

APPENDIX 1 Publication Wolverhampton City Centre Area Action Plan (AAP): Summary of Consultation Responses and Proposed Minor Modifications

Key:

<u>Underlined</u>	Text to be inserted	Struck through	Text to be deleted	MM	Minor Modification
BCCS	Black Country Core Strategy	WCC	Wolverhampton City Council		
NPPF	National Planning Policy Framework	UDP	Wolverhampton Unitary Development Plan		
SPD	Supplementary Planning Document	NPPG	National Planning Policy Guidance		
CIL	Community Infrastructure Levy	S106	Section 106		
HV	Holliss Vincent Retail Update Study				
HVA	Holliss Vincent Addendum Letter				

Table 1: Formal Consultation Responses (full respondent comments are available on request)

General

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
2	The Coal Authority	The City Centre AAP boundary is not on the surface coal resource and is not within the Development High Risk Area. No comments to make.	Welcomed	None
3	Network Rail	No comments to make	Welcomed	None
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Request that PCCWM and the Crime Prevention Design Advisor (CPDA) Team are engaged in the AAP preparation process, and in the preparation of other key documents affecting the City Centre e.g. Parking Strategy, Public Realm Design Guide, in line with the NPPG. Request that a key policy priority for	Agree that the PCCWM and CPDA should be involved in the AAP preparation process, and in the preparation of other key documents, as appropriate. Discussions have taken place to ensure a good working relationship going forward to implement the AAP. Secured by Design is covered by BCCS Policy ENV3: Design Quality.	None None

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		all Character Areas should be to ensure all proposals meet Secured by Design standards.		
6	Resident (A and J Perry)	Suggested additions to paras 1.5.2, 1.5.3 and 1.5.9 to include reference to Wolverhampton's historic development, religious function and churches. Whilst the Issues & Options Report may mention Wolverhampton's history, we believe the AAP, as a Planning Document, should provide as much information as possible, as future parties may not consult any other documents. The AAP is necessarily not a "concise" document, so a little more explanation will not make much difference, and may inform future users of it better.	These suggested minor additions are not considered necessary as the Publication AAP contains sufficient contextual background material, particularly in para 1.5.2.	None
13	Natural England	No comments to make	Welcomed	None
20	Historic England	Support references to the importance and value of the historic environment, including within the Vision. There is an inconsistent approach taken to impact on the historic environment in the Character Areas section, both between Character Areas and between the vision, policy, justification and development opportunity table for some Character Areas.	Welcomed The Character Area policies and proposals should be viewed in the context of extensive and detailed UDP policies on the historic environment, BCCS Policy ENV2 and Policy CC9 covering HLC sites and viewshed issues for the City Centre. Historic environment issues impact on all Character Areas in the City Centre, but the	None (MM1) Insert the following text at the end of para 4.1.1: <u>"It should be noted that the planning issues covered in this section are not exhaustive and development proposals should be assessed against all Local Plan policies."</u>

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
		<p>Detailed comments: Policy CA3 (f) – re-word to relate to significance of all heritage assets in line with the NPPF Policy CA4 – re-word section on proposals affecting the canal corridor to include heritage assets in addition to archaeological interest. Policy CA5 (a) – “historic asset” should be re-worded “heritage asset” in line with NPPF Policy CA8 (c) - re-word to relate to significance of all heritage assets in line with the NPPF. Policy CA10 (h) – replace “preserve” with “protect and conserve” in line with the NPPF.</p>	<p>degree of importance and level of impact varies. The Character Area policies highlight key priorities for each area and are not designed to be a comprehensive list of all issues affecting all sites within that area. The development opportunities vary in terms of the amount of information available regarding historic environment issues and the importance of those issues in terms of development / regeneration. Therefore there is an inevitable variation in treatment of the historic environment throughout Part C of the AAP.</p> <p>Agree to the suggested minor changes to achieve consistency with NPPF wording.</p>	<p>(MM2) In Part C, where there is reference to “potential for archaeological interest”, add the following wording: “- <u>desk based archaeological assessment required and, where necessary, field evaluation by a qualified professional</u>”</p> <p>(MM3) Amend Policy CA3 (f) to read: “<u>Protect and conserve the significance of heritage assets, including their enhance the settings of important heritage assets,</u> including the canal, Old Steam Mill, Chubb Building, Prince Albert Public House and conservation areas.”</p> <p>(MM4) Amend Policy CA4 to read: “... Proposals affecting the canal corridor should: ... Protect and enhance areas of landscape, ecological, <u>heritage</u> and archaeological interest within ...”</p> <p>(MM5) Amend Policy CA5 (a) to read: “... recreational resource, green space and <u>heritage</u> historic”</p>

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				<p>asset”</p> <p>(MM6) Amend Policy CA8 (c) to read: “... Wolverhampton City Centre conservation area and important <u>protect and conserve the significance of heritage assets, including and their settings,</u> including St Peter’s Church and Wolverhampton Art Gallery.”</p> <p>(MM7) Amend Policy CA10 (h) to read: “Preserving <u>Protecting</u> and enhancing <u>conserving</u> the historic industrial environment.”</p>
21	Severn Trent	No comments to make	Welcomed	None
15	South Staffordshire District Council	Fully supportive of the approach taken by the City Council in the Publication AAP	Welcomed	None
17	Turley (on behalf of London Cambridge Properties)	Concerns about the soundness of the AAP because some of the policies are not compliant with NPPF para 182 as they are not based on the evidence base and are, therefore, not justified. [these concerns are set out in more detail in the entries for ID: 17 below]	The AAP is compliant with NPPF para 182 because it is based on the evidence base	None

Policy CC1 Meeting Shopping Needs

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
17	Turley (on behalf of London Cambridge Properties)	<p>Delivery of Retail Floorspace (Policy CC1) - The AAP should be based on a credible evidence base and the findings of the Retail Study need to be reflected in the AAP policies, particularly in relation to the delivery of floorspace. Policy CC1 should be updated to ensure that priority is given to the regeneration of the shopping core and that the timing of the delivery of new retail floorspace is clear.</p>	<p>Welcome the respondent's view that the findings of the Retail Study need to be reflected in the AAP policies, particularly in relation to the delivery of floorspace. The AAP is based on a credible evidence base and the AAP policies do reflect the findings of the Retail Study.</p> <p>Policy CC1 does ensure that priority is given to the regeneration of the shopping core. Greater emphasis and protection is placed on the Wulfrun Centre as it is within the proposed "area of enhancement and refurbishment" within the Shopping Core, and is named in the Vision for Policy CA1 (p.56).</p> <p>Priority is given to the regeneration of the Shopping Core by:</p> <ul style="list-style-type: none"> • Making the Shopping Core the first priority in the Spatial Strategy (para 2.3.1 first bullet point) • Making "meeting shopping needs" the first thematic policy in the AAP (Policy CC1) • Making the Shopping Core the first character area policy in the AAP (Policy CA1). • Highlighting that the first priority to meet retail floorspace requirements will be delivered by "focusing retail provision in the Primary Shopping Area (PSA)" (CC1(a)) • Emphasising in the supporting text to Policy CC1 that the priority of the PSA is for non-food (comparison) retail provision and large-scale 	None

