

Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024

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How to Respond to the Consultation

We are consulting on the Wolverhampton Local Plan Issues and Preferred Options **from 26 February to 10 April 2024** under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

Have your say - we welcome your views

Please visit the website: www.wolverhampton.gov.uk/localplan

On the website you will find this main document, the Issues & Preferred Options summary leaflet, and other information including evidence documents and an interactive map.

We would encourage you to use the online response form that is designed to be quick and easy to complete, where you can answer the questions in this document and make any other comments about the Wolverhampton Local Plan. A shorter survey about the Issues & Preferred Options summary leaflet is also available.

Paper copies of this document and other documents (for reference), plus the summary leaflet and response forms are available at:

- Wolverhampton Civic Centre, St Peter's Square, Wolverhampton WV1 1SH (at the business reception by the mayoral entrance)
- All of Wolverhampton's libraries

Drop-in: you can view the consultation documents and speak to Planning Officers at the following drop-in sessions:

Wednesday 6th March, 9am – 5pm

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

Thursday 7th March, 3pm – 7pm and

Saturday 9th March, 10am – 2pm

Wolverhampton Central Library, Snow Hill, Wolverhampton WV1 3AX

Tuesday 12th March, 10am - 1pm

Wednesfield Library, 2 Well Lane, Wednesfield WV11 1XT

Wednesday 13th March, 4pm - 7pm

Bilston Library, Mount Pleasant, Bilston WV14 7LU

Thursday 14th March, 2pm – 5pm

Tettenhall Library, St Michael's Parish Centre, Upper Street, Tettenhall, WV6 8QF

If you need help understanding the documents, completing the response form, or would like to discuss with Planning Officers, please contact the Wolverhampton Local Plan Team at: localplan@wolverhampton.gov.uk or Tel: 01902 551155

Please send paper responses to Wolverhampton Local Plan, City Planning, City of Wolverhampton Council, Civic Centre, St Peter’s Square, Wolverhampton WV1 1RP; or hand them in at Wolverhampton Civic Centre.

What is the deadline for responses?

The consultation will end at **5:00 pm on Wednesday 10 April 2024**
Please provide your response to us by this date.

How will my response be used?

We will use your response to inform the preparation of next stage of the Plan, which is called the Publication Wolverhampton Local Plan. Please note that the responses will be made public - for more information see the privacy notice at www.wolverhampton.gov.uk/localplan

Thank you for your interest in the Wolverhampton Local Plan.

Wolverhampton Local Plan Timetable

Issues and Preferred Options Consultation	26 February – 10 April 2024
Publication Consultation	Dec 2024 – Jan 2025
Submission to Government	June 2025
Independent Examination by Planning Inspector	June 2025 – Spring 2026
Adoption by City of Wolverhampton Council	Mid 2026

1. Introduction

What is the Purpose of the Wolverhampton Local Plan?

- 1.1 The Wolverhampton Local Plan (referred to as the WLP throughout this document) will contain strategic planning policies and land allocations and targets to support the growth and regeneration of the City of Wolverhampton up to 2042.
- 1.2 The WLP will set out a vision and strategic priorities and a spatial and policy framework for delivery. This framework will guide and shape development across Wolverhampton and set clear parameters for growth and transformation. The policies and proposals will be used to help make planning decisions and guide investment and regeneration in Wolverhampton.
- 1.3 Once adopted, the WLP will provide a strategy for bringing land forward with a clear presumption in favour of sustainable development. It will provide certainty and transparency to residents, businesses and developers about how the city is expected to grow up to 2042.

Why Does Wolverhampton Need a Local Plan?

- 1.4 The government requires all local authorities to develop a long-term plan that sets out how and where land can be developed over the next 15 years, to meet the growing needs of local people and businesses. The development plan for an area is made up of strategic policies (which address the strategic priorities for an area) and non-strategic policies (which deal with more detailed matters).
- 1.5 The WLP will set out strategic policies for Wolverhampton and housing and employment allocations for the whole of Wolverhampton, except for Wolverhampton City Centre. The WLP will sit alongside non-strategic policies for Wolverhampton provided in the saved parts of the Wolverhampton Unitary Development Plan, and Area Actions Plans for Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre. A future review of the Wolverhampton City Centre Area Action Plan will provide up-to-date development allocations for Wolverhampton City Centre.
- 1.6 The WLP will provide a policy framework to:
 - a) enable delivery of the right type of development to meet identified needs in the most sustainable places;
 - b) provide certainty about which types of development are likely to be approved where and help prevent uncoordinated development;
 - c) protect and enhance areas designated for their environmental value;
 - d) seek to meet housing needs up to 2042;

- e) attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;
- f) ensure infrastructure (such as roads, public transport, schools, healthcare, utilities, broadband, waste and sewage disposal) is provided at the right time to serve the new homes and employment provision it supports;
- g) increase employment opportunities to support the delivery of the Black Country and West Midlands Combined Authority Strategic Economic Plans (SEP), the Local Industrial Strategy and Covid-19 recovery plans;
- h) address the issues arising from climate change to support delivery of the Council's Climate Commitment (2020);
- i) promote and enhance health and well-being to reduce health inequalities and support the Council's Public Health Vision for 2030 and Health Inequalities Strategy.

What will the Wolverhampton Local Plan replace?

1.7 When adopted, the WLP will replace:

- the Black Country Core Strategy (2011) for the Wolverhampton area
- significant parts of the Stafford Road Corridor and Bilston Corridor Area Action Plans (2014)
- some parts of the Wolverhampton City Centre Area Action Plan (2016)
- parts of the Wolverhampton Unitary Development Plan (2006)

How does the Wolverhampton Local Plan relate to the Black Country Core Strategy and the Black Country Plan?

- 1.8 The Black Country Core Strategy (BCCS) was produced by the four Black Country authorities (BCA) of Dudley, Sandwell, Walsall and Wolverhampton and covered the period up to 2026. The BCCS provided the strategic framework for the three Area Action Plans (AAPs) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated.
- 1.9 The four authorities began a review of the BCCS in 2016, to roll forward the plan and address changes that had taken place since 2011. The Black Country population and economy were growing and there was a need to identify additional housing and employment sites beyond the capacity of the BCCS. There had been several changes to national planning policy and the national economic situation had also changed. The BCCS was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline. Therefore, the BCCS anticipated significant recycling of industrial land for housing. However, the manufacturing and industrial markets of the Black Country remained stable and have expanded in some cases, meaning that the expected surplus of vacant brownfield land has not occurred.

