

Wolverhampton Local Plan Examination – MIQs

Response of the Council to

Matter 2:

Spatial strategy and site selection methodology

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Issue 2.1

Whether the Plan sets out an appropriate spatial strategy, considering reasonable alternatives?

Questions

Note: These questions relate to the overall spatial strategy and the site selection methodology. More detailed questions on site allocations will be considered in later hearing sessions.

Vision and objectives

22. Does the Plan set out a suitably positive and realistic vision for the future development of the City of Wolverhampton area?

- 22.1 The Wolverhampton Local Plan (WLP) provides a positive, realistic and flexible framework to guide the future of the City. The WLP plans positively to ensure that the needs and aspirations of those who live, work in or visit the area are to be met as much as possible, whilst also ensuring that it retains the characteristics that make it attractive and distinctive. The WLP Vision is set out in para 2.3 of the WLP [Submission Document SD CD1] and is taken from Our City: Our Plan – City of Wolverhampton Council's strategic framework for improving outcomes for local people and delivering regeneration ambitions, as explained in para's 1.35-1.36 of the WLP. This Vision is flexible, to allow the city to respond to future challenges in a way that is right for Wolverhampton residents and businesses.
- 22.2 Para 3.5 of the Regulation 19 WLP [SD CD1] explains that the spatial strategy has been developed through a comprehensive assessment of a range of seven alternative spatial options, as set out in the Issues and Preferred Options WLP [SD PC2], and corresponds to Spatial Option G – Balanced and Sustainable Growth: "[t]he Sustainability Appraisal demonstrated that this spatial option will enable Wolverhampton to meet a significant proportion of its growth needs in a way that takes full account of environmental, climate change, accessibility and social requirements. By promoting the right type and amount of development in the most sustainable locations, the Strategy therefore plays a crucial role in delivering an inclusive Wolverhampton that supports communities to achieve their goals."

- 23. Are the thirteen strategic priorities listed in Table 2 of the Plan justified and are they consistent with the overall vision and priorities facing the city? What does the 'Further Work Required' column mean when it lists policies within the Plan? Is the Plan clear on what is proposed to be achieved through the policies in the Plan as regards meeting the strategic priorities?**
- 23.1 Table 2 of the Regulation 19 WLP [SD CD1] shows how the thirteen WLP strategic priorities are directly related to the WLP Vision, by demonstrating how each of the strategic priorities will deliver the four priorities of Our City: Our Plan, which form a key part of this Vision (as set out in para 2.3 of SD CD1). The strategic priorities are also designed to respond to the 'Big Issues' detailed in paras 1.54-1.94 of SD CD1. These Big Issues originate from work on the Black Country Plan, Our City: Our Plan and the WLP Sustainability Scoping Appraisal Report (2022) [SD EN21].
- 23.2 Appendix G of the Regulation 19 WLP Sustainability Appraisal (SA) [SD CD3b] provides an assessment of the strategic priorities against SA Objectives. It confirms that all of the strategic priorities have positive impacts for at least one SA Objective, and none have a negative impact on any SA Objective. Those priorities which have the greatest number of positive impacts are priority 3 (to mitigate and adapt to climate change), 4 (to protect and enhance the natural environment) and 11 (to ensure that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity).
- 23.3 Table 2 of SD CD1 clearly shows, in the third column, how each of the strategic priorities will be delivered through specific WLP policies.
- 23.4 The column heading "further work required" on pages 39 and 40 of SD CD1 is a typographical error. An additional modification [AM009] has been proposed to replace this heading text with "WLP Policies", as shown at the top of this table on page 38.

Spatial strategy

The NPPF states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (paragraph 20).

- 24. Was consideration given to including the area currently covered by the Wolverhampton City Centre AAP as part of a spatial option? If not, why not?**
- 24.1 The geographical extent of Wolverhampton City Centre Area Action Plan (WCCAAP) covers both the Wolverhampton City Centre (WCC) defined in figure 2 of the WLP, and an area to the south of Wolverhampton City Centre - the Blakenhall and Graiseley and All Saints Character Areas - as explained in para 3.16 of the Plan.
- 24.2 The whole of the area covered by the WCCAAP was considered as part of the spatial strategy options referred to in the Council's responses to Questions 3

and 7. Indeed, WCC forms an integral part of the Growth Network, alongside the Core Regeneration Areas, as set out in Policy CSP1.

- 24.3 The scope of the WLP, at the outset, excluded the allocation of development sites in WCC, because the WLP built on the work carried out to prepare the Black Country Plan (BCP) and therefore replicated the scope of the BCP. However, in all other respects, the WLP covers the whole of the Wolverhampton City area, including WCC.
- 24.4 The Black Country Core Strategy had a Plan period to 2026, therefore, following the end of work on the Black Country Plan (BCP) and in order to progress the WLP as quickly as possible, it was important to build on the extensive work that had taken place recently to develop the BCP. This meant making use of existing evidence, draft policies and responses made to the Draft BCP consultation, where these were still relevant. To enable rapid preparation of the WLP and adopt up-to-date strategic policies for Wolverhampton in line with Government priorities, it was necessary that it have the same scope as the BCP – covering all strategic policies for Wolverhampton and all housing and employment allocations, with the exception of sites within WCC.
- 24.5 The WCCAAP was adopted in 2016 and many of the site allocations which include housing are still developable and deliverable, as set out in the 2024 SHLAA, 2025 SHLAA [ED WCC 9] and Housing Topic Paper Update August 2026 [ED WCC2a] with many sites under construction, having planning permission or with planning applications submitted. The SHLAA provided an up to-date position on housing sites in the WCC and the WLP housing target for the CC was based on the detailed information set out in the SHLAA.
- 24.6 The WCCAAP allocations will be updated through the emerging Wolverhampton Plan. This will be underpinned by the new Wolverhampton City Centre Masterplan (adopted by Wolverhampton City Council on 2 September 2026 – also see Matter 1 para 18.11 and para 29.2) and will be adopted by 2029 in line with the Wolverhampton Plan Timetable which came into effect on 30 June 2026. However, it is not anticipated that there will be significant changes to the housing element of site allocations over the WLP Plan period. The Council has proposed main modifications which will align the WCC housing target in the WLP with the Masterplan.

25. Was consideration given to testing a spatial option that included some Green Belt release? If not, why not?

- 25.1 Consideration was not given to testing a spatial strategy option that included some Green Belt release.
- 25.2 The Regulation 19 WLP and supporting evidence is clear that all potential, suitable and sustainable sources of land supply for housing, employment land and gypsy and traveller pitches falling within the Wolverhampton City boundary have been explored – with the exception of green belt land.

- 25.3 This is because, in accordance with the 2024 NPPF transitional arrangements, the WLP is being examined under the 2023 NPPF and not the 2024 NPPF. At the heart of the 2023 NPPF is a presumption in favour of sustainable development which is detailed in para 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.
- 25.4 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.”*
- 25.5 This change meant that local authorities preparing a Local Plan, which did not have enough suitable land to meet their housing or employment development needs, could now choose whether or not to review the green belt to release land for more housing or employment development.
- 25.6 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.
- 25.7 When the Black Country Plan was being prepared under the 2019 NPPF, the Wolverhampton green belt was found to have potential capacity for only 1,014 homes, with no areas suitable for employment development or gypsy and traveller pitches.
- 25.8 Taking these factors into account, the Council chose, at the outset of the WLP preparation process, 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 which were consulted on involved release of green belt land for development, and no green belt sites have been considered for development or assessed as reasonable alternatives throughout the WLP preparation process.
- 26. The Plan states that the spatial strategy was one of seven spatial options that were considered. Are the reasons as to why this pattern of development was selected sufficiently clear? Does it promote a sustainable pattern of development within the Plan area, in accordance with paragraph 11 of the NPPF?**
- 26.1 Seven spatial options (A-G), including the proposal to take forward the preferred spatial option G, were consulted on at WLP Issues and Preferred

Options stage, as set out in para's 5.32-5.34 of SD PC2. The key reason for selecting spatial option G is provided in para 5.33:

"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."

26.2 The preferred spatial option translated into the proposed key spatial diagram and the associated spatial distribution of housing and employment development detailed in the proposed Site Allocations.

26.3 The preferred spatial option was subsequently taken forward in the WLP Regulation 19, following amendments to update figures including the updated employment land requirement, as set out in para 1.105 of SD CD1. This explains that the chosen spatial option will deliver balanced and sustainable growth by focusing 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. One of the key features of this spatial option is increased housing density in the most accessible locations, including more housing in Wolverhampton City Centre. The option will deliver a highly sustainable pattern of development. Para 3.5 of SD CD1 explains that this option *"will enable Wolverhampton to meet a significant proportion of its growth needs in a way that takes full account of environmental, climate change, accessibility and social requirements. By promoting the right type and amount of development in the most sustainable locations, the Strategy therefore plays a crucial role in delivering an inclusive Wolverhampton that supports communities to achieve their goals."*

26.4 As set out in the Council's response to Question 3, various different reasonable alternatives were identified and described by the Council as the plan-makers, and evaluated in the SA Reports accompanying each consultation stage. This included the seven spatial options, which considered how the overall number of homes and area of employment land could be strategically distributed throughout the WLP area.

26.5 The Council's outline reasons for selecting or rejecting each spatial option are provided in section 5.6 of the WLP Regulation 19 SA Report [SD CD3a]. Para 5.6.12 concludes that:

"Overall, Option B was identified to perform the best (or joint best) against the most SA Objectives; however, this strategy would lead to a housing shortfall. Option G is the only option that would satisfy both the identified housing and employment needs, whilst also attempting to strike a balance between retaining valuable environmental assets and prioritising development in more accessible locations which facilitate sustainable transport, and as such could be seen as the most sustainable option on the whole and leading to more

significant benefits for housing and the economy compared to the other options.”

- 26.6 Therefore, the reasons provided, at each key stage of the Plan preparation process, as to why spatial option G was selected are sufficiently clear.
- 26.7 These reasons, and the conclusions of the SA process, provide clear evidence that this spatial option promotes a sustainable pattern of development within the Plan area, in accordance with paragraph 11 of the NPPF.
- 26.8 NPPF Paragraph 11a sets out that “*all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*”
- 26.9 A sustainable pattern of development therefore requires that a balance is struck.
- 26.10 The spatial strategy meets the development needs of the area by maximising housing and employment development land supply within the urban area, including through increased housing densities, and by seeking to export unmet needs to appropriate locations through co-operation with neighbouring authorities.
- 26.11 It is right to note that there is no longer a formal Duty to Co-operate which was not saved by the Government and so no longer applies as a legal requirement to plans being examined under the current system. However, the need for effective co-operation between authorities remains a requirement of the NPPF this Plan is being examined under, and the new 2026 NPPF (PM10), and was expressly referenced in the Minister’s Letter to the Chief Executive of the Planning Inspectorate (Nov 2025) noting the need – despite the removal of the Duty to Co-operate – for LPAs to collaborate across their boundaries on unmet need.
- 26.12 The spatial strategy aligns growth and infrastructure by focusing development in areas already well served by transport and other forms of infrastructure, as set out in the answer to question 30.
- 26.13 The spatial strategy improves the environment by protecting the quality of existing areas of environmental value, particularly the Wolverhampton Green Belt and the Neighbourhoods Area, and promoting regeneration to improve the environment, particularly within the Growth Network.
- 26.14 The spatial strategy mitigates and adapts to the effects of climate change, including by making effective use of urban land, by focusing housing and employment growth in areas which will minimise vehicle trips and maximise use of sustainable modes of transport, and areas with surplus, vacant or under-used land and buildings, at increased housing densities. Further detail is provided in the answers to questions 28 and 37.

26.15 The Spatial Strategy balances these aims and objectives to ensure that a sustainable pattern of development is provided for the future.

27. Has the need for any strategic infrastructure requirements, particularly those relating to transport and utilities been robustly assessed as part of the spatial strategy decision-making process and are such requirements clearly set out in policy? Is the Plan clear on how such strategic infrastructure will be delivered and are the assumptions in terms of funding and timescales realistic? Is this evidence up to date?

27.1 As explained in the response to Question 35, the spatial strategy will deliver balanced and sustainable growth by focusing development in the most sustainable locations – the Growth Network made up of Wolverhampton City Centre and Core Regeneration Areas - which will make best use of existing infrastructure. A key feature of the spatial strategy is increased housing density in the most accessible locations. As set out under Policy HOU2 and evidenced in Appendix 3 of the Site Assessment Report [SD S11], there is high accessibility by sustainable modes of transport to key residential services in the Growth Network, minimising pressure on the highway network and social infrastructure.