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		<p>Sequential and Impact Assessment (Policy CC1 and CA1) - the requirement for the sequential and impact tests (as required by NPPF paras 24 / 26) for edge and out of centre retail development should be made clear in the AAP. This should not seek to duplicate national policy but reflect local circumstances.</p>	<p>retail development (first sentence of para 3.1.3 and first sentence of para 3.1.6)</p> <p>The timing of the delivery of new retail floorspace is clearly set out. To reflect the nature of the delivery of new retail floorspace and as the AAP runs to 2026 it was not considered effective to set arbitrary years by which a set amount of floorspace should be delivered. Rather, a clear policy mechanism is provided for delivery – the prioritisation and protection of the “area of enhancement and refurbishment” within the Shopping Core (which includes the Wulfrun Centre), followed by retail provision in Southside and elsewhere in the City Centre that does not prejudice the vitality and viability of the Shopping Core: Policy CC1(a) & (c), and paras 3.1.3 & 3.1.6; first para and parts (a) & (d) of Policy CA1 and paras 4.2.3 & 4.2.5.</p> <p>The sequential and impact tests are made clear in the AAP.</p> <p>Policy CA1 relates specifically to the Shopping Core which corresponds to the proposed Primary Shopping Area and therefore would not be subject to the sequential and impact tests, consistent with the NPPF (nevertheless, further additional protection is provided through the requirements relating to the “area of enhancement and refurbishment” within the Shopping Core, which serves to reflect local circumstances).</p> <p>The sequential and impact tests are specifically referred to and made clear in Policy CC1 through:</p>	None

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		<p>This applies to the Peel Centre (Policy CC4[sic]) and the Royal Hospital site (Policy CC11[sic]).</p> <p>The Hollis[s] Vincent Retail Study Update (December 2014) does not identify any capacity for new convenience floorspace until the end of the plan period and the delivery of important regeneration should not be compromised by retail development on edge and out of centre sites.</p>	<ul style="list-style-type: none"> • the text in the final sentence of Policy CC1 regarding meeting “relevant requirements of the Core Strategy and national planning policy”. This future-proofs the AAP, does not duplicate national policy and reflects local circumstances • for clarity, the specific local requirements and circumstances regarding the sequential and impact tests are set out in detail in supporting para 3.1.7 <p>Agree. As set out in Policy CC1(c) and the final sentence of Policy CC1, alternative proposals than those set out in the AAP would need to meet the sequential and impact tests. Therefore, this would apply to any retail proposals that are different to the schemes that received planning consent at The Peel Centre (Policy CA4) and The Royal Hospital (Policy CA11).</p> <p>The Holliss Vincent Retail Update Study (HV) does identify immediate capacity for new convenience floorspace (see HV Table 6.2 p.81 which identifies atleast 3,700sqm gross capacity at 2016), much of which is the result of over-trading (see para 6.25 p.82). The identified convenience capacity is reflected in AAP Policy CC1 and para 3.1.5.</p> <p>Agree that the delivery of important regeneration should not be compromised by retail development on edge and out of centre sites – this is specifically</p>	<p>None</p> <p>None</p> <p>None</p>

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		<p>The sequential and impact assessments do not apply for retail development on sites that are allocated for such uses</p> <p>However it is important that these issues are tested for both the Peel Centre and Royal Hospital sites to ensure the revitalisation and enhancement of the shopping core is not compromised by the development of these sites.</p> <p>The evidence base does not require sites to be allocated for convenience retail and the policies should be amended to reflect this.</p>	<p>reflected in the policy mechanisms set out in Policy CC1(c) and the final para of Policy CC1, and para 3.1.7.</p> <p>In fact the AAP is stricter than this analysis in terms of applying the sequential and impact assessments, as Policy CC1(c) and the last para of Policy CC1 sets out – the sequential and impact tests would apply to any future retail proposals coming forward that are different to the schemes that have received planning consent in edge/out of centre locations, which includes The Peel Centre (Policy CA4) and The Royal Hospital (Policy CA11).</p> <p>These issues have been tested either through the planning consents at these sites, which are reflected in Policies CA4 and CA11, or will be tested through the requirement that any alternative retail proposals need to meet the national, BCCS and AAP policy tests as set out in Policy CC1(c) and the final para of Policy CC1.</p> <p>As set out in Table 6.2 p.81 of the Holliss Vincent Retail Update Study, the evidence base does identify the need to plan for convenience retail capacity. The 2010 BCCS Inspectors' Report (para 149 pp.42-3) advises that the Wolverhampton City Centre AAP should resolve convenience retail issues (because BCCS Policy CEN3 does not set any convenience floorspace figures for Strategic Centres, including Wolverhampton City Centre). The positive outcome of the analysis in Holliss Vincent's Addendum Letter</p>	<p>None</p> <p>None</p> <p>None</p>

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		Comments regarding The Royal Hospital [see entry under Policy CA11 below]	(HVA), following Tesco's announcement that they will not be proceeding with building-out a foodstore at The Royal Hospital site, is that it is not necessary for the AAP to allocate a new site for a large-scale foodstore to meet convenience needs. This is reflected in AAP Policy CC1(b). See entry under Policy CA11 below	

Policy CC3 Leisure, Visitor and Cultural Facilities

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Recommend that the Policy includes additional wording to better facilitate delivery of a "...safe, accessible and inclusive environment", particularly in respect of the evening economy: "The Council will promote management of both the daytime and evening economy to create safe and accessible environments where crime, anti-social behaviour, disorder and the fear of crime, do not undermine quality of life or community cohesion. Measures might include promoting natural surveillance, active street frontages, improved lighting or CCTV coverage where appropriate. Facilities which appeal to a cross-section of the community in terms of	Para 3.1.17 sets out the WCC approach to working with stakeholders such as the Police. In addition, an officer from the Crime Prevention Design Advisor (CPDA) Team is embedded with the Planning service and picks up all relevant planning proposals which may impact on community safety, including ATM installations and evening economy businesses, from the planning application list. The type of proposals listed are those where there are recognised community safety issues and WCC would consult this officer if he had not already picked up such a proposal. The proposed policy wording, and the examples of issues which a policy could address, are not evidence based in that they do not specifically	None