- 1.10 The BCCS review began in 2016 followed by an Issues and Options Consultation and Call for Sites in 2017. The scope of the review was wider than the BCCS, including detailed site allocations for housing and employment development across the Black Country, excluding Wolverhampton City Centre and other Strategic Centres. At this point the work was retitled the 'Black Country Plan'.
- 1.11 The Covid-19 pandemic of 2020–21 caused a significant shift in the way Black Country residents work, shop and access services, bringing about some longer term changes to the ways communities operate that may have implications for land uses which need to be addressed through robust yet flexible policies.
- 1.12 In 2021, consultation took place on a Draft Black Country Plan (BCP), which took into account Issues and Options consultation responses and a range of evidence produced to inform the Plan. The Draft BCP identified a vision and framework for future development of the Black Country up to 2039, addressing needs and opportunities in relation to housing, the local economy and infrastructure and seeking to safeguard the environment, enable adaptation to climate change and secure high quality and accessible design.
- 1.13 A number of consultation respondents raised concerns about the proposed release of land from the green belt for development, whilst others questioned whether the brownfield first approach could, alone, deliver sufficient capacity to meet needs. The consultations also demonstrated that there was support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country. A summary of the key issues raised in the Draft BCP consultation is set out in the WLP Consultation Statement.
- 1.14 In autumn 2022 it was decided not to take forward the BCP, and for the four BCAs to instead pursue separate strategic plans and progress differing approaches to site allocations to meet identified needs. However, there will still be continued joint working across the Black Country on a number of planning issues, particularly transport, and some of the joint evidence prepared to support the BCP is still relevant for individual plans.

What is the Scope and Timetable for the Wolverhampton Local Plan?

- 1.15 Following the decision to end work on the BCP, Wolverhampton adopted a new Local Development Scheme setting out a timetable for the immediate preparation of a Wolverhampton Local Plan (WLP). This has since been updated, as set out below:

Issues and Preferred Options Consultation:	26 February – 10 April 2024
Publication Consultation (Regulation 19):	Dec 2024 – Jan 2025
Submission to Secretary of State:	June 2025
Independent Examination by Planning inspector:	June 2025 – Spring 2026
Adoption of Wolverhampton Local Plan:	Mid 2026

- 1.16 To progress the WLP as quickly as possible, it is important to build on the extensive work that took place recently to develop the BCP. This means making use of existing evidence, draft policies and responses made to the Draft BCP consultation, where these are still relevant.
- 1.17 To facilitate this, the WLP will have the same scope as the BCP – covering all strategic policies for Wolverhampton and all housing and employment allocations, with the exception of sites in Wolverhampton City Centre. This gap will be filled by a review of the Wolverhampton City Centre AAP to provide up-to-date site allocations for the City Centre area. The WLP will have a Plan period that extends to 2042, covering at least 15 years after adoption in line with national requirements.
- 1.18 The scope and timetable for the WLP reflect an urgent need to review and update Wolverhampton strategic policies and site allocations, for the following reasons:
- The large and increasing shortfall between housing and employment land needs and available development land;
 - The need to bring forward a strategic plan before 2025, when local plan system changes are expected to come into effect through implementation of the Levelling Up and Regeneration Bill.

What is the Purpose of this Issues and Preferred Options Consultation?

- 1.19 Under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, it is necessary to carry out a public consultation to test the issues, scope and preferred options for the WLP. The Plan will then be written up in detail for consultation at Publication stage (under Regulation 19) and then submitted to the Secretary of State (under Regulation 22) for an independent examination by the Planning Inspectorate.
- 1.20 It is important to identify and consult on the key issues which the WLP will need to address and then to identify options for the WLP - in terms of the vision and strategic priorities, spatial strategy, policies and site allocations. Given the amount of work undertaken recently on the BCP, it is also possible to select and consult on preferred options for the WLP.
- 1.21 Wolverhampton is a densely developed urban area, with small areas of green belt on the fringes. Most of the sites in the urban area which were proposed for allocation for housing and employment use in the Draft BCP are still considered suitable to include in the WLP. A continual “call for sites” in Wolverhampton has been open through the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) for over ten years. Since consultation on the Draft BCP, the SHLAA process has generated some new sites suitable for housing, which are included in this consultation. The Issues and Preferred Options consultation will promote and encourage the submission of any further sites through the “call for sites” process.

- 1.22 At the present time, even taking into account all suitable and deliverable sites in the urban area, uplifting housing densities and including housing windfall allowances and an ambitious estimate of the housing capacity of Wolverhampton City Centre, there are still significant shortfalls of development land for housing and employment use over the Plan period, as detailed in sections 5b(i) and 5b(iii) below.
- 1.23 At the heart of the National Planning Policy Framework (NPPF) is a **presumption in favour of sustainable development** which is detailed in paragraph 11. For plan-making purposes, this means that: *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁷.”* Footnote 7 clarifies that the policies referred to include land designated as Green Belt.
- 1.24 In December 2023 there was a key change to national planning policy as set out in paragraph 145 of the NPPF: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 1.25 This change means that local authorities preparing a Local Plan, which do not have enough suitable land to meet their housing or employment development needs, can now choose whether or not to review the green belt to release land for more housing or employment development.
- 1.26 Wolverhampton is a densely developed and constrained urban area with a small amount of green belt land, forming only 11% of the total land area. Much of this green belt land provides important services for the urban area, such as public open space, education and sports facilities, or is of significant value for wildlife, historic character or landscape character. Therefore, City of Wolverhampton Council has chosen not to review the green belt to address the housing and employment development shortfalls arising from the WLP. This means that none of the spatial options being consulted on involve release of green belt land for development, and no green belt sites will be considered for development or assessed as reasonable alternatives throughout the WLP preparation process.
- 1.27 It is considered that the majority of policies in the Draft BCP are still supported by the evidence, subject to some changes to address valid planning issues raised by consultees and considerations specific to Wolverhampton. Therefore, this consultation proposes that the WLP should substantially repeat the Draft BCP strategic policies, but with some amendments to respond to: new evidence and national guidance; the new

geography and timescale; and any valid planning issues raised during the Draft BCP consultation (2021).

- 1.28 This consultation should therefore be read alongside the Draft Black Country Plan (2021) and published evidence and consultation responses, which are available at: [link]. Some of the evidence prepared to support the BCP will also support the WLP – subject to updates in some cases.
- 1.29 Other evidence produced to support the WLP, including the Sustainability Appraisal report, is available at: www.wolverhampton.gov.uk/localplan. The WLP will be supported by a continual Sustainability Appraisal process which includes an Equalities Impact Assessment, as required by legislation and guidance, and there will be a full Habitats Regulations Assessment of the WLP at Publication stage.
- 1.30 A WLP Infrastructure Delivery Plan will also be produced at Publication stage, and Statements of Common Ground will be agreed between the City of Wolverhampton Council and neighbouring authorities and organisations, as appropriate, to support the later stages of the Plan process. A full list of evidence and supporting documents is provided in Section 4.

Question 1: Do you agree with the proposed scope of the Wolverhampton Local Plan?
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2. National, Regional, Black Country and Local Policy Context

2.1 The WLP is being prepared in the context of national, regional, Black Country and local policy, guidance, strategies and evidence. The following section summarises the key elements of this context, however this is not intended to be exhaustive and other more detailed work has been and will be used to inform the approach to developing specific planning policies.

National

National Planning Policy Framework (NPPF)

2.2 The NPPF (2023) sets out the Government's planning policies for England and how these should be applied. It provides the framework within which locally prepared plans for housing and other development can be produced.

2.3 Planning law requires that applications for planning permissions are determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF must be taken into account when preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and other statutory requirements.