27.2 WLP Section 4 – Infrastructure and Delivery states that: “[t]he provision of appropriate infrastructure in a timely manner underpins the transformational and regeneration strategy of the WLP.” As set out in WLP para 4.4, the WLP is supported by a range of evidence on strategic infrastructure requirements, which is detailed and cross-referenced in the Infrastructure Delivery Plan (IDP) [SD IN1 and IN2]. The aim of the IDP has been to understand the capacity of existing infrastructure and then understand and plan for infrastructure requirements, where necessary, to support the development proposed in the WLP. Therefore, the IDP provides evidence on the appropriateness and deliverability of the emerging development strategy in terms of strategic infrastructure.

27.3 Main modifications [MM026 – MM030] have been proposed to strengthen the supporting text for Policies CSP1 and DEL1 – Infrastructure Provision, by making explicit reference to the supporting evidence provided in the IDP, and the sufficiency of infrastructure to support growth, subject to planned improvements by service providers and national initiatives to address projected increased electricity demands in particular.

27.4 The Feb 2025 IDP evidence is up to date as of August 2026, with the exception of updates to the position regarding: Healthcare Provision projects; school place planning; and flood risk evidence. An updated version of the IDP reflecting these evidence changes has been produced [ED WCC 12]. These changes have not materially affected the conclusions of the IDP (summarised below), and therefore do not affect consideration of the WLP spatial strategy and WLP policies relating to infrastructure.

27.5 The IDP (para 2.3.12) concludes that most new housing development in the urban area will enjoy good accessibility, including to sustainable modes of transport, centres of employment, schools, shops, health facilities and other

residential services. This should help to reduce the requirement for additional travel and will also help mitigate the impact of development.

- 27.6 The IDP concludes that the Wolverhampton urban area is well served by infrastructure, and that providers generally have access to sources of investment and funding to both maintain quality and increase capacity to support a growing population. The remaining requirements which developers will be expected to fund are local in character, relatively limited in terms of both cost and extent and are unlikely to prevent development from going ahead, as evidenced by the Viability Assessment [SD IN3].
- 27.7 Therefore, although the IDP and the WLP identify the need for various local infrastructure requirements to support development (for Site Allocations, these are detailed in Table 12), there are limited strategic infrastructure improvements required to support development, and all the evidence indicates that these will be delivered in a timely manner, with no “showstoppers” identified. The detail of these strategic infrastructure improvements is set out below.

Utilities

- 27.8 The Black Country Utilities Infrastructure Capacity Study 2019 [SD IN7], which looked at potential impacts of higher levels of growth than those proposed in the WLP, concluded that gas, electricity and broadband infrastructure in Wolverhampton had capacity to cope with growth, as illustrated in Figure 1. All of the relevant utility providers, including Severn Trent Water regarding water supply and sewage treatment works, were consulted throughout preparation of the WLP, and none have expressed any concerns regarding the potential impact of proposed WLP allocations or policies on utility capacity or infrastructure. The IDP concludes that, where gaps in service provision exist, service providers are aware of these and are working to address them. No specific strategic infrastructure requirements over and above existing planned improvements have been identified. Further detail is provided in section 8 of the IDP.
- 27.9 The IDP highlights that major changes may be required to the way that Wolverhampton is powered over the Plan period, together with an increasing reliance on digital solutions. Policy DEL3 supports the timely delivery of digital infrastructure, where this falls within the control of the planning system. The capacity of electricity networks to meet ‘new demands’, such as increased use of electric vehicles and plans to roll-out of low and zero carbon heating solutions, are being considered by the UK Government. The Council will continue to engage with utility providers to consider the potential impact of new government regulation and future demands.

Transport

- 27.10 Detailed Black Country Transport Modelling (2024) [SD TR1] has informed the WLP. Parts of Wolverhampton’s existing highway infrastructure, and the motorway network, suffer from congestion. Assuming that key projects to improve highways, public transport, walking and cycling infrastructure are delivered, as set out in WLP Section 9 Transport, the IDP concludes that the

development of new housing and employment land will not have a significant negative impact on highways infrastructure. In addition, multi-modal network improvements, delivery of the metro extension in the wider Black Country, and initiatives to increase more sustainable transport methods are expected to improve the situation going forward. Further detail is provided in section 4 of the IDP.

- 27.11 The IDP infrastructure schedule identifies key transport schemes for active travel, public transport and highways at the strategic (regional) and local level. These schemes will, to varying degrees, support growth, although not all measures are aimed at proposals in the emerging WLP. The schedule clearly identifies how the schemes will be delivered, including indicative cost, timescale / phasing and funding mechanism / source. These details are reflected in the WLP Section 9 Transport, as appropriate.
- 27.12 Policy CSP1 6) e) refers specifically to the Core Regeneration Areas providing the focus for investment in transportation infrastructure, particularly public transport routes and hubs. Para 3.9 of the supporting text sets out how growth will be supported by transport investment, and this could be further strengthened by linking to the priorities for development of the transport network set out under WLP Policy TRAN1 - a main modification is proposed to address this [MM031].
- 27.13 WLP para's 9.5-9.17 and figure 8: Transport Key Diagram robustly demonstrate alignment between the transport priorities set out in Policy TRAN1 and development activity, and support the delivery timelines for key local infrastructure projects set out in the IDP.
- 27.14 Policy TRAN1 relates to the existing, and emerging update to the, Local Transport Plan and articulates the relationship between WLP policies and prioritised regional funding for transport infrastructure. The evidence base for TRAN1 clearly supports the justification and rationale for priority schemes identified for delivery, locally and regionally, within the IDP, and provides further detail on funding assumptions and delivery timescales. All projects are endorsed within wider organisation pipelines and plans. The recent funding announcements for the region (Transport for City Regions £2.4 billion local award up to 2032) and associated West Midlands Combined Authority (WMCA) Investment Prospectus provide further confidence regarding the ability to develop and deliver the scale of transport infrastructure identified within the WLP and the IDP.
- 27.15 Since submission of the WLP in March 2025, there have been some minor changes to funding sources and timelines for IDP transport projects, however these changes will not materially affect delivery of WLP housing and employment development requirements. In terms of regional / strategic network projects, the M54-M6 / M6 Toll Link Road anticipated end date is now 2030 and Wolverhampton / Shrewsbury Line Improvements will now be delivered post 2026 subject to funding. However, WLP growth is not limited by or directly dependent on these projects.

28. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?

- 28.1 The WLP spatial strategy is very much focused on making effective use of previously developed land, based on a robust and up-to-date evidence base. The key elements of this evidence base are the 2024 SHLAA [SD HO4], the Black Country Employment Land Supply Technical Paper Update 2024 [SD EC6], and the WLP Site Assessment Report [SD SI1]. These documents have thoroughly considered all sources of previously developed land, including vacant buildings and surplus occupied employment land, and considered the suitability and deliverability of these sources for development in line with up-to-date information, including the WLP Viability Assessment [SD IN3]. All “call for sites” have been taken into account in the evidence base and assessed / appraised, as appropriate.
- 28.2 At the request of the Inspectors, the housing land supply and employment land supply information underpinning the WLP has been updated as of August 2026, taking into account the most recent information on planning applications and deliverability – including the recently adopted Wolverhampton City Centre Masterplan [ED WCC13]. This updated evidence is presented in the Housing Topic Paper Update August 2026 [ED WCC2a], the 2025 SHLAA Update [ED WCC9], the 5 Year Housing Land Supply Forms and Spreadsheet [ED WCC 10 and WCC 11]; and the 2026 Employment Land Supply Paper [ED WCC4b]. The updated evidence has resulted in a small reduction in both housing and employment land supply over the Plan period. A series of proposed main modifications are proposed to ensure the WLP takes account of this robust and up-to-date evidence. Further details are provided in the Council’s responses to Matter 4 (Housing) and Matter 6 (Employment) Questions. The proposed modifications will not materially affect the focus of the WLP on making the most effective use of previously developed land.
- 28.3 The vast majority of land in Wolverhampton has been developed in the past, and there is a regular “churn” of previously developed sites coming forward for development, of varying sizes. The WLP encourages the re-use of this supply, wherever possible, as a continuation of the approach taken in the adopted Black Country Core Strategy.
- 28.4 All vacant previously developed land and properties within the City, which are suitable and deliverable for housing or employment development and of a size to be appropriate for allocation, are identified for development either in the WLP or in the Wolverhampton City Centre Area Action Plan [SD DP2] as updated by the evidence referred to in para 28.2. In addition, surplus occupied employment land is also identified for future redevelopment for housing, where this is appropriate, in accordance with a strategy carried forward from the Black Country Core Strategy [SD DP1].
- 28.5 The WMCA Black Country Brownfield Land Study 2022 [SD HO7] provided an independent and objective assessment of brownfield land housing capacity, and concluded that the Draft Black Country Plan sites (upon which the WLP sites are based) represented a maximisation of brownfield housing land supply, acknowledging the local barriers to unlocking sites.

- 28.6 As set out in WLP para 3.14, the spatial strategy is focused on previously developed land (also referred to as brownfield land throughout the WLP), with limited release of greenfield land where this is justified and negative impacts can be effectively mitigated. Around 97% of all housing supply and around 40% of employment development land supply over the Plan period will be on previously developed land.
- 28.7 Given the significant shortfall in housing and employment land supply to meet future needs, it was necessary to consider the allocation of a limited number of greenfield sites. Although this is not the preferred solution, such new development will take place in sustainable locations where it can make use of existing infrastructure, support existing services and facilities and deliver improvements to them where necessary. In addition, WLP and other policies (including national Biodiversity Net Gain) will ensure that these developments deliver green space improvements, landscaping, and climate change mitigation.
- 28.8 The majority of land supply categorised as greenfield was previously developed and has been cleared and colonised by vegetation over time (rather than being repurposed as recreational open space), so that such land does not meet the NPPF definition of previously developed land. Allocations which include Site of Local Importance for Nature Conservation (SLINC) designations have only been proposed for development because there are very limited site options available for employment development and gypsy and traveller pitches, as set out in WLP para 10.14.
- 28.9 The spatial strategy also ensures previously developed land is effectively used by maximising housing density levels across the Plan area, where this is appropriate. The strategy concentrates housing development in areas with high levels of sustainable transport access to residential services, which can support higher densities – particularly in Wolverhampton City Centre. These higher densities are secured through WLP Policy HOU2 – Housing Density, Type and Accessibility, and go beyond the already high levels required by the adopted Black Country Core Strategy, ensuring that the most effective use is made of all previously developed land over the Plan period. Although higher densities cannot be imposed upon sites which already benefit from planning permission, the WLP housing supply takes into account an uplift to WLP density levels for other sites, as appropriate (as detailed in the SHLAA 2024 and SHLAA 2025). As highlighted in the Housing Topic Paper [ED WCC2] para's 3.10-3.11, the net density of housing sites has increased significantly in recent years, and the current average density of commitments is 80 dwellings per hectare.
- 28.10 Further detailed information is provided in the Housing Topic Paper and Employment Topic Paper.
- 29. Will the spatial strategy promote the vitality of town centres in the area as required by national policy?**

- 29.1 Promoting the vitality of town centres is central to the spatial strategy. Not only does the hierarchy and network of centres (set out in more detail in WLP Chapter 8) have a strong influence on the spatial character of Wolverhampton but centres are pivotal to sustaining Wolverhampton's communities and economy, and their future growth.
- 29.2 In addition to Council strategies relating to centres – such as the new City Centre Masterplan – 'Our Future City Centre Plan' [ED WCC 13 & 13A]; Wolverhampton City Centre Investment Prospectus (WLP para's 1.42-3) and Good Growth Strategy (WLP para 1.45) - the Plan's spatial strategy is informed by Issue 5: Centres (WLP para's 1.76-8) and Strategic Priority 9 (WLP Table 2). Centres contribute to the spatial strategy meeting the overarching strategic objectives and achieving the Council's vision (please see answer to Question 35 below).
- 29.3 The spatial strategy has promoting the viability of centres at its heart in both elements of the Growth Network and Neighbourhoods Area. Centres are central to the spatial elements of the Growth Network as it comprises:
- a) Wolverhampton City Centre (the tier-one Strategic Centre in the city) with a focus for economic activity and housing provision to support its vitality (Policy CSP1 part 5), and
 - b) three Core Regeneration Areas which are served by the tier-two Town Centres of Bilston and Wednesfield and the District Centre of Stafford Road (Three Tuns). These centres will play a vital role in supporting employment and housing growth in these areas, as emphasised in Policy CSP1 part 6 d & f.
- 29.4 Beyond the Growth Network, centres play an equally vital role in serving the majority of Wolverhampton residents who live in the Neighbourhoods Area, which is supported by the extensive network of tier-three District & Local Centres, as emphasised in Policy CSP1 part 7 d & e.
- 29.5 This approach reflects the fact that centres offer highly accessible and sustainable locations for facilities which serve local and sub-regional communities, and is supported by the priority that future growth planned for in the WLP should be served by the network of centres (for example WLP para's 1.76, 1.78 second bullet point, and 3.23).
- 29.6 The importance placed on centres in the spatial strategy includes through centres policies (WLP Chapter 8) which set out in more detail how the Development Plan promotes the vitality of centres, consistent with national policy. This includes a strong 'centres first' approach that has robust criteria for out-of-centre proposals to ensure relevant growth is maximised in centres.
- 30. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?**