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		<p>age range and social groups would be supported and an overconcentration of facilities which attract a narrow age range or social group would be resisted.”</p> <p>Examples of issues which the new policy could address are: access to taxis; reasonably-priced parking; well-run premises; CCTV in clubs; and control of licensed premises, hot food takeaways, off-licences, ATMs and Sheesha lounges.</p> <p>If the night-time economy is increased there may be implications for police resources which may require additional infrastructure for which financial contributions should be sought from developers.</p>	<p>relate to local issues in Wolverhampton City Centre. Also, in many cases they relate to issues not within the remit of planning and are not enforceable.</p> <p>Measures related to good design to maximise surveillance, provide active street frontages and lighting are comprehensively covered in other policies in the Local Plan, primarily Policy D10: Community Safety of the UDP.</p> <p>The AAP does not propose an increase in the night-time economy and there is no evidence that any increase would place pressure on existing police resources. Evidence would be required to underpin any new policy to seek financial contributions from developers, which could only be secured through S106 in Wolverhampton (as there are no plans to introduce CIL) and therefore would be restricted by the CIL Regulations.</p>	None
6	Resident (A and J Perry)	Suggested additions to paras 3.1.13 and 3.1.14 to include reference to the importance of the City’s religious function and churches. Whilst we accept the term “cultural” should include religion and the various places of worship, this may not necessarily be considered by a proportion of the future users of this document, and we maintain that Churches and places of worship of other	As set out in the Council Response to the Draft Plan consultation document [ID: 56 pp.57-8], the important role played by religion and places of worship is recognised in para 1.5.3. The city’s religious function and places of worship are covered implicitly in the reference made to ‘cultural facilities’. It is proposed to make a minor modification to clarify this.	(MM8) Para 3.1.9 “The provision of cultural (<u>including places of worship</u>), visitor, entertainment and leisure facilities are a vital component in ensuring the City functions well,

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		faiths should be recognised distinctly.		particularly in the evening.
10	Theatres Trust	The Theatres Trust supports this policy as it clearly aims to protect existing cultural facilities such as the Grand Theatre. This reflects advice provided in para 70 of the NPPF regarding the safeguarding of cultural facilities.	Welcomed	None

Policy CC6 Transport

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
1	Office of Rail and Road	The AAP is legally compliant and sound	Welcomed	None
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Recommend that the Policy includes the following wording: “Work with the PCCWM to ensure security and safety are fully considered in development proposals.” and the justification includes the following wording: “The PCCWM will be consulted about any transport and connectivity proposals to ensure that opportunities to improve safety, both on the transport system itself and in the surrounding environment, are identified and appropriate measures included to promote safe and accessible environments where crime and disorder, and the fear of crime, do not	It is acknowledged that the Police can provide important advice on development proposals, including transport proposals, on issues such as design. However, it would not be appropriate to include a statement requiring the Council to work with the Police on relevant development proposals in Policy, as this is not a planning application requirement, but good practice for the local planning authority to follow. WCC is following this good practice and has a good working relationship with the local Police. An officer from the Crime Prevention Design Advisor (CPDA) Team is embedded with the	None

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		<p>undermine quality of life or community cohesion.”</p> <p>Suggest including the following wording in the Policy: ‘Make provision for the safe storage of cycles to meet Association of Chief Police Officers ‘Secured by Design’ standards.’ and; ‘new car parks, or retrofitted/redevelopments of car parks will be encouraged to achieve the Association of Chief Police Officers (ACPO) ‘Park Mark’ award / accreditation.’</p> <p>Welcome para’s 3.3.4-5 which emphasise the importance of improving public realm and safety, and support transport and public realm improvements and the Council’s corporate initiative to support businesses and better manage city centre activities. Support new bullet point (viii) to “Promote sustainable maintenance and management of the public realm”.</p>	<p>Planning service and picks up all relevant planning proposals which may impact on community safety, including transport proposals, from the planning application list. Therefore the proposed wording does not reflect the way that WCC currently works with the police.</p> <p>Cycle storage is covered elsewhere in BCCS Policy TRAN4: Creating Coherent Networks for Cycling and Walking, and secured by design under BCCS Policy ENV3: Design Quality.</p> <p>It is not within the remit of the AAP to set such standards, which cover issues which cannot be controlled through planning.</p> <p>Welcomed</p>	<p>None</p> <p>None</p>
6 & 7	St Peter’s Collegiate Church & Resident (A and J Perry)	Policy CC6(d). Whilst it is accepted that the proposed change by the Council adding (iv) to this section goes a little way towards dealing with the issue, the only way to answer the points raised would be to exclude St Peter’s, Broad Street and Fold Street Car Parks from	For the reasons set out in the Council’s response to the AAP Draft Plan consultation, it would not be justified or effective to exclude St Peter’s, Broad Street and Fold Street Car Parks as Development Opportunities	None

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		<p>development. We suggest (iv) should read “The retention and enhancement of existing surface car parks which are essential to support, and enable the continuation of, important specific functions within the City Centre”.</p> <p>Draft Plan para 3.1.47 Council’s proposed amendment to this does not preclude closure of car parks altogether, it only allows for monitoring them. Their closure should not be entertained unless the provision of equivalent parking facilities has already been put in place.</p> <p>Draft Plan para 3.1.49 – Council response not understood, as our extra wording was merely intended to qualify what was already in this paragraph.</p>	<p>The suggested wording for Policy CC6(d)(iv) would dilute the current wording as there are not just surface level car parks in the City Centre that are of strategic importance</p> <p>The changes to Draft Plan para 3.1.47 (which has now become Publication Plan para 3.1.36) is part of a wider section (paras 3.1.32 – 3.1.36) explaining the approach to car parking set out in policy CC6(d). The monitoring of car parking provision would inform the acceptability of proposals that affect car parking provision, as part of the priority to ensure no net loss of car parking spaces in the City Centre.</p> <p>Draft Plan para 3.1.49 related to the Sustainability Appraisal (SA) section of Policy CC6. SA sections for each Policy were included in the Draft Plan to provide evidence and context for consultation, but have been removed from the Publication Plan (consistent with adopted Stafford Road Corridor and Bilston Corridor AAPs).</p>	<p>None</p> <p>None</p>
8	Canal and Rivers Trust	Note that references to a proposed bridge crossing in the Canalside Quarter have been removed.	Welcomed	None

