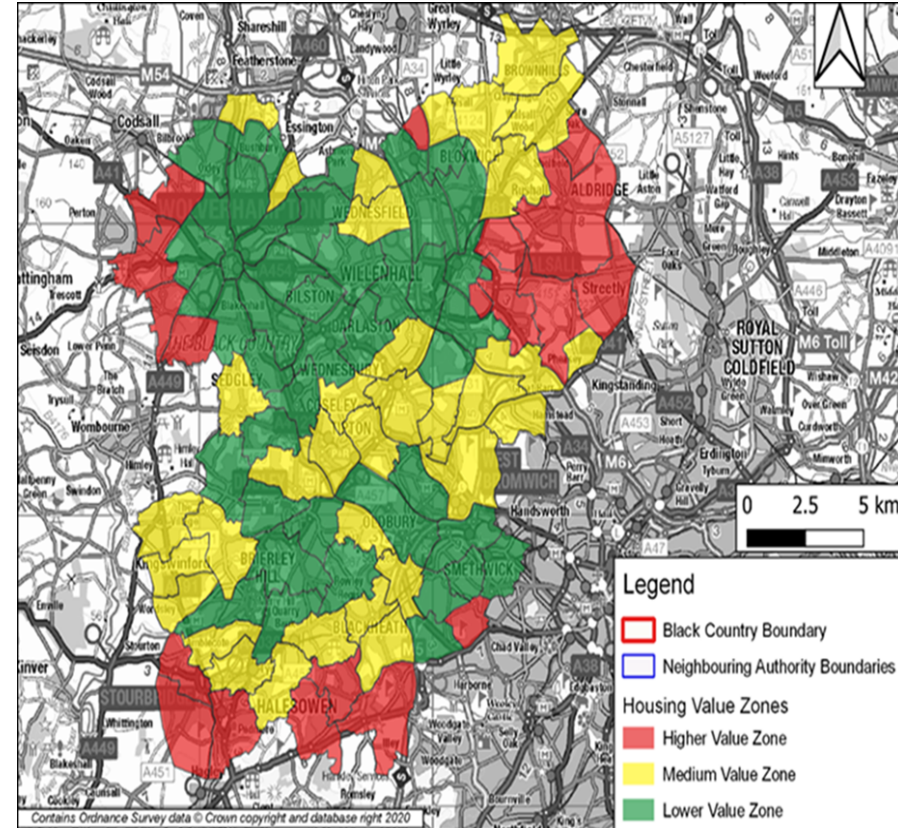
- increasing tree cover
- health impacts of development (hot food takeaways, betting shops, shisha bars)
- water quality / air quality
- national internal space standard for housing

Affordable housing

- viability rules mean we must reduce our 25% requirement to 10% (most housing sites are in the lower value zone)

Infrastructure contributions where required and viable

- primary health
- school places
- playing pitches



Ian Culley

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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.

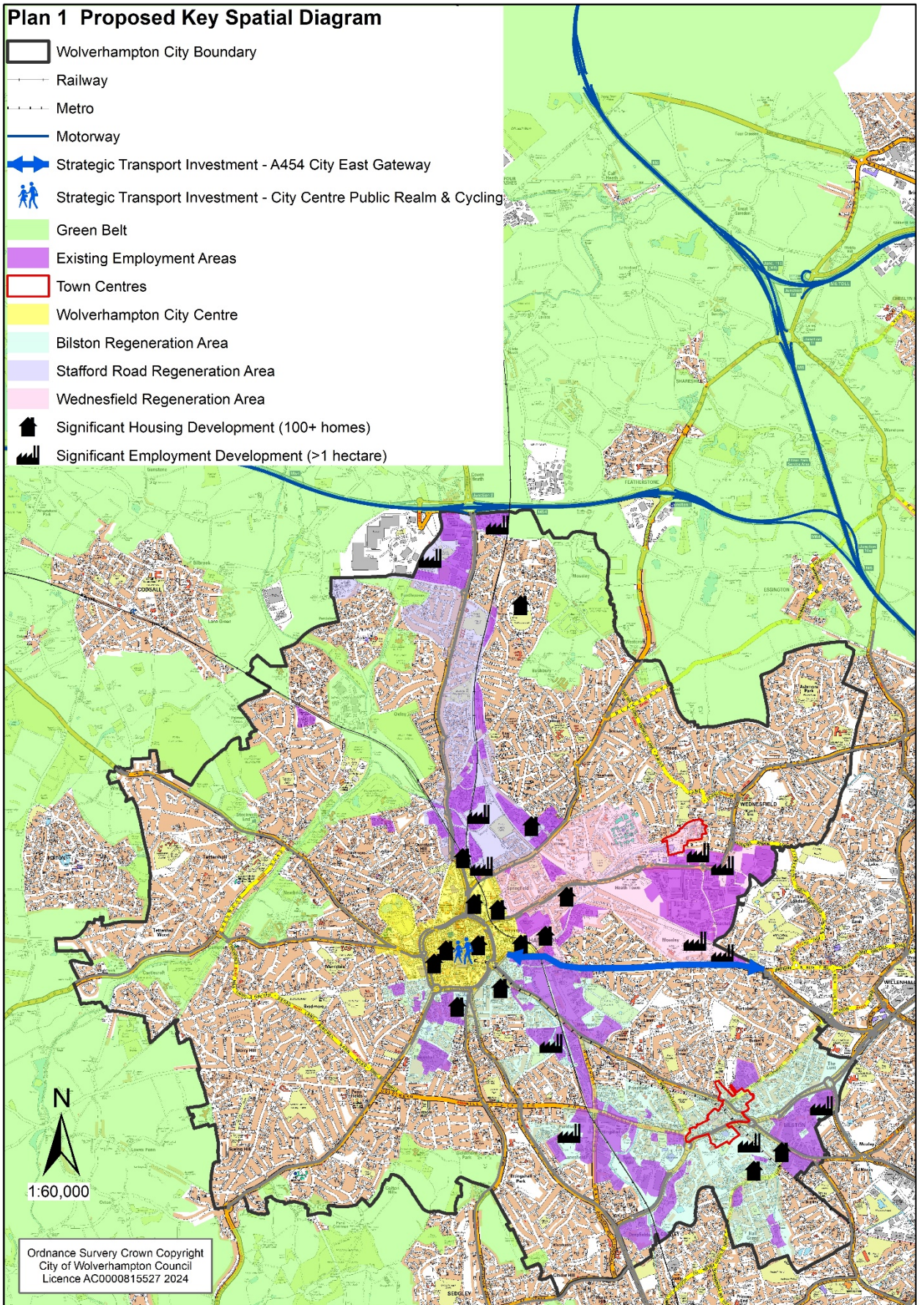
3.0 The Wolverhampton Local Plan Issues and Preferred Options Consultation

- 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

Contents

	How to Respond to the Consultation
1.	Introduction
2.	National, Regional, Black Country and Local Policy Context
3.	A Spatial Portrait and the Big Issues
4.	Evidence
5.	The Preferred Options
	a. Vision and Strategic Priorities
	b. Growth and Spatial Options
	c. Policies
	d. Site Allocations
Table 1	Evidence and Background Documents to support the Wolverhampton Local Plan
Table 2	Wolverhampton Local Plan Strategic Priorities aligned to Our City: Our Plan Priorities
Table 3	Proposed Spatial Distribution of Housing and Employment Development (2022-42)
Table 4	Wolverhampton Local Plan Proposed Site Allocations – Housing, Gypsy and Traveller Pitch, Employment Development
Table 5	Draft Black Country Plan Proposed Housing Allocations in the Urban Area now <u>Not Suitable</u> for Development
Plan 1	Proposed Key Spatial Diagram
Plan 2	Proposed Policies Map
Appendix 1	Consultation Questions
Appendix 2	Specific Amendments to Draft Black Country Plan Policies

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.

<p>Question 2: Do you agree with the “big issues” identified for the Wolverhampton Local Plan to address?</p>
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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

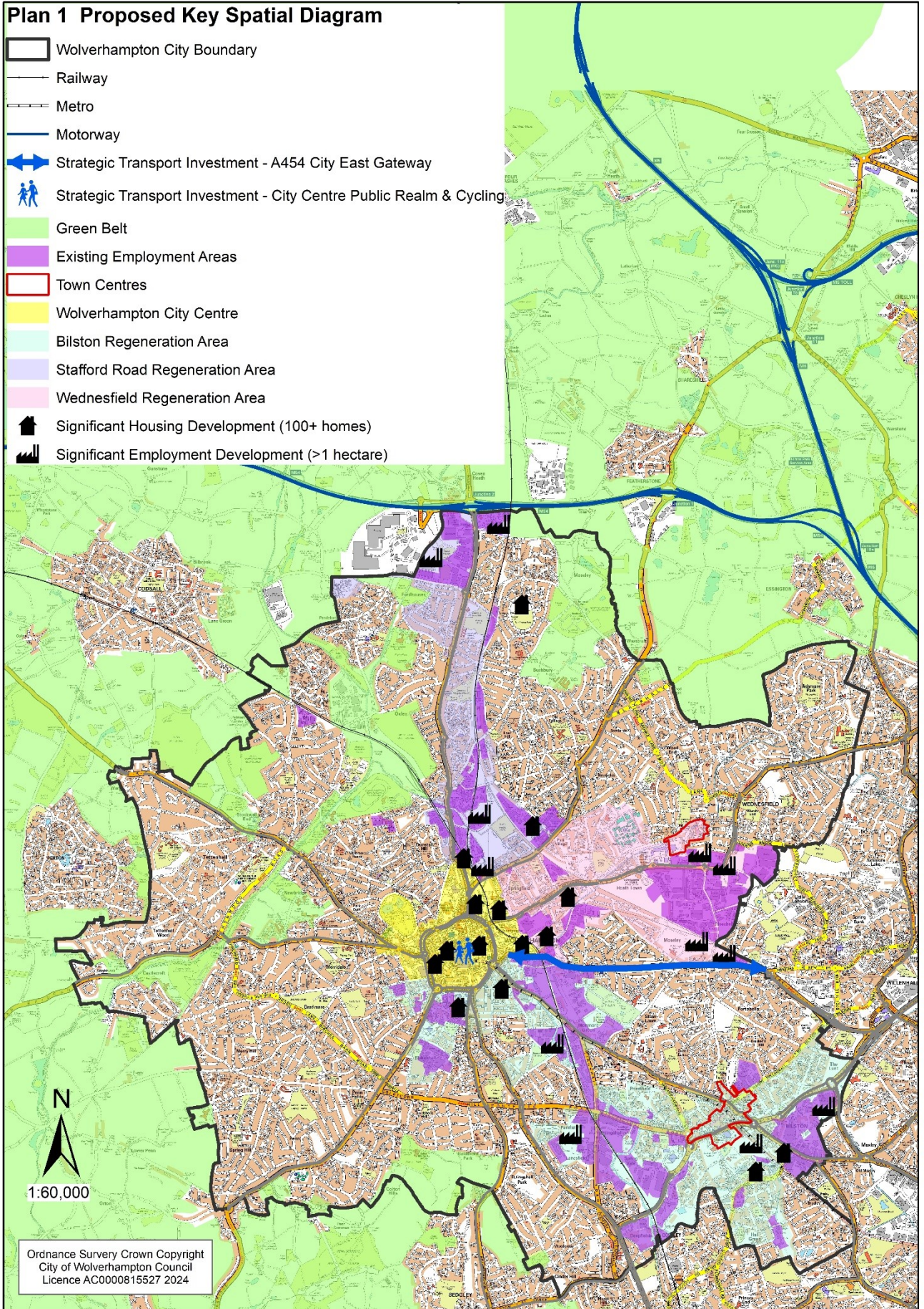
Option	Description of Option	Impact on Growth Options
Option A	“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> • As for Option H1 • As for Option E1
Option B	Employment-Led - reconfigure uses in the urban 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)



N
1:60,000

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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.