- 30.1 The Spatial Strategy Topic Paper [ED WCC1] explains in detail how the WLP SA process has tested reasonable options and reasonable alternatives for the WLP in terms of levels of growth, the spatial strategy and site allocations. This is also explained in the answers to questions 2, 3, 4 and 5.
- 30.2 The SA outputs at each stage of the WLP process have fed into the development of the next stage of the WLP, as part of the iterative approach required by national guidance. ED WCC1 paras 3.8, 4.22 and 4.26 explain how this applies to the WLP spatial strategy. The WLP Site Assessment [SD SI1] process has reflected the SA findings and recommendations, as set out in Diagram 1 and detailed on each Site Assessment form (p. 21), in line with the WLP Regulation 19 SA Report.
- 30.3 Chapter 18 of the WLP Regulation 19 SA Report [SD CD3a] explains in detail how the SA has influenced the Plan, including how the WLP Regulation 19 was developed to reflect the findings and recommendations of the WLP Issues and Preferred Options SA report [SD EN20]. In particular, Table 18.1 summarises the general recommendations made in the SA process and the actions taken by the Council to address and / or respond to these recommendations, as appropriate. Chapter 19 details likely residual effects of the WLP policies and site allocations following mitigation, the positive effects of which are summarised in Table 19.1, and the adverse effects in Table 19.2.
- 30.4 Taken together, these documents clearly demonstrate how the SA has influenced the location of development and the overall strategy throughout the Plan-making process.

Habitats Regulations Assessment (HRA)

- 30.5 The HRA reports produced at each stage of the WLP process have fed into the development of the next stage of the WLP, as part of the iterative approach required by national guidance. The WLP Issues and Preferred Options HRA [SD EN22] included a screening of those matters contained within the consultation (without mitigation measures) and made recommendations that were used to inform WLP Regulation 19 policy wording. This wording included Policy ENV1 (1) a) regarding the protection of European sites, and Policy ENV2 – Development Affecting Cannock Chase Special Area of Conservation (SAC). Appendix E the WLP Regulation 19 HRA [SD CD22] set out a detailed HRA screening of each proposed WLP allocation, taking into account mitigation as set out in WLP policies, which fed into the site allocation policies set out in WLP Table 12 for sites H22, H24c) and H24d).
- 30.6 Following the considerable amount of work undertaken to prepare the Draft Black Country Plan (BCP), at the outset of the WLP preparation process it was clear that the main potential impacts of the WLP development strategy on protected sites would be:
- a) Recreational pressure on Cannock Chase SAC; and
 - b) Air quality impacts on various protected sites.

- 30.7 Regarding a), it was apparent early in the Plan-making process that, given the exclusion of green belt land from the scope of the WLP, there would be limited potential housing supply within the agreed Cannock Chase SAC 15km zone (detailed on WLP Figure 10 and explained in para's 10.17-10.19). This low level of housing supply had been taken into account when formulating the Cannock Chase SAC Partnership evidence base and acceptable mitigation measures referred to in WLP Policy ENV2. In addition, a Cannock Chase SAC Partnership contributions system to mitigate impacts of development within the 15km zone had been in operation since April 2022. Therefore, the Council as competent authority was able to conclude, at WLP Issues and Preferred Options stage, that the preferred spatial strategy was unlikely to have an adverse impact upon the integrity of Cannock Chase SAC, taking into account the current mitigation system.
- 30.8 In terms of air quality impacts on various protected sites (and water quality within the canal network), given the complex and partnership nature of the required evidence work, it was not possible to reach a concrete conclusion regarding the potential impact of WLP policies and site allocations until later in the Plan-making process – at WLP Regulation 19 stage. The HRA was then able to conclude that there would be no adverse impacts on site integrity at any protected site, as set out in the response to question 6, and in para's 6.1-6.15 of the Spatial Strategy Topic Paper [ED WCC1].
- 30.9 These documents clearly demonstrate how the HRA has influenced the location of development and the overall strategy throughout the Plan-making process.

Infrastructure

- 30.10 Please refer to the response to Question 27.

Viability Assessment (VA)

- 30.11 The VA reports produced at Draft BCP stage [SD IN6] and WLP Regulation 19 stage [SD IN3] have fed into each stage of the WLP process, as part of the iterative approach required by national guidance. In particular, they have informed the development through the Draft BCP and WLP process, of:
- A spatially differentiated approach to affordable housing and other planning requirements; and
 - A suite of housing and employment allocations within the urban area which are viable for delivery over the Plan period, taking into account the positive impacts of regeneration initiatives and secured and potential funding sources.
- 30.12 These documents clearly demonstrate how the VA evidence has influenced the location of development and the overall strategy throughout the Plan-making process.

Other Key Evidence

30.13 Other key evidence and the way in which it has directly influenced the location of development and the overall strategy throughout the Plan-making process is set out below.

- Wolverhampton Strategic Housing Land Availability Assessment [SD HO4, and ED WCC 9]. These annual reports setting out up-to-date and robust evidence on housing land supply has underpinned the WLP in terms of location of housing development and the overall strategy in terms of housing, at each stage of the Plan-making process.
- Black Country Employment Land Supply Technical Paper and Updates [SD EC6-8, ED WCC 4B]; Black Country Employment Area Review [SD EC9]. These regularly updated reports setting out up-to-date and robust evidence on employment land supply have underpinned the WLP in terms of location of employment development allocations, protected employment land and the overall strategy in terms of employment, at each stage of the Plan-making process.
- WLP Site Assessment Report 2024 [SD SI1 and SI2]. This report has underpinned the selection of new development allocations for the WLP throughout the Plan-making process, drawing together evidence from other sources, and including the accessibility standards modelling for residential development which is provided in Appendix 3.
- Black Country Centres Study Refresh 2024 [SD CE1 and CE2-4]. This report has underpinned the plan-making of the WLP by providing up-to-date overviews and analysis of the trends, capacity and future potential relating to centres, which has influenced the WLP strategy relating to the importance, role and function of the City, Town, and District & Local Centres. This is related to the location of development in the WLP by emphasising that future development should be served by the network of centres, and the importance of, and capacity for, new housing, particularly in the City Centre. This underpins the overall strategy, with the Growth Network comprising the City Centre, and three Core Regeneration Areas served by the city's two Town Centres (Bilston and Wednesfield) and the Stafford Road (Three Tuns) District Centre. The Growth Network is complemented by the Neighbourhoods Area which is served by a network of District & Local Centres.
- Black Country Waste Study Update – Wolverhampton 2023 [SD WM1]. This report has underpinned the WLP in terms of the protected waste infrastructure and definition of preferred areas for new waste facilities.
- Environmental Evidence - as listed in Table 1 of the WLP and in the Schedule of Submission Documents has underpinned the WLP, in terms of environmental constraints on development and also the need for new development to be served by a high quality network of environmental infrastructure. This evidence includes the Wolverhampton Open Space Strategy and Action Plan 2024 [SD EN12]; up-to-date nature conservation site information provided by EcoRecord and available at: [Wolverhampton Planning Policy Map](#); and the Wolverhampton Strategic Flood Risk Assessment Level 1 and Level 2 2024 [SD EN13 and EN14]. The WLP Site Assessment Report [SD SI1] draws together, analyses and makes use of this information to develop recommendations for each of the sites assessed for development.

- 31. Overall, is it clear how the spatial strategy will meet the overarching strategic objectives and achieve the Council's vision?**
- 31.1 The spatial strategy, set out in section 3 of the Plan and policies CSP1 and CSP2, is designed to support the delivery of the WLP's Vision and strategic priorities by ensuring that Wolverhampton benefits from the right development in the right place at the right time. This development will meet the needs of people living and working in Wolverhampton, while protecting and enhancing the environment and the unique character of the area.
- 31.2 The Spatial Strategy provides the overarching basis for the Plan's proposals for growth and infrastructure improvements. The Spatial Strategy Key Diagram (WLP Figure 1) is supplemented by thematic Key Diagrams for housing, employment land, centres, transport, cycling, environment, waste and minerals in the relevant sections of the Plan.
- 31.3 Table 3 of CD1 details the pattern of proposed development within the Growth Network (Core Regeneration Corridors and Wolverhampton City Centre) and those areas outside the Growth Network. The scale of development in each of these areas is summarised in Table 3. Table 2 of CD1 sets out the relationship between the strategic priorities and the individual plan policies. Policies CSP1 and CSP2 are identified as addressing Strategic Priorities 1-4, 6, 8, and 9.
- 31.4 Para 3.4 of CD1 lists the considerations which the spatial strategy is based on. Bullet b) "The Plan's Vision, objectives and aims;" is an error, and should instead read: "The Plan's Vision and Strategic Priorities;" (proposed additional modification [AM00x])

Policy CSP1

32. Part 1 c) of Policy CSP1 will ‘Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.’ The Plan is not proposing to meet all the identified housing, employment and gypsy and traveller needs for the Plan area, so is this part of the policy clear and effective, recognising what is stated in part 3 of the policy?

32.1 It is accepted that, in a number of places in the WLP, text which refers to “needs” should instead refer to “requirements” – recognising the distinction between objectively assessed needs, and the actual amount of development which the WLP is planning to deliver over the Plan period. Part 1 c) of Policy CSP1 is one of these places. The Council is proposing a main modification [MM032] to amend the word “needs” to “requirements”.

33. Part 2 of Policy CSP1 appears to set out statements on how the spatial strategy will be delivered. Is the policy wording clear and effective? Is it consistent with national policy, such as in relation to Green Belt, heritage assets and open space, as well as other policies within the Plan?

33.1 Part 2 of Policy CSP1, which is a high-level strategic policy, seeks to explain in general terms the characteristics and benefits of the WLP spatial strategy. The statements represent summaries of the spatial strategy approach to green belt, heritage assets, open space and other environmental issues, rather than specific policy approaches.

34. Part 3 of Policy CSP1 states that ‘Those development needs that cannot be accommodated within the Wolverhampton administrative area will be exported to sustainable locations in neighbouring local authority areas through the Duty to Cooperate’.

a. In accordance with national planning policy a development plan is required to set out policies for the development and use of land within its area. Is the policy wording requiring development to be exported outside the Plan area consistent with this?

34.1 The exporting of development needs that cannot be met within Wolverhampton’s administrative area is a part of the Plan strategy. It is therefore important that the Plan references that there will be housing, employment development land and gypsy and traveller permanent pitch shortfalls against need, due to constraints, and provides wider context as to the approach to address these shortfalls in the future. This is acknowledged in the Duty to Cooperate section of the Plan (paras 1.110-1.115 of SD CD1). However, the Council maintain it is beneficial to have the context explained with reference to the spatial strategy and so the reference to this approach in part 3 of Policy CSP1 was included for completeness. However, it is accepted that this text would more appropriately be provided in the supporting text to the Policy, and a main modification [MM033] is proposed to achieve this.

b. **How will the Council ensure that unmet needs will be delivered by neighbouring authorities during the plan period, considering the evidence submitted regarding the ability of such authorities to take any unmet needs?**

34.2 It is the Council's view that it is appropriate to rely on neighbouring authorities to deliver Wolverhampton's unmet housing and employment development land needs. The ability to rely on neighbouring authorities to deliver unmet needs is well established and referenced in national policy at several points: as both an aspiration under NPPF para 11a, an element of being positively prepared at para 35a, and a factor in considering the amount of housing to be planned for at para 61. While the Council cannot take on any neighbouring authorities' unmet needs (it is neither practical nor sustainable to do so due to various constraints) it is entitled to rely on neighbouring authorities as part of a strategy for delivering its unmet needs. To be 'sound', a plan needs to identify a strategy which seeks to meet (rather than necessarily ensuring it meets) the area's development needs.

34.3 The Plan clearly identifies a positive strategy that will seek to achieve the area's development needs through a mix of promoting its own development (where sustainable) and relying on neighbouring authorities for the remainder. There is significant evidence that shows this is a robust and positive strategy especially in light of ongoing regional work and co-operation.