Policy CC7 Delivering a Sustainable Mix of Housing

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5	Sport England	<p>Given the lower housing provision proposed in the AAP compared to the Core Strategy suggest change to para 3.2.2 to remove the phrase: “which could more than double the population”.</p> <p>In order to ensure there is strong enough emphasis on the need to ensure that there is adequate provision of indoor and outdoor sports facilities for the new population which will be created through the APP suggested additional para after 3.2.16: “The City Centre is well served by a wide range of sports facilities within easy walking distance of new housing sites. These include Central Baths pool and gym, University indoor sports halls and gym, West Park tennis courts and bowling green, Fowlers Park football pitches and a new 3G artificial grass pitch, climbing wall, four court sports hall, dance studio and gym at the Youth Zone. The area south of the City Centre is served by the Youth Zone, the Blakenhall Healthy Living Centre sports halls and gym, Dixon Street Playing Fields and Phoenix Park, which were improved through All Saints and Blakenhall New Deal for Communities funding, and a new community use pitch will be created at St Luke’s Primary school. However, as the population increases through housing development sporting provision</p>	<p>Agreed</p> <p>Agreed</p>	<p>(MM9) Para 3.2.2 second sentence: “The Core Strategy anticipates that the AAP area could accommodate a further 3,800 homes, which could more than double the population.”</p> <p>(MM10) After 3.2.16 add new para: <u>“3.2.17 The City Centre is well served by a wide range of sports facilities within easy walking distance of new housing sites. These include Central Baths pool and gym, University indoor sports halls and gym, West Park tennis courts and bowling green, Fowlers Park football pitches and a new 3G artificial grass pitch, climbing wall, four court sports hall, dance studio and gym at the Youth Zone. The area south of the City Centre is served by the Youth Zone, the Blakenhall Healthy Living Centre sports halls and gym, Dixon Street Playing Fields and Phoenix Park, which were improved through All Saints and Blakenhall New Deal for Communities funding, and a new community use pitch will be created at St Luke’s Primary school. However, as the population increases through housing development sporting provision will be kept under review, in light of forthcoming playing pitch and built facility strategies. Open space and play contributions secured from residential developments can be spent on outdoor</u></p>

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		will be kept under review, in light of forthcoming playing pitch and built facility strategies. Open space and play contributions secured from residential developments can be spent on outdoor sports provision where this is a local priority.”		sports provision where this is a local priority.” Publication Plan para 3.2.17 re-numbered: “ 3.2.17 <u>3.2.18</u> ”

Policy CC8 High Quality Design and Public Realm

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20	Historic England	<p>Para 3.3.3 should refer to the importance of high quality design in the historic, as well as the natural and built environment.</p> <p>Policy CC8 should be re-phrased to reflect the NPPF terminology. Support the viewsheds methodology and consider that views to and from heritage assets should be referenced in this Policy.</p> <p>Fig 8 key should be amended from “Historic Park and Garden” to “Registered Park and Garden” to reflect</p>	<p>Agree that the importance of high quality design for promoting historic character and local distinctiveness is also promoted through BCCS Policy ENV2 Historic Character and Local Distinctiveness.</p> <p>Agree that Policy wording should reflect the NPPF terminology where possible and that views from heritage assets, as well as to them, should also be highlighted in the Policy.</p> <p>Agree.</p>	<p>(MM11) Amend para 3.3.3 to: “The importance of high quality design in the built and natural environment for successful place making <u>and promoting historic character and local distinctiveness</u> ...”</p> <p>(MM12) Amend Policy CC8 (vii) to: “Protect and conserve the significance of settings of and views to heritage assets to help promote local distinctiveness including their settings, and views to and from these assets;”</p> <p>(MM13) Amend Fig 8 key to read “<u>Historic Registered</u> Park and Garden”</p>

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		NPPF terminology.		

Policy CC9 Protecting and Enhancing Historic Character and Local Distinctiveness

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4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Request additional wording in Policy to give favourable consideration to use of alternative materials to replace stolen building materials/artefacts e.g. lead in appropriate circumstances, as part of a pragmatic, flexible approach.	Existing BCCS / UDP policy allows for a flexible approach, considering the use of alternative materials for each site on its merits.	None
6	Resident (A & J Perry)	Draft Plan para 3.3.12 [which is now Publication Plan para 3.3.10] suggested wording about “Folds” – amendment noted. Please re-consider adding cross reference to www.wolverhamptonfolds.co.uk	As reference is made to Folds in para 3.3.10 and the AAP is a document with a longevity to 2026 it is not considered necessary to include reference to the web link. A google search for “Wolverhampton Folds” yields the web link as the first result	None
19	Council for British Archaeology West Midlands	Pleased to see the area’s strong local character, identity and sense of place recognised as an asset which enhances the city centre’s distinctive offer. Look forward to further enhancement of the city centre’s historic core through heritage-led regeneration	Welcomed	None

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		<p>schemes similar to those in areas such as St John's and Worcester Street which have proved a major success. Section on Protecting and Enhancing Historic Character and Local Distinctiveness is a model of clarity and the document as a whole is enhanced by the results of the Viewsheds study. The approach is one that we would wish to see adopted elsewhere.</p>		
20	Historic England	<p>Welcome inclusion of specific policy for the historic environment and the many references which highlight the value of the historic environment in the City Centre.</p> <p>Concerns that the wording of Policy CC9 clauses (a) and (b) should reflect the NPPF and that “enabling development” should not be referred to in (a) (iii).</p>	<p>Welcomed</p> <p>Policy CC9 is part of a suite of policies covering historic environment issues in the UDP and BCCS. Policy CC9 clauses (a) & (b) specifically relate to City Centre Historic Landscape Characterisation sites (HLC sites) only. HLC sites are not necessarily all heritage assets, as the criteria for their designation include townscape value and potential as catalysts for regeneration (ref. para 3.3.15). Therefore the policy wording for their treatment is slightly different from that set out in the NPPF for heritage assets. The wording is also very similar to that used in the recently adopted (2014) Stafford Road Corridor and Bilston Corridor AAPs (Policies SRC7 & BC6) and it is important to maintain consistency across the Local Plan area.</p>	<p>None</p> <p>(MM14) Amend para 3.3.15 to: “.. significance of previously unrecognised heritage assets <u>Historic Landscape Characterisation</u> (HLC) sites which are not covered by a listed or local</p>

