

EXAMINATION OF THE WOLVERHAMPTON LOCAL PLAN

INSPECTORS' MATTERS, ISSUES AND QUESTIONS

STAGE 1

LEGAL COMPLIANCE AND STRATEGIC MATTERS

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[Wolverhampton Local Plan Examination](#)

Introduction from the Inspectors

These matters, issues and questions (MIQs) relate to the examination of the Wolverhampton Local Plan (the Plan). They follow on from our colleagues' initial questions (ID 1) and the Council's response (WCC 1 – 7C) and our letter (ID 5) and the Council's response (WCC 8). **These MIQs supersede all previously published MIQs.**

It was originally planned to begin these hearing sessions in December 2025, but unfortunately, they had to be postponed.

Stage 1 hearings will now commence on **Tuesday 22 September 2026**. Full details about the examination, the conduct of the hearing sessions and the format of any written statements are provided in our separate Guidance Note. Please refer to the Hearing Programme to find out which topics are being heard on which days and when further hearings are planned.

All documents can be found on the examination webpage using the following link: [Wolverhampton Local Plan Examination](#) or please contact the Programme Officer if you have any difficulties in viewing them.

For clarity we confirm that the Plan is being examined under the December 2023 version of the National Planning Policy Framework (the NPPF) and the associated version of the National Planning Practice Guidance (PPG) and the December 2024 Planning policy for traveller sites. Any references to more recent guidance are expressly stated.

Matter 1: Compliance with statutory procedures and legal matters

Issue

Whether the Plan has been prepared in accordance with legal and procedural requirements?

Questions

Note: Responses to these questions should only relate to legal and procedural compliance. Detailed matters relevant to soundness will be considered during later hearing sessions.

Duty to Cooperate

Duty to Cooperate S33A of the Planning and Compulsory Purchase Act 2004 set out a duty to cooperate (DtC) in relation to planning of sustainable development. The new plan-making system provided by the Levelling-Up and Regeneration Act 2023 does not include the DtC. When the Regulations came into place on 25 March 2026, the DtC requirement for plans in the current system was removed. Therefore, we shall not consider the duty to cooperate as a procedural/legal requirement. The NPPF includes policy on maintaining effective cooperation and we will assess the soundness of the Plan in this regard in the consideration of the other matters and issues. In particular, see matter 3 below.

Sustainability appraisal (SA)

Paragraph 32 of the NPPF states that local plans should be informed throughout their preparation by a SA that meets the relevant legal requirements. Have these requirements been met in relation to this Plan? In particular:

1. Is the SA methodology robust? Does it clearly identify the key sustainability issues, and does it explain how these were identified? Are these key issues suitably reflected in the SA objectives?
2. Have the likely effects of the Plan's policies and site allocations been adequately considered and does it identify any necessary measures where relevant?
3. Does the SA adequately consider the likely significant effects of reasonable alternatives where these exist, including whether it is clear why some alternatives were discounted or rejected?
4. Were all of the housing sites assessed on a like for like basis? If not, why not?
5. Were all of the employment sites assessed on a like for like basis? If not, why not?

6. How did the Council consider reasonable alternatives for different levels of housing and employment growth to be provided by the Plan through the SA process? Were the alternatives sufficiently distinct to enable comparisons to be made of their different sustainability implications, and were they realistic, deliverable and capable of achieving the plan's objectives? Bearing this in mind does the SA in this case sufficiently test the reasonable alternative growth options?
7. How did the Council consider reasonable alternatives for different spatial strategy options to be provided by the Plan through the SA process? Were the alternatives sufficiently distinct to enable comparisons to be made of their different sustainability implications, and were they realistic, deliverable and capable of achieving the plan's objectives. Bearing this in mind does the SA in this case sufficiently test the reasonable alternative spatial strategy options?
8. What, if any, role did the sustainability appraisal process play in the selection of sites to be allocated by the Plan? How were reasonable alternatives determined and assessed?
9. Overall, does the SA adequately assess the environmental, social and economic effects of the Plan in accordance with legal and national policy requirements?
10. Have any concerns been raised about the SA and if so, what is the Council's response to these?

Habitats Regulations Assessment (HRA)

We note that the HRA states at paragraph E2 that the 'WLP is not directly connected with or necessary to the management of any European site. Consideration was therefore given to potential links or causal connections between the effects of the WLP and European sites within the study area to identify Likely Significant Effects...' Following the screening and Appropriate Assessment processes and having factored in the 'protective policies set out in the WLP, alongside existing protection measures in existing high level strategic and planning policy frameworks...', the HRA concludes, at paragraph 8.1.4, that 'the WLP would have no adverse impact on site integrity at any European site, either alone or in-combination'. On this basis our questions are as follows:

11. Does the HRA adequately address whether the Plan would adversely affect the integrity of relevant European sites either alone or in combination with other plans or projects? Is the HRA conclusion robust?
12. Overall, does the HRA meet the legal requirements for Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)?

13. Are there any outstanding objections from Natural England or the Environment Agency to the Plan proposals? If so, what are these and how is the Council working to overcome them?