34.4 The key mechanism by which the Council has sought to ensure that residual housing and employment land requirements will be met was formerly through the Duty to Cooperate process and via the agreed Statements of Common Ground that are now in place [SD CD15 and SD CD15a-e]. The formal Duty to Co-operate no longer applies as a legal requirement to plans being examined under the current system. However, the need for effective co-operation between authorities remains a requirement of the NPPF this Plan is being examined under, and the new 2026 NPPF (PM10), and was expressly referenced in the Minister's Letter to the Chief Executive of the Planning Inspectorate (Nov 2025) noting the need – despite the removal of the Duty to Co-operate – for LPAs to collaborate across their boundaries on unmet need. The Council has proposed main modifications to amend the phrase "Duty to Cooperate" to "effective co-operation with neighbouring authorities and relevant" throughout the WLP [MM033-MM039].

34.5 The Housing and Employment Topic Papers [ED WCC 2AB and ED WCC 4 & 4B] provide a current position on the status of neighbouring authorities in relation to unmet needs.

34.6 In the case of housing this position is detailed in Table 1 of the Housing Topic Paper. It is anticipated that a total of ~~4,661~~1,850 homes will be secured through co-operation with neighbouring authorities to be implemented through the delivery of respective Local Plans. Given the

proposed change in the WLP housing requirement to 8,809 homes, compared with a need for 19,728 homes, these contributions would reduce the Wolverhampton shortfall to 9,2589,069 homes.

- 34.7 For gypsy and traveller accommodation, the equivalent section in the Gypsy and Traveller Topic Paper [ED WCC3] is paras 6.26-6.27.
- 34.8 Moving forward, the Council is working with all neighbouring Local Plan areas, including those in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), to progress a programme of work involving an update of the 2018 Housing Market Area Growth Study to understand the extent of the combined housing shortfall across the GBBCHMA and to develop scenarios designed to address this shortfall. This programme of work is consistent with the approach established through the Association of Black Country Authorities since April 2022 correspondence. The update of the 2018 Growth Study has been commissioned and is anticipated to be completed by the end of 2026. This work will provide an updated position on housing need and supply across the GBBHMA and identify opportunities to meet any identified shortfall.
- 34.9 The work will be used to inform individual local plans and the preparation of Spatial Development Strategies (SDS) including that currently being prepared for the mayoral West Midlands Combined Authority area (WMCA) (comprising the seven metropolitan local authorities). The West Midlands SDS will have a minimum time period of 25 years, and the decision to commence work on the West Midlands SDS was agreed at WMCA Board at its meeting on 18th July 2025 and the Report can be accessed via - https://governance.wmca.org.uk/ieDecisionDetails.aspx?AllId=18806&_ga=2.103396167.633382218.1764077792-430265268.1764077792 . This Report sets out a set of guiding principles, governance arrangements and proposals for initial engagement on the SDS.
- 34.10 In the period since the approval of this Report, work on the West Midlands SDS has progressed at pace, and a number of evidence studies have been commissioned. The most relevant of these to the issue of unmet needs is the Housing and Employment Land Needs Assessment (HELNA) covering the SDS area. The HELNA will review and consolidate existing information at an SDS level and fill in any existing gaps in relation to housing and employment needs.
- 34.11 The HELNA is primarily weighted towards economic evidence more so than housing, as the West Midlands Strategic Growth Study (currently in production) considers the quantitative strategic growth requirements and options to accommodate identified needs.
- 34.12 The HELNA has a number of aims and objectives, as follows:
- Provide a strategic overview of current housing and economic market conditions across the West Midlands, informed by engagement with local and national agents.

- Establish housing and employment land needs to 2050, including the national standard method for housing need and employment land scenarios linked to population growth and housing need.
- Assess population-based housing need, including broad requirements by home size and affordable housing need, and link this back to standard method need.
- Undertake a high-level revision of the housing needs of particular groups and advise on future assessments including what role the SDS could provide in supporting their delivery.
- Review current housing and employment land supply across the WMCA and compare this against identified needs to establish any shortfalls, surpluses or cross-boundary implications.
- Provide strategic recommendations on broad growth locations and policy interventions to help meet identified employment land needs, recognising that housing growth options are being considered through the separate Strategic Growth Study.

34.13 The work is programmed for completion in late 2026 and will provide the primary evidence base to understand how employment land needs arising across the SDS area can be addressed.

34.14 The SDS presents an opportunity for the region to work collaboratively on housing and commercial growth, integrating transport, energy, and social infrastructure. It will act as a spatial investment framework – giving certainty and confidence to public and private sector investors in key housing and commercial schemes. In terms of housing issues specifically, SDSs should meet the collective housing need as established by the standard method, including redistribution where need generated in a local authority cannot be met in-situ. The SDS will not allocate sites, but will be required to identify broad growth locations, with detailed boundaries confirmed in Local Plans.

34.15 The West Midlands SDS, and SDS to be prepared by adjacent Strategic Authorities subject to local government reorganisation, will therefore provide a key opportunity for the housing and employment land shortfalls to be met during the WLP plan period through further emerging local plans informed by up-to-date evidence on unmet housing need. Critically, the Inspectors can have confidence in this, as the mechanism has already been shown to be effective through the anticipated contribution of ~~4,664~~1,850 homes referenced in para 34.6 above.

34.16 For employment land, paras 4.1-4.3 of the Employment Topic Paper confirm current contributions, again to be implemented through the delivery of respective Local Plans. Current 'live' contributions will provide 112.2ha towards the needs of the Black Country Functional Economic Area, all from South Staffordshire, including the West Midlands Interchange.

34.17 Section 4 of ED WCC4 sets out the approach the Council is taking towards meeting the remaining employment land shortfall. It notes that the majority of local authority areas with which the Black Country has an evidenced strong or moderate economic relationship are at relatively early stages in

the preparation of their Local Plans, and so can consider opportunities to provide employment land that can contribute towards meeting needs arising in Wolverhampton and the wider Black Country FEMA, and also test opportunities identified for further assessment in the West Midlands Strategic Employment Sites Study. On a wider geography, as set out above, the emerging West Midlands SDS provides an opportunity to consider employment land needs and supply across the whole of the metropolitan area.

c. Are statements of common ground with neighbouring authorities up to date? If not, why not?

34.18 Table 5.1 of SD CD15 lists the Statements of Common Ground and their status relating to effective cooperation with neighbouring authorities as of March 2025. In September 2025, Telford & Wrekin Council signed the GBBCHMA SoCG (<https://www.telfordandwrekinlocalplan.co.uk/downloads/file/543/tw15a-gbbchma-socg-position-at-september-2025---signed>) and so this has now been signed by all parties. This was prepared to align with the originally scheduled examination dates before they were delayed due to unforeseen circumstances.

34.19 This SoCG is in the process of being updated in the light of Local Plan preparation activity since September 2025. This activity is summarised in the Housing Topic Paper (August 2026) [ED WCC2aB]. It is not anticipated that this will result in any significant changes to the level of housing apportioned to Wolverhampton, other than those detailed in ED WCC2aB, which give rise to the anticipated contribution of ~~4,661~~1,850 homes.

35. Parts 4, 5 and 6 of Policy CSP1 describe the Growth Network (comprising Wolverhampton City Centre and the three Core Regeneration Areas of Stafford Road, Wednesfield and Bilston) and state that this will be the primary focus for new development, regeneration and infrastructure investment.

a. Does this adequately reflect the strategic priorities set out in Table 2 of the Plan?

35.1 The Growth Network gives spatial expression to the WLP strategic priorities, which are aligned to the priorities set out in “Our City: Our Plan” (SD CD24). This approach represents an evolution of the adopted Black Country Core Strategy (SD DP1) approach where, for Wolverhampton (BCCS Appendix 2 – SD DP1b), the City Centre (SC4) and Regeneration Corridors (RC1-4 & 5) were identified as the focus for regeneration. The City Centre and four Regeneration Corridors were then subject to allocations and more detailed policies through Wolverhampton’s adopted Area Action Plans (SD DP2-4).

35.2 WLP Table 3 sets out that the Growth Network (comprising Wolverhampton City Centre and the three Core Regeneration Areas of Stafford Road, Wednesfield and Bilston) will deliver the majority of anticipated housing

(72%) and employment (100%) growth in Wolverhampton, delivering the key development outputs of the Plan's strategic priorities.

- 35.3 WLP Table 2 links the four priorities of "Our City: Our Plan" to the Plan's 13 strategic priorities, and provides the relevant WLP Policies that will help to deliver the strategic priorities, in addition to Policy CSP1 parts 4, 5 and 6. Where the strategic priorities relate to future development and growth, and have a strong spatial element, these are reflected in the Growth Network. In particular, the "Our City: Our Plan" priorities:
- a. "Good homes in well-connected neighbourhoods" is reflected in: Strategic Priority 5 relating to housing, which focusses the majority of future planned housing development in the growth network; and Strategic Priority 6 relating to accessibility, as the growth network comprises very sustainable locations for development, being highly accessible by various means of transport (see also c.iii. below)
 - b. "More local people into good jobs and training" is reflected in: Strategic Priority 7 which includes a number of elements strongly related to future employment growth all of which are focussed in the growth network
 - c. "Thriving economy in all parts of the city" is reflected in:
 - i. Strategic Priority 8 relating to providing a balanced portfolio of employment sites, which includes all employment allocations being within the growth network
 - ii. Strategic Priority 9 relating to centres, with the City Centre and Core Regeneration Areas of the Growth Network relating to Wolverhampton's Tier-One & Tier-Two Centres plus a Tier-Three District Centre (see also response to Question 20)
 - iii. Strategic Priority 11 relating to providing infrastructure to support future growth and prosperity, is focussed in the growth network, with the City Centre providing the hub linking to Core Regeneration Areas that each contain major radial transport routes
- 35.4 In addition to having strong links to the Growth Network, these and other strategic priorities have a spatial relevance that extend beyond the Growth Network. In particular, the Council priority for "Healthy, inclusive communities" is reflected in Strategic Priorities 1 – 4 relating to the built and natural environment enhancing health and well-being; mitigating and adapting to climate change; and protecting and enhancing the natural environment respectively.
- 35.5 The Growth Network, together with the Neighbourhoods Area and the Green Belt which complement and support the Growth Network, cover the whole of Wolverhampton, and provide the overall spatial strategy shown in WLP Figure 1. The spatial strategy is a key delivery mechanism for the strategic priorities, as detailed in the answer to Question 31.
- b. **Table 3 in the Plan indicates that the city centre will be the focus for housing development, whereas the Core Regeneration Areas will be the focus for employment development. Is the policy clear as to the different**

roles and functions of these areas and why different levels and types of growth will be directed towards them?

- 35.6 As noted in Policy CSP1 Part 3, Table 3 shows how the housing and employment land requirements for Wolverhampton will be met - summarising the spatial distribution of Housing and Employment Growth, predominantly relating to allocations, reflecting the quantitative outputs of the WLP's planned growth.
- 35.7 Housing development will be focused in the city centre because of its central role as part of the Growth Network, highly sustainable location, significant housing development potential, and the benefits that increasing the residential population would bring to support the function of the city centre. Table 3 also indicates that a similar scale of housing development will be delivered in the Core Regeneration Areas.
- 35.8 Employment development, which focus on promoting and supporting employment in manufacturing, research and development (Use Class E(g)(ii), E(g)(iii) and B2), warehousing (Use Class B8) and other uses that are appropriately located in industrial employment areas (WLP para 7.1), will be focused in the Core Regeneration Areas because these include existing established employment areas (with concentrations of jobs including manufacturing, construction, wholesale and transport & storage), have the greatest potential for future industrial growth and benefit from excellent connectivity to the wider economy.
- 35.9 The different roles and functions of these areas extend beyond the quantitative outputs for planned growth set out in Table 3. Policy CSP1 and supporting text provides details of the distinct roles and functions of the Growth Network (parts 4-6); the Core Regeneration Areas (part 6 and para's 3.24-6, with more detail relating to Stafford Road (para's 3.27-9), Wednesfield (para's 3.30-1) and Bilston (para's 3.32-5); and the City Centre (part 5 and para's 3.16-3.23). In addition to housing provision, this highlights the importance of the city centre as a transport hub and a focus for retail, office, leisure and service provision.
- c. **Table 3 of the Plan has no employment land allocations within the city centre area. How will the Plan ensure that sustainable economic growth is achieved in this area? Is this approach consistent with the Plan's strategic priorities (specifically number 8) and para. 3.18 which states that the city centre is the engine of the city economy?**
- 35.10 The city centre has no employment allocations because references to 'employment' and 'employment land' in the Plan relate to promoting and supporting employment in manufacturing, research and development (Use Class E(g)(ii), E(g)(iii) and B2), warehousing (Use Class B8) and other uses that are appropriately located in industrial employment areas. WLP Chapter 7 Economy emphasises this approach in para 7.1, which is delivered through policies EMP1-5. Such uses are strategically planned to be focused in the Core Regeneration Areas, reflecting Strategic Priority 8. Details of this approach are set out in Policy CSP1 part 6 a-c, which cites high quality

manufacturing & logistics, local employment land and industrial & logistics development.