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		<p>Potential archaeological interest is highlighted for a number of development opportunity sites, however it is not clear how this issue will be addressed. This could be achieved by a clause in Policy CC9.</p>	<p>However, it is appropriate to replace the reference to heritage assets in the supporting text to improve accuracy and to add sub-headings to the policy to aid clarity.</p> <p>Clause (a) (iii) was carried over from Bilston Corridor AAP Policy BC6 in error – it related to HLC sites adjoining or containing identified heritage buildings at risk as listed in Policy BC10. This clause does not make sense in the context of the City Centre AAP, where there are no identified heritage buildings at risk, and therefore should be deleted.</p> <p>Para 3.3.17 sets out the work undertaken to date for each development opportunity, in response to comments by Historic England at Draft Plan stage. This includes highlighting where there may be archaeological interest to assist developers in implementing Policies HE24-28 of the UDP - detailed policies for</p>	<p>list designation.”</p> <p>(MM15) Insert sub-headings into Policy CC9: “Historic Landscape Characterisation Study Sites” at the beginning of the Policy; and “Effects on Views and Visibility” before (c).</p> <p>(MM16) Delete clause (a): “(iii) on sites containing or adjacent to heritage assets at risk, consideration of the potential for enabling development.”</p> <p>(MM17) In Part C, where there is reference to “potential for archaeological</p>

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			archaeology across the City which include the requirement for archaeological evaluation. However, for clarity this guidance can be repeated in tables in Part C.	interest”, add the following wording: “- <u>desk based archaeological assessment</u> required and, where necessary, <u>field evaluation by a qualified professional</u> ”

Policy CC10 Delivering Environmental Infrastructure in the City Centre

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
8	Canal and Rivers Trust	We note that paragraph 3.3.30 states “Detailed guidance on design of canalside development to enhance the environment and deliver regeneration benefits is set out in Policy CA4.” The design guidance reflects some of our recommended guiding principles for waterside developments which is welcomed.	Welcomed	None
14	The Woodland Trust	Where it may be necessary to remove trees for operational or visual amenity reasons, appropriate replacement planting should take place to mitigate such action and this should be acknowledged in Policy CC10 as a modification. Also, whilst Policy CC10 acknowledges there is a lack of quality landscaped open space as a natural asset, ancient woodland and veteran trees should be protected	UDP Policy N7: Urban Forest includes a requirement for “replacement of trees removed with council consent, with trees of a size and species specified by the council.” There are no designated ancient woodlands or veteran trees in the AAP area (reference para 7.5.3 of the UDP). Therefore there is no need for additional policy wording on these issues in the AAP.	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		absolutely.		
16	The Environment Agency	Support wording in Policy CC10 to incorporate SUDs and urban green measures that can provide high quality SUDs features where there is more limited space, often within City Centres. This will help with climate change mitigation, in respect of more intense rainfall and reducing the urban heat island effect.	Welcomed	None
17	Turley on behalf of LCP Limited	There is no evidence base or justification for a policy that requires green roofs. The inclusion of a green roof should be a material consideration rather than a policy requirement so that this does not restrict development coming forward.	Policy CC10 clause (b) only requires provision of green roofs on large new developments of 1,000 sq metres floorspace or more and allows for this requirement to be waived if it can be demonstrated that this is not viable or feasible - therefore it does not restrict development coming forward. The Policy is similar to that set out in the recently (2014) adopted Stafford Road Corridor and Bilston Corridor AAPs, The Inspector for the Stafford Road Corridor AAP concluded that Policy SRC9 was justified and consistent with national policy in requiring new employment developments with a floor space of 1,000 m ² or more to provide green roofs. Policy SRC9 was based on the same evidence as the City Centre AAP i.e. the Black Country Environmental Infrastructure Guide (EIG) Design Guidelines. The Inspector also attached significant weight to the support of the Environment Agency and Natural England for the policy. The Environment Agency have similarly provided support for the City Centre AAP Policy CC10.	None

Policy CC11 City Centre Renewable and Low Carbon Energy Infrastructure

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
8	Canal and Rivers Trust	As per our previous representation we welcome the recognition within the supporting text for this policy (para 3.3.39) of the opportunities the canals can provide for heating and cooling of buildings to meet renewable energy targets and the requirement to consult with us on any proposals for use of the canal water. However, any references must be Canal & River Trust (“&” not “and”).	Welcomed	(MM18) Amend references throughout the document to “Canal & River Trust”
17	Turley on behalf of LCP Limited	In some instances the use of any of the technologies referred to in Policy CC11 will be unfeasible or unviable for small scale development and could prevent vital enhancements to the retail core. The policy should be reworded to cover only developments of over 1,000 sqm floorspace to recognise this issue in line with NPPF which requires development to promote renewable and low carbon energy unless it “is not feasible or viable” (para 96).	<p>A number of BCCS policies support the proposed policy, as demonstrated by the recent adoption of an identical requirement in the Bilston Corridor and Stafford Road Corridor AAPs (2014), which was supported by the Stafford Road Corridor AAP Inspector in his report (see detail for further supporting information). The policy requires the potential for renewable technologies to be explored as part of the hierarchical approach, therefore if they are proved to be unfeasible (and a fabric first solution is not possible) allowable solutions are the “fall back” position.</p> <p>The policy requirement cannot be limited to developments of over 1,000 sqm as any size cut-off criteria will depend on future changes to building regulations.</p>	None

Policy CA1 Shopping Core

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
6	Resident (A & J Perry)	<p>Suggested amendment to Draft Plan “Further Information” entries for Table CA1A Southside 1 & Southside 2 [see Draft Plan Council Response Schedule for ID: 56 pp. 80-81]. It is not understood why our suggested wording would not be effective – your comments suggest that the designation of Conservation Area was worthless [sic]. The properties which have recently been demolished need not have been demolished, as the Council as planning Authority could have, and should have, taken action against owners leaving properties in a Conservation Area to fall into poor repair, to ensure their restoration and bringing back into economic use. Demolition of the buildings follows the maxim put forward in certain quarters that it is better to have a derelict site than an empty building awaiting restoration by a suitable developer! As expected, these demolitions have ruined the townscape and created a “blitz” impression which we suggest discourages interest by developers, shopkeepers and the public. The only new development is the grotesque monster [Youth Zone] at the end of Worcester Street which is presumably publicly funded anyway!</p>	<p>As set out in the Council response to the Draft Plan consultation, the suggested changes are not considered effective. Conservation Area designations are included in the Publication AAP maps, such as Fig. 13, and Table CA1A includes reference to the Conservation Area under the “Further Information” section. Conservation Area status is taken very seriously. The Council is undertaking a co-ordinated approach to this area through the Southside Intervention Plan, which includes taking reasonable and proportionate action regarding the condition of buildings. Demolition only occurs when related to a strategic intervention, specific demolition notice, as part of a planning permission and/ or for safety reasons.</p>	None
17	Turley on behalf of LCP	The Town and Country Planning (General Permitted Development) (England) Order	As set out in the Council Response to the Draft Plan consultation, a frontage use policy is ‘justified’ as it	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
	Limited	2015 permits the change of use from A1 to A3 (subject to the Prior Approval process). At the time of the previous consultation this provision was only temporary but this is now permanent. The principle of the change of use from A1 to A3 cannot be restricted via this policy (subject to any Article 4 Directions that might be applicable) and should be amended accordingly to ensure it is sound (by being effective and justified).	would be consistent with NPPF para 23. The proposed wording of Policy CA1(e) takes into account the permanent changes to permitted development rights, which only apply to proposals under 150 sqm gross and the 'prior approval' route requires the issue of 'city centre performance' to be taken into account. This is made 'effective' in Policy CA1(e) through the wording in the third sentence "proposals for a change of use that are subject to planning control".	