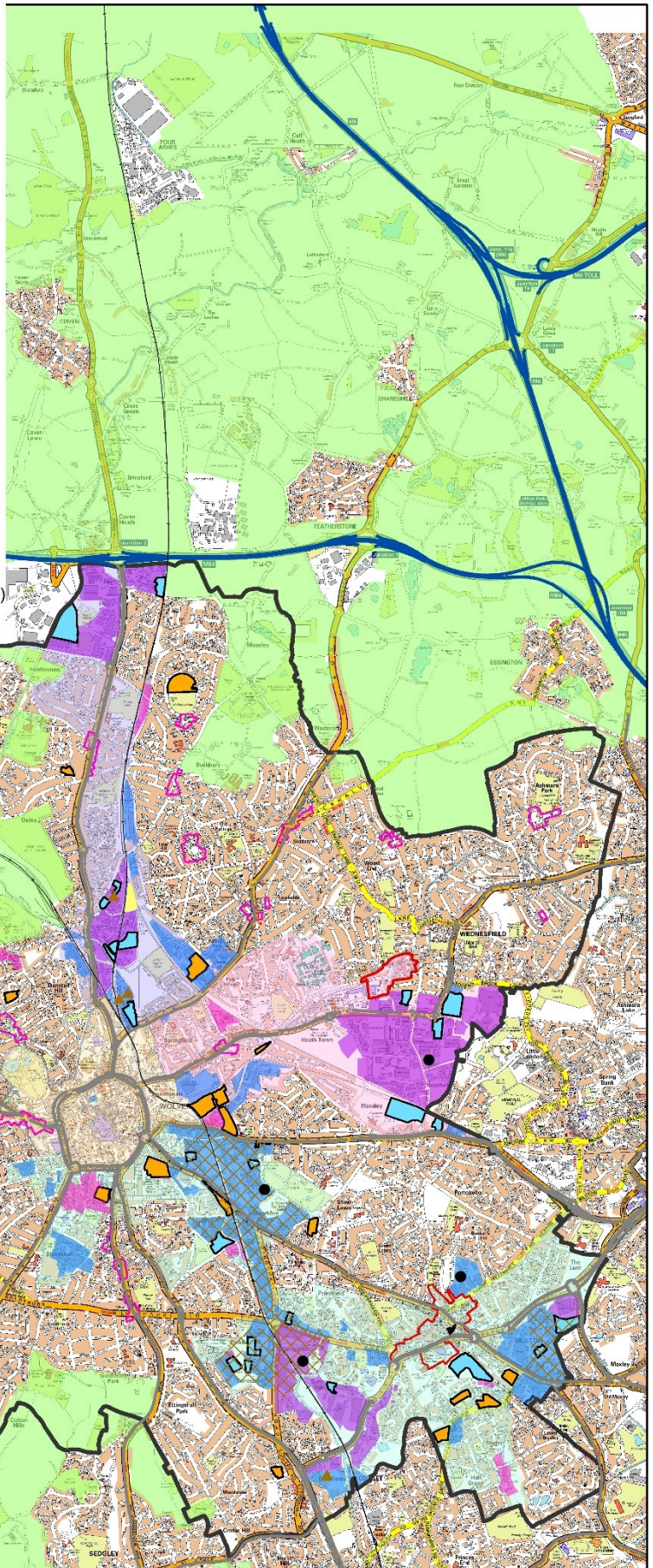
Question 9: Do you agree with the preferred approach to policies in the Wolverhampton Local Plan (that the policies and Policies Map designations should repeat those in the Draft Black Country Plan (2021), subject to the amendments set out in Appendix 2 and summarised in section 5 c)?

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			
<p>Policy TRAN1 Priorities for the Development of the Transport Network</p>	<p>174-181</p>	<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>
<p>Policy TRAN2 Safeguarding the Development of the Key Route Network</p>	<p>183-184</p>	<p>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>	<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

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About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of City of Wolverhampton Council (CWC). There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report without written permission from Lepus.

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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).

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Contents

1	Introduction	1
2	Environmental baseline	12
3	Assessment methodology and scope of appraisal	35
4	Housing growth options	70
5	Gypsy and traveller growth options	81
6	Employment growth options	90
7	Assessment of spatial options	101
8	Assessment of policy areas	118
9	Assessment of reasonable alternative development sites	122
10	Recommendations	130
11	Conclusions and next steps	134
	Appendix A – SA Framework	A1
	Appendix B – Assessment of proposed WLP policy areas	Bi
	Appendix C – Reasonable Alternative Site Assessments	Ci

Tables

Table 1.1:	The WLP and Sustainability process so far	9
Table 1.2:	Consultation responses from statutory consultees on SA Scoping Report (November 2022)	10
Table 2.1:	Estimated CO ₂ emissions in 2021	20
Table 2.2:	Per capita carbon dioxide emissions by sector: regional summary 2021 (kt CO ₂)	20
Table 3.1:	Summary of SA Objectives	35
Table 3.2:	Impact sensitivity	38
Table 3.3:	Impact magnitude	38
Table 3.4:	Guide to scoring significant effects	39
Table 3.5:	Presenting likely impacts	41
Table 4.1:	Wolverhampton housing growth options identified by CWC	71
Table 4.2:	Impact matrix of the three housing growth options	79
Table 5.1:	Wolverhampton Gypsy and Traveller pitch options identified by CWC	82
Table 5.2:	Impact matrix of the two Gypsy and Traveller growth options	88
Table 6.1:	Wolverhampton employment growth options identified by CWC	90
Table 6.2:	Impact matrix of the three employment growth options	99
Table 7.1:	Wolverhampton spatial options identified by CWC	101
Table 7.2:	Impact matrix of the seven spatial options	115
Table 8.1:	Summary of policy area assessments	120
Table 9.1:	Summary impact matrix of all reasonable alternative sites (pre-mitigation)	124
Table 9.2:	Outline reasons for selection / rejection of reasonable alternative sites for the WLP	126
Table 10.1:	SA recommendations for the Wolverhampton Local Plan	130

Boxes

Box 2.1: Key issues regarding accessibility and transport identified during Scoping.....	13
Box 2.2: Key issues regarding air quality identified during Scoping	14
Box 2.3: Key issues regarding biodiversity, flora, fauna and geodiversity identified during Scoping	19
Box 2.4: Key issues regarding climatic factors identified during Scoping.....	21
Box 2.5: Key issues regarding cultural heritage identified during Scoping.....	23
Box 2.6: Key issues regarding human health identified during Scoping	25
Box 2.7: Key issues regarding landscape and townscape identified during Scoping	27
Box 2.8: Key issues regarding population and material assets identified during Scoping	30
Box 2.9: Key issues regarding soil and water resources identified during Scoping	34
Box 3.1: Schedule 1 of the SEA Regulations	37
Box 3.1: SA Objective 1: Cultural heritage strategic assessment methodology.....	43
Box 3.2: SA Objective 2: Landscape strategic assessment methodology	46
Box 3.3: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology	48
Box 3.4: SA Objective 4: Climate change mitigation strategic assessment methodology	52
Box 3.5: SA Objective 5: Climate change adaptation strategic assessment methodology	53
Box 3.6: SA Objective 6: Natural resources strategic assessment methodology	55
Box 3.7: SA Objective 7: Pollution strategic assessment methodology	57
Box 3.8: SA Objective 8: Waste strategic assessment methodology.....	60
Box 3.9: SA Objective 9: Transport and accessibility strategic assessment methodology	61
Box 3.10: SA Objective 10: Housing strategic assessment methodology	63
Box 3.11: SA Objective 11: Equality strategic assessment methodology	64
Box 3.12: SA Objective 12: Health strategic assessment methodology.....	65
Box 3.13: SA Objective 13: Economy strategic assessment methodology.....	67
Box 3.14: SA Objective 14: Education, skills and training strategic assessment methodology	68

Figures

Figure 1.1: Wolverhampton administrative boundary.....	3
Figure 1.2: Sustainability appraisal process.....	8
Figure 2.1: Draft Black Country Local Nature Recovery Opportunity Map	18

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 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.

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]

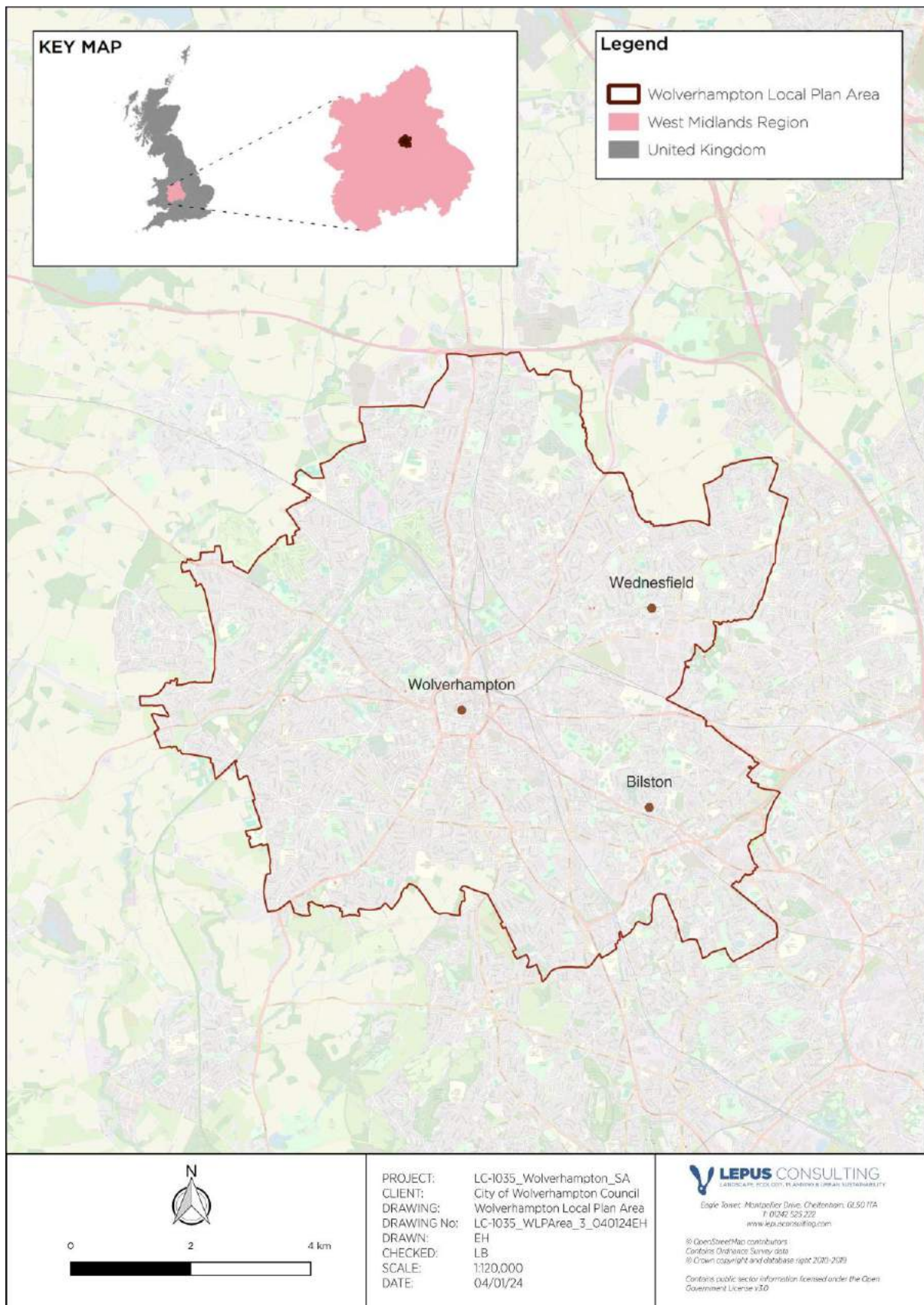


Figure 1.1: Wolverhampton administrative boundary

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.

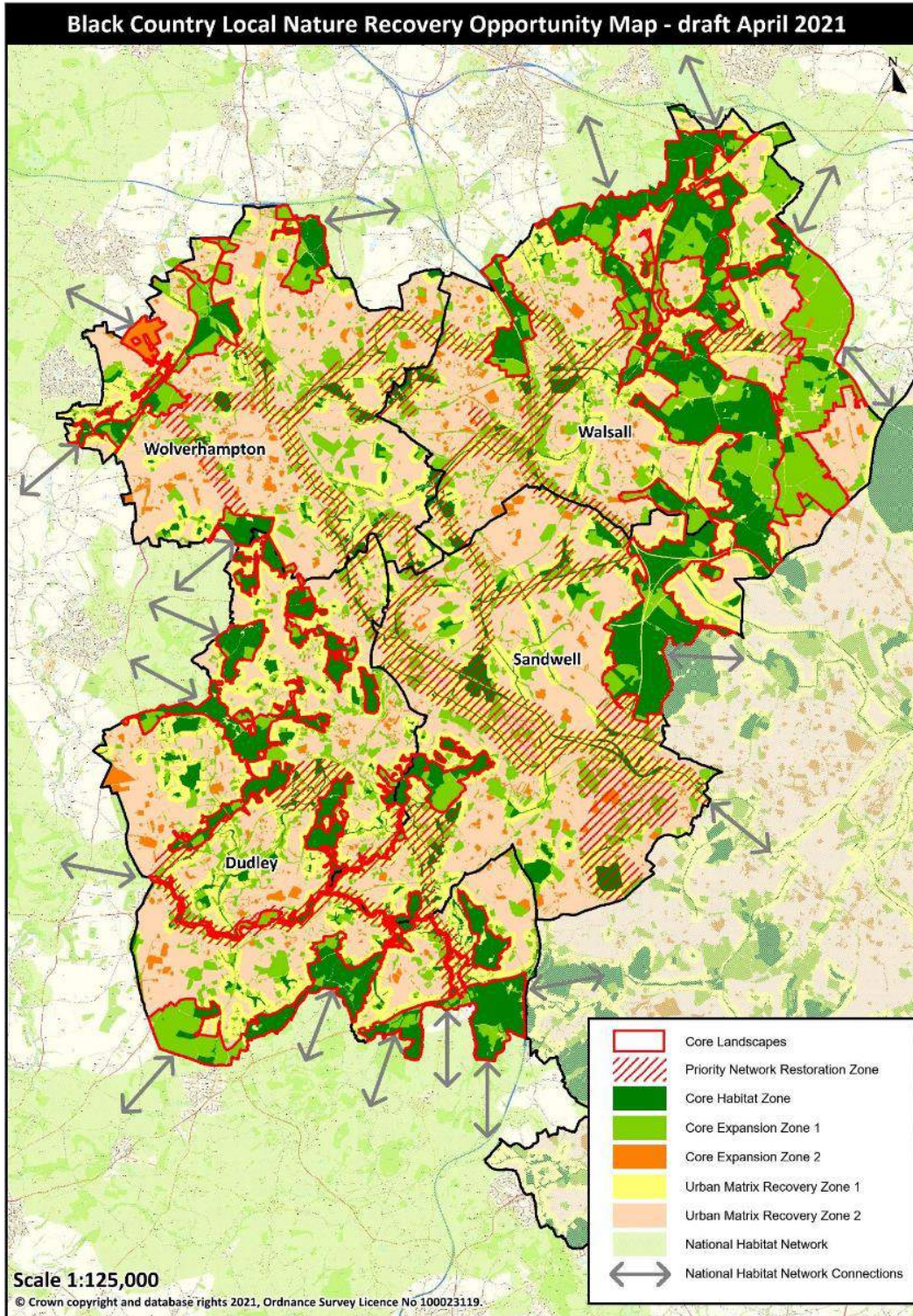


Figure 2.1: Draft Black Country Local Nature Recovery Opportunity Map

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-87bba26fbf5/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 website ¹¹⁶ , 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 distances ¹¹⁷ .	