- 35.11 The Wolverhampton City Centre AAP [SD DP2] covers both the city centre (as defined in the WLP) and Black Country Core Strategy (BCCS) Regeneration Corridor 3, which includes some local quality employment land. The latter area now falls in scope for WLP allocations, as explained in WLP para 3.16, with the relevant AAP policy elements to be superseded, as set out in WLP Appendix 1.
- 35.12 Whilst the focus for industrial uses is outside the city centre, sustainable economic growth in the city centre as a crucial part of the Growth Network will be achieved by maintaining and enhancing its important attributes and qualities as set out in WLP para's 3.17-8, with para's 3.19-23 outlining how this will be delivered. The role played by the city centre set out in Policy CSP1 part 5 is consistent with Strategic Priority 9 and supported by policies in WLP Chapter 8: Centres (see also answer to Question 20).
- 35.13 The city centre acts as a driver of the city economy as it provides integration with the rest of the city's roles and functions by:
- Being the main focus of economic activity in the city. In 2024, 24,150 employees worked in the city centre – 24% of all jobs in the city (Business Register and Employment Survey ONS, Nomis 10 Nov 2025 - total of relevant Local Super Output Areas (LSOAs)). This gives a concentration of 80 jobs per ha, by far the highest concentration of jobs in the Growth Network - the second highest being Wednesfield Core Regeneration Area with 33 jobs per ha. The city centre includes at least one LSOA which had the highest concentration of jobs in the city, reflecting a range of employment sectors: retail; accommodation & food services; business administration & support services; public administration; education; and arts, entertainment, recreation & other services. This diverse economic base complements activity in the rest of the city, particularly the industrial uses in the Core Regeneration Areas.
 - Facilitating economic activity in the rest of the city, including supporting industrial jobs and growth. The city centre provides a range of services (particularly shopping and leisure) that support residents who work in the Wolverhampton economy, and also provides key infrastructure and connectivity to the rest of the city (particularly as the focus for transport networks).
- 35.14 Future investment and regeneration in the city centre is promoted through Policy CSP1 Part 5 (particularly parts a, b & d). The city centre's economic activity and growth will be facilitated through:
- specific key elements and proposals that directly relate to the city centre economy (para 3.19 points a, c, d & e and para 3.22); will support the city centre economy (para 3.19 points b, f & g and para 3.23); and will promote the city centre's distinctive strengths and unique opportunities (para 3.21);
 - WLP policies relevant to the City Centre, including those in Chapter 8, as emphasised in para 3.20; and

- Wolverhampton City Centre AAP policies promoting sustainable economic growth in the city centre (particularly centre uses) – CC1: Meeting Shopping Needs; CC2: Offices; CC3: Leisure, Visitor and Cultural Facilities; CC5: Education and Learning; CC6: Transport; and Character Area policies

36. Parts 7 and 8 of Policy CSP1 set out the approach to development in Neighbourhood Areas and the Green Belt, stating that the Neighbourhood Areas will meet 28% of the Plan's housing supply and 0% of employment land supply.

- a. The policy refers to Neighbourhood Areas but the explanatory text, such as at paragraphs 3.12 and 3.36, refers to Neighbourhoods Area. Is it singular or plural? Can the Council confirm which is correct please and explain what the term means in the context of the Plan? Is the role of Neighbourhood Areas in meeting the needs of local communities and businesses clear? How will housing and employment growth needs be met in these areas given that the spatial strategy directs only some small-scale development to these areas?**

36.1 The correct term is "Neighbourhoods Area" (NA) – singular. The Council has proposed main modifications [MM040-43] which amend the text to the singular version throughout the WLP and also remove the words "towns and", from Policy CSP1 2) c) which were included in error (the Draft Black Country Plan called these areas "Towns and Neighbourhoods Areas").

36.2 WLP para 3.36 explains that the NA forms the majority of the built-up area of Wolverhampton and is where most residents live. The NA refers to those parts of Wolverhampton which do not fall within either the Growth Network or the Green Belt. The NA forms a patchwork of mostly residential areas. The NA covers most of the western half of the City, intersected by wedges of green belt. In the eastern half of the City, the NA fills the gaps between the hub of the City Centre and the spokes of the Core Regeneration Areas.

36.3 It is accepted that this could be expressed more clearly in the WLP, particularly as the Neighbourhoods Area is not shown on Figure 1: Spatial Strategy Key Diagram. Therefore, the Council has proposed a main modification [MM044] to para 3.36 to expand the description of the NA.

36.4 WLP Policy CSP1, Table 3, para's 3.12-3.13 and para's 3.36-3.39 together provide a clear and robust vision of the role of the NA in meeting the needs of local communities and businesses. As these are primarily established residential neighbourhoods, served by District & Local Centres, local residential services and small-scale employment opportunities, there are limited development opportunities within the NA (four housing allocations totalling 152 homes), and the strategy is to protect and enhance the quality of the residential environment. As part of this enhancement, renewal of out-dated housing stock will be supported – as is currently taking place through the Tarrans Housing Renewal scheme (housing allocation H24) - and small-scale windfall development is expected to come forward generally in line with historic rates, together with a limited structural uplift in centres, as set out in WLP para's 6.12-6.13.

36.5 Although only some small-scale development will take place within the NA, their housing and employment growth needs will generally be met in the adjoining Growth Network, which is well connected to the NA by a network of highways and sustainable transport modes. This is illustrated in Appendix 3 of the Site Assessment Report [SD SI1], which robustly demonstrates that the

majority of the NA has high levels of sustainable transport access to all main residential services, including employment opportunities. These high levels of accessibility will be further enhanced by the transport improvements set out in WLP Section 9: Transport, and supported by the protection of Centres (Policy CEN2), and improvements to education (Policy HOU6), health (Policy HW3) and other community facilities over the Plan period.

- b. The policy states that regeneration benefits will spread from the city centre and Core Regeneration Areas to Neighbourhood Areas via access and design improvements. What does this mean and how will it be achieved?**

36.6 The Neighbourhoods Area (NA) forms a patchwork of mostly residential areas. To the east of the City, the NA fills the gaps between the hub of the City Centre and the spokes of the Core Regeneration Areas (CRAs). As the City Centre and the CRAs are regenerated through high quality design development, environmental improvements and better highways and public transport networks, the whole of the NA – and particularly those parts adjoining the edge of the Network - will benefit from an enhanced environment and improved access to the variety of existing and improved services provided by the Network – jobs, shopping, leisure, regional transport hubs, etc.

- c. Does the Spatial Strategy strike the right balance between seeking to protect the openness, integrity and function of the Green Belt whilst at the same time ensuring that sufficient economic and housing growth is delivered to meet the needs of local communities and businesses within the Green Belt area?**

36.7 The economic and housing growth needs of local communities and businesses within the green belt area are not specifically evidenced within the WLP itself or supporting documents. There are very limited areas of residential development within the existing green belt, notably at Lower Penn where there are approximately 30 properties. Therefore, any housing growth needs arising directly from the green belt areas would be minimal. There are a small number of businesses located within the green belt, the most notable being Dunstall Park Racecourse, two Golf Courses, Wolverhampton Football Club Training Ground and Severn Trent Sewage Works, together with some canal-related activity and a public house. Again, the economic growth needs of these businesses would be minimal, and no such businesses have highlighted any specific development needs through either the Black Country Plan or WLP consultation processes. Given the character and location of green belt areas in Wolverhampton – being predominantly wedges of land extending into the urban area – it would be reasonable to assume that any such needs could be met within the adjoining urban areas. In this context the Council is satisfied that the Spatial Strategy does strike the right balance.

- d. A shortfall in both housing and employment land was identified at an early stage of the plan making process. A decision was taken not to review the Green Belt in line with paragraph 145 of the 2023 NPPF in**

place at the time. Nevertheless, given the substantial extent of the shortfall identified, did the Council consider whether this constituted the exceptional circumstances required to review Green Belt boundaries?

- 36.8 As detailed in para's 4.6 - 4.16 of the Spatial Strategy Topic Paper [ED WCC1], at the outset of the WLP preparation process, the Council proposed that it should make the choice, in accordance with para 145 of the 2023 NPPF, not to review the Wolverhampton Green Belt through the WLP process.
- 36.9 NPPF para 145 does not specify how the choice whether to review the green belt should be exercised, nor does it set out any particular factors to be taken into account when making this choice. Notwithstanding this, the factors taken into account by the Council when proposing not to review the Wolverhampton Green Belt are set out in para 4.14 of the Spatial Strategy Topic Paper: "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. When the BCP was being prepared under the 2019 NPPF, the Wolverhampton Green Belt was found to have potential capacity for only 1,014 homes, with no areas suitable for employment development or gypsy and traveller pitches."
- 36.10 The Council consulted on this approach through the WLP Issues and Preferred Options consultation [SD PC2], as set out in para's 1.21-1.26 and "Question 1: Do you agree with the proposed scope of the Wolverhampton Local Plan". The key issues raised by representations in response to this question are set out in the Appendix to the WLP Consultation Statement Regulation 19 [SD CD9] within pages 2-32 and elsewhere in relation to other questions. Pages 32 - 33 of SD CD9 sets out how the "main issue" of "Scope should be expanded to include a green belt review" has been addressed in the WLP Regulation 19. This demonstrates that the Council kept the decision whether to review the green belt "under review" until preparation of the WLP Regulation 19.
- 36.11 Once the choice had been made, through the WLP Regulation 19, not to review the green belt, the Council considers that it was not bound to consider whether the exceptional circumstances required to review green belt boundaries applied, as this part of NPPF para 146 was not relevant to the WLP. This is because NPPF para 146 only sets out the circumstances which must be in place should a local planning authority choose to review and alter Green Belt boundaries as part of the plan-making process – and the Council has not made that choice. Para 146 does not set out the circumstances which must be in place to justify not reviewing Green Belt boundaries through the plan-making process.

- e. Policy CSP1 refers to Green Belt landscapes and enhancing the value of the Green Belt. Are these references justified and consistent with national Green Belt policy?**

36.12 Policy CSP1 part 8) is not intended to replace or repeat national guidance on protecting green belt land set out in para's 142-156 of the NPPF. It is intended to provide additional local guidance on the particular existing and potential value of land and buildings which fall within the Wolverhampton Green Belt, for various purposes. The Council considers that this policy text provides useful guidance on the positive value and uses of green belt land in Wolverhampton, in the context of the wider Spatial Strategy, which are distinct from the role of this land as designated green belt.

36.13 The reference to safeguarding and enhancing green belt landscapes refers to the approach set out in Policy ENV5, as explained in WLP para 3.43. The Council considers that the reference to taking opportunities to enhance the value of the green belt for various purposes does not conflict with national guidance on protecting green belt land and provides a list of valuable purposes of Wolverhampton Green Belt land, which serve local communities within the urban area and which would benefit from enhancement over the Plan period. This is explained in WLP para's 3.41-3.42, which sets out the examples of the enhancement of Smestow Valley Local Nature Reserve and Northcote Farm Country Park.

37. Will the Growth Network and Neighbourhood Areas taken together ensure that growth is sustainably achieved?

37.1 The Spatial Strategy for the Growth Network and Neighbourhoods Area will, taken together, ensure that growth is sustainably achieved, through a balanced approach to development which:

- Makes best use of existing transport, environmental, community service, and other infrastructure networks across the City;
- Maximises efficient use of land suitable for development, including through increased housing densities, repurposing of surplus industrial land, conversion of surplus buildings and concentrating new homes in the City Centre;
- Builds on and enhances existing high levels of accessibility across the City, including accessibility of existing and new residents to residential services;
- Protects and enhances the environment and services of established residential neighbourhoods;
- Minimises climate change impacts (primarily through minimising vehicle trips and maximising use of sustainable transport modes).

37.2 This is explained in detail in Policy CSP1 and WLP para's 3.1-3.39.

Policy CSP2

38 In relation to Policy CSP2 on placemaking

a. How does this policy specifically relate to the spatial strategy?

38.1 Policy CSP2 relates to the spatial strategy in that it sets out the broad principles for good placemaking and achieving high quality design which will

apply across the City, and which will be fundamental to achieving the Spatial Strategy.

b. Does it mainly set out Council statements rather than policy requirements which are covered by other policies?