Duty to Co-operate

2.4 The Localism Act (2011) introduced a requirement on all local authorities to co-operate with neighbouring local authorities and other bodies with a regulatory or strategic interest in Local Plan issues. The duty requires ongoing, constructive, and effective engagement on areas of plan-making, which may have strategic cross-boundary implications. The WLP Duty to Co-operate Statement prepared for Publication stage will demonstrate how the City of Wolverhampton Council has fulfilled this duty through the WLP preparation process, and how the bodies referred to in the Act have helped to shape the emerging WLP.

2.5 As part of this strategy, it is intended to draft and agree Statements of Common Ground at Publication stage with relevant authorities and bodies on key Duty to Co-operate issues. These will build on Duty to Cooperate engagement at a Black Country level associated with the preparation of the BCP as well as direct Wolverhampton engagement with neighbouring local plans, both during that time and in the period following the end of work on the BCP. The outcomes from this work, how it has shaped the emerging WLP, and the preferred approach to addressing the Duty to Cooperate for the WLP are detailed in section 5 (b).

Regional - West Midlands Combined Authority

- 2.6 Wolverhampton is a constituent member of the West Midlands Combined Authority (WMCA) which was established in 2016. The WMCA overarching objective is to build 'a better connected, more prosperous, fairer, greener and healthier West Midlands'. To deliver this objective, the WMCA have developed a number of strategies and associated programmes relevant to the preparation of the WLP. These are summarised below.
- 2.7 The WMCA Strategic Economic Plan (SEP) was adopted in 2016 and sets out the vision, objectives, strategy and actions needed to improve the quality of life for everyone who lives and works in the West Midlands. While this strategy pre-dates Britain leaving the European Union, the Covid-19 recession, and ongoing shifting economic turbulence, it outlines a number of high-level challenges facing the West Midlands which remain relevant. These include:
- Bringing forward land for housing and employment
 - Accelerating the rate of house building to match aspirations for growth.
- 2.8 Following the 2016 SEP, the WMCA produced the West Midlands Local Industrial Strategy (LIS) which was published in May 2019. The LIS demonstrates how the West Midlands is forging its future and building an inclusive and balanced economy. Together with the supporting documents published locally, it shows the West Midlands is taking action to continue growth in productivity and earning power for all.
- 2.9 In July 2022, the WMCA published their Plan for Growth which captures the key features of the West Midlands economy. The Plan for Growth pinpoints clusters where the West Midlands has comparative advantage and businesses are confident to invest. Working in conjunction with local authorities and universities as local anchor institutions, the WMCA will deliver conditions for growth through:
- New powers over economic development
 - Transport investment
 - Housing and land investment
 - Pioneering new approaches to regeneration
 - Developing skills
 - Working with investors
 - Committing to net zero by 2041
- 2.10 These strategies have formed the basis for a range of investment programmes supported by Government funding packages. One of the priorities for this funding is the delivery of projects which provide land for new homes and employment. WMCA has led the way nationally in the delivery of brownfield land, including sites in Wolverhampton, and moving forward, over the lifetime

of the WLP, this activity will continue, providing valuable support to unlock constrained sites and deliver critical infrastructure. The focus of this future work includes supporting projects in town centres to enable them to thrive again, innovative approaches to the delivery of sustainable homes, zero carbon homes and the delivery of land to support business needs.

- 2.11 In March 2023, the WMCA agreed a new Deeper Devolution Deal with Government, securing new and significant longer-term funding agreements and a range of new powers. From the next spending review, the WMCA will have a departmental-style arrangement with a single pot of funding negotiated with Government. This financial certainty will enable local authorities and the WMCA to better plan and fund transformative investment in the region to create a fairer, greener and better-connected West Midlands. The deal also included further commitments for City Region Sustainable Transport Settlements, Investment Zones and Levelling Up Zones, and a landmark housing deal worth up to £500 million, offering greater flexibility to drive brownfield regeneration and unique powers and funding to deliver affordable housing at pace.
- 2.12 The City of Wolverhampton Council will continue to work closely with the WMCA to drive forward investment in housing, regeneration, transport, employment to deliver a better connected, more prosperous, fairer, greener and healthier West Midlands.
- 2.13 The West Midlands Local Transport Plan (LTP) 2011-2026 Movement for Growth sets out clear objectives for dealing with transport issues, problems and challenges in the wider region and within Wolverhampton. It draws on a number of national, regional and local planning and transportation policy documents to ensure that the strategy guides the delivery of wider objectives. A new West Midlands LTP is being developed to replace Movement for Growth and will set out overall aims, vision and approaches to guide the development and delivery of transport policies until the end of 2041. The emerging strategy seeks to: sustain economic success; create a fairer society; support local communities and places; become more active; and tackle the climate emergency.

Sub-regional – the Black Country

- 2.14 The Black Country – made up of the local authorities of Dudley, Sandwell, Walsall and Wolverhampton - forms a distinctive sub-region on the western side of the West Midlands conurbation. It shares an eastern boundary with the City of Birmingham and to the north, west and south it is bounded by districts in Staffordshire and Worcestershire, and it is in relative proximity to Shropshire and centres such as Cannock and Bromsgrove. The Black Country sub-region has a unique economic history, settlement form and topography and is very much shaped by its industrial past. The four Black Country Authorities (BCAs) have a shared set of social, economic, and environmental issues and challenges, and have a long history of successful joint working most notably

through the Black Country Local Enterprise Partnership (LEP). The LEP was established in 2011 with an overarching objective of creating jobs and building a strong economy by tackling barriers to sustainable growth, securing and delivering a total of £2.4bn of funding. The LEP has now been disbanded, along with others throughout England, with key functions transferred to other organisations including WMCA.

2.15 The WLP will draw on work carried out to prepare the Draft BCP, which is firmly rooted in a robust understanding of sub-regional as well as local issues. Therefore, sub-regional issues are still of significant relevance to the WLP, as reflected in the issues and challenges set out below.

2.16 There are many planning issues which have cross-boundary impacts across the Black Country and continue to benefit from a common evidence base, assumptions and approach. These issues include:

- **Employment** – there are strong trading and commuting links between the BCAs, which form part of the same Functional Economic and Market Area (FEMA) with a joint Employment Development Needs Assessment (EDNA).
- **Housing** – there are strong migration and commuting links between the BCAs and they form a sub-market of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA), with a joint Housing Market Assessment (2020).
- **Transport** – much transport infrastructure and strategic transport planning is shared and access catchments overlap for some residential services. The BCAs carry out traffic modelling jointly to support Local Plans.
- **Centres** – retail, leisure and commuting catchments overlap across the Black Country and the four Strategic Centres have complementary roles.
- **Sport** – access catchments overlap for some facilities and there is a proposed sub-regional strategic approach to forward planning, based on jointly commissioned Playing Pitch and Outdoor Sports Strategies and Built Facilities planning.
- **Nature Conservation** – the Black Country and Birmingham have a common Local Sites system and the BCAs have developed a common tree evidence base and a Nature Recovery Network approach which reflects the cross-boundary nature of wildlife corridors across the sub-region and will help inform the statutory West Midlands Combined Authority Local Nature Recovery Strategy.
- **Historic Environment** – the BCAs have adopted a common approach to Historic Landscape Characterisation which seeks to protect areas of highest landscape character and was a key factor in the Draft BCP site assessment process.
- **Air Quality** – the BCAs have an agreed approach to air quality impact mitigation set out in a joint Supplementary Planning Document. This is

based on regional work which is currently being updated through the West Midlands Combined Authority.