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 Greenspaces ¹¹⁸ . 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 distances ¹¹⁹ .	

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 Midlands ¹²⁰ . The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> 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, 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 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, 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 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, Ettingshall	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.	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.	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.	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.	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

Appendix B Contents

B.1	Overview	B1
B.1.1	Introduction	B1
B.1.2	Overview of policy assessments	B2
B.2	Spatial Strategy	B5
B.2.1	Policy CSP1 – Development Strategy	B5
B.2.2	Policy CSP2 – The Strategic Centres and Core Regeneration Areas	B7
B.2.3	Policy CSP3 – Towns and Neighbourhood Areas and the Green Belt	B8
B.2.4	Policy CSP4 – Achieving well-designed places	B9
B.2.5	Policy CSP5 – Cultural Facilities and the Visitor Economy	B10
B.2.6	Policy GB1 – The Black Country Green Belt	B11
B.2.7	Policy GB2 – Extensions and Replacement Buildings in the Green Belt	B12
B.3	Delivery	B14
B.3.1	Policy DEL1 – Infrastructure Provision	B14
B.3.2	Policy DEL2 – Balance between employment land and housing	B14
B.3.3	Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks	B15
B.4	Health and Wellbeing	B16
B.4.1	Policy HW1 – Health and Wellbeing and Policy HW3 – Health Impact Assessment (HIA)	B16
B.4.2	Policy HW2 – Healthcare Infrastructure	B17
B.5	Housing	B19
B.5.1	Policy HOU1 – Delivering Sustainable Housing Growth	B19
B.5.2	Policy HOU2 – Housing Density, Type and Accessibility	B19
B.5.3	Policy HOU3 – Delivering Affordable, Wheelchair Accessible and Self Build / Custom Build Housing B20	
B.5.4	Policy HOU4 – Accommodation for Gypsies and Travellers and Travelling Showpeople	B21
B.5.5	Policy HOU5 – Education Facilities	B22
B.5.6	Policy HOU6 – Houses in Multiple Occupation	B22
B.6	The Economy	B24
B.6.1	Policy EMP1 – Providing for Economic Growth and Jobs	B24
B.6.2	Policy EMP2 – Strategic Employment Land	B24
B.6.3	Policy EMP3 – Local Employment Areas	B25
B.6.4	Policy EMP4 – Other Employment Sites	B25
B.6.5	Policy EMP5 – Improving Access to the Labour Market	B26
B.7	Centres	B27
B.7.1	Policy CEN1 – The Black Country Centres	B27
B.7.2	Policy CEN2 – Strategic Centres	B28
B.7.3	Policy CEN3 – Tier Two Centres	B29
B.7.4	Policy CEN4 – Tier Three Centres	B29
B.7.5	Policy CEN5 – Proposals of Small-Scale Local Facilities	B30

B.7.6	Policy CEN6 – Edge-of-Centre and Out-of-Centre Development.....	B30
B.8	Transport	B32
B.8.1	Policy TRAN1 – Priorities for the Development of the Transport Network and Policy TRAN2 – Safeguarding the Development of the Key Route Network	B32
B.8.2	Policy TRAN3 – Managing Transport Impacts of New Development	B33
B.8.3	Policy TRAN4 – The Efficient Movement of Freight.....	B33
B.8.4	Policy TRAN5 – Creating Coherent Networks for Cycling and Walking	B34
B.8.5	Policy TRAN6 – Influencing the Demand for Travel and Travel Choices and Policy TRAN7 – Parking Management.....	B35
B.8.6	Policy TRAN8 – Planning for Low Emission Vehicles	B36
B.9	Environmental Transformation	B37
B.9.1	Policy ENV1 – Nature Conservation.....	B37
B.9.2	Policy ENV2 – Development Affecting Special Areas of Conservation.....	B38
B.9.3	Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain.....	B39
B.9.4	Policy ENV4 – Provision, Retention and Protection of Trees, Woodlands and Hedgerows	B40
B.9.5	Policy ENV5 – Historic Character and Local Distinctiveness of the Black Country	B41
B.9.6	Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark	B42
B.9.7	Policy ENV7 – Canals.....	B43
B.9.8	Policy ENV8 – Open Space, Sport and Recreation	B44
B.9.9	Policy ENV9 – Design Quality	B45
B.10	Climate Change	B48
B.10.1	Policy CC1 – Increasing Efficiency and Resilience.....	B48
B.10.2	Policy CC2 – Energy Infrastructure	B48
B.10.3	Policy CC3 – Managing Heat Risk	B48
B.10.4	Policy CC4 – Air Quality	B48
B.10.5	Policy CC5 – Flood Risk	B49
B.10.6	Proposed New Policy – Water Quality	B50
B.10.7	Policy CC6 – Sustainable Drainage and Surface Water Management (SuDS).....	B51
B.10.8	Policy CC7 – Renewable and Low Carbon Energy and BREEAM Standards.....	B51
B.11	Waste	B53
B.11.1	Policy W1 – Waste Infrastructure: Future Requirements.....	B53
B.11.2	Policy W2 – Waste Sites	B53
B.11.3	Policy W3 – Preferred Areas for New Waste Facilities	B54
B.11.4	Policy W4 – Locational Considerations for New Waste Facilities.....	B54
B.11.5	Policy W5 – Resource Management and New Development	B55
B.12	Minerals	B56
B.12.1	Policy MIN1 – Minerals Production: Requirements.....	B56
B.12.2	Policy MIN2 – Minerals Safeguarding	B56
B.12.3	Policy MIN3 – Preferred Areas for New Minerals Development	B57
B.12.4	Policy MIN4 – Managing the Effects of Mineral Development	B57

Tables

Table B.1.1: Presenting likely impacts B2
Table B.1.2: Summary of policy area assessments B2

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 adaption (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

	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
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

Appendix C: Contents

C.1	Introduction	C1
C.2	SA Objective 1: Cultural Heritage	C7
C.3	SA Objective 2: Landscape	C11
C.4	SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity	C14
C.5	SA Objective 4: Climate Change Mitigation.....	C19
C.6	SA Objective 5: Climate Change Adaptation	C21
C.7	SA Objective 6: Natural Resources.....	C24
C.8	SA Objective 7: Pollution.....	C27
C.9	SA Objective 8: Waste	C30
C.10	SA Objective 9: Transport and Accessibility	C32
C.11	SA Objective 10: Housing.....	C35
C.12	SA Objective 11: Equality	C37
C.13	SA Objective 12: Health	C39
C.14	SA Objective 13: Economy	C43
C.15	SA Objective 14: Education, Skills and Training.....	C46

Tables

Table C.1.1: Reasonable alternative sites in Wolverhampton.....	C5
Table C.2.1: Sites impact matrix for SA Objective 1 – Cultural heritage.....	C9
Table C.3.1: Sites impact matrix for SA Objective 2 – Landscape	C12
Table C.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity ..	C17
Table C.5.1: Sites impact matrix for SA Objective 4 – Climate change mitigation.....	C19
Table C.6.1: Sites impact matrix for SA Objective 5 – Climate change adaptation.....	C22
Table C.7.1: Sites impact matrix for SA Objective 6 – Natural resources	C25
Table C.8.1: Sites impact matrix for SA Objective 7 – Pollution	C28
Table C.9.1: Sites impact matrix for SA Objective 8 – Waste.....	C30
Table C.10.1: Sites impact matrix for SA Objective 9 – Transport and accessibility	C33
Table C.11.1: Sites impact matrix for SA Objective 10 – Housing	C35
Table C.12.1: Sites impact matrix for SA Objective 11 – Equality	C37
Table C.13.1: Sites impact matrix for SA Objective 12 – Health.....	C41
Table C.14.1: Sites impact matrix for SA Objective 13 – Economy.....	C44
Table C.15.1: Sites impact matrix for SA Objective 14 – Education, skills and training	C47

Figures

Figure C.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton	C2
Figure C.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton	C3
Figure C.1.3: Reasonable alternative sites proposed for Gypsy and Traveller use in Wolverhampton	C4

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.