- 38.2 Policy CSP2 does set out broad principles and draws together key policy requirements relating to good design which are set out in other WLP policies, where relevant.
- 38.3 However, as design is a cross-cutting issue affecting all types of development and environmental infrastructure, and the interactions between different land uses, it also sets out over-arching policy requirements which are not repeated elsewhere in national or local policies, as set out below:
- 1) “The design of spaces and buildings should be influenced by their context and enhance local character and heritage whilst responding to locally identified community needs, changes in society and cultural diversity.”
 - 2) “Good quality building designs will be sought that are appropriate to Wolverhampton, of a size, scale and type to integrate into their neighbourhood.”
 - 3) “All development proposals should demonstrate a clear understanding of ... how the proposal makes a positive contribution to Wolverhampton place-making and environmental improvement.”
 - 4) “New development should promote maximum freedom of movement through a permeable street network and a choice of sustainable means of transport, including ongoing support for the provision and extension of walking and cycling infrastructure. Transport proposals should include connections to and between transport hubs, ensuring that interventions make a positive contribution to place-making and increase accessibility and connectivity.”
 - 5) “Development proposals will be required to provide active frontages, well-located, safe and accessible pedestrian and cycle infrastructure and an appropriate intensity of use in centres and elsewhere. Designs should promote natural surveillance and defensible spaces.”

c. Are all relevant policies listed? If not, what is the reason for this and is it effective?

38.4 All relevant policies are not listed in Policy CSP2, as this would make the Policy too long and involve excessive repetition. However, all of the places to reference relevant policies are provided in the supporting text, specifically within para 3.46. The Council considers that this is effective.

d. In accordance with paragraph 16 f) of the NPPF does the policy serve a clear purpose and does it avoid unnecessary duplication of national and other local policies?

38.5 Policy CSP2 serves the clear purpose of providing broad principles for good placemaking and achieving high quality design which will apply across the City, and which will be fundamental to achieving the Spatial Strategy. The Policy does set out broad principles and draws together key policy requirements relating to good design which are set out in other WLP policies, where relevant.

38.6 However, as design is a cross-cutting issue affecting all types of development and environmental infrastructure, and the interactions between different land uses, it also sets out over-arching local policy requirements which are not repeated elsewhere in national or local policies, as set out in the answer to Question 29 b) above.

Issue 2.2

Whether the site selection process used an appropriate methodology that is based on proportionate evidence and is it justified and consistent with national policy.

Questions

Note: Our questions here relate to the site selection methodology for housing and economic development. Detailed questions on specific site allocations are set out under later matters.

The Council's methodology for site assessment and selection is set out within the Local Plan Site Assessment Report (latest version November 2024). The report states that the majority of sites are already committed and are within the urban area (defined as the areas outside of the Green Belt).

39. Is the site selection methodology justified, and does it accord with national planning policy and guidance? In particular:

- a. Has it been suitably informed by relevant studies/assessments and site constraints, and has it included a sufficiently robust assessment of potential development impacts including in relation to heritage, flooding, water quality and the effect on biodiversity?**

- 39.1 Yes, the site selection process for the WLP used an appropriate methodology based on proportionate evidence which is justified and consistent with national policy.
- 39.2 Diagram 1 of the Site Assessment Report [SD SI1] summarises the method used for site selection. Firstly, the supply of possible sites was identified from existing planning permissions and allocations, and from the SHLAA [SD HO4] and Employment Land Supply Paper [SD EC6]. This followed the methodology set out in National Planning Practice Guidance by identifying a wide range of potential development sites, including previously developed land, vacant and underused public land; sites promoted through an on-going “call for sites” process and other opportunities.
- 39.3 Firstly, sites within the Green Belt and within Wolverhampton City Centre were removed, as these were out of scope for allocation in the WLP. Secondly, sites already allocated for housing or employment use in adopted Plans, or which had been identified as suitable and developable for housing or employment use through the SHLAA 2024 or Employment Land Supply Paper 2024, were filtered out to be assessed through a “light touch” approach, as detailed in the response to Question 40. Thirdly, sites were filtered out if they were impacted by gateway constraints, as detailed in the response to Question 41.
- 39.4 The remaining eight sites were then assessed against a consistent set of criteria, using a “RAG” rating (Red, Amber, Green). Each site was subject to Sustainability Appraisal (SA), using a consistent method set out at Appendices F and H of the Regulation 19 SA [SD CD3b].
- 39.5 The viability and deliverability of each site was considered, and any shown not to be viable or deliverable were removed or had a capacity discount applied. The results of the Site Assessment Report directly informed which sites were selected for allocation in the WLP and for what land use.
- 39.6 Site capacity has been calculated using a consistent approach to density assumptions as set out in WLP Policy HOU2 – Housing Density, Type and Accessibility, where higher densities are expected in the strategic and town centres and in places with high levels of accessibility to residential services.
- 39.7 The WLP Site Assessment methodology and individual site assessment reports provide a balanced consideration of the evidence base for each site, including heritage value, flood risk, ecological information, nature conservation designations and the SA findings.
- 39.8 With regard to heritage, the site assessment process was able to draw upon the wealth of detailed evidence provided by the Black Country Historic Landscape Characterisation (HLC) (2009), other local HLC studies and plans, the Black Country Historic Environment Record (HER) and a new comprehensive analysis of the local character and distinctiveness of the Wolverhampton and wider Black Country area completed using historic landscape characterisation (HLC) principles [SD EN26]. This Study categorised and defined locally distinctive areas of the Black Country, or

Historic Environment Area Designations (HEADS), building on evidence from the original Black Country Historic Landscape Characterisation.

- 39.9 Following the WLP Regulation 18 consultation, the site assessment methodology was adjusted to reflect a consultation response from Historic England – as detailed in para's 1.11-1.15 of SD SI1. These adjustments were able to reflect recent detailed evidence from the WLP Heritage Impact Assessments [SD EN19], and increased the robustness of the site assessment process at Regulation 19 stage.
- 39.10 With regard to flood risk, the site assessment methodology has been informed by an up-to-date Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) [SD EN13 and EN14] which were published in August 2024 and October 2024. The SFRA was prepared in line with the Environment Agency guidance on how to prepare a strategic flood risk assessment and the latest versions of relevant national policy and guidance when the document was written (NPPF - July 2024 and PPG – February 2024). For further details please see the answer to Question 39 b).
- 39.11 Since the SFRA was published there have been updates to both the NPPF (February 2025 and August 2026) and PPG (September 2025). However, these changes would not materially affect the assessment and conclusions in relation to flood risk.
- 39.12 Following the WLP Regulation 18 consultation, the site assessment methodology was adjusted to reflect consultation responses from the Environment Agency (EA), regarding flood risk and wastewater impacts linked to protection of water quality, as detailed in para's 1.11-1.12 of SD SI1. These adjustments were able to reflect recent evidence from the Level 2 SFRA work [SD EN14] and information provided by Severn Trent following further EA guidance [SD EN7 and EN8], and increased the robustness of the site assessment process at Regulation 19 stage. The EA thereafter provided reassurance that their concerns had been addressed regarding flood risk and wastewater / water quality impacts.
- 39.13 With regard to biodiversity, recent ecological surveys have been carried out for the majority of site allocations where nature conservation value was considered likely to be an issue. WLP Table 12 sets out clearly which site allocations are affected by a SLINC designation and/ or currently considered to be subject to Biodiversity Net Gain (BNG), and outlines that mitigation will be required. It is not appropriate to carry out a detailed Local Site Assessment for each allocation because the nature and value of habitats can change over time, and there are limited financial and time resources.
- 39.14 The SA concludes that, for those sites with potential impacts on SINC's and SLINC's, mitigation measures set out in WLP site policies will significantly reduce impacts on nature conservation / biodiversity. The WLP has achieved a balance between addressing high development pressures and the need to maximise efficient use of land in the urban area, and the need to protect areas of biodiversity value, promote nature recovery and meet national biodiversity net gain requirements.

- b. **Has the sequential test, and exception test, where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?**

39.15 The Sequential Test is a method used to steer new development to areas with the lowest probability of flooding. Once the sequential test has been applied, and it has been shown that there are no reasonably available lower risk sites, appropriate for the proposed development, the Exception Test is then applied to any proposed allocations which meet the criteria set out in Table 2 of PPG (para 079 Ref 7-079-20220825). In these cases, it should be demonstrated that:

1. development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk; and
2. the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

39.16 The preferred options set out in the WLP Issues and Preferred Options consultation included proposed site allocations, derived from a site selection process which, for flood risk purposes, drew on the existing Black Country Strategic Flood Risk Assessment (SFRA). The scope of the WLP for the purposes of site allocations excluded green belt and city centre sites. However, existing housing allocations in the city centre were assumed to be able to come forward.

Sequential Test / Flood Zone 2 and 3

39.17 As part of the development of the WLP, the Sequential Test has been undertaken based on the site screening assessment forming part of the Wolverhampton SFRA [SD EN13 and EN14]. This assessment considered the flood risk from all relevant sources of flooding including fluvial and surface water. Each of the proposed WLP site allocations and the 13 existing allocations within the city centre were screened against this data, providing a proportion of flood risk to each site and allowing sequential consideration of each site within the WLP and the Sustainability Appraisal (SA).

39.18 During a review of the site screening assessment document [SD EN14a], which was carried out to enable responses to these questions, it was identified that there were some issues with the spreadsheet, caused by site IDs being shifted within the document. Therefore, the summary provided below is based on an updated, corrected version of the site screening assessment, which has been submitted for addition to the Examination Document list.

39.19 As set out in the extract below, the updated screening assessment identifies seven proposed WLP site allocations which fall partially within Flood Zones 2 or 3 (six of which were existing allocations or permissions and therefore not

subject to the detailed site assessment process), and 11 site allocations where more than 5% of the site was affected by surface water flooding during the 1% AEP event.

- 39.20 Only two housing site allocations included Flood Zone 3 – site H21 Former Stowheath Centres, Stowheath Lane (3.6% of the site), and H24a Arnhem Road (11.9% of the site). Further details regarding these sites are provided below. Five employment site allocations included Flood Zone 3. On employment sites, densities are generally lower, allowing flood risk to be more easily managed through a sequential approach to development.
- 39.21 When developing the Regulation 19 WLP, in applying the sequential test, it was clear that there were no other reasonably available, lower risk sites, appropriate for the proposed developments, and therefore the sequential test had been passed for all site allocations. This is because all potential development sites considered suitable and deliverable over the Plan period were proposed for allocation, as demonstrated in the Wolverhampton SHLAA 2024 [SD HO4] and the Black Country Employment Land Supply Paper 2024 [SD EC6].
- 39.22 Supporting this conclusion, Table N.7.1 of the WLP Regulation 19 SA states, under “Climatic Factors” that: “CWC has ensured that development is directed in the first instance towards sites at the lowest risk of flooding based on the SFRA following national guidance and as such there is anticipated to be no significant effect on the risk of flooding.”

Exception Test

- 39.23 Of the 63 sites screened, 12 “Red” sites were identified to require a Level 2 SFRA site assessment due to potential significant obstacles or challenges for development related to flood risk which required further consideration. Seven of these are employment allocations, four are housing allocations, and one is a gypsy and traveller pitch allocation. The criteria used to identify these sites is shown in Table 4-1 of the Level 2 SFRA - Main report [SD EN14]. The Level 2 site sheets [SD EN14a-m] consider all sources of flood risk in detail for each of the “Red” sites.
- 39.24 The only material change between the previous and updated versions of the site assessment spreadsheet occurs for site E2 (which is not a “Red” site), where Flood Zone 3 is now identified to cover 35% of the site. Flood risk only affects the northern part of the site, and access and escape would not be affected by potential flooding. Furthermore, the flood extents do not follow the path of the watercourse along the eastern boundary of the site, indicating that flood risk is likely to be overestimated for the site. As the proposed development type for this site is employment, the vulnerability classification would be “Less vulnerable” and therefore the Exception Test would not be required for this site.
- 39.25 The Level 2 SFRA site assessment for the 12 “Red” sites included an assessment of whether the Exception Test would be required for these sites and, importantly, whether the principle of development could be supported.

The Level 2 SFRA concluded that the Exception Test would only be required for one of the “Red” sites – H21. A further eight sites were identified where an Exception Test was not required, but was recommended due to the scale of surface water flood risk and / or potential issues with access and escape from the site. The final three “Red” sites (E25, E23 and E17) were identified as not needing the Exception Test at all. It was found that the principle for development could be supported at all sites based on the extent of flood risk.