- **Waste** – Waste planning policy requires a strategic cross-boundary approach to ensure waste is appropriately managed and facilities appropriately located, therefore the BCAs have completed joint evidence, which currently shows that Wolverhampton has surplus waste processing capacity which can contribute to meet the needs of other authorities in the Black Country Waste Processing Area (WPA).

Local

Our City: Our Plan

2.17 Our City: Our Plan is the City of Wolverhampton Council's strategic framework for improving outcomes for local people and delivering levelling up ambitions, co-produced with over 4,500 local people and stakeholders. It sets out how the City of Wolverhampton Council will work with their partners and communities to build a more prosperous and inclusive Wolverhampton where everyone can share in the opportunities and success of our city. The plan is structured around six key priorities.

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



- 2.18 Three cross cutting principles support the delivery of the plan: driven by digital; climate action; and being fair and equal. High quality and aspirational physical development and land use is an important element to realise and deliver the priorities of Our City: Our Plan, which will help to create a virtuous cycle of: attracting further investment; widening local demographics and increasing local spend; advancing pride in place and local aspirations; and increasing economic productivity.

Vision for Public Health 2030 and Health Inequalities Strategy (2021 – 2023)

- 2.19 The City's Vision for Public Health 2030 envisages that in 2030 Wolverhampton will be a healthy, thriving city of opportunity where we are serious about boosting health and wellbeing. Actions to achieve this include driving a city-wide focus on tackling the wider determinants of health and wellbeing by seeking improvements to the broad factors which impact on people's lives. These factors relate to lifestyle choices and socio-economic factors which are heavily influenced by the built environment and the housing, employment, education, leisure and other opportunities which it offers.
- 2.20 The Health Inequalities Strategy provides the strategic framework for addressing the stark and entrenched health inequalities within Wolverhampton. The framework provides an overarching set of guiding principles and tools that facilitate and embed an agreed approach to tackling health inequalities in a way that is tangible, and outcome focused. The strategy sees health inequalities as the result of the interplay between:

- Short term causes (ability to access a service or manage a condition)
- Medium term risk factors (e.g. lifestyle, uptake of vaccination, access to healthcare information)
- Longer-term causes (education and skills, economy, housing, and environment)

2.21 One of the key guiding principles is to “Pro-actively identify opportunities to have a positive impact on the wider determinants of health for example through planning, licensing and housing functions, use of assets and green space and provision of facilities for usage by community groups.”

Our Climate Commitment (2020)

2.22 Our Climate Commitment is the City Council’s commitment to action following its declaration of a Climate Emergency in July 2019. The Council pledged to make all council activities net carbon zero by 2028, and to ensure all strategic decisions and budgets are in line with the shift to net carbon zero. The Council have also pledged to work with partners across the city and region to make Wolverhampton net carbon zero by 2041.

2.23 Reaching this target will require the City Council to embed low carbon practices within planning policy, land allocation, development and regeneration, and for us to work closely with our public and private sector partners to maximise the use of low carbon solutions.

Good Growth Strategy (2024)

2.24 The City Council is developing a Good Growth Strategy to enable all businesses, residents, families and communities to benefit from the growth and new opportunities in our city. The strategy outlines the Council’s proposed approach to economic development and how the Council will work alongside partners to support the local economy to grow. The strategy is based on three interconnected themes of Place, Productivity and People and a central principle of ‘good growth’. This means achieving both the right quantity and the right quality of growth; creating a strong, productive and resilient economy where a radical uplift in business competitiveness, productivity and profits goes hand in hand with access to good jobs that pay higher wages, and where all residents have access to opportunity and enjoy improved quality of life. The strategy explains the main focus of the Council’s work, and actions that can propel Wolverhampton’s economic prospects and, fundamentally, the life chances and wellbeing of residents.

2.25 The “Place” element of the strategy focuses on supporting the development of sustainable communities and workplaces, delivering inclusive low carbon transport network, and securing the potential of the City and town centres. Delivering these aims will require a positive planning framework.

3. A Spatial Portrait and the Big Issues

A Spatial Portrait of Wolverhampton

- 3.1 Wolverhampton is a young, vibrant, and diverse city with a population of c.270,000 people. The city covers an area of 69.4sq km and includes the city centre and the town centres of Bilston and Wednesfield.
- 3.2 Wolverhampton has a long history as a settlement going back to the 10th century, and in the Middle Ages was a small market town. From the 18th century, the industrial revolution transformed Wolverhampton into an important manufacturing town. Until the 1980s, Wolverhampton, together with the wider Black Country and Birmingham, was the powerhouse of Britain's manufacturing economy. The decline in heavy industry, and jobs associated with it, has left a legacy of difficult ground conditions and brownfield sites that present redevelopment and regeneration challenges.
- 3.3 Covid-19 hit the city hard from the earliest wave and during subsequent waves of the pandemic, exacerbating existing social and economic challenges, including lower-than-average earnings, relatively high levels of unemployment and a need to enhance the skills base of the local workforce. But the city is bold and ambitious and has been driving forward, forging economic recovery and 'levelling up'.
- 3.4 The city is going through a period of significant transformation with new investment, new opportunities and new challenges. With effective planning, Wolverhampton has the right local conditions to deliver transformational and sustainable regeneration to benefit all of its people.

The Big Issues

- 3.5 This section summarises the big issues which a Wolverhampton Local Plan will need to respond to. Some of these issues have arisen since the BCCS was adopted in 2011. They form the main opportunities and challenges which the WLP will seek to address, and draw on local issues identified in Our City: Our Plan (2023) and themes identified in the WLP Sustainability Scoping Appraisal Report (2022).

The big issues are:

1. Climate change and zero-carbon
 2. A growing and changing population
 3. Health and wellbeing
 4. Economic recovery and growth
 5. Centres
 6. Transport and connectivity
 7. The natural and built environment
 8. Infrastructure
- 3.6 The role of the WLP in addressing these big issues is set out below.

Issue 1 – Climate change and zero-carbon

- 3.7 The climate emergency remains one of the biggest long-term challenges facing the world today. In July 2019, the City of Wolverhampton Council became the first local authority in the Black Country to declare a Climate Emergency. The Climate Emergency Declaration pledged to make all council activities net carbon zero by 2028, ensure all strategic decisions and budgets are in line with the shift to net carbon zero, and work with partners across the city to work towards a net carbon zero future.
- 3.8 The Council has made good progress towards becoming a net zero council, with carbon emissions dropping from 16,841 tonnes CO₂e in 2018/19 to 13,276 tonnes CO₂e in 2021/22. The drop has mainly been achieved by the council switching to a renewable electricity provider and the introduction of LED streetlights.
- 3.9 The Council has also committed to supporting Wolverhampton to become a carbon net zero city by 2041. In 2020, Wolverhampton produced a total of 855 Kt CO₂e emissions. This has reduced by 77 Kt CO₂e (-8.3%) since 2019, compared to a decrease of 3.8% in England. 28.9% of these emissions were domestic, 31.4% were from transport, 14% were from industry, and 8.7% from commercial sources.
- 3.10 The WLP has a role in addressing these issues by: reducing the carbon emissions from new developments; reducing the need to travel and enabling a shift to more sustainable travel modes; maximising the use of low carbon energy solutions; seeking to reduce the impact of flooding; and enhancing Wolverhampton's green and blue infrastructure, to protect the people, environment and economy of Wolverhampton.