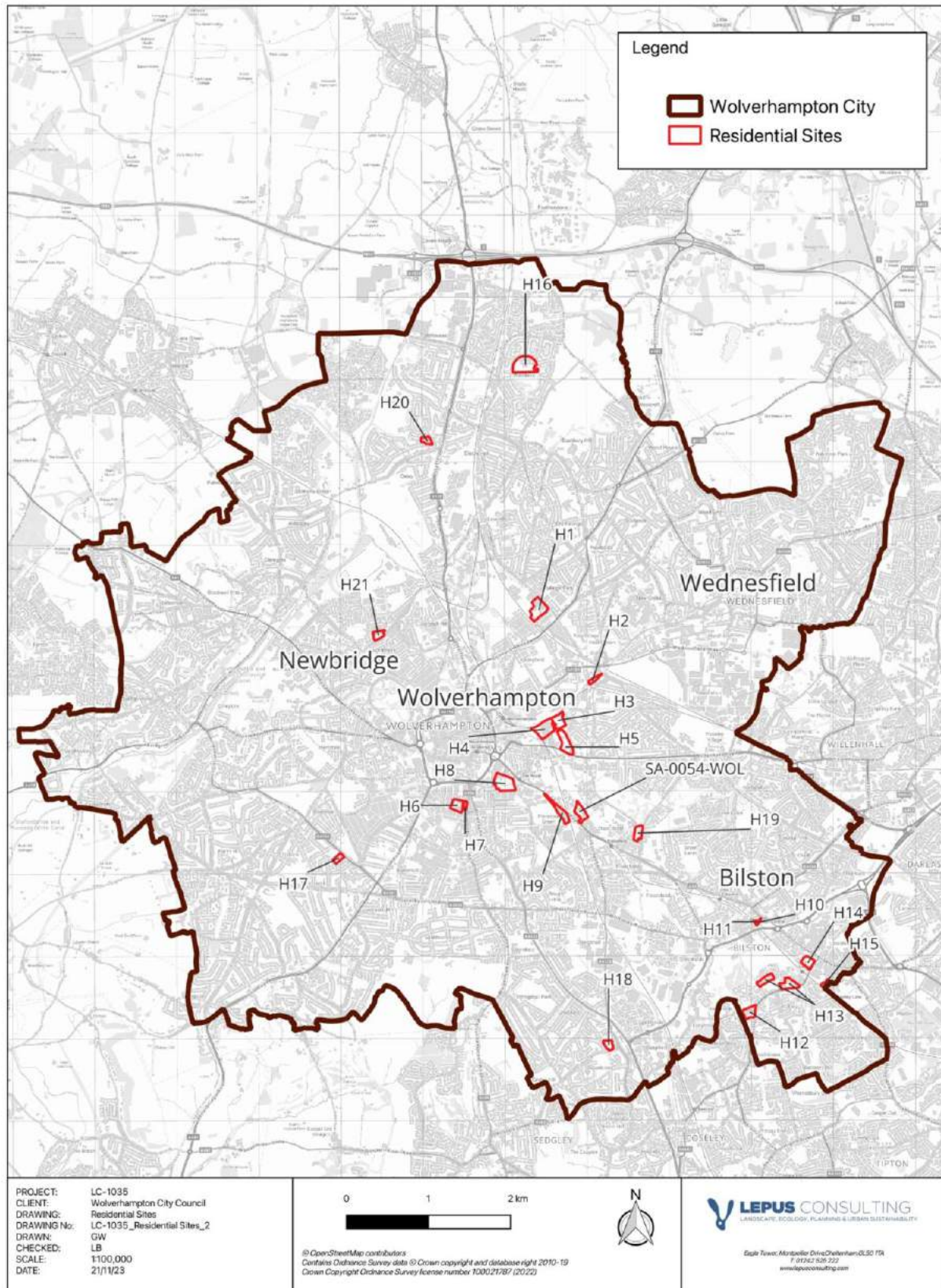


Figure C.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton

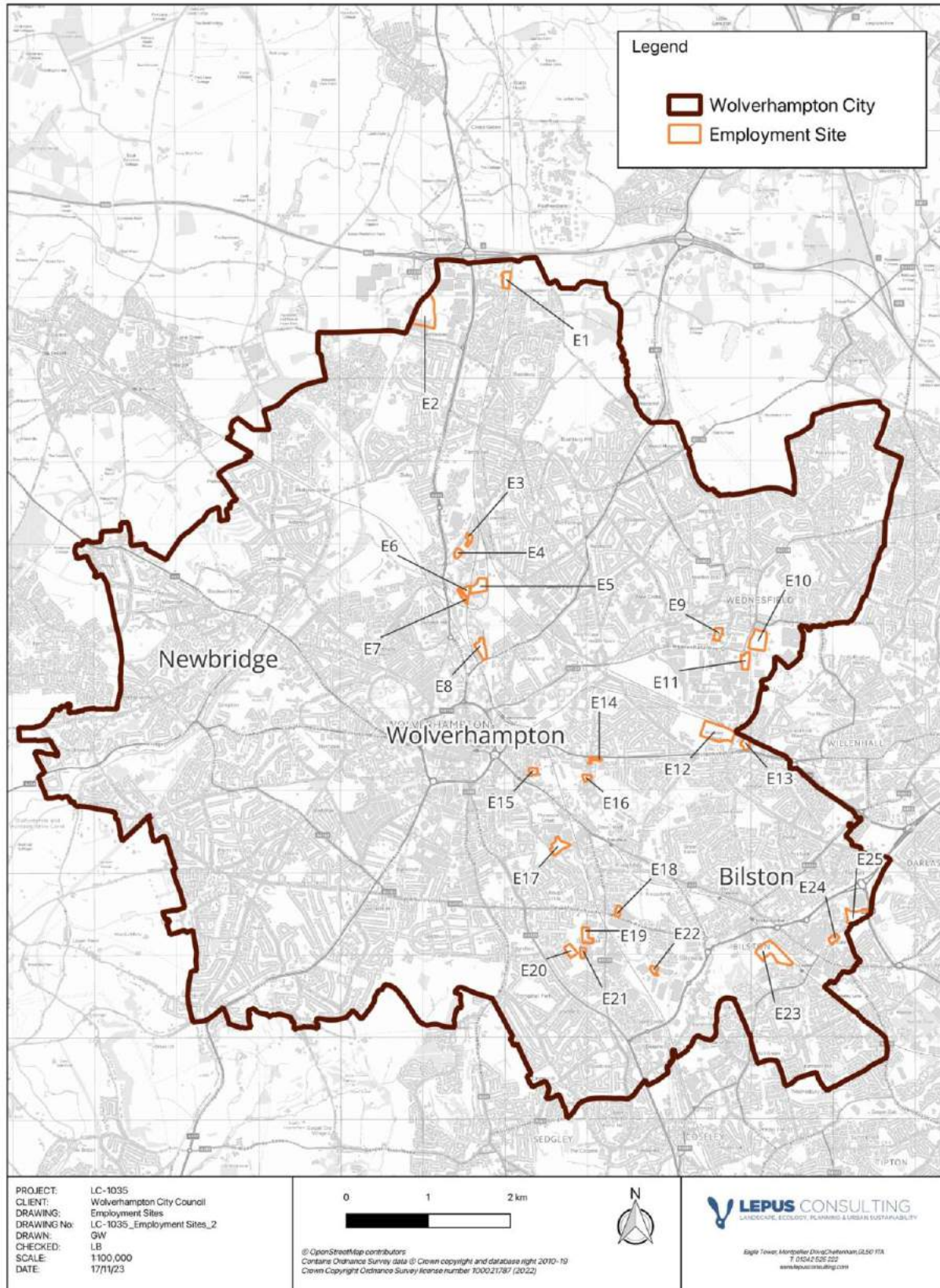


Figure C.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton

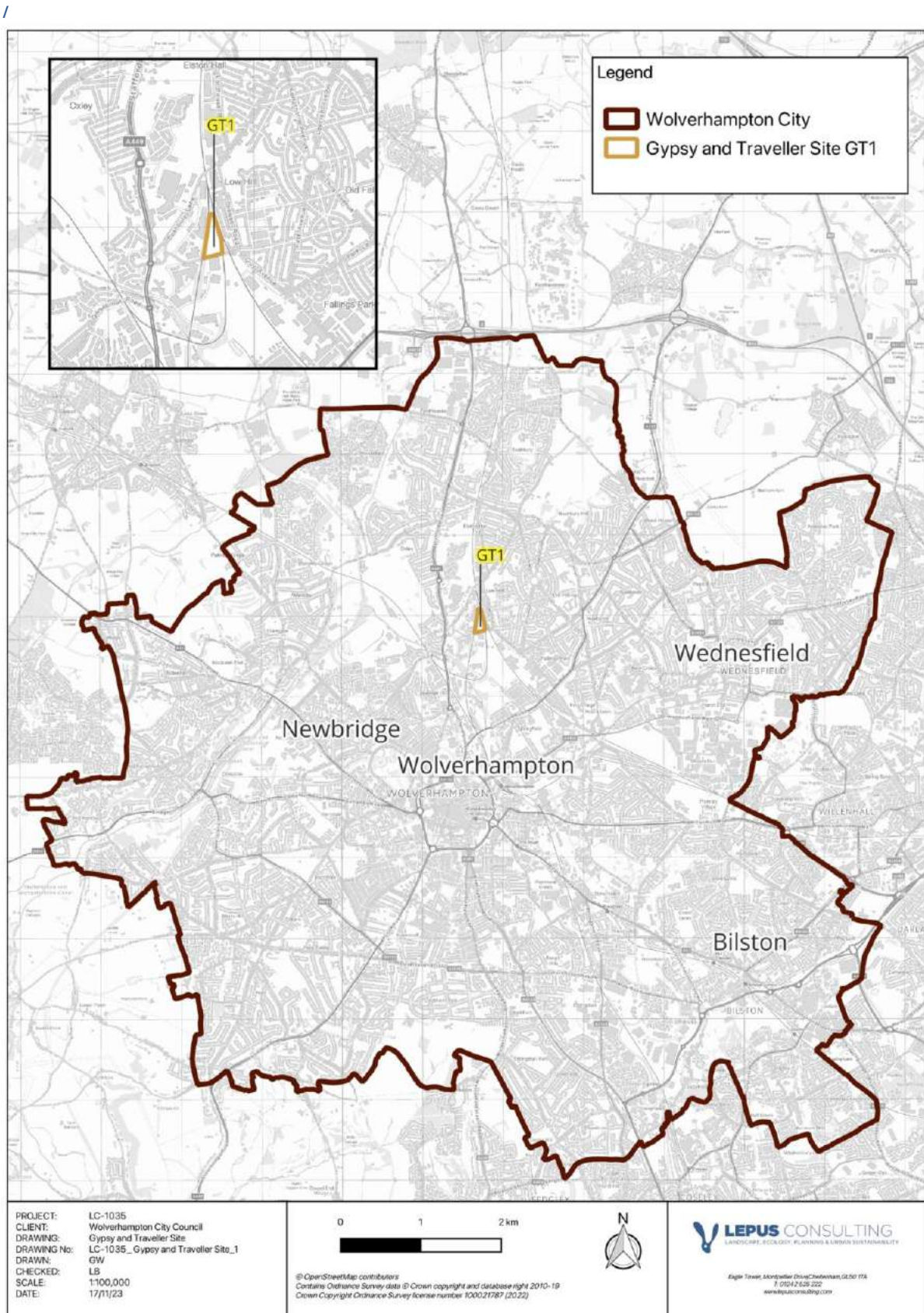


Figure C.1.3: Reasonable alternative sites proposed for Gypsy and Traveller use in Wolverhampton

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 Northicote 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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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

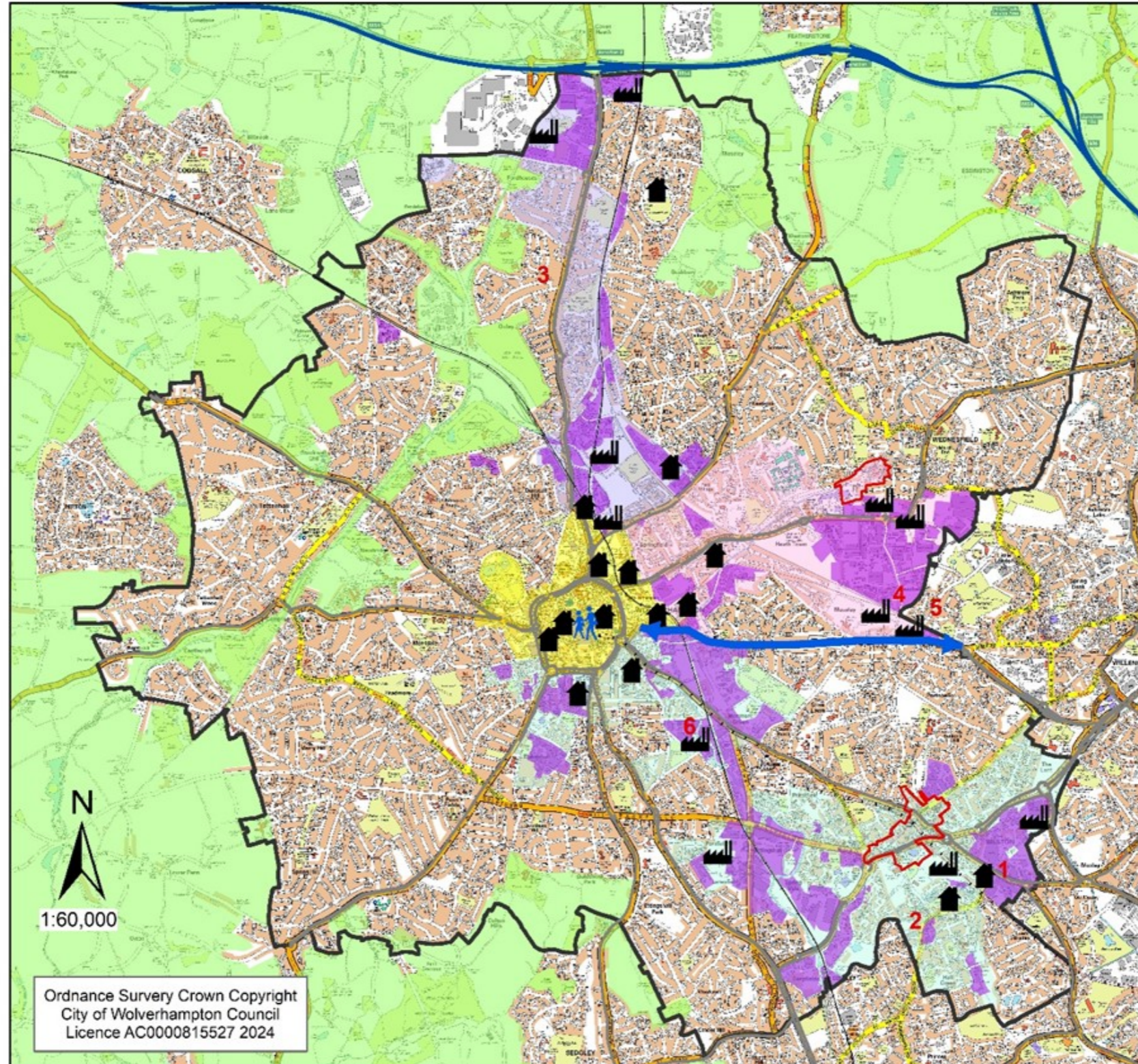
The Preferred Option will also deliver 63ha of new employment development, 100% of which would be in regeneration areas around town centres and along transport corridors. The map overleaf shows the Preferred Spatial Option, which will deliver Balanced and Sustainable Growth.

<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)**

<p>Question C: Do you agree with the proposed site allocations for the Wolverhampton Local Plan?</p>

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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City of Wolverhampton Council, Civic Centre, St. Peter’s Square,
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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WMCA Single Settlement Memorandum of Understanding

Scrutiny Board

21 February 2024

Page 379

Agenda Item No: 4

Presenter:

Laura Collings

Head of Policy and
Strategy

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Recommendations for action or decision

Scrutiny Board is recommended to:

- Consider and comment on the Single Settlement Memorandum of Understanding (MoU).

Recommendations for noting:

- The high-level next steps for Single Settlement negotiations and implementation between the West Midlands Combined Authority and His Majesty's Government.

Purpose and Background

- On the 6 September 2023 Cabinet formally endorsed the West Midlands Combined Authority Trailblazer Deeper Devolution Deal.
- A significant part of the deal was the single settlement – this would essentially see the WMCA funded like a Government department.
- Over the last few months, the WMCA, LAs and HMG have developed the ‘key principles’ of how the single settlement will operate.
- The result was Memorandum of Understanding published by HMG on 22 November 2023 at the Autumn Statement.
- Constituent LAs of the WMCA are now seeking to individually consider the single settlement MoU through their own governance processes.