- 39.26 Only one of the other screened sites - H24a (which is not a “Red” site) meets the criteria set out in Table 2 of the PPG for application of the Exception Test. However, this development involves like-for-like replacement of existing houses through a housing renewal programme to replace Tarran housing stock which is no longer fit for purpose. As a result, the Council considers that the first part of the Exception Test is passed for this site. As the proportion of the site within Flood Zone 3 is low (11%) it is anticipated that a site-specific Flood Risk Assessment would be able to demonstrate that the site could be made safe for its lifetime without impacting on flood risk elsewhere. This site was excluded from the Level 2 SFRA site assessment as a planning application was expected imminently. The site now has planning permission.
- 39.27 The Council considers that the nine “Red” sites subject to the Exception Test pass the first part of the Test, as the development of these sites for much needed employment development, housing and gypsy and traveller pitches, will provide wider sustainability benefits to the community that outweigh flood risk. The SFRA Level 2 site assessments concluded that the proposed development type at all “Red” sites is capable of meeting the second part of the Exception Test, subject to meeting the recommendations in the Level 2 SFRA, detailed design and completion of a Flood Risk Assessment at planning application stage.
- 39.28 Therefore, all ten sites subject to the Exception Test were considered to have passed the first and second parts of the Exception Test, as part of the WLP preparation process.

Use of Flood Risk Evidence in the Site Assessment and Site Allocation Process

- 39.29 For sites subject to the site assessment process, on the site assessment forms, the presence of Flood Zone 3 within the site is identified within the constraints on the first page of each form. The relevant details from the Level 1 SFRA report (and Level 2 SFRA where applicable) are set out within the “Flood risk, drainage and ground water” section on the second page of each form. This information was updated at Regulation 19 stage to reflect the Level 2 SFRA results. No sites subject to the site assessment process were identified to fall within Flood Zone 3 or 2.
- 39.30 Where allocations were carried forward from existing adopted Plans or were otherwise committed, the information regarding fluvial and surface water flood risk, taken from the SFRA reports, is set out in WLP Table 12 of Section 13,

including a requirement to comply with the Level 2 SFRA Site Report recommendations, where appropriate.

Flood Map for Planning Updates – March 2025 and May 2026

- 39.31 At the point that the Level 1 and Level 2 SFRAs were published, the documents used the best available data. Since then, the Flood Map for Planning has been updated (in March 2025 and May 2026) with new NaFRA2 data prepared by the Environment Agency. Section 1.7 of the Level 1 SFRA identifies that data can be updated from time to time and highlights that developers need to approach the Risk Management Authorities to confirm if newer data is available.
- 39.32 With regards to the WLP, a comparison between the previous and updated Flood Zones (published in March 2025) has been carried out. This shows that there is only one site (H21) where the extent of the flood zones has changed by more than 1%. In this location, the extent of Flood Zone 3 has increased from 3.6% to 5.6%, and the extent of Flood Zone 2 has increased from 10.6% to 14.7%. As these are relatively low percentages, it is highly likely that development could go ahead avoiding the areas at risk of flooding. This would not change the Level 2 SFRA recommendations for this site.
- 39.33 Comparison between the previous and updated surface water mapping (published in March 2025) has also been carried out as set out in the Strategic Flood Risk Addendum [ED WCC7A-C]. This showed that surface water flood risk increased by more than 5% at nineteen locations. Analysis of the surface water flood risk across these sites indicates that these will all remain developable despite the changes in flood extents. Therefore, this would not change the Level 2 SFRA conclusions.
- 39.34 Since the Strategic Flood Risk Addendum was published in April 2026 new surface water climate change mapping has been made available (published in May 2026). As suitable surface water climate change mapping was not available when the Strategic Flood Risk Addendum was prepared the 0.1% AEP was considered as providing a proxy for climate change. The present day 0.1% AEP event has since been compared with the 1% AEP climate change data published in May 2026 to confirm that the 0.1% AEP event was a suitable proxy for climate change. This comparison showed that the 0.1% AEP event was suitable, with it covering a conservative extent (larger than the 1% AEP climate change event) across the whole of the Wolverhampton administrative area. Consequently, the conclusions of the Level 2 SFRA remain valid despite the changes to this dataset.
- c. Does the methodology include clear and robust processes to show how decisions on sites have been made to determine whether they should be taken forward through the Plan process or discounted?**
- 39.33 The methodology provides a clear and robust explanation of how decisions on sites have been made to determine whether they should be taken forward through the Plan process or discounted. Following a clear and robust filtering process to remove sites which were out of scope or subject to gateway

constraints, and consideration of evidence on a variety of planning-related criteria (as detailed in the responses to Questions 39 a) and 41), a conclusion is provided at the end of the site assessment form, for each site assessed. This conclusion provides a balanced consideration of the evidence base and policy considerations for each site and a clear recommendation as to whether the site is suitable or not suitable for the use assessed i.e. housing or employment. The balanced consideration and recommendations are provided on a consistent basis across all sites assessed.

40. The site assessment methodology applied at Issues and Options stage (February 2024) was largely based on that developed during the development of the Draft Black Country Plan (2021). Why was this methodology determined to be the most appropriate for the Wolverhampton area?

- 40.1 Significant work was undertaken to develop a robust site assessment methodology for the Black Country Plan (BCP). At an early stage, it was decided that it was proportionate to apply this detailed methodology only to potential “new” sites (predominantly “call for sites” submissions), which were not currently suitable for development under existing local and national policy. Therefore, the methodology did not apply to sites which were already committed through allocation in an adopted Plan, planning permission, or inclusion in the most recent Strategic Housing Land Availability Assessment (SHLAA) as suitable and deliverable for housing. As explained in para 2.3 of SD SI1, a “light touch” assessment process has been applied to these committed sites, as evidenced in the 2024 SHLAA [SD HO4] and Employment Land Supply Paper [SD EC6].
- 40.2 The methodology was tested in detail through development of the Draft BCP [SD PC7], and applied to a range of sites across the Black Country authorities, as set out in the Draft BCP Site Assessment Report which can be viewed at: [Sites Assessment | Black Country Plan](#). The site selection methodology was largely supported by consultation responses to the Draft BCP, as set out in the WLP Regulation 18 Consultation Statement [SD PC5].
- 40.3 As explained in para 1.16 of the WLP Regulation 18 [SD PC2], to progress the WLP as quickly as possible following cessation of work on the BCP, it was important to make use of existing BCP work, including existing evidence, where still relevant. Therefore, the WLP Regulation 18 Site Assessment methodology [SD SI2] was substantially based on that used for the BCP process - the key difference being that the WLP methodology only applied to the urban area, whereas the BCP methodology also applied to green belt areas (in line with changes to NPPF, as set out in para 1.5 of SD SI1).
- 40.4 Following the WLP Regulation 18 consultation, the site assessment methodology was adjusted to reflect consultation responses from Historic England, Natural England, the Environment Agency and others – as detailed in para’s 1.11-1.15 of SD SI1. These adjustments were able to reflect newly available evidence, such as the Level 2 SFRA work, and increased the robustness of the site assessment process at Regulation 19 stage.

41. As part of the methodology, sites with ‘gateway constraints’ (including biodiversity; flooding and heritage designations; existing residential operational sites; and the willingness of landowners to develop the site), were screened out at an early stage of the process. How was this list of constraints defined, is it comprehensive and is it justified?

41.1 The WLP approach looks to balance the need for sustainable and deliverable growth over the Plan period with a clear focus on improving the lives of residents. Given acknowledged issues around lack of sufficient housing and employment land supply in Wolverhampton, it is important to ensure that the application of constraints through the WLP site selection process has been justified and evidenced. The Council believes that the decision to apply the selected constraints is justified and backed up by evidence.

41.2 The use of gateway constraints ensures that the most sensitive locations are protected from harmful development, in line with the NPPF, where para 123 requires local authorities to make effective use of previously developed land, “... while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

41.3 The NPPF also refers to the need to protect and enhance biodiversity (para’s 180 & 186a), to avoid harm to the green belt (para’s 142 & 145) and giving great weight to avoiding harm to designated heritage assets (para 205).

41.4 As explained in response to Question 40, the list of gateway constraints applied in the WLP site assessment methodology [SD SI1] is similar to that used for the Draft Black Country Plan, with adjustments made to reflect local context e.g. removal of Sites of Special Scientific Interest (SSSIs) and SACs because there are none in Wolverhampton; and inclusion of existing residential / operational sites for urban areas (this was previously a gateway constraint only for green belt areas). As explained in para’s 1.5-1.10 of SD SI1, green belt sites were also filtered out at the outset of the site assessment process, as detailed in Diagram 1. The Site Assessment approach, including gateway constraints, was subject to consultation at WLP Issues and Preferred Options stage.

41.5 The gateway constraints applied are:

- Ancient woodland / veteran tree
- Local Nature Reserves
- Sites of Importance for Nature Conservation (SINC)
- Flood risk zone 3
- Registered parks and gardens
- Scheduled Ancient Monuments
- HSE Zone 1 (for residential)
- Operational burial grounds
- Common land
- Existing residential / operation sites
- Where the landowner is expressly unwilling to develop (including withdrawn sites)

- 41.6 The list of gateway constraints is both comprehensive and justified, as it covers all circumstances where national or local policies preclude allocation of land for development. These include where the landowner is expressly unwilling to develop the site, which is a key consideration when assessing the deliverability of the site for development. It should be noted that a site would not be screened out if only a small proportion of the site were affected by a gateway constraint, as there might still be potential for the remainder of the site to be developable.
- 41.7 Of particular note is the inclusion of Sites of Importance for Nature Conservation (SINCs) as a gateway constraint. SINCs are significant at a regional level because of the ecology / habitats they sustain and are therefore strongly protected from development in the nature conservation hierarchy set out in adopted BCCS Policy ENV1 [SD DP1], and replacement WLP Policy ENV1, and in similar policies across the Birmingham and Black Country authorities. This means that SINCs provide an important part of biodiversity networks and are a fundamental aspect of the emerging local nature recovery strategy work being led by the West Midlands Combined Authority.
- 41.8 In contrast, the policy approach towards Sites of Local Importance for Nature Conservation (SLINCs) allows for slightly more flexibility where development is proposed that affects them. Compensation for the partial or complete loss of SLINCs can be acceptable if appropriate in certain circumstances, such as where the need for a particular development might outweigh their retention. There are three WLP site allocations which will result in loss of part of a SLINC, as detailed in WLP para 10.14.
- 41.9 A programme of resurveys on extant SINCs and SLINCs has been ongoing for several years, with potential development sites prioritised to enable the site selection process to be informed by up-to-date evidence, as far as possible [SD EN17, EN17a-x].
- 41.10 In practice, the gateway constraints did not apply to, and therefore did not restrict, any of the sites in the Wolverhampton urban area which were considered for allocation in the WLP. As set out in the Site Assessment Report [SD SI2a] Appendix 1 Table 2, only two “call for sites” were excluded from assessment – one was an existing employment allocation put forward for housing (which was excluded because, as an existing allocation, it was subject to the “light touch” approach – see response to Question 40), and the other was too small to be considered as an allocation (see response to Question 44).
- 41.11 Therefore, the Council believes that, even if these gateway constraints were set aside, in whole or in part, the amount of additional land that might subsequently become available for development is unlikely to make up sufficient additional supply to meet development needs shortfalls. Doing so would, however, result in the permanent loss of, or significant harm to, local environments and the health and wellbeing of residents.

- 41.12 In addition, some of the identified constraints relate to physical issues, such as hazardous sites or flood zones. If set aside, these issues would need to be remediated or addressed as part of any development, which would have significant implications for development costs and viability.
- 41.13 The use of constraints as a means of assessing the suitability of land and sites for development purposes is therefore justified when considered in terms of the spatial strategy approach and the importance of ensuring sites are genuinely deliverable.
- 42. The site assessment and selection process has not been applied to the City Centre area (as defined). The Site Assessment Report states that ‘Instead, broad targets for housing, retail and office floorspace have been provided’ and that this approach is robust ‘due to the recently adopted detailed Area Action Plan’ that covers that area, and an up-to-date Strategic Housing Land Availability Assessment (SHLAA). Notwithstanding this, we note that the Plan does not propose retail, leisure and office space in the City Centre area, but this issue will be considered under later matters. Nevertheless, is the approach to the City Centre area in terms of the site selection methodology justified, particularly since the Plan was adopted around 10 years ago? Does this have any effect on the robustness of the site selection methodology for the submitted Plan?**
- 42.1 The approach to the Wolverhampton City Centre (WCC) area in terms of the site selection methodology is justified and does not have any effect on the robustness of the site selection methodology for the submitted Plan.
- 42.2 The WLP WCC boundary has been drawn to exclude any areas of existing employment land, as defined in the Employment Land Supply Paper 2024 [SD EC6]. Therefore, the approach to WCC in terms of the site selection methodology does not relate to employment development sites, and the remainder of this answer relates to housing sites.
- 42.3 The Spatial Strategy Topic Paper [ED WCC1] (para’s 4.3-4.5 and 4.28) sets out the reasons why WCC housing allocations have not been revisited as part of the WLP preparation process, and explains that Policy CSP1 and Table 3 set out a strategy and deliverable WCC housing requirement, based on robust, up-to-date evidence. A key part of this evidence is the 2024 SHLAA [SD HO4], which itemises all sources of housing capacity making up the WCC housing supply / requirement of 4,676 homes. 90% of this supply is from identified sites (allocated or permitted), and only 10% from small windfall and surplus floorspace structural change allowances. This is reflected in the lack of any new housing sites which came forward during the BCP and WLP preparation processes through the “call for sites”.
- 42.4 Para 3.16 of the WLP Regulation 19 explains that: “This evidence provides a sound basis to understand the housing capacity of the city centre for the

purposes of the WLP and will be updated and further tested in detail when the AAP is reviewed to provide up-to-date site allocations for the city centre.”