Issue 2 – A growing and changing population

- 3.11 Wolverhampton has a growing and changing population, which presents a range of planning and regeneration challenges. Wolverhampton is a young and diverse city of c.270,000 people. The population has increased by c.6% over the past ten years and is projected to rise to c.296,000 by 2041, a further increase of c.10%. As the population continue to grow, the city will also see changes in its characteristics and structure.
- 3.12 Although the city is younger than the England average, it still faces challenges from an ageing population. Between 2011 and 2021 the city saw significant growth of 25.8% in residents aged 90 years and over. A growing dependent population exerts significant pressure on services and housing.
- 3.13 Wolverhampton is proud of its diverse population. In 2021, 45% of the population were from ethnic minorities, above the Black Country average of 23% and the England average of 27%. 15% of Wolverhampton residents have a main language which is not English - also higher than the England average of 9%. Wolverhampton will continue to harness the talents of different groups

of people to make for a more robust and resilient economy, and rich and vibrant culture.

- 3.14 Wolverhampton is the third most densely populated of the 30 local authorities in the West Midlands. The City is continuing to see an increase in new homes built, despite a temporary decline in 2020/21 due to Covid-19. As of March 2022, Wolverhampton had a total of 112,630 homes, an increase of 1315 (+1.2%) since March 2021.
- 3.15 A growing and changing population compounds local housing need pressures. The WLP has a role in addressing this issue by providing a range and choice of accommodation, house types and tenures to improve and diversify the Wolverhampton housing offer, and to meet the needs of current and future residents.

Issue 3 – Health and wellbeing

- 3.16 Stark inequalities continue to exist in the conditions in which people are born and live in Wolverhampton, which in turn has an adverse effect on people's health and wellbeing.
- 3.17 Wolverhampton was ranked as the 24th most deprived local authority out of 317 using the ONS indices of deprivation measure (which has improved from the 2015 ranking at 17th). The City also experiences high levels of child poverty; 33.3% in 2022 compared to a national average of 20.1%.
- 3.18 Wolverhampton has lower rates of physical activity than the national average, with 55.1% of adults classed as active between 2020-2021, compared to 61.4% nationally. Both male and female life expectancy were lower in Wolverhampton (81.3 and 76.6 years respectively), than the national average (83.1 and 79.4 respectively) in the period 2018-2020. Wolverhampton also has higher rates of obesity than the rest of England, and residents suffer from higher levels of alcohol abuse, smoking, depression and social isolation. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.
- 3.19 These issues vary significantly across Wolverhampton, with pockets of deprivation and poor health scattered across the city. Covid-19 has further exacerbated these existing health inequalities with negative impacts falling disproportionately on more deprived, disadvantaged and excluded groups. The role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing is increasingly recognised and understood. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.
- 3.20 The WLP has a role in addressing existing health and wellbeing issues in Wolverhampton by providing a built and natural environment that protects health and wellbeing through: supporting the making of healthier choices; minimising pollution (air, noise and other forms); providing healthy homes;

providing a range of employment opportunities; supporting and facilitating investment in health infrastructure; reducing the negative health effects of climate change; and providing streets safe for active, low emission travel for all.

Issue 4 – Economic recovery and growth

- 3.21 Wolverhampton, like many post-industrial localities, faces long term social and economic challenges. However, prior to the onset of Covid-19, Gross Value Added (GVA) growth in Wolverhampton had been at its highest on record. Longer term, the average growth in GVA for the last five years for Wolverhampton was 3.8%, which was above the England growth rate of 2.5%.
- 3.22 Wolverhampton's economy and business community has been hit hard by the major shocks of recent years, halting a period of growth. Output and productivity have decreased faster than the national average, and Wolverhampton still has a significant "output gap", which has increased long-term. Wolverhampton's total GVA decreased from £5.3bn in 2019 to £5.1bn in 2020. This equated to a 3.9% annual decrease, compared to an England-wide decrease of 3.1%. Wolverhampton's output gap (GVA per head in Wolverhampton compared to national average) was £2.7bn for 2020.
- 3.23 Wolverhampton had an employment rate of 66% in 2022, 10% lower than the England average. Average hourly weekly pay for Wolverhampton residents working full-time was £569 in 2022, which was £76 lower than the England average (£646).
- 3.24 Wolverhampton has the highest unemployment claimant rate in the Black Country, and the second highest claimant rate in England for residents aged 16+ (7.5% in September 2023), surpassed only by Birmingham (8.6%). Between 2020 and 2022, unemployment in Wolverhampton rose by 1.5% (from 5.9% to 7.4%). Wolverhampton has a low business survival rate, with 30% of businesses founded in 2016 surviving for 5 years compared to the England average of 38%.
- 3.25 Skills levels in Wolverhampton remain below the national average, and the Covid-19 pandemic has exacerbated some of the barriers young people face in accessing good skills training and employment prospects. However, we are starting to see positive trends. The number of residents in Wolverhampton with NVQ Level 4+ increased by 12.3% from 2020 to 2021, reaching 35.4%, the highest proportion of residents since records began. 9.5% of Wolverhampton's population have no formal qualifications.
- 3.26 The WLP has a role in addressing these issues by providing a balanced portfolio of employment sites with more energy efficient buildings, protecting and enhancing existing sustainable employment areas and encouraging new investment, allowing some poorer quality employment sites to be redeveloped for more beneficial alternative uses and enabling communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.

Issue 5 – Centres

- 3.27 Centres play a crucial role in contributing to the distinctive spatial character and identity of Wolverhampton, being focal points to sustainably provide services to meet the needs of communities, from shopping and leisure to housing and education. The City of Wolverhampton covers an area of around 70 sq km and is served by a hierarchy and network of centres, with Wolverhampton City Centre acting as the key strategic centre, two town centres at Bilston and Wednesfield, and numerous district and local centres.
- 3.28 There are a number of challenges facing Wolverhampton's centres, such as the prevailing economic climate and changing shopping patterns resulting in high vacancy levels, which mean centres are struggling.
- 3.29 The WLP has a role to play in enhancing the vitality, diversification and performance of centres, to serve the current and future needs of communities as places to live, shop, work and visit. The Plan can help address challenges facing centres by:
- providing a flexible policy framework to allow centres to diversify and serve realistic ambitions for future mixed use growth;
 - ensuring that future growth (particularly housing and employment) is well served by the existing network of centres, to help support their future vitality and viability;
 - setting out tests to prevent proposals which could undermine centres by causing significant adverse impacts, such as out-of-centre developments.