Consultation

14. Has the Plan been prepared in accordance with the Council's Statement of Community Involvement and statutory consultation requirements? Has all relevant and available evidence been made available for consultation, at the various stages of Plan preparation?

Other regulatory and procedural requirements

15. Has the Plan been prepared in accordance with the Adopted Local Development Scheme (LDS)? Is the LDS up to date?
16. Is the plan period of 2024-2042 clearly set out in the Plan? Will the Plan cover a minimum 15-year period from the anticipated date of adoption?
17. Regulation 8(5) of the Town and Country Planning (Local Plan) (England) Regulations 2012 requires any new plan to list the policies in existing adopted plans which are to be superseded. The submitted Plan intends to replace the Black Country Core Strategy (2011) for the Wolverhampton area; parts of the Stafford Road Corridor and Bilston Corridor Area Action Plans (AAP) (2014); some parts of the Wolverhampton City Centre AAP (2016); and parts of the Wolverhampton Unitary Development Plan (2006). The Plan lists the policies and allocations that it is intended to replace in Appendix 1.
- a. Is the Plan proposing to supersede all the policies in the existing Black Country Core Strategy (2011) in so far as they relate to Wolverhampton? If so, is this clearly set out within the Plan?
 - b. Whilst paragraph 1.5 of the Plan says that strategic policies in the Wolverhampton City Centre Area Action Plan (WCC) are not reviewed as part of this Plan and that a future review of that document will provide up to date allocations for Wolverhampton City Centre, Appendix 1 of the Plan appears to remove certain allocations from the WCC and replace 'designations' with strategic policies in this Plan (EMP1-EMP4). Can the Council clarify their position on this matter.
 - c. Is the Plan proposing to supersede any other adopted plans?
 - d. Is the list of policies and allocations that are proposed to be superseded (as set out in Appendix 1 of the Plan) complete?
18. Paragraphs 20-23 and 28-30 of the NPPF set out requirements for strategic policies and non-strategic policies respectively.

The Plan at paragraph 1.5 states that it ‘sets out strategic policies for Wolverhampton...’ and that it ‘sits alongside non-strategic policies for Wolverhampton provided in the saved parts of the Wolverhampton Unitary Development Plan (2006) and Area Action Plans...’. Paragraph 1.17 identifies that the Plan includes all strategic policies for Wolverhampton and paragraph 1.116 states that Sections 3-12 of the Plan sets out the strategic policies. This means that all policies within the Plan are considered to be strategic.

- a. Is our understanding correct and if so does this approach accord with paragraphs 20-23 and 28-30 of the NPPF?
 - b. Site allocations are set out in Table 12 within Section 13 of the Plan. They are not set out in individual policies. Can the Council please explain the reasons for this? Is the approach justified, effective and consistent with national policy?
19. We note from the Council’s summary of representations (CD8a) that some new Supplementary Planning Documents were proposed. As set out in our letter (ID 5), the final adoption date for new SPDs was 30 June 2026. It seems that the Council did not meet this deadline and therefore the SPDs cannot now be adopted. What implications does this have for the Plan and in particular the matters which the Council intended to cover with SPD?
 20. In relation to the Public Sector Equality Duty, is it clear how the Plan seeks to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010, in relation to those who have a relevant protected characteristic?
 21. Does the Plan clearly include policies designed to ensure that the use of land and development in the Wolverhampton Plan area contributes to the mitigation of, and adaptation to climate change as required by section 19(1A) of the Planning and Compulsory Purchase Act 2004 and NPPF paragraphs 158 - 161?

Matter 2: Spatial strategy and site selection methodology

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?
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?

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?
25. Was consideration given to testing a spatial option that included some Green Belt release? If not, why not?
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?
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?
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?
29. Will the spatial strategy promote the vitality of town centres in the area as required by national policy?
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?
31. Overall, is it clear how the spatial strategy will meet the overarching strategic objectives and achieve the Council's vision?

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

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

Policy CSP2

38. In relation to Policy CSP2 on placemaking:
- a. How does this policy specifically relate to the spatial strategy?
 - b. Does it mainly set out Council statements rather than policy requirements which are covered by other policies?

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

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?
 - 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?
 - 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?
- 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?
- 41. As part of the methodology, sites with 'gateway constraints' (including biodiversity; flooding and heritage designations; existing residential and

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?

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?
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?
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?
45. Is it clear how the methodology has considered any relevant findings from the SA and HRA processes?
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?
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?
48. Overall, is the site selection methodology robust and consistent with national policy and guidance?

Matter 3: Effective cooperation

Issue

Whether the Council has maintained effective cooperation on strategic matters that cross administrative boundaries through plan making

Questions

49. What is the evidence that the Council has maintained effective cooperation on strategic matters that cross administrative boundaries as per paragraphs 25 – 27 of the NPPF?
50. What has been the outcome of the cooperation?

Matter 4: Housing needs, requirements and overall supply

Issue

Whether the identified housing needs and housing requirement figures are supported by robust and credible evidence and whether they have been positively prepared, justified and consistent with national policy?