Single Settlement Overview

- At every spending review the WMCA will be allocated a single funding allocation for funds aligned to:
 - Local Transport
 - Housing and Regeneration
 - Adult Skills
 - Local Growth and Place
 - Buildings Retrofit (Pilot)
- The funding received will cover the length of the spending review - it will be calculate using allocation formulae.
- We will not know the full amount of funding we will receive through the Single Settlement until the next spending review (likely November 24).

Key Information for Scrutiny

- Funding Streams: SS will not include any funding which falls within scope of the local government finance settlement or LA functions.
- No Detriment: The MOU states the single settlement will 'deliver the principle that they (WMCA) are not worse off than had the single settlement not been in place'
- Flexibility
 - As well as the single pot – the other significant benefit is flexibility.
 - There will be the opportunity to move funds across pillars (e.g local growth to skills) and between capital and revenue to meet local priorities.

What does this mean for Wolverhampton?

- Crucially, this removes the short term, ad hoc, restrictive grants the region currently receives – simplifying in one pot.
- Ending (in large part) the competitive, time consuming and resource intensive bidding process Council's face.
- This enables us to focus on long term planning – delivering local priorities.
- Each constituent LA in the WMCA will develop a 'Place Plan' – setting out to the WMCA – how we want the single settlement to deliver for Wolverhampton.

Next Steps

- We expect to receive the first single settlement at the beginning of the first financial year after the next spending review – likely 1 April 2025.
- Work continues between WMCA and HMG develop further detail of the single settlement.
- This includes work to understand which ‘funds’ are in scope for the single settlement.
- This will ensure we are ready to ‘deliver’ as quickly as possible post spending review.
- Further reports to Cabinet and Scrutiny Board as this develops.

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CITY OF WOLVERHAMPTON COUNCIL	<h1>Cabinet</h1> <h2>21 February 2024</h2>
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Report title	Formal ratification of the single settlement memorandum of understanding (MoU) between the West Midlands Combined Authority and His Majesty's Government	
Cabinet member with lead responsibility	Councillor Stephen Simkins, Leader of the Council	
Wards affected	All	
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

Recommendations for decision:

Cabinet is recommended to:

1. Consider and ratify the Single Settlement Memorandum of Understanding (MoU).

Recommendations for noting:

2. The high-level next steps for Single Settlement negotiations and implementation between the West Midlands Combined Authority and His Majesty's Government.
3. 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.
4. 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 and will therefore not be available to call in once a decision is made by Cabinet.

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 received 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. A negotiating mandate for these matters will be brought to the MPL meeting in January 2024. Thereafter, there will still be further details to agree with HMG before the next Spending Review, expected to be in November 2024.
 2. Functional strategies: WMCA's expectation is that strategies for each of the five functions of the single settlement will need to 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 confirming 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

² See 'Table A.1 Matrix of Mitigation' on pages 27 – 28 of the [MoU](#).

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 '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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HM Treasury

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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Contents

Introduction	6
Scope	6
Determining the quantum at Spending Reviews	10
Determining the formulae	12
Flexibility	13
Spending control	14
Agreeing outcomes and targets	16
Governance arrangements for monitoring and evaluation	19
Risk management and dispute resolution	21
HMG direction under exceptional circumstances	22
Accountability arrangements	22
Local context on implementation	25
Next steps	26
Annex A: Matrix of mitigation, assessment, and escalation	27

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); The West Midlands Combined Authority (Adult Education Functions) Order 2018 (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

¹² As 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
 Page 425

	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

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Forward Plan of Key Decisions

Agenda Item No: 5

Date: 23 January 2024



Wolverhampton.gov.uk

**CITY OF
WOLVERHAMPTON
COUNCIL**

This document sets out known 'key decisions' that will be taken by the Cabinet or one of the Cabinet Panels (the Executive) over the coming months.

Forthcoming decisions are published online to meet the statutory 28 day rule for each meeting of the Executive. Where it has not been possible to meet the 28 day rule for publication of notice of a key decision or an intention to meet in private, the relevant notices will be published as required by legislation as soon as possible.

What is a key decision?

A key decision is an Executive decision which is likely:

- to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority's budget for the service or function to which the decision relates (in Wolverhampton, this is defined as expenditure or savings **in excess of £250,000**), and/or
- to be significant in terms of its effects on communities living or working in an area comprising **two or more wards** in the area of the local authority.

The report relating to a decision, together with any other documents being considered, will be available five clear days before the decision is to be taken (unless the documentation contains exempt information). Copies are available on the Council's website or can be requested from Democratic Services.

The forward plan also provides notice of when the Cabinet may decide to exclude the press and public during consideration of a particular matter due to the potential for disclosure of confidential or exempt information. The grounds upon which local authorities can exclude the press and public are specified by law, details of the exempt categories are available on request from Democratic Services.

Councillors or members of the public wishing to:

- make a representation about why a matter should be heard in public, or
- submit information to the decision-making body about an item in the forward plan, or
- request details of relevant documents, or
- seek advice about the Council's decision-making arrangements,

should contact the Democratic Services team:

Email: democratic.services@wolverhampton.gov.uk

Telephone: 01902 550320

Address: Civic Centre, St Peter's Square, Wolverhampton WV1 1SH

Forthcoming key decisions

Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
Our Council					
Treasury Management Strategy 2024-2025 To approve the Treasury Management Strategy 2024-2025.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Louise Miles Cabinet Member for Resources	Alison Shannon Chief Accountant Tel: 01902 554561
Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy The approve the Capital Programme 2023-2024 to 2027-2028 Quarter Three Review and 2024-2025 to 2028-2029 Budget Strategy.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Louise Miles Cabinet Member for Resources	Alison Shannon Chief Accountant Tel: 01902 554561
2024-2025 Budget and Medium Term Financial Strategy 2024-2025 to 2026-2027 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.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Louise Miles Cabinet Member for Resources	Alison Shannon Chief Accountant Tel: 01902 554561

Page 429

[NOT PROTECTIVELY MARKED]

Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
21 February 2024 - Public Procurement Award of Contracts for Works, Goods and Services Public Procurement Award of Contracts for Works, Goods and Services.	All Wards	Cabinet (Resources) Panel 21 Feb 2024	Open	Councillor Louise Miles Cabinet Member for Resources	John Thompson Procurement Head of Procurement Tel: 01902 554503
City Development Regeneration Programme Budget and Procurement Route Update on programme budget and procurement route.	Not applicable	Cabinet (Resources) Panel 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Kassandra Polyzoides Deputy Director of Regeneration
21 February 2024 - Exempt Procurement Award of Contracts for Works, Goods and Services Exempt Procurement Award of Contracts for Works, Goods and Services.	All Wards	Cabinet (Resources) Panel 21 Feb 2024	Fully Exempt	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
Performance and Budget Monitoring 2023-2024 To provide an integrated finance and performance update against the Relighting Our City priorities.	All Wards	Cabinet 20 Mar 2024	Open	Councillor Louise Miles Cabinet Member for Resources	Alison Shannon Chief Accountant Tel: 01902 554561
Treasury Management Activity Monitoring Quarter Three 2023-2024 To approve the Treasury Management Activity Monitoring Quarter Three 2023-2024 report.	All Wards	Cabinet (Resources) Panel 20 Mar 2024	Open	Councillor Louise Miles Cabinet Member for Resources	Alison Shannon Chief Accountant Tel: 01902 554561

Page 430

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
<p>20 March 2024 - Public Procurement Award of Contracts for Works, Goods and Services Public Procurement Award of Contracts for Works, Goods and Services.</p>	All Wards	Cabinet (Resources) Panel 20 Mar 2024	Open	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
<p>20 March 2024 - Exempt Procurement Award of Contracts for Works, Goods and Services Exempt Procurement Award of Contracts for Works, Goods and Services.</p>	All Wards	Cabinet (Resources) Panel 20 Mar 2024	Fully Exempt	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
<p>24 April 2024 - Public Procurement Award of Contracts for Works, Goods and Services Public Procurement Award of Contracts for Works, Goods and Services.</p>	All Wards	Cabinet (Resources) Panel 24 Apr 2024	Open	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
<p>24 April 2024 - Exempt Procurement Award of Contracts for Works, Goods and Services Exempt Procurement Award of Contracts for Works, Goods and Services.</p>	All Wards	Cabinet (Resources) Panel 24 Apr 2024	Fully Exempt	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503

Page 4 of 11

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
22 May 2024 - Public Procurement Award of Contracts for Works, Goods and Services Public Procurement Award of Contracts for Works, Goods and Services.	All Wards	Cabinet (Resources) Panel 22 May 2024	Open	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
22 May 2024 - Exempt Procurement Award of Contracts for Works, Goods and Services Exempt Procurement Award of Contracts for Works, Goods and Services.	All Wards	Cabinet (Resources) Panel 22 May 2024	Fully Exempt	Councillor Louise Miles Cabinet Member for Resources	John Thompson Head of Procurement Tel: 01902 554503
Thriving economy in all parts of the city					
Wolverhampton Local Plan - Issues and Preferred Options Consultations To approve the Wolverhampton Local Plan Issues and Preferred Options Report.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Michele Ross Lead Planning Manager Tel: 01902 554038
Heath Town Baths Update Position statement on re-development of Heath Town Baths.	Heath Town	Cabinet (Resources) Panel 21 Feb 2024	Fully Exempt	Councillor Stephen Simkins Leader of the Council	Julia Nock Deputy Director of Assets Tel: 01902 550316

Page 432

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
<p>Delivering the Bell Street Box Space Update on the improvements, resources and approvals required to deliver the new Bell Street Box Space development as part of the regeneration of City Centre West.</p>	All Wards	Cabinet 20 Mar 2024	Open	Councillor Bhupinder Gakhal Cabinet Member for Visitor City	Ian Fegan Director of Communications and Visitor Experience
<p>Strong families where children grow up well and achieve their full potential</p>					
<p>West Midlands Combined Authority Single Settlement Memorandum of Understanding Formal ratification of the single settlement memorandum of understanding (MoU) between the West Midlands Combined Authority and His Majesty's Government.</p>	All Wards	Cabinet 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Laura Collings Head of Policy & Strategy Tel: 01902 550414
<p>SEND and Inclusion Strategy To approve the SEND and Inclusion Strategy.</p>	All Wards	Cabinet 21 Feb 2024	Open	Councillor Jacqui Coogan Cabinet Member for Jobs, Skills and Education	Helen Bakewell Head of Inclusion & Empowerment Tel: 01902 551583

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
<p>Determined Admission Arrangements for Community and Voluntary Controlled Schools 2025-2026 Outcome of admission arrangements consultation and seeking approval of the admission arrangements for 2025-2026.</p>	All Wards	Cabinet 21 Feb 2024	Open	Councillor Jacqui Coogan Cabinet Member for Jobs, Skills and Education	David Kirby Service Manager School Organisation and Support Tel: 01902 554152
<p>Fulfilled lives for all with quality care for those that need it</p>					
<p>Our City Our Plan Refresh To approve the refresh of the Council's overarching strategic framework Our City Our Plan for the 2024/2025 municipal year.</p>	All Wards	Cabinet 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Laura Collings Head of Policy & Strategy Tel: 01902 550414
<p>Care and Support Provider Fee Review 2024/25 To present the annual fees review for adult social care and support providers.</p>	All Wards	Cabinet (Resources) Panel 21 Feb 2024	Open	Councillor Jasbir Jaspal Cabinet Member for Adults and Wellbeing	Juliet Alilionwu Head of Commissioning (Adults)

Page 434

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
Good homes in well connected neighbourhoods					
Wolverhampton Homes Business Plan 2024 - 2025 To present the Business Plan and associated Delivery Plan for Wolverhampton Homes 2024 - 2025, to seek approval and recommendation for adoption by the Council.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Steve Evans Deputy Leader: City Housing	Jenny Lewington Deputy Director of City Housing Tel: 01902 555706
Good Growth Strategy To approve the Council's new strategic economic plan.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Laura Collings Head of Policy & Strategy Tel: 01902 550414
Canalside South - Land Transaction To report the final commercial terms of the Sale Agreement.	Heath Town	Cabinet 21 Feb 2024	Fully Exempt	Councillor Stephen Simkins Leader of the Council	Claire Prince Regeneration Officer Tel: 01902 550152
City Centre West Work in progress Budget.	Not applicable	Cabinet (Resources) Panel 21 Feb 2024	Open	Councillor Stephen Simkins Leader of the Council	Kassandra Polyzoides Deputy Director of Regeneration