Policy CA2 Westside

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
6	Resident (A & J Perry)	Suggested amendment to Draft Plan "Further Information" entries for Table CA2A Westside 1 & Westside 3 [see Draft Plan Council Response Schedule for ID: 56 pp. 83-84]. See comments from ID:6 to Policy CA1 above. If there were a desire to refurbish and bring into economic use important buildings, the methods of this plan could be changed to enforce this.	As set out in the Council response to the Draft Plan consultation, the suggested changes are not considered effective. The buildings fronting Pitt Street and Worcester Street do not fall within Westside 1 (site 2a(i)) and the Methodist Church and 7 School Street lie outside the Westside 3 boundary. This would not prevent the future refurbishment of these buildings if such proposals came forward.	None
9	Savills	Support addition of "leisure, food and drink" to para 4.3.6 and Table CA2A; and addition of "School Street" to Table CA2A	Welcomed	None

Policy CA3 City Interchange and Commercial Gateway

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	<p>Request Policy CA3 (e) be reworded to "... facility which achieve the Association of Chief Police Officers (ACPO) "Park Mark" award / accreditation.'</p> <p>Support para 4.4.2 reference to aim of creating safe and sustainable places.</p>	<p>It is not within the remit of the AAP to set such standards, which cover issues which cannot be controlled through planning.</p> <p>Welcomed</p>	<p>None</p> <p>None</p>
12	Harris Lamb	<p>Site reference 3e (Former Post Office Site) in Table CA3A is a brownfield site in a highly sustainable location and its use for predominantly residential purposes would assist in meeting the city's housing needs.</p> <p>The site's city centre location would increase the vitality and viability of the city centre, supporting local businesses and residential use is an accepted town centre use.</p> <p>The principle of residential development only has been established through approval of a previous planning application.</p> <p>Site 3e (Former Post Office Site) in Table CA3A should be amended to state that the appropriate use of the site is office and / or housing-led development, with the potential for ancillary retail and</p>	<p>As set out in the Council's Response to Harris Lamb's representation to the Draft Plan consultation (ID: 32 p. 85 of "Summary of Consultation Responses, Council Responses and proposed Changes" document), site 3e is of strategic importance to the delivery of Grade A office-led mixed use development to serve the city centre and deliver the AAP's spatial strategy.</p> <p>Character Area CA3: City Interchange & Commercial Gateway (Vision and Policy CA3) sets out the important role of this character area in providing office-led mixed use development, which is to complement the consolidation and diversification of the retail offer in the Shopping Core Character Area (Policy CA1) and the other complementary leisure-led mixed use development in the Westside Character Area (Policy CA2), together with residential provision throughout the AAP area (Policy CC7).</p> <p>The Interchange Character Area is identified as providing the potential for around 25,000sqm of office floorspace, which will make an important contribution to the potential delivery of the 70,000sqm of office floorspace outlined in</p>	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		<p>leisure development.</p> <p>The development capacity of the site should be amended to include “up to 250 residential units”. The potential for some ancillary commercial development should also be added.</p> <p>The statement in the further information column should be deleted.</p>	<p>Policy CC2(a).</p> <p>The Bruton Knowles Commercial Sites Assessment Study Appendix 3 identifies the sites where the market could deliver this office floorspace. Site 3e is identified as the largest potential office site in the Interchange Character Area, contributing 13,000 sqm of the 25,000 sqm office floorspace proposed in this area, and potentially generating 1,000 jobs.</p> <p>It is recognised that residential provision is of crucial importance to the City Centre and residential-led sites for set out in Policy CC7 (cf. Fig 7 p.33). The Canalside Quarter Character Area (Policy CA4) is identified as particularly lending itself to residential-led mixed use development, which is in close proximity to site 3e and adjoins the Interchange Character Area. Site 3e is identified for “ancillary residential” to ensure that it is able to contribute significantly to office-led mixed use provision.</p>	

Policy CA4 Canalside Quarter

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
17	Turley (on behalf of London Cambridge Properties)	Peel Centre [see entry under Policy CC1 above]	See entry under Policy CC1 above	None

Policy CA6 University Quarter

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Welcome reference to enhancing pedestrian legibility and improvements to make a safe environment for students / visitors, and para 4.7.2	Welcomed	None

Policy CA8 St Peter's Cultural Quarter

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Support new wording in Table CA8A for Site 8c regarding City Centre Police Station.	Welcomed	None
6 & 7	St Peter's Collegiate Church & Resident (A & J Perry)	Table CA8A St Peter's Car Park & Broad St Car Park. St Peter's Car Park should be removed from schedule, because of long-standing Council agreement with St Peter's Collegiate Church to provide car parking for worshippers (unless suitable alternative agreed), and for evening use by patrons of	For the reasons set out in the Council response to the Draft Plan consultation to Policy CA8 (ID 31 & 56 pp. 97-99), it would not be 'justified' or 'effective' to remove St Peter's and Broad Street Car Parks as Development Opportunities. The Council are unaware of any agreement with the Church that requires the retention of St Peter's Car Park (aswell as Broad Street or Fold Street Car Parks). The AAP seeks to ensure no net loss of parking spaces	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		<p>Arena and Grand Theatres, Lighthouse and other City Centre visitors... .</p>	<p>across the AAP area, as set out in para 3.1.46. Parking charges are not within the remit of the AAP.</p> <p>It is important that the AAP provides a flexible approach by identifying a portfolio of sites for a mix of uses that could help deliver investment, jobs and regeneration in the City Centre. A viability study has looked at the site and concludes that alternative uses coming forward at St Peter's Car Park would be viable. The AAP proposes the development of high quality multi-storey car parks to improve the accessibility of the city centre to visitors as advised in the Commercial Sites Assessment Study (para 2.1.9). These multi-storey car parks will provide for the needs of new development and will provide for spaces displaced through the development of a number of surface car parks across the city centre. Any car parking spaces displaced through development would only be carried out on a phased basis to ensure that there is a balanced network of car parks across the city centre to meet a variety of needs.</p> <p>It is recognised that 'destination' parking can play a role in serving important facilities in the City Centre, such as those within CA8 St Peter's Cultural Quarter. A Car Parking Strategy is being undertaken, which will include investigating the issue of destination parking.</p> <p>In terms of other existing surface level car parks in St Peter's Cultural Quarter, Table CA8A identifies the need to include some public car parking at the Broad Street Car Park development opportunity (8b) as part of the future redevelopment of the site. New car parking will also be provided at the Interchange (site 3a), which is a short</p>	