- 42.5 The Wolverhampton City Centre AAP (2016) [SD DP2] sets out housing allocations and other sources of housing capacity to help meet the Black Country Core Strategy housing target for WCC. Given the complex and evolving nature of development opportunities in WCC, there have since been a number of changes to the capacity of these allocations. In recent years, the increased availability of external funding and direct involvement of the Council and other public bodies in WCC regeneration has also driven an acceleration in development activity, pushing up housing capacities, speeding up delivery on existing sites, and bringing forward new housing sites.
- 42.6 The 2024 SHLAA (Appendix 3 Table 1) details capacity and phasing as of March 2024 for the ten remaining WCC AAP allocations and new housing sites of 50+ homes in WCC – as shown on Figure 1: Spatial Strategy Key Diagram of the WLP. The Housing Topic Paper [ED WCC 2a] (Table 3 and paras 3.45-46) details the progress made since March 2024 to bring forward these sites, and identifies one new site. 8 of the 19 sites now have planning permission, of which 6 are under construction. Although the housing capacity of these sites has reduced by 663 homes, alone they would deliver 83% of the proposed revised WLP WCC housing requirement of 8,809 homes.
- 42.7 Therefore, subject to the proposed main modifications to the WLP housing requirement and associated housing targets to reflect the housing land supply position as of August 2026 (please see responses to Questions 51 and 43), there is sufficient certainty that at least 4,230 homes can be delivered in WCC over the WLP Plan period through committed sites, windfalls and structural change uplift. The Council is confident that any potential housing allocations sites have already been identified, and can be delivered under current local and national planning policy. In addition, no WCC sites have been put forward through the “call for sites” process which are not already committed.
- 42.8 WCC already benefits from an adopted Development Plan Document (the AAP) which allocated significant levels of housing in WCC and is delivering on them. The evidence shows that there is a 4,230 home supply from existing identified sites, windfalls and surplus floorspace which can be relied upon in the WLP. In these circumstances – coupled with the proportionate, up to date evidence that confirms there are no additional, new developable sites which are deliverable by 2042 – it would not be justified to apply the site assessment and selection process to the WCC Area, which is already providing a significant amount of housing for the WLP. Therefore, it has not been either necessary or appropriate to apply the site assessment and selection process to the WCC area, and this approach does not have any effect on the robustness of the site selection methodology for the submitted Plan.
- 43. The Site Assessment Report proposes (at paragraph 2.2) to bring forward a supplementary plan for the City Centre should any further housing sites require allocation in the future. Is this approach effective**

and justified? Is this still the intention bearing in mind the emergence of the new planning system?

- 43.1 Following emergence of the new planning system, and the requirement for Wolverhampton to produce a new Plan under this system commencing in October 2026, the proposal to bring forward a supplementary plan for the City Centre is no longer effective or justified. This is because the scope of the new Plan, which was consulted on during summer 2026, will include all planning matters for Wolverhampton, including all development allocations within the City Centre (as defined in figure 2 of the WLP).
- 43.2 The new Plan is due to be adopted in 2029, and will be based on the up-to-date evidence and framework provided by the adopted Wolverhampton City Centre Masterplan (Our Future City Centre Plan) [ED WCC 13 & 13A], which has been subject to extensive public consultation. The Masterplan is broadly consistent with the site specific assumptions made in the 2024 SHLAA regarding housing up to 2042, and also considers the potential for other types of development, and development opportunities beyond 2042. The updated Housing Topic Paper (August 2026) [ED WCC 2A] and associated 5 Year Housing Land Supply Forms [ED WCC 10] take into account the changes to site capacities and deliverability which are captured in the Masterplan. These changes are reflected in the Council's proposed main modifications to the WLP housing requirement and housing targets for various elements of housing supply [MM045 – MM069], referenced in the Council's response to Question 51.
- 43.3 It should be noted that the WLP housing target for the WCC is wholly based upon the delivery of identified sites and windfall assumptions and does not rely on the allocation of any new sites, given the substantial housing already being delivered in WCC via the AAP and the identified limits on capacity.
- 44. In seeking to identify sites, the methodology has adopted a minimum size criterion of 0.4 ha for employment sites and 10 dwellings for housing sites without planning permission and 50 dwellings for housing sites with planning permission. Are these thresholds appropriate and justified by the evidence?**
- 44.1 A site size threshold of 0.4 ha has been applied for employment use because, while small sites can provide a constant supply of developable land, in overall terms they make a limited contribution to the delivery of employment development needs. The availability of such sites can also be difficult to predict. Therefore, the WLP adopts assumptions over the yield of such sites over the Plan period based on historic trends, with the rationale set out in the Black Country Employment Land Supply Paper [SD EC6]. WLP Policies EMP2, EMP3 and EMP4 support the delivery of sites within existing employment areas within which the vast majority of sites of less than 0.4ha are expected to come forward.
- 44.2 As the City of Wolverhampton is a large, densely developed urban area, there is a significant churn of previously developed land coming forward for

housing development on a continuous basis. The annual SHLAA reports record how this churn consistently brings forward small housing sites of less than 10 homes, which form a significant part of housing supply.

44.3 However, it is not possible to identify the majority of such small sites in advance of a planning application being submitted, or to predict precisely where they will come forward. In addition, there can be a large number (up to one hundred) new small sites coming forward each year. This means that attempting to identify and allocate all such sites through the Local Plan process would be impractical, resource-intensive and disproportionate. It would also not be necessary, as most of these sites only emerge when a planning application is approved, at which point there is sufficient certainty that housing will be delivered.

44.4 Instead, section 7 of the SHLAA 2024 [SD HO4] sets out a method for calculating a small site windfall allowance each year, which is based on historic rates and has proved to be robust over an extended period of time.

44.5 Therefore, in line with the other Black Country authorities, the Council has determined to allocate only sites capable of delivering 10 homes or more. This is also in line with the national definition of a major development, and dovetails with the majority of planning obligation requirement thresholds. The site selection methodology therefore reflects this 10 home threshold for sites without planning permission. To seek to assess and allocate sites of less than 10 homes in the WLP would give rise to double-counting with the small site windfall allowance in the housing land supply.

44.6 For moderate sized sites (of 10-49 homes) with planning permission, given the general scale of housing supply in Wolverhampton, there would be little impact on overall housing supply should a single site not be built out. However, a precautionary approach has been applied to large sites, of 50 or more homes, with planning permission i.e. to allocate these to ensure that they are not lost from housing supply to other uses.

45. Is it clear how the methodology has considered any relevant findings from the SA and HRA processes?

45.1 The WLP Site Assessment methodology and individual site assessment reports [SD SI1] provide a balanced consideration of the evidence base for each site, including the SA findings, which is brought together in the Conclusion section at the bottom of each form.

45.2 The key findings of the SA of the WLP relating to each site are set out near the end of each site assessment form, above the Conclusion section. The HRA findings are not specifically highlighted in the site assessment forms, as they were not relevant to the particular sites assessed, as explained below.

45.3 As detailed in para's 1.11-1.15 of SD SI1, at WLP Regulation 19 stage the site assessment process and WLP Table 12 site policies were adjusted

following a WLP Regulation 18 consultation response from Natural England, which requested that the site assessment process should:

- 1) assess and address the potential impact of development allocations on European sites (through habitats regulations assessment (HRA) / appropriate assessment); and
- 2) be informed by the Sustainability Appraisal process.

45.4 In relation to point 1), during 2024 considerable work was undertaken by the Council, in partnership with relevant neighbouring authorities, to investigate the likely in-combination effects of planned developments in the area on relevant European sites, through air quality impacts caused by traffic movements. This work concluded that it is unlikely that the combined impacts will harm the value of the relevant European sites, and therefore no specific mitigation or avoidance measures are required. Further detail is provided in the WLP Duty to Cooperate Submission Appendix 9 Statement of Common Ground [SD CD15a] and the Duty to Cooperate Topic Paper [ED WCC5].

45.5 Where housing allocations are likely to contribute towards recreational impacts on Cannock Chase SAC, as defined through the Cannock Chase SAC Partnership Memorandum of Understanding (as referenced on page 30 of SD CD15a), this is highlighted in WLP Table 12, in accordance with WLP Policy ENV2. This did not apply to the two sites assessed for housing through the site assessment process (as they were not located within the Cannock Chase SAC 15km zone), and therefore was not highlighted in the site assessment forms.

46. The Heritage Impact Assessment (HIA) (CD EN19) was published in February 2025 and, so after the publication of the Plan. Are there any findings in the HIA that affect any of the outcomes of the site selection process?

46.1 The information which is presented in the HIA was collated and made use of during the WLP Regulation 19 site assessment process. This information was then drawn together in the form of a HIA report and published in February 2025, in response to a request from Historic England. At this point the HIA was shared with Historic England, who have since provided no comments on the report. Therefore, it is reasonable to conclude that there are no findings in the HIA that would change any of the outcomes of the site selection process.

47. Sites were assessed against a variety of different criteria across the broader economic, social and environmental themes. Each site was then given a RAG rating (Red, Amber, Green) for each individual criterion. How was the list of criteria identified and is it comprehensive and justified?

47.1 The list of criteria used in the site assessment methodology was developed for the Black Country Plan process, and is comprehensive and justified, reflecting the wide variety of planning-related constraints and opportunities

which could affect sites proposed for housing or employment development in the Wolverhampton area.

- 47.2 The list reflects and draws on all of the relevant detailed evidence base underpinning the WLP and allows for a sufficient robust assessment of potential development impacts, as detailed in the answer to Question 39 a).
- 47.3 As set out in the answer to Question 40, the list of criteria, as part of the overall methodology, was tested in detail through the development of the Draft BCP [SD PC7], and applied to a range of sites across the Black Country authorities, as set out in the Draft BCP Site Assessment Report which can be viewed at: [Sites Assessment | Black Country Plan](#). The site selection methodology was largely supported by consultation responses to the Draft BCP, as set out in the WLP Regulation 18 Consultation Statement [SD PC5].
- 47.4 As explained in para 1.16 of the WLP Regulation 18 [SD PC2], to progress the WLP as quickly as possible following cessation of work on the BCP, it was important to make use of existing BCP work, including existing evidence, where still relevant. Therefore, the WLP Regulation 18 Site Assessment methodology [SD SI2] was substantially based on that used for the BCP process. Following the WLP Regulation 18 consultation, the site assessment methodology was adjusted to reflect consultation responses from Historic England, Natural England, the Environment Agency and others – as detailed in para's 1.11-1.15 of SD SI1. These adjustments were able to reflect newly available evidence, such as the Level 2 SFRA work, and increased the robustness of the site assessment process at Regulation 19 stage.

48. Overall, is the site selection methodology robust and consistent with national policy and guidance?

- 48.1 The answers to Questions 39 a), b) and c), 40, 41, 44, 45, 46 and 47 provide detail on the variety of ways in which the site selection methodology applied through the WLP plan-making process, as set out in SD SI1, is robust.
- 48.2 The methodology is consistent with national policy and guidance, as it assesses the comprehensive range of planning-related considerations set out in the 2023 NPPF and National Planning Practice Guidance (PPG), where these are relevant to the Wolverhampton area, to a sufficient and proportionate degree.
- 48.3 The use of gateway constraints as a filter has ensured that the most sensitive locations are protected from harmful development, in line with the NPPF, particularly as para 123 requires local authorities to make effective use of previously developed land, "... while safeguarding and improving the environment and ensuring safe and healthy living conditions."
- 48.4 The NPPF also refers to the need to protect and enhance biodiversity (para's 180 & 186a), to avoid harm to the green belt (para's 142 & 145) and giving

great weight to avoiding harm to designated heritage assets (para 205). These are reflected in the gateway constraints and the methodology criteria.

- 48.5 The methodology also more generally applies a decision-making process which is in full accordance with the policies and guidance set out in the NPPF and PPG, as well as taking into account local policy approaches, including those being introduced in the WLP e.g. Historic Environment Area Designations through WLP Policy ENV5.

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