Issue 6 – Transport and connectivity

- 3.30 Wolverhampton has excellent transport connectivity with the sub-region and the rest of the UK. It is well served by the M54 and M6 motorways and benefits from good public transport links through the Metro, inter-city and cross-country railway links and in its role as a hub of the sub-regional bus network. All of these networks are effectively linked through the recently opened £150 million Wolverhampton Interchange in the city centre.
- 3.31 Key current and future transport projects to improve connectivity within Wolverhampton and to the wider Black Country include: A454 City East Gateway (Phases 1, 2 and 3); A449 Stafford Road Corridor; A4124 Birmingham New Road; Wolverhampton City Centre public realm and cycling schemes; and electric vehicle charging infrastructure.
- 3.32 A balanced approach to transport investment is required that recognises the need to invest in all modes of transport but prioritises increasing the proportion of people using sustainable and active modes such as public transport, walking and cycling.
- 3.33 The WLP has a role in addressing these issues by seeking to improve transport infrastructure to ensure efficient and sustainable accessibility within an integrated network, prioritising sustainable and active travel and supporting electric vehicle infrastructure.

Issue 7 - The natural and built environment

- 3.34 Wolverhampton is rich in both its natural and built heritage and its environmental assets. There is an extensive canal network which has the potential to provide a wide range of ecosystem services, including recreation, land drainage, flood protection, water supply, energy generation, carbon storage, heritage preservation and nature conservation. Parts of the Wolverhampton landscape have been recognised for their importance for nature and are protected under various laws or designations. The area is home to the Smestow Valley and Wyrley & Essington Canal Local Nature Reserves, as well as Ancient Woodlands such as Tettenhall Ridge.
- 3.35 The City's Open Space Strategy and Action Plan (2020) identifies where there are surpluses and shortfalls in a range of types of open space across the City. It identifies a broadly adequate level of open space in Wolverhampton, although there are significant variations across the City producing some local surpluses and shortfalls, as well as an overall shortfall in allotment provision. The Open Space Strategy is currently being reviewed and a revised Strategy and Action Plan will be completed in 2024. The City's Playing Pitch and Outdoor Sport Strategy (2022) has recently been updated and, whilst it identifies some local shortfalls in sports provision, it suggests these can largely be addressed by improvements to existing facilities plus provision of additional 3G (third generation) pitches.
- 3.36 There are approximately 473,000 trees across Wolverhampton, that cover an area equivalent to 1,150 ha. They filter 14.5 tonnes of airborne pollutants and remove an estimated 6,150 tonnes of carbon from the atmosphere, each year. They also intercept around 151,000 m³ of rainwater each year, equivalent to an estimated £149,000 in avoided water treatment costs.
- 3.37 While the City has the smallest population of the four BCAs, it is the second most densely populated, the administrative boundary being very tightly drawn around the urban area. The northern, western and south-western fringes of the City lie within the West Midlands Green Belt, which also extends into the urban area in a series of green 'corridors'.
- 3.38 In the industrial revolution Wolverhampton became a major centre for coal mining, lock-making and subsequently the manufacture of cars and motorcycles. This has created a rich legacy of historic buildings and attractive parks and open spaces. It has a strong sporting, cultural and leisure offer, and is home to Wolverhampton Wanderers Football Club, the Grand Theatre and nationally important The Halls Wolverhampton concert venue. The City's industrial heritage is an asset to the economy, but it has left a legacy of brownfield sites that can present redevelopment challenges.
- 3.39 The WLP will need to create a strategy for the protection and enhancement of the natural environment and strengthen the environmental infrastructure network to support sustainable growth. It will also need to protect, sustain and

enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places.

Issue 8 - Infrastructure

- 3.40 Physical and social infrastructure is required to enable and support the growth required over the Plan period. New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide infrastructure solutions.
- 3.41 Future-proofed digital infrastructure is the backbone of a modern thriving economy, driving productivity and spreading growth. Wolverhampton is making significant progress upgrading its digital infrastructure with gigabit coverage at 94% and full fibre coverage at 62% (2023), with all providers upgrading to full fibre in the city. Wolverhampton has an extensive digital infrastructure and is at the forefront of digital innovation. The City is also making progress supporting the upgrade of mobile connectivity, with 5G available for 99% of the city from at least one operator and 66% of the city from all operators. Digital connectivity will increasingly become important, with the switch over from analogue to digital, to support new ways of working, service delivery and consumer demand, so we need to continue to support the rollout to ensure digital infrastructure meets our needs now and in the future.
- 3.42 An estimated 11,660 households in Wolverhampton are without broadband and there are an estimated 118,000 limited and non-users of the internet in the City. Although older people generally use the internet less, 44% of those that are offline are under the age of 60. Digital is increasingly important for accessing services, skills, job search and employment along with keeping in touch with families and friends, with digital considered the 4th utility.
- 3.43 To maximise the benefit locally, the city is proactively supporting residents to get online by providing devices and connectivity through a network of trusted partners to improve digital skills and supporting businesses to digitalise and introduce smart technology to support the delivery of services.
- 3.44 The provision of high quality and aspirational physical development is an important element to help to create a virtuous cycle of attracting further investment; widening local demographics and increasing local spend; advancing pride in place and local aspirations; and driving productivity. Social infrastructure is also necessary to create capacity and resilience within communities.
- 3.45 The WLP has a role in addressing these issues by ensuring that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity.

<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.

<p>Question 7: Do you agree with the Preferred Employment Land Growth Option (E3) for the Wolverhampton Local Plan?</p>
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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