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		<p>Development [of St Peter's Car Park] would ruin prospect of two of City's most important Listed Buildings, Giffard House and Molineux House, and also their "open square" relationship with University, St Peter's Church and Civic Centre – this open square idea could be improved upon with suitable treatment, the ultimate being a pedestrian area covering the Ring Road and linking one side to the other.</p> <p>Broad Street Car Park should be</p>	<p>distance from St Peter's Character Area. There are existing car parks in this character area which are not proposed for redevelopment in the AAP e.g. at the Civic Centre. Although the Civic Centre currently does not open on a Sunday this potential could be explored in the future, as a possible alternative to not identifying St Peter's, Broad Street and Fold Street Car Parks as development opportunities.</p> <p>WCC recognises the historical importance of St Peter's Collegiate Church and the important role it plays in serving the community. The Council are committed to working proactively in partnership with church to assist in addressing any accessibility issues. If St Peter's Car Park does come forward for development in the future this could include investigating potential alternative car parking provision which could be utilised by the church.</p> <p>The important location of St Peter's Car Park is recognised in Table CA8A "Further Information" column, which says: "High profile location regarding ring road and nearby landmark buildings. Proposals should improve the public realm and enhance the setting of the conservation area and nearby heritage assets, such as St Peter's Church, including by maintaining important views."</p> <p>As stated above, a Car Parking Strategy is being</p>	

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		<p>removed from schedule in view of Sunday overspill parking needs for St Peter's Collegiate Church, use by Temple, Mosque, Westbury Chapel, long-stay use by railway travellers, daytime and evening use for Art Gallery, Arena and Grand Theatres, Lighthouse and other City Centre visitors. The Council's response [to the Draft Plan representation] does not address the different users and needs specified as requiring this to remain as a surface car park in its present size, not allowing it to be developed with merely an unspecified element of public car parking. Car Parking at the Interchange is not an acceptable alternative, as, apart from its use being likely to be taken up by travel users, it size is unlikely to be large enough, it is difficult to gain access to because of the complex street systems, and it is too far for people to walk, particularly elderly and inform and the very young. It should be understood also that because of the risks multi-storey car parks are ones to be avoided by many people.</p>	<p>commissioned, which will include addressing the issue of 'destination' parking. A planning permission at the Interchange to increase multi-storey car parking provision. This car parking will be easily accessed off the Ring road via Corn Hill (Publication AAP Fig 17). The Interchange is in close proximity to serve city centre facilities, particularly in the eastern part of St Peter's Cultural Quarter, such as the Grand Theatre and Light House cinema, especially in the evening</p>	
6	Resident (A & J Perry)	Policy CA8(c) and para 4.9.1 – suggested additions to Draft Plan wording describing St Peter's	As set out in the Council's response to the Draft Plan consultation representations [ID:56 p.101], it is felt that the importance of St Peter's Church is already expressed in	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
		Church. Our suggested additions were intended to support the reasoning for the Church being given special consideration as regards its status, contribution to the City and the many aspects of its use, by its own congregation and Choir, the general public, visitors of many faiths and none.	the existing wording of the AAP, from the naming of Character Area CA8, the listed building and ancient monument designations on the mapping (e.g. Fig. 28) and reference to the importance of the church in e.g. para 4.9.1 .	

Policy CA11 All Saints

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
17	Turley (on behalf of London Cambridge Properties)	Royal Hospital (Policies CC1 and CA11) - The aspirations for the Royal Hospital site set out in Policies CC1 and CA11 are inconsistent with each other. Policy CC1 identifies the site for a foodstore whereas Policy CA11 identifies the site for a mixed use development which could be led by either housing, education or a foodstore. Our previous representations raised concerns about the delivery of a foodstore on the site given the current market conditions and Tesco having pulled out of the site. Policies for this site also need to reflect the priority that should be given to the enhancement and revitalisation of the shopping core, which should not be compromised by the	<p>Policies CC1 and CA11 reflect the analysis in the Holliss Vincent Addendum Letter (HVA)</p> <p>Policy CA11 does not require that a foodstore is delivered. Rather, the policy for site 11a and Character Area CA11 does provide maximum flexibility by setting out a range of possible alternative primary uses at The Royal Hospital Site.</p> <p>It is necessary to refer to a foodstore at The Royal Hospital in Policy CC1 and CA11 because, as set out in the Holliss Vincent Addendum Letter (HVA) p. 4, the extant planning permission for a food superstore at the Royal Hospital Site has</p>	None

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
		<p>promotion of retail proposals on edge and out of centre sites. The Royal Hospital is a significant opportunity site and development should not be constrained by the requirement for food retail development. Policies relating to this site should be flexible to ensure important regeneration comes forward without compromising other aspirations of the AAP. So we suggest the Policy CC1 removes reference to the Royal Hospital and Policy CA11 removes reference to a foodstore being a primary use.</p>	<p>been lawfully commenced. However, the wording and structure of Policies CC1 and CA11 recognise that this foodstore consent is unlikely to come forward in its approved form. Policy CC1(b) sets out the potential alternative ways in which new convenience retail could be provided. A foodstore at The Royal Hospital is ranked last in this list and is referred to as the “potential” for a new foodstore. Policy CA11 lists a “foodstore” as a potential principal use, but this is also ranked last in the list after “housing” and “education”. Para 4.12.3 p.128 specifically notes that a foodstore is unlikely to come forward in its approved form.</p> <p>Agree that priority should be given to enhancing and revitalising the shopping core. This approach is emphasised and endorsed in the Holliss-Vincent Addendum Letter p.4, and is reflected in Policies CC1, CA1 and CA11. In particular, the first sentence of Policy CA11 refers to mixed use development “that will complement the city centre as a whole”.</p>	
18	NLP (on behalf of Tesco)	<p>Request Fig 33 mapping clarification</p> <p>Request addition to Policy CA11 “housing (including student accommodation)” for clarity</p>	<p>Agree</p> <p>The national definition of housing includes student accommodation, and this is already clarified in para 4.12.4 and Table</p>	<p>(MM19) Make boundary of site clearer on Fig 33</p> <p>None</p>