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Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
City Housing Decant Policy Approval of the Council's approach to the decanting of tenants and leaseholders.	All Wards	Cabinet 20 Mar 2024	Open	Councillor Steve Evans Deputy Leader: City Housing	Michelle Garbett Service Lead Housing Strategy Tel: 01902 552954
Black Country Transport and Wolverhampton Major Transport Investment Programme 2024 - 2025 Investment programme for Black Country Transport and for Wolverhampton's Major Transport schemes programme for the period 2024 - 2025 and beyond.	All Wards	Cabinet 20 Mar 2024	Open	Councillor Craig Collingswood Cabinet Member for Environment and Climate Change	Marianne Page Head of Strategic Transport Tel: 01902 551798
Home Loss and Disturbance Policy To approve a Home Loss and Disturbance Policy.	All Wards	Cabinet (Resources) Panel 20 Mar 2024	Open	Councillor Steve Evans Deputy Leader: City Housing	Meryl Tsagli Housing Policy Officer
Homelessness Prevention Strategy To approve the Homelessness Prevention Strategy	All Wards	Cabinet 24 Apr 2024	Open	Councillor Steve Evans Deputy Leader: City Housing	Daniel Cartwright Homelessness Policy Officer

Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
<p>Revision to the Private Sector Housing Assistance Policy Revision to be made to the Private Sector Assistance Policy following review.</p>	All Wards	Cabinet (Resources) Panel 24 Apr 2024	Open	Councillor Steve Evans Deputy Leader: City Housing	Michelle Garbett Service Lead Housing Strategy Tel: 01902 552954
<p>Wolverhampton Open Space Strategy and Action Plan To approve the new Open Space Strategy and Action Plan for Wolverhampton.</p>	All Wards	Cabinet 22 May 2024	Open	Councillor Bhupinder Gakhal Cabinet Member for Visitor City	Ric Bravery Strategic Health Lead (City Planning)
<p>Housing Asset Management Strategy 2024 - 2028 To approve the Asset Management Strategy 2024-2028 for council owned housing stock.</p>	All Wards	Cabinet (Resources) Panel 22 May 2024	Fully Exempt	Councillor Steve Evans Deputy Leader: City Housing	Karen Beasley Head of Housing Development Tel: 01902 554893
<p>Hampton View, Heath Town - Surrender of lease To approve the agreed Heads of Terms with Sanctuary Housing Association for the surrender of lease for Hampton View and to agree the future use of the high-rise block.</p>	Heath Town	Cabinet (Resources) Panel 22 May 2024	Fully Exempt	Councillor Steve Evans Deputy Leader: City Housing	Karen Beasley Head of Housing Development Tel: 01902 554893

[NOT PROTECTIVELY MARKED]

Title of key decision:	Wards affected:	Decision to be taken by and date:	Public or private:	Lead Cabinet Member:	Employee to contact:
More local people into good jobs and training					
Review of Agency Provision Review of Agency Provision.	All Wards	Cabinet 21 Feb 2024	Open	Councillor Paula Brookfield Cabinet Member for Governance and Equalities	Sukhvinder Mattu Head of People Services Tel: 01902 553571

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Scrutiny Work Programme

2023 – 2024

Version Date – 13 February 2024

Page 439

Agenda Item No. 6



The Scrutiny Work Programme – 2023 to 2024

Overview and Scrutiny Committees should be powerful committees that can contribute to the development of Council policies and hold the Cabinet to account for its decisions. Another key part of the overview and scrutiny role is to review existing policies, consider proposals for new policies and suggest new policies.

Overview and scrutiny should be carried out in a constructive way and should aim to contribute to the delivery of efficient and effective services that meet the needs and aspirations of local inhabitants. Overview and Scrutiny Committees should not shy away from the need to challenge and question decisions and make constructive criticism. The Scrutiny Board and Scrutiny Panels will conduct their proceedings in accordance with the Overview and Scrutiny Procedure Rules set out in Part 4 of the Constitution. Each Scrutiny Panel will, subject to guidance from the Scrutiny Board, be responsible for setting and reviewing their priorities and work programme for the year.

Any scrutiny member is entitled to give notice to the Scrutiny Team that they wish an item relevant to the functions of the Panel to be considered for inclusion on an agenda for a meeting of the Board or Panel. A discussion will then take place between the Lead Officer for the Panel or Board, the Scrutiny Officer and the Chair / Vice-Chair of the Panel or Board to determine if the request for an additional item is a priority for scrutiny and to give time to consider the value scrutiny can bring to the item. This would ideally take place at an informal preparation meeting. If agreement cannot be reached, it will go to the Scrutiny Panel/Board for decision. The Chair will have due regard for all the points raised in making the decision. Where it is not considered appropriate for the Board or Panel to deal with the item(s), at the next meeting, the Chair will give the reasons for this decision to the member requesting the item. In addition to their rights as Councillors, members of the Scrutiny Board and Scrutiny Panels have additional right to documents, and to notice of meetings, as set out in the Access to Information Procedure Rules in Part 4.

The Scrutiny Board and Panels may scrutinise, and review decisions made, or actions taken in connection with the discharge of any Council functions. As well as reviewing documentation, in fulfilling the scrutiny role, it may require any Cabinet Member, the Head of Paid Service and/or any Designated Officer to attend before it to explain in relation to matters within their remit:

- a) any particular decision or series of decisions;
- b) imate
- c) the extent to which the actions taken implement Council policy; and/or
- d) their performance,
- e) and it is the duty of those persons to attend if so required.

Key Links:

[Part 2 - Article 7 - Overview and Scrutiny Arrangements.pdf \(moderngov.co.uk\)](#)

[Part 2 - Article 4 - The Full Council.pdf \(moderngov.co.uk\)](#)

[Part 4c - Overview and Scrutiny Procedure Rules.pdf \(moderngov.co.uk\)](#) [Part 4d - Access To Information Procedure Rules.pdf \(moderngov.co.uk\)](#)

Should you need to contact the Scrutiny Team please email: Scrutiny@wolverhampton.gov.uk

Scrutiny Board**Chair:** Councillor Phil Bateman MBE**Vice Chair:** Councillor Ellis Turrell**Scrutiny Support:** Martin Stevens DL

- Co-ordinate the Scrutiny Work Programme
- Major infrastructure projects that crosscut Scrutiny Panels
- WMCA interface - Interface for the purposes of Scrutiny Board is defined, as including the relationship and interactions the Council has with the Combined Authority, particularly strategy and policy impacting on Wolverhampton.
- MTFS (overall oversight on Revenue/Capital/Assets)
- Overall performance
- Our City, Our Plan, the council's strategic framework for levelling up
- Pre-Decision – If an item needs to come for pre-decision, which cannot go to the relevant Scrutiny Panel for logistical reasons such as timing or the agenda already being at capacity, then Scrutiny Board can instead consider the item. Some pre-decision items may always need to come to Scrutiny Board such as the MTFS.
- Levelling Up
- Pre-Decision
- Call-in
- Petitions
- Wolverhampton Pound
- Oversight of Select Committee work – reporting on outcomes. Scrutiny Review Groups and Select Committees should clearly state in their terms of reference if they should report to the parent Scrutiny Panel or Scrutiny Board. To avoid duplication, it should not be both.

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
City West Relaunch Scheme - Payments	The Extraordinary Scrutiny Board meeting held on 2 May 2023 was adjourned.	John Roseblade	Isobel Woods / Richard Lawrence	13 June 2023	5 June 2023	Completed

[NOT PROTECTIVELY MARKED]

Statutory Scrutiny Guidance and the Governance of Scrutiny Board	A report detailing the purpose of Scrutiny Board and the Statutory Scrutiny Guidance.	David Pattison	David Pattison	13 June 2023	5 June 2023	Completed
Budget Performance Monitoring Q4	Standard Budget / Performance Monitoring Report – Q4.	Claire Nye / Charlotte Johns	Alison Shannon / James Amphlett	20 July 2023	12 July 2023	Completed
WMCA Devolution Deal	To consider the Devolution Deal	Charlotte Johns	Laura Collings	26 September 2023	18 September 2023	Completed
Social Housing Regulation Act 2023 - Landlord Services Review	Pre-Decision Scrutiny. Scrutiny Board requested this item come before them last time it was before them.	John Roseblade	Andrew Bryant / Lynda Eyton	26 September 2023	18 September 2023	Completed
Task and Finish Scrutiny Group Proposals	As requested by the Chair and Vice-Chair of Scrutiny Board.	David Pattison / John Roseblade / Ian Fegan	N/A	26 September 2023	18 September 2023	Completed
Budget Performance Monitoring Q1	Standard Budget / Performance Monitoring Report	Claire Nye / Charlotte Johns	Alison Shannon / James Amphlett	26 September 2023	18 September 2023	Completed

[NOT PROTECTIVELY MARKED]

Annual Scrutiny Report	Annual Scrutiny Report for May 2022 – May 2023.	David Pattison	Laura Noonan / Martin Stevens	23 October 2023	13 October 2023	Completed
Wolverhampton Local Plan	Requested by Scrutiny Board in September.	Richard Lawrence	Stephen Alexander / Ian Culley	23 October 2023	13 October 2023	Completed
Communication Plan for the Council	Cllr Phil Bateman requested this at a previous meeting of the Board. Stressing the importance of communications.	Ian Fegan	Richard Wyatt	14 November 2023	6 November 2023	Completed
Wolverhampton Pound – To include Progress on Recommendations from Select Committee	Review of recommendations from Wolverhampton Pound Select Committee	Claire Nye	John Thompson / Parvinder Uppal / Louise West	14 November 2023	6 November 2023	Completed
West Midlands Combined Authority - Overview and Scrutiny Annual Report	Chair of Scrutiny Panel from WMCA will attend.	Lindsey Roberts (WMCA – Scrutiny Officer)	James Hughes (WMCA - Member Relationship Manager)	12 December 2023	4 December 2023	Completed
West Midlands Combined Authority - Report setting out the work they are carrying out this year	West Midlands Combined Authority falls in the remit of the Panel. Members requested further scrutiny in this area.	Laura Shoaf CBE (Chief Executive WMCA)	James Hughes (Member Relationship Manager)	12 December 2023	4 December 2023	Completed

[NOT PROTECTIVELY MARKED]

	They are providing a report on the work they are doing related to Wolverhampton.					
Housing Revenue Account (Pre-Decision Scrutiny)	Item is received annually each year.	Claire Nye	Alison Shannon	12 December 2023	4 December 2023	Completed
Budget Performance Monitoring Q2	Standard Budget / Performance Monitoring Report – Q2.	Claire Nye / Charlotte Johns	James Amphlett / Alison Shannon	12 December 2023	4 December 2023	Completed
Budget and Performance Update (Pre-Decision Scrutiny). Includes Our City: Our Plan Refresh	Item is received annually each year.	James Howse / Charlotte Johns	Alison Shannon / James Amphlett	6 February 2024	29 January 2024	Completed
WMCA Single Settlement	Officer request to include on the agenda.	Charlotte Johns	Laura Collings	21 February 2024	13 February 2024	Agenda Sent
Wolverhampton Local Plan	Scrutiny Board requested at the 23 Oct 2023 meeting.	Richard Lawrence	Stephen Alexander / Ian Culley Michele Ross	21 February 2024	13 February 2024	Agenda Sent
City Learning Quarter	Requested by Director	Richard Lawrence		5 March 2024	26 February 2024	Programmed

[NOT PROTECTIVELY MARKED]

Council's Physical Activity Strategy including recent investment in Gym Equipment	Requested by Chair	John Denley	Richard Welch	5 March 2024	28 February 2024	Programmed
Budget Performance Monitoring Q3	Standard Budget / Performance Monitoring Report – Q3.	James Howse / Charlotte Johns	James Amphlett / Alison Shannon	16 April 2024 (Pre-election period)	8 April 2024	Programmed
Emergency Planning (Date to be confirmed)	Requested by Chair	David Pattison	Tim Munro/ Chelsea Sibley	16 April 2024	8 April 2024	Programmed
Flooding Scrutiny Task and Finish Group – Final Report	To receive the final report from the Flooding Scrutiny Task and Finish Group.	David Pattison / John Roseblade	John Charles / Tim Munro/ Chelsea Sibley	16 April 2024 (Pre-election period)	8 April 2024	Programmed

Page 446

To Be Scheduled for Scrutiny Board:-

Funding Streams available to the Council (Action from 7 March 2023 – Scrutiny Board)

Cross Directorate - Mental Health Item as discussed by Scrutiny Board on 20 July 2023 (Early in the New Municipal Year)

Economy and Growth Scrutiny Panel

Chair: Councillor Jacqueline Sweetman

Vice Chair: Councillor Udey Singh

Scrutiny Support: Lee Booker

Remit, Function and Measures

- Help create good quality local jobs
- Working in partnership to support local people into work and better jobs
- Ensuring flexible skills systems which support local businesses to grow and residents to access good jobs
- Supporting local businesses to start up, scale up and thrive
- Attracting new investment which brings social and economic benefit to all
- Creating vibrant high streets with quality culture and leisure offers
- Growing the low carbon and circular economy
- Number of working age adults (16-64) claiming unemployment benefits
- Number of young adults (18-24) claiming unemployment benefits
- Level of 16 & 17 year old NEETS
- Number of jobs created / safeguarded in the city through the Investment Team
- % Local Authority spend on apprenticeship levy
- Number of apprentices and graduate placements within the council
- Empty properties in the city centre
- Business that survive one year in city
- Businesses that survive five years in the city
- % of premises in the city with full fibre coverage
- Wolverhampton based businesses supported by the Council
- New investment opportunities generated by the Council
- To measure progress against the Strategic Economic Plan.