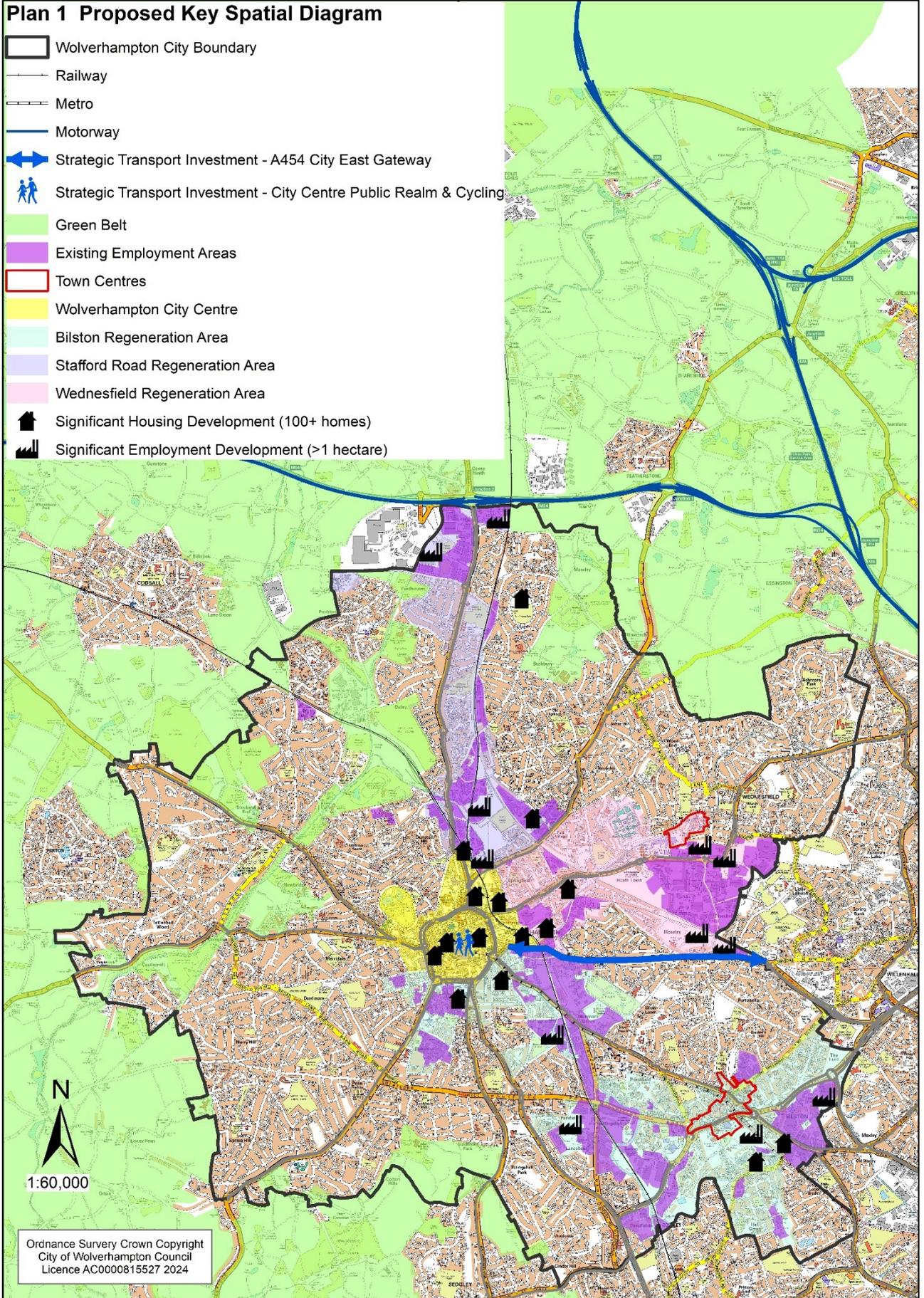
Option	Description of Option	Impact on Growth Options
Option A	“Business as Usual” – retain current housing and employment allocations in urban area and protect green belt.	<ul style="list-style-type: none"> • As for Option H1 • As for Option E1
Option B	Employment-Led - reconfigure uses in the urban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

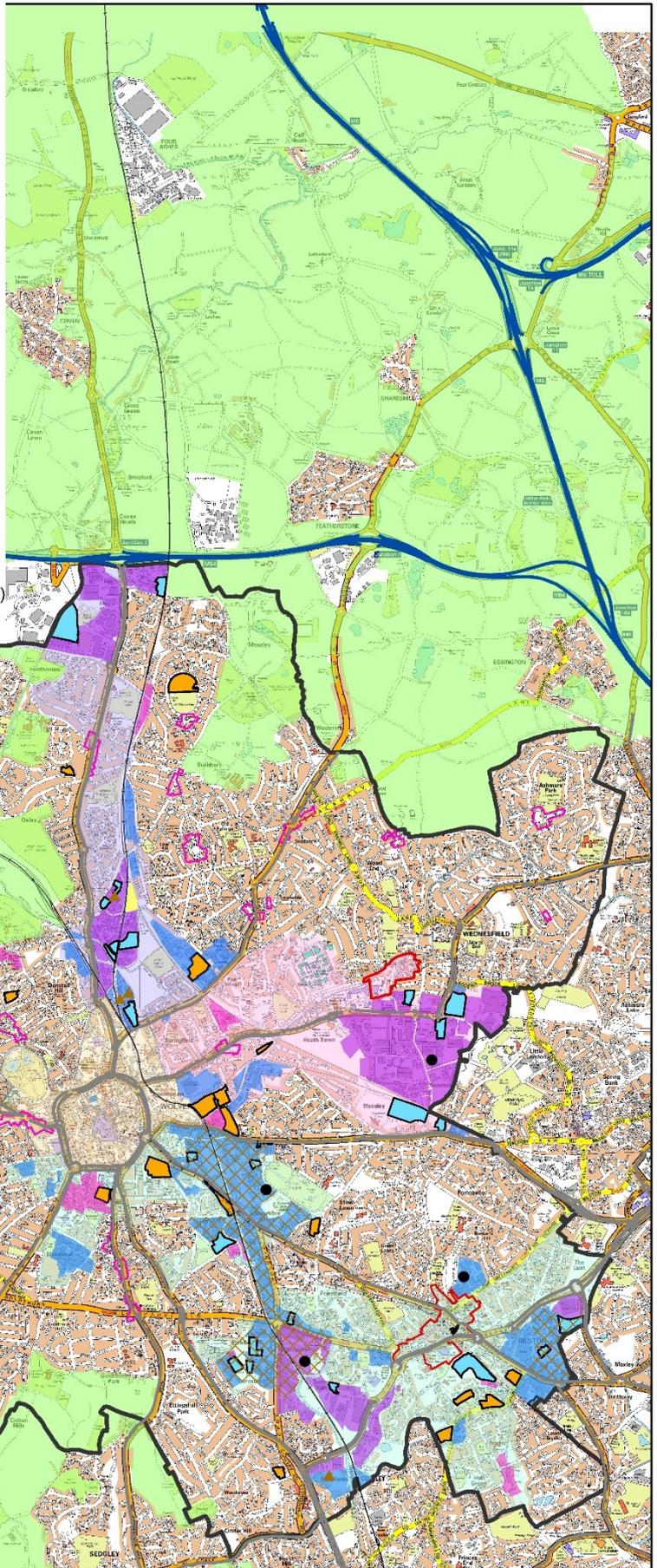
Question 9: Do you agree with the preferred approach to policies in the Wolverhampton Local Plan (that the policies and Policies Map designations should repeat those in the Draft Black Country Plan (2021), subject to the amendments set out in Appendix 2 and summarised in section 5 c)?