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
		<p>Policy CA11 refers to the delivery of “at least 100 new homes”. This is a significant underestimate of the potential capacity of the site and that the policy would therefore be unsound because it would not accord with national policy to optimise the potential to accommodate development (NPPF, para 58). The development site is 6ha and 100 homes would only equate to 17dph – clearly inappropriate for a city centre site and inconsistent with national planning policies. We consider that the policy should be consistent with para 4.12.4 which refers to the potential for 350 – 500 homes. We suggest the fourth paragraph of the policy is amended to read:</p> <p><u>“The [RHDA] area has the capacity to deliver approximately 350 – 500 new homes. It is important that the area delivers at least 100 new homes, as part of any mixed-use proposal, to maximise the potential of this sustainable location, served by new open space, enhanced public realm and improved linkages to the rest of the city centre.”</u></p> <p>Para 4.12.4 – The reference to encouraging “high and medium density</p>	<p>CA11A.</p> <p>The reference to 100 new homes in Policy CA11 is not a statement of capacity. Policy CA11 provides a flexible policy mechanism to facilitate mixed-use development and comprehensive regeneration. A minimum housing figure is provided to ensure that if a non-residential primary use came forward on the site (such as education), then the policy would ensure delivery of at least 100 homes to contribute towards meeting housing needs. The reference to the delivery of “at least 100 new homes” is therefore not a maximum figure for a single use across the whole site which would equate to 17dph. It is suggested to clarify this further.</p> <p>The potential housing capacity for the site is contained in para 4.12.4. As this figure is an indication of capacity and not a policy steer it is not felt necessary to include it in the wording of Policy CA11. Rather, by not including a maximum housing figure in the policy there is flexibility for a housing-led scheme to potentially deliver more than 500 homes.</p> <p>The wording of para 4.12.4 does not preclude high and medium density development coming forward. Rather,</p>	<p>(MM20) Amend fourth para of Policy CA11 to read: “It is important that the area delivers at least 100 new homes, <u>as part of any mixed-use proposal</u>, to maximise the potential of this sustainable location, served by new open space, enhanced public realm and improved linkages to the rest of the city centre.”</p> <p>None</p> <p>None</p>

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
		<p>development” which was in the previous draft of the AAP should be retained - this is a city centre site with good public transport links and a major gateway into the city centre core. The former bus depot site is especially suitable for higher density development – being adjacent to the city centre core, accessible and at an important gateway. The reference to “high and medium density development” would be consistent with local context and national planning policy, and it would therefore be ‘sound’.</p> <p>Development Outputs – the reference to 22,300sqm of mixed use development seems low and it is not clear how this figure is derived. For example, if 370 homes were to come forward (as per 2007 scheme), the average size of each unit would be only 60sqm (assuming a 100% housing scheme). We consider that the figure cannot be ‘justified’ and that it is therefore ‘unsound’. To maximise flexibility and deliverability, consideration should be given to deleting any reference to a maximum amount of floorspace, particularly as a range of dwelling numbers is included.</p> <p>Figure 34 – Policy CA11 – the map is inaccurate and misleading as it shows buildings that have been demolished</p>	<p>maximum flexibility is being provided for the site for varying densities to come forward, which would be considered on their own merits – for example the south and western part of site 11a, which adjoin the existing residential area of All Saints, might lend itself to the delivery of lower density family housing.</p> <p>22,300 sqm is indicative of the scale of development that could come forward in the All Saints Character Area. Each Character Area in the AAP has a Development Outputs section for this purpose. The figure for All Saints is derived from the Bruton Knowles Commercial Sites Assessment Study Appendix 3. This figure is not prescriptive and does not constitute a maximum amount of floorspace for the site (the wording “around 22,300sqm mixed use development” is used) and is not included in the wording of Policy CA11.</p> <p>The LPA does not have the power to “de-list” buildings, even when they have been demolished, however an explanatory note would be added for clarity</p>	<p>None</p> <p>(MM21) Add explanatory note to Fig 34: “* These buildings have been demolished”</p>

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan (MM Ref)
		Development Opportunities – see comments above regarding development capacity and number of new homes that could be delivered.	See comments above	None

Policy CC12 Infrastructure, Delivery and Monitoring

ID	Respondent	Summary of Respondent Comments	Council Response	Proposed Minor Modifications to Publication Plan
4	Police and Crime Commissioner West Midlands (Tyler Parkes)	Request that the police are included in the list of partners for provision of essential infrastructure through S106 or CIL, and that Figure 35 Infrastructure Requirements should include delivery of police infrastructure, by the police authority and developers. This would recognise that developers may be required to contribute towards any need for additional police resources as a result of the burden placed on the service from the scale and type of development proposed in the AAP to ensure maintenance of effective levels of crime prevention.	There is no evidence that additional police infrastructure is required to support the development proposed in the City Centre AAP. Any additional requirement placed on developers would need to be specific and to be quantified and viability tested. WCC does not currently intend to adopt CIL	None

Table 3: Proposed Minor Modifications to Publication Plan in response to up-to-date information, changing circumstances and to correct errors

MM Ref	Reason for Minor Modification	Proposed Minor Modifications to Publication Plan
22	The Council served notice on 8 th July 2015 of the intention to demolish the Old Steam Mill in the Interchange & Commercial Gateway Character Area, under Section 78 of the Building Act 1984, with the Wolverhampton Interchange Partnership instructing Balfour Beatty to carry out the process. This was announced in a Council press release on 8 th July 2015 and reported to Planning Committee on 21 st July 2015.	Remove references to “Old Steam Mill” in section CA3: <ul style="list-style-type: none"> • Fig 16 remove mapping label: “Old Steam Mill” • Amend Policy CA3 (f) Enhance the setting of important heritage assets, including the canal, Old Steam Mill, Chubb Building, Prince Albert Public House and conservation areas. • Table CA3A Site Ref 3a Further Information, second sentence: “Exemplary standard of design to reflect gateway location, create new civic spaces, maximise canalside location and enhance the conservation areas covering parts of the site and the setting of the Old Steam Mill Grade II listed building.”
23	Following work on a Black Country Air Quality SPD it has emerged that Site 3c (Piper’s Row) may be affected by air pollution and therefore any residential provision as part of a mixed use development will need to be carefully designed and may need to incorporate air quality mitigation measures. It would be appropriate to highlight this in the “further information” section for this site.	Amend “further information” for Site 3c as follows: “... bus station. As the site may be affected by air pollution, any proposal involving residential development will need to be carefully designed and may be required to incorporate air quality mitigation measures.”
24	Typographic error	Para 3.1.5 third sentence change “Policy CC1 part (e)” to “Policy CC1 part (b)”
25	Para 4.1.2 was carried forward from the Draft Plan in error. This paragraph relates to options and therefore should have been deleted at Publication stage.	Delete para 4.1.2