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
Portfolio for City Inclusive Economy about his Plans and	Chair requested Portfolio Holder to give a	Richard Lawrence	Richard Lawrence	21 June 2023	13 June 2023	Completed

[NOT PROTECTIVELY MARKED]

Priorities for the Municipal Year	statement about his plans for the year.					
Supporting the City's Businesses	Item requested at previous Panel meeting due to European Funding coming to an end in April.	Richard Lawrence	Isobel Woods	21 June 2023	13 June 2023	Completed
Supporting more people into jobs and training	Item requested at previous Panel meeting as part of on going Scrutiny on policy.	Emma Bennett	Isobel Woods	21 June 2023	13 June 2023	Completed
IPW Consultants Report on Visitor Economy	Item requested by Chair and agreed by Panel	Ian Fegan / Richard Lawrence	Ian Fegan	11 July 2023	3 July 2023	CANCELLED
IPW Consultants Report on Visitor Economy / 5 Years Event Strategy	Item requested by Chair and agreed by Panel	Ian Fegan / Richard Lawrence	Ian Fegan	27 September 2023	19 September 2023	Completed
National Brownfield Institute & Green Innovation Corridor	Chair of Panel requested NBI to present their business case.	Richard Lawrence		27 September 2023	19 September 2023	Completed
Former Heath Town Baths	Panel requested a further item on	Richard Lawrence		27 September 2023	19 September 2023	Completed

[NOT PROTECTIVELY MARKED]

	this to check status of Development.					
Budget and Performance Update	Standard report received each year.	Richard Lawrence	James Amphlett Luke Dabin-Williams Raeesa Mohammed	29 November 2023	21 November 2023	Completed
Good Growth Strategy	Requested by Deputy Chief Executive for inclusion.	Charlotte Johns/Richard Lawrence	Charlotte Johns/ Laura Collings	29 November 2023	21 November 2023	Completed
Former Heath Town Baths Update	To consider the latest position.	Richard Lawrence		29 November 2023	21 November 2023	Completed
Business Growth	Request from Richard	Charlotte Johns / Richard Lawrence	Laura Collings / Julia Obada	7 February 2024	30 January 2024	Completed
Wolverhampton Speedway	As requested by Scrutiny Board	Ian Fegan		7 February 2024	30 January 2024	Completed
Development of Hotels in the City and the Visitor Economy	Panel Members have requested status of bringing new Hotels into the City.	Richard Lawrence	Kasandra Polyzoides	7 February 2024	30 January 2024	Completed

Page 449

To Be Scheduled

Creation Festival

Provisional Q&A with Portfolio Holder/ Leader (agreed in new Municipal year)

Health Scrutiny Panel

Chair: Councillor Cllr Susan Roberts MBE

Vice Chair: Councillor Paul Singh

Scrutiny Support: Lee Booker

Remit, Function and Measures

The Panel will have responsibility for scrutiny functions as they relate to the scrutiny of health provision in accordance with relevant legislation and Government guidance.

The Panel will look at Health related issues in partnership with:

- Public Health
- NHS
- ICB/ICP/ICS
- Health and wellbeing Board
- Healthwatch
- Neighbouring Authorities

In addition:-

- Participating with other relevant neighbouring authorities in any joint scrutiny arrangements of NHS Trusts providing cross border services
- Initiating the response to any formal consultation undertaken by relevant NHS Trusts and the Integrated Care Board or other health providers or commissioners on any substantial development or variation in services
- Decisions made by or actions of the Health and Wellbeing Board
- Reports and recommendations to relevant NHS bodies, relevant health service providers, the Secretary of State or Regulators

- Keep residents safe by containing and reducing the spread of Covid-19
- Close the gap on healthy life expectancy
- Help people live happier more active lives
- Protect vulnerable people at risk of harm and exploitation
- Alcohol specific mortality per 100,000
- % of physically inactive adults (Public Health Outcomes Framework)

- % of less active children (Active Lives Survey)
- Suicide rate (all persons) per 100,000
- % of 40-74 year olds 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)
- Narrowing the gap in % of adult residents in the city who have received their Covid-19 vaccination
- 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

Item	Description	Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
Hearing Aids	Presentation on Hearing Aid services across the City. Access for patients and performance stats.	Paul Tulley, Managing Director – Wolverhampton ICB	Sally Sandel - ICB	29 June 2023	21 June 2023	Completed
Patient Participation Groups	Report/Presentation on the status of Patient Participation Groups in the city, including performance information and status of activity.	Paul Tulley, Managing Director – Wolverhampton ICB	Sally Sandel - ICB	29 June 2023	21 June 2023	Completed
Local Joint Health and Wellbeing Strategy	Officers requested this come before the Panel.	John Denley	Madeleine Freewood	29 June 2023	21 June 2023	Completed

[NOT PROTECTIVELY MARKED]

Healthwatch Urology Survey Report	Healthwatch requested to bring item to the Panel	Stacey Lewis	N/A	29 June 2023	21 June 2023	Completed
CQC Inspection Report on the Black Country Healthcare NHS Foundation Trust Adult Acute Service	Scrutiny on the recent downgrading of the Adult Acute Services at the Mental Health Trust	Marsha Foster (Chief Executive – Black Country Healthcare NHS Foundation Trust)	Dr Mark Weaver (Chief Medical Officer – Black Country Healthcare NHS Foundation Trust)	21 September 2023	13 September 2023	Completed
Maternity Services RWT	Chief Executive of RWT requested this come before the Panel due to the national changes and reports on failures at other Trusts.	David Loughton (Chief Executive – RWT)	Debra Hickman, Chief Nursing Officer - RWT	21 September 2023	13 September 2023	Completed
RWT Quality Accounts	Standard report received each year.	David Loughton (Chief Executive – RWT)	Cody Long, Deputy Director of Assurance - RWT	21 September 2023	13 September 2023	Completed

[NOT PROTECTIVELY MARKED]

Healthwatch Annual Report	To receive the annual Healthwatch report. Standard item.	Stacey Lewis – Wolverhampton Healthwatch	N/A	21 September 2023	13 September 2023	Completed
Public Health Annual Report	Standard Annual Report the Panel receives each year.	John Denley	Madeleine Freewood	14 December 2023	6 December 2023	Completed
Budget and Performance Update	Standard report received each year.	John Denley	James Amphlett Jo McCoy Lindsey Cowan	14 December 2023	6 December 2023	Completed
Child to Adult Transition Services	Member of the Panel requested.	David Loughton (Chief Executive – RWT)	Debra Hickman Chief Nursing Officer - RWT	14 December 2023	6 December 2023	Completed
Hospital at Home	RWT requested this item about Virtual Wards.	David Loughton (Chief Executive – RWT)	Debra Hickman Chief Nursing Officer - RWT	14 December 2023	6 December 2023	Completed
Healthwatch GP Services Survey	Healthwatch survey to incorporate feedback on call access times as well as investigating website patient access.	Stacey Lewis – Wolverhampton Healthwatch	N/A	14 December 2023	6 December 2023	Completed
Gynaecology Services Review	Vice-Chair requested item. Joint item with RWT, Public Health and ICB with a focus on Gynaecology services at New Cross and Trust partners, the Manor and Cannock.	David Loughton (Chief Executive – RWT)	Debra Hickman (Chief Nursing Officer RWT)	18 January 2024	10 January 2024	Completed

[NOT PROTECTIVELY MARKED]

West Midlands Ambulance Service Review Wolverhampton	Routine item required for review by the Panel	Pippa Wall/Mark Doherty	N/A	18 January 2024	10 January 2024	Completed
Integrated Care System Review of Strategy, Performance and Priorities	Full review of the strategy and performance against priorities.	John Denley/Paul Tulley	N/A	18 January 2024	10 January 2024	Completed
Healthwatch GP Services Survey	Continuation of the part-deferred item from the previous meeting	Stacey Lewis	N/A	18 January 2024	10 January 2024	Completed
Tuberculosis In Wolverhampton – Stats and Review	Item requested by Vice Chair	John Denley	Ainee Khan / Riva Eardley	18 January 2024	10 January 2024	Completed
RWT Hospital Transport Service	Requested by the Panel when they considered Urology item. To be included, small report on New Cross parking	David Loughton (Chief Executive – RWT)	N/A	21 March 2024	13 March 2024	Programmed
One Wolverhampton - Pharmacy	How Pharmacy services are changing within the new health system framework .	John Denley/Paul Tulley	Bal Kaur	21 March 2024	13 March 2024	Programmed

Page 454

To be added - How the Care Quality Commission works in Wolverhampton – new municipal year
Deferred to next Municipal year Mental Health Item & Dentistry .

Climate Change, Housing and Communities Scrutiny Panel

Chair: Councillor Anwen Muston

Vice Chair: Councillor Wendy Dalton

Scrutiny Support: Earl Piggott-Smith

Remit, Function and Measures

The scrutiny of:

- Vibrant sustainable communities where people feel proud to live
- Keeping neighbourhoods, city infrastructure and the environment clean
- Improving city housing
- Cultural and leisure services
- Community Safety (Designated Statutory Panel)
- Work together to deliver more new homes
- Ensuring safe and healthy homes for all
- Ensuring access to a secure home
- Ensuring clean, green neighbourhoods and public space
- Well-connected businesses and residents
- Number of new builds completed in the city
- Net additional dwellings in the city
- % of dwelling stock that is vacant in the city
- Housing affordability ratio
- Total crime recorded per 1000 population
- % of planning application decisions made with 13 weeks or agreed timescales
- Number of homeless support in the community to prevent further harm
- Number of domestic abuse cases referred to Multi Agency Risk Assessment Conference (MARAC)
- WV Active membership numbers with breakdown by- long term health conditions, disabilities, low socioeconomic groups, minority ethnic groups
- Number of rapid charging electric car points in the city
- % Domestic Abuse related incidents and crimes

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
Rough Sleepers Update	Presentation on the Councils homelessness team and up to date information on rough sleepers	John Denley	Anthony Walker	27 June 2023	19 June 2023	Completed
Improvement of Housing Standards through Licensing (exempt report)	Report on Housing Standards in the private rented sector with particular focus on licensing.	John Roseblade	Chris Howell & William Humphries	27 June 2023	19 June 2023	Completed
Safer Wolverhampton Partnership Strategic Priorities Consultation	Officer request.	John Denley	Hannah Pawley	27 June 2023	19 June 2023	Completed
Wolverhampton Homes – Building Safety Strategy (particular focus on Fire Safety)	Member requested at a previous meeting.	Shaun Aldis	Simon Bamfield/Ian Gardner (WHM)	28 September 2023	20 September 2023	Completed
West Midlands Local Transport Plan Status	Panel received a report last year and asked them to come back in the future.	John Roseblade	Alex Greatholder/Marianne Page (TfWM)	28 September 2023	20 September 2023	Completed

[NOT PROTECTIVELY MARKED]

Wolverhampton Homes Customer Engagement Strategy - briefing	At Chair's request.	John Roseblade	Shaun Aldis/ Julie Haydon	28 September 2023	20 September 2023	Completed
Climate Change 2028	Chair requested.	David Pattison	Perminder Balu/Oliver Thomas	19 October 2023	11 October 2023	Completed
Fly Tipping	Member requested at Scrutiny Board.	John Roseblade	Steve Woodward	19 October 2023	11 October 2023	Completed
Community Safety Police Session 1	Panel requested more items on the police after a previous successful meeting with the Police.	John Denley	Supt Martin Hurcomb – West Midlands Police and Simon Foster, West Midlands Police and Crime Commissioner	16 November 2023	8 November 2023	Completed
Budget and Performance Update	Standard item received each year.	John Roseblade	Luke Dabin-Williams Raeesa Mohammed James Amphlett	16 November 2023	8 November 2023	Completed
Combatting Anti-Social Behaviour	Item ties in with the Police and Community collaboration theme and enables Panel full overview with a partnership approach	John Denley	<ul style="list-style-type: none"> Supt Martin Hurcomb – West Midlands Police Simon Foster, West Midlands Police and Crime Commissioner 	22 February 2024	14 February 2024	Programmed

[NOT PROTECTIVELY MARKED]

			<ul style="list-style-type: none"> Wolverhampton Homes – Angela Barnes Steve Woodward- Head of Environmental Services 			
Update Wolverhampton Homes Customer Engagement Strategy	At the request of the Panel.	John Roseblade	Shaun Aldis/ Julie Haydon	7 March 2024	28 February 2024	Programmed
Climate Change Wider Programme	At Chair's request.	David Pattison	Perminder Balu/Oliver Thomas	7 March 2024	28 February 2024	Programmed

Page 458

To be scheduled

- Aids and Adaptations - concern about delays in assessments - possible joint work with Adults Scrutiny Panel
- One Public Estates Project - Ballal Raza - Regeneration Programme Manager
- City Centre Public Space Protection Order Proposals (Findings from Consultation)
- Improvement of Housing Standards through Licensing – update on progress – report to be presented 11.7.24 - William Humphries
- Community Safety Strategy Consultation – final - Hannah Pawley
- Update on West Midlands Local Transport Plan - Alex Greatholder/Marianne Page (TfWM) - September 2024