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)



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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	<p>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.</p> <p>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.</p>	<p>To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending to 2042.</p> <p>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.</p>
The Economy			

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Policy EMP1 / relevant parts of Chapter 13 D - Wolverhampton	89 – 94	<p>Update employment land need and requirement figures to relate to Wolverhampton only, and to cover a Plan period of up to 2042.</p> <p>For the period 2020-41 the Wolverhampton employment land need is 116 ha as recommended in the Black Country EDNA Update (2023) in the light of more up to date economic projections and intelligence. The Wolverhampton employment land supply for this period is 64 ha, reflecting more up to date information on land availability as set out in the Wolverhampton Employment Land Supply Paper. These figures will be updated as of April 2024 for Publication and Submission stages, based on up-to-date evidence.</p> <p>Include a summary of key economic strategies to explain how the Plan is consistent with them and helping to assist with their delivery.</p> <p>Clarify the definition of other sources of land referred to in Part (2) of the Policy as being land within existing employment areas not currently in employment use, such as vacant yardage and landscaping.</p>	<p>To reflect that the Plan is covering Wolverhampton only and has a new Plan period extending to 2042.</p> <p>To ensure that the employment land need and requirement figures are based on the most up to date and robust evidence.</p> <p>This information is provided in the EDNA - to ensure the Plan provides a comprehensive explanation of the overall strategy it would be helpful if this narrative was also set out in the Plan.</p> <p>To confirm the source of land referred to in Part (2) as net additional employment land and therefore appropriate to consider as a source of land to meet the overall employment land requirement.</p>
Policy EMP4	133	<p>Replace tests a), b) and c) to be applied to proposals involving redevelopment of land currently in employment use to non-employment uses with the following:</p> <ul style="list-style-type: none"> a) if the site is vacant, that it has been marketed for employment use for a period of at least 6 months, including by site notice and through the internet or as may be agreed by the local planning authority; b) if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation; c) if the site forms part of a larger area occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area. 	<p>The Policy would benefit from clarification in terms of the detail of the tests which will be applied to proposals for redevelopment.</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
Policy EMP5	136	<p>Change to part 3 of Policy to refer to planning obligations being negotiated with applicants rather than required.</p> <p>Change to part 2c of Policy to be consistent with Part 2 of Policy TRAN1.</p>	<p>The reference to planning conditions and obligations is necessary to show how the objectives of Policy EMP5 will be secured. However, to ensure consistency between the various elements of the Policy it is recognised that part 3 should refer to such obligations being negotiated (as is stated in part 2) rather than required.</p> <p>Part 2c of the Policy should emphasise sustainable transport modes consistent with part 2 of Policy TRAN1 rather than 'a choice of means of transport'.</p>
Centres			
Centres Chapter	140 - 173	<p>Make wording adjustments to ensure policies are concise, make appropriate reference to national guidance and are augmented with relevant information/ evidence relating to Wolverhampton, including referencing:</p> <ul style="list-style-type: none"> • examples of specific schemes/ locations that can assist with delivering regeneration priorities, projects and the application of policies (such as the undertaking of impact tests); • relevant Wolverhampton planning documents/ policies/ evidence to assist with the determination of planning applications related to centre-uses. 	<p>To reflect the para 5.40 f. proposed approach above, the 'Sub-Areas and Site Allocations – Section 13 – D Wolverhampton' adjustments below, and that the Plan is covering Wolverhampton only and has a new Plan period extending up to 2042.</p>
Policy CEN1	143 - 156	<p>Add text to end of para 8.15 b) "In order to have a successful evening economy it is important that a variety of facilities, appealing to a wide range of age and social groups, are provided in such a way to ensure a safe, accessible and inclusive environment and any anti-social behaviour is discouraged."</p>	<p>To emphasise the importance of ensuring safety relating to the evening economy and leisure proposals in the light of issue raised in Draft BCP consultation responses, which is also addressed in proposed changes to Policy CSP5 point 5.</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>Emphasise the value of natural and cultural aspects of WCC for the visitor economy. Reference the potential for Tier-One and Tier-Two Centres to become public transport interchanges/ hubs, and for Tier-Two and Tier-Three Centres to provide increased sustainable transport access to residential services</p> <p>Promote health and wellbeing by ensuring services and retail facilities in centres promote choice while enabling and encouraging healthy choices;</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To reflect the priorities set out for Health & Wellbeing.</p>
Policy CEN2	156-161	<p>Amend text of Part (1)(a) to add the housing target for Wolverhampton City Centre. This figure is currently 4536 homes (as of 2022) and will change slightly for Publication stage in 2024.</p> <p>Replace text of Part (8) with: “Accessibility: Wolverhampton Strategic Centre should be accessible by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial, leisure and business development that require a Transport Statement within Wolverhampton Strategic Centre boundary shall evidence the means to which they are compatible with achieving sustainable development. This evidence must be proportionate to the scale and nature of the proposal and: incorporate provisions for the enablement and/or enhancement of sustainable means of travel and integrated modes of transport to and within Wolverhampton Strategic Centre; have due regard to any sustainable transport projects and measures prioritised within the Local Transport Plan and Local Planning Documents, including the management of demand for car parking, impact of car-borne traffic, and car parking regimes; and meet any relevant requirements set out in Policies TRAN6 and TRAN7”</p> <p>Replace text of para 8.29 with: “It is recognised that individual Strategic Centres in the Black Country, particularly Wolverhampton Strategic Centre, have their own vehicle parking regimes and approaches to parking, both within and outside the influence of the planning system. Nevertheless, a common approach going forward can help to ensure and enhance sustainability and encourage a modal shift in transport towards</p>	<p>To emphasise the importance of housing provision for Wolverhampton City Centre, and for the City Centre housing target to reflect up to date and robust evidence which will inform the Wolverhampton City Centre Supplementary Plan..</p> <p>To provide clarity on the proportionate nature and scope requiring proposals to demonstrate compatibility with/ contribute to accessibility and sustainable development in the light of issues raised in Draft BCP consultation responses and the Black Country Parking Study (2021).</p>

Section / Policy / Part of Draft BCP	Pages of Draft BCP	Specific Amendment	Reasons for Amendment
		<p>publicly accessible transport, cycling and walking, as well as reducing the need to travel. This can be assisted by ensuring relevant proposed development within Wolverhampton Strategic Centre contributes to facilitating this objective, with due regard to any sustainable transport projects and measures as prioritised within the Local Transport Plan and Local Planning Documents, and including helping to manage the demand for, and seeking an appropriate degree of parity between, car parking provision in the Black Country's Strategic Centres."</p> <p>At end of first sentence of para 8.25 add cross-reference to para 8.15 b) regarding an increased focus on the evening economy in centres.</p>	<p>To emphasise importance of ensuring safety relating to the evening economy and leisure proposals in light of issues raised in Draft BCP consultation response.</p>
Transport			
Policy TRAN1 Priorities for the Development of the Transport Network	174-181	<p>Paragraph 4: Update list of key transport projects to reflect latest Transport for West Midlands, West Midlands Rail, National Highways, City of Wolverhampton Council and other partner Authorities' priority projects which are of relevance to Wolverhampton.</p> <p>Add reference, in introductory text and justification, to relevant current investment plans including City Region Sustainable Transport Settlement (CRSTS), West Midlands Rail Strategy, and Bus Service Improvement Plan (BSIP), as well as to the emerging West Midlands Local Transport Plan (LTP) and to the need to decarbonise transport in line with national and local targets.</p> <p>Add reference, in introductory text and justification, to production of a transport evidence base for the land use allocations.</p>	<p>Issues raised in Draft BCP consultation responses.</p> <p>To reflect current key transport projects and investment plans of relevance to Wolverhampton whilst providing flexibility for changes which may occur in the lifetime of the Local Plan.</p>
Policy TRAN2 Safeguarding the Development of the Key Route Network	183-184	<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

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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.

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		<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