Adults Scrutiny Panel

Chair: Councillor Val Evans

Vice Chair: Councillor Christopher Haynes

Scrutiny Support: Earl Piggott-Smith

Remit, Function and Measures

- Ensuring the health and care reform agenda is delivered for people in Wolverhampton
- Protecting vulnerable people at risk of harm and exploitation
- Services for older and vulnerable adults
- Local safeguarding arrangements for adults
- Support the Health and Social Care system to respond to and recover from Covid-19
- Maximise independence for people with care and support needs
- Work as a system to make sure that people get the right support at the right time
- % of older people (aged 65 and older) who were still at home 91 days after discharge from hospital into reablement/rehabilitation services
- % of adults with learning disabilities in paid employment
- % 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

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
4 July Meeting Postponed	N/A	N/A	N/A	4 July 2023	26 June 2023	Agenda Sent Postponed
Post Covid Position – update briefing	Update on current position	Becky Wilkinson	Becky Wilkinson	17 October 2023	9 October 2023	Completed

[NOT PROTECTIVELY MARKED]

Principal Social Worker Annual Report	This is an annual report that is presented to the panel for discussion and comment on the work of the Principal Social Worker in promoting and improving the quality of social work practice and outline the key priorities for 2023-2024.	Becky Wilkinson	Jennifer Rogers	17 October 2023	9 October 2023	Completed
Adult Social Care Winter Planning 2023-24	Request from Director to add this item to the agenda.	Becky Wilkinson and Health Partners	Becky Wilkinson and Sian Thomas, Paul Tulley and Rachel Murphy	17 October 2023	9 October 2023	Completed
CQC Assurance Preparation	Presentation on CQC readiness and assurance for comment	Becky Wilkinson	Meena Dulai	20 November 2023	10 November 2023	Completed
Our Commitment to All Age Carers Update on Progress	Request from the panel to provide an update on progress. Carers to be invited to present	Becky Wilkinson	Sandra Ashton Jones	20 November 2023	10 November 2023	Completed
Adult Social Worker and	This is an annual report that	Becky Wilkinson	Courtney Abbott	20 November 2023	10 November 2023	Completed

[NOT PROTECTIVELY MARKED]

Workforce Health Check Surveys 2022 - update on actions	presented to the panel for discussion and comment.					
Budget and Performance Update	Request from Director to add this item to the agenda.	Becky Wilkinson	James Amphlett, Lindsey Cowan James Barlow	5 December 2023	27 November 2023	Completed
Transforming Adults Service Programme Annual Report 2022-2023	Requested from the Directorate.	Becky Wilkinson	Emma Deakin	5 December 2023	27 November 2023	Completed
Wolverhampton Adult Social Care Provider Care and Support Review 2024 - 2025	This is an annual report that presented to the panel for discussion and comment.	Andrew Wolverson	Andrew Wolverson	20 February 2024	12 February 2024	Programmed
Quality Assurance Framework and Suspension Policy 2024 – 2034	Requested from the Directorate.	Andrew Wolverson	Andrew Wolverson	20 February 2024	12 February 2024	Programmed
Adult Services Social Work and Wider Workforce Health Check Survey.	This is an annual report that presented to the panel for discussion and comment.	tbc	Courtney Abbott	19 March 2024	11 March 2024	Programmed

[NOT PROTECTIVELY MARKED]

Adult Social Care Position Statement – Review of the Year	CQC Quality Transformation	tbc	Andrew Wolverson	19 March 2024	11 March 2024	Programmed
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Chair and Vice Chair to meet with CQC Inspectors – date tbc – Andrew Wolverson - <https://www.cqc.org.uk/local-systems/local-authorities/introducing-assessments> (Assessing how local authorities meet their Care Act duties is a new responsibility for CQC)

Children and Young People Scrutiny Panel

Chair: Councillor Qaiser Azeem

Vice Chair: Councillor Stephanie Haynes

Scrutiny Support: Earl Piggott-Smith

Remit, Function and Measures

The scrutiny of:

- Provision of all local authority services for children and young people including education, early intervention and prevention, social care, special needs and commissioned services.
- Children’s safeguarding including child exploitation.
- Ensuring that children have the best start in life and good early development
- Ensuring high quality education that closes the attainment gap
- Ensuring that children and young people grow up happy with good physical, social and mental health, and wellbeing
- Ensuring that every young person in the city is equipped for adulthood with life skills and ready for work
- Ensuring that families are strengthened where children are vulnerable or at risk
- % of Early Years and Childcare settings rated Good or Outstanding
- % of take up of 2-year-olds benefitting 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
- Rate of children open to social care per 10,000 population under 18
- % of repeat referrals into Childrens Social Care with 12 months
- % of children and young people in care who have had 3 or more placements in the year
- % of EHC plans issued within 20 weeks

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
Wolverhampton Children and Young People's Self-Evaluation 2023-24	This is an annual report that is presented to the panel for comment.	Emma Bennett	Alison Hinds	27 July 2023	19.7.23	Completed
Principal Social Worker Annual Report 2022 - 2023	This is an annual report that is presented to the panel for comment.	Emma Bennett	Jennifer Rogers	27 July 2023	19.7.23	Completed
Education, Skills and Employment Strategy – Pre-Decision Scrutiny	At the request of the Director, agreed by the Chair	Emma Bennett	Laura Collings	27 July 2023	19.7.23	Completed
SEND Written Statement of Action -	This will be a verbal update on the findings from the DFE/NHS	Alison Hinds	Brenda Wile	4 October 2023	26 September 2023	Completed

[NOT PROTECTIVELY MARKED]

DFE/NHS monitoring meeting - update	monitoring visit on 6 July 2023 and update from Cross Party Scrutiny Review Group - Written Statement of Action					
Childcare Sufficiency Assessment	This is an annual report that is presented to the panel for information and comment.	Alison Hinds	Phil Leivers	4 October 2023	26 September 2023	Completed
WST Exploitation Thematic Review	At the request of the SEB lead	Alison Hinds	Andrew Wolverson	4 October 2023	26 September 2023	Completed
WST Knife Crime Thematic Review	At the request of the SEB lead	Alison Hinds	Andrew Wolverson	4 October 2023	26 September 2023	Completed
Semi-supported accommodation registration and children's homes not registered with Ofsted update	At the request of the SEB lead	Alison Hinds	Jazmine Walker/ Alison Hinds	4 October 2023	26 September 2023	Deferred
Budget and Performance Update	Request from Director to add this item to the agenda.	Alison Hinds/Brenda Wile	James Barlow Amanda Sherrard James Amphlett	22 November 2023	14 November 2023	Completed
Transforming Childrens	Request from Director to add	Alison Hinds	Emma Deakin	22 November 2023	14 November 2023	Completed

Page 464

[NOT PROTECTIVELY MARKED]

Services Programme Annual Report 2022 - 2023	this item to the agenda					
Families First for Children Pathfinder Programme	Request from Director to add this item to the agenda	Alison Hinds	Rachel King	22 November 2023	14 November 2023	Completed
Family Hubs and Start for Life Offer Programme – to be circulated for information only prior to meeting	The panel requested an update on plans to establish the programme and to review progress.	Alison Hinds	Alison Hinds	22 November 2023	14 November 2023	Completed
Virtual School Head Annual Report 2023	Request from Director to add this item to the agenda	Brenda Wile	Darren Martindale, Virtual School Head	31 January 2024	23 January 2023	Agenda Sent
School Exclusion and Suspension - update on local data including plans to further reduce the number of school exclusions a	The panel requested on update on plans to reduce the number of school exclusions and suspensions.	Alison Hinds	Brenda Wile /Jameel Mullan	31 January 2024	23 January 2023	Agenda Sent
Education Excellence: Update and monitoring	The panel requested an update on progress	Alison Hinds	Phil Leivers	31 January 2024	23 January 2024	Agenda Sent

Page 465

	following the presentation of a previous report draft in January 2023.					
SEND and Inclusion Strategy (pre-decision scrutiny)	At the request of the SEB lead	Alison Hinds	Brenda Wile	31 January 2024	23 January 2024	Agenda Sent
SEND and Inclusion Strategy – update (pre-decision scrutiny)	At the request of the SEB lead	Alison Hinds	Brenda Wile	6 March 2024*	27 February 2024	Programmed
Childrens Services Social Work and Wider Workforce Health Check Survey	This is an annual report that is presented to the panel for comment specifically on the survey findings from social workers and other workers in children's service.	Alison Hinds	Courtney Abbott /Jennifer Rogers	6 March 2024*	27 February 2024	Programmed
School Place Sufficiency Strategy	To report on the plan following request from the Chair.	Alison Hinds	Brenda Wile / Bill Hague	6 March 2024	27 February 2024	Programmed

[NOT PROTECTIVELY MARKED]

School Appeals	Panel requested a progress report on actions.	David Pattison	Laura Gittos / Jaswinder Kaur	6 March 2024	27 February 2024	Programmed
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To be scheduled

- Children's Oral Health – 2024 special meeting (tbc)
- Proposed visit to new Childrens Residential Care Homes (2024 tbc) - Alison Hinds
- Proposed visit to Family Hub network (2024 tbc) - Alison Hinds
- Education, Skills and Employment Strategy update – July 2024

***Meeting rescheduled with the agreement of the Chair and Vice Chair**

Resources and Equality Scrutiny Panel

Chair: Councillor John Reynolds

Vice Chair: Councillor Sohail Khan

Scrutiny Support: Lee Booker

Remit, Function and Measures

The scrutiny of organisation and performance of the human, financial, technical and material resources to support the delivery of Council services.

- Measuring Success
- Our City Our Plan – Our Council Programme
- Our Assets
- Our Data
- Our Digital
- Our Money – Including Reserves
- Our People
- Our City: Our Plan – PRIDE values
- Wolverhampton Pound

- 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
- Overall, how well informed do you think your council keeps residents about the services and benefits it provides? (LGA Resident Satisfaction Survey)

Page 108

Item	Description	SEB Lead	Officer Report/Author Lead	Date of Meeting	Publication Date	Status
EDI strategy - Equalities Impact Assessments	Standing item How the Council evaluates Equalities implications on projects and policy.	David Pattison	Jin Takhar	08 June 2023	31 May 2023	Completed
Land and Property Disposal Annual Report	Presentation on the handling of Asset Disposals	Claire Nye	Julia Nock	08 June 2023	31 May 2023	Completed
Treasury Management Activity Monitoring Quarter Three 2022-2023	A quarterly report	Claire Nye	Allison Shannon	08 June 2023	31 May 2023	Completed

[NOT PROTECTIVELY MARKED]

EDI strategy Progress against Objectives	Our People, Adult, Children, Education and People. EDI Performance and KPIs	David Pattison	Jin Takhar	12 October 2023	4 October 2023	Completed
Race at Work Charter & Pay Gap Reporting	Presentation on progress with Race at Work Charter responsibilities	David Pattison	Jin Takhar	12 October 2023	4 October 2023	Completed
Treasury Management	For Information Only	Claire Nye	Alison Shannon	12 October 2023	4 October 2023	Completed
Budget and Performance Update	Request from Director to add this item to the agenda – the report to include Our Council and Performance/Budget information.	David Pattison / Laura Phillips / Claire Nye	Alison Shannon Steve Morgan James Amphlett	7 December 2023	29 November 2023	Completed
Reserves	To discuss the Council's Reserves	Claire Nye	Alison Shannon	7 December 2023	29 November 2023	Completed
Treasury Management Strategy 2024-2025 report	pre-decision scrutiny – this is an annual report.	Claire Nye	Allison Shannon	7 December 2023	29 November 2023	Completed
Digital Wolves Strategy Update (paper)	This is an update to the report presented in February 2023 aimed at maximising the benefit of digital to residents and businesses in the city.	Charlotte Johns	Heather Clark	1 February 2024	24 January 2024	Completed

Page 469

[NOT PROTECTIVELY MARKED]

Strategic Asset Plan 2024-2029	Pre-Decision - Extended briefing as requested by the Chair to discuss Asset Disposal Strategy	Richard Lawrence	Julia Nock	1 February 2024	24 January 2024	Completed
EDI strategy Progress against Objectives	Three Reports - 1) City Housing - Jenny Lewington , 2) Public Health John Denley 3) Annual EDI report Jin Takhar	David Pattison	Jin Takhar	12 March 2024	4 March 2024	Programmed
Contract Management and Procurement Report	this reports updates previous report that was presented to the panel in October 2022.	James Howse	John Thompson	12 March 2024	4 March 2024	Programmed
Gender Pay Gap review	Standing item	David Pattison	Sukhvinder	12 March 2024	4 March 2024	Deferred
Customer Service Strategy	Request from panel on update on changes to the strategy following a presentation in October 2022.	Charlotte Johns	Lamour Gayle	12 March 2024	4 March 2024	Programmed
LGA Resident Satisfaction Polling	The panel requested a report on the findings.	Charlotte Johns	Lamour Gayle	12 March 2024	4 March 2024	Programmed

Page 470

To be scheduled – Yoo Recruit! Item