Questions

Note: Some general questions on affordable housing and housing needs for specific groups are included here. With the exception of gypsy and traveller accommodation, detailed questions in relation to 5 year housing land supply and policies for the provision of all forms of housing, including site allocations and delivery, will be set out under later matters.

General housing need and requirement

51. Is the preferred approach to housing growth and the housing requirement set out in Policies CSP1 and HOU1 of at least 9,330 net new homes over the plan period of 2024 to 2042, justified, positively prepared and consistent with national policy?
52. Is the assessment of local housing needs for Wolverhampton robust, sufficiently up to date, and has the standard method for assessing minimum local housing need been correctly applied? Are there any exceptional circumstances that would justify calculating Wolverhampton's housing need on a basis other than using the standard method?
53. Is it clear that the figure of at least 9,330 net new homes is the housing requirement within the Plan and is it justified and consistent with national policy? Can the Council clarify why some sections of the Plan, including paragraph 1.111 refers to 9,330 new homes being a 'housing target'?
54. The Plan sets out the overall housing requirement for the plan period as at least 9,330 net new homes. Policy HOU1 by reference to Table 4 also sets out minimum housing targets for three phases of the plan period (2024-32, 2032-37 and 2037-42). The housing trajectory at Appendix 2 of the Plan sets out an annual net housing target of 518 dwellings over the plan period.
- a. Is the housing requirement effectively set out within policy? What is the purpose of setting out the housing target in three phases? Does this need updating prior to adoption of the Plan?

- b. For effectiveness should an annual housing requirement be defined in policy or is this adequately clear within the Plan?
55. Paragraph 67 of the NPPF states that 'strategic policies should also set out a housing requirement for designated neighbourhood areas....'. There are two made Neighbourhood Plans (NP) (Tettenhall and Heathfield Park, both dated 2014). Can the Council confirm whether there are any other designated neighbourhood areas? Should the Plan set out housing requirements for designated neighbourhood areas in accordance with paragraphs 67-68 of the NPPF?
 56. As the proposed housing requirement figure within the Plan will not meet identified needs how does this align with the economic growth projections for Wolverhampton?

The Overall Supply of Housing

57. Paragraph 75 of the Framework says strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Is the housing trajectory and information required by the tables appended to our letter (ID5) showing the expected rate of delivery of housing land up to date?
58. How will the supply and delivery of housing from neighbouring authorities to meet the identified unmet needs of Wolverhampton be undertaken? Does this need identifying separately in a trajectory?
59. Does the Plan identify a developable supply and/or broad locations in years 6-10 and, where possible, years 11-15 necessary to maintain continuity of deliverable supply, including an appropriate buffer for changing circumstances?
60. The Council relies heavily on sites allocated in existing adopted Plans to meet the overall housing need as well as to provide a 5 year supply of housing land on adoption of the Plan. What evidence is there to show that these sites will come forward now when they have failed to do so since these Plans were adopted?
61. Table 4 of the Housing Topic Paper provides a breakdown of housing supply. Of the total supply of 9,502, it shows a windfall site allowance of 1,704. This is a large portion of the overall supply. Is there compelling evidence that this is a reliable source of housing supply?
62. Are other elements of housing supply set out in Table 4 such as 'structural change in centres' and 'density uplift' realistic and based on past trends?

63. Does Table 4 include supply from allocated sites and other sources in the geographical area covered by the Wolverhampton City Centre AAP?
64. How is specialist housing factored into supply?
65. Are there any accommodation needs for boat dwellers and have these been suitably assessed?
66. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?
67. Is there sufficient variety in terms of the location and type of site allocated?

Affordable housing and other specific housing needs and requirements

68. Has the level of need in Wolverhampton for affordable housing been appropriately assessed? Will the housing requirement in the Plan meet the identified affordable housing needs? If not, what approaches are being taken to rectify this?
69. Paragraph 6.40 of the Plan highlights some other assessed housing needs including those for older people.
 - a. Have the levels of need in Wolverhampton for other specific housing needs of different groups within the community, such as those specified in paragraph 63 of the NPPF and any others, been appropriately assessed?
 - b. Does the housing requirement figure in the Plan include these identified needs and will they be met?

Matter 5: Gypsies, Travellers and Travelling Showpeople (Policy HOU5)

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the provision of accommodation for Gypsies, Travellers and Travelling Showpeople.

Questions

Gypsy and traveller accommodation need, requirement and supply

70. Based on the December 2024 Planning policy for traveller sites (PPTS) Annex 1 definition of gypsies and travellers what is the identified unmet need for gypsies and traveller pitches for the period 2024-2042? Is this figure based on up-to-date evidence?

71. Should the Plan set out a need and requirement figure for gypsy and traveller pitches for the Plan period as it does for bricks and mortar housing? If not, does the approach accord with PPTS?
72. The Council's preferred growth option (G2) in the SA includes exporting 19 pitches through the DtC, but the Plan says this is not the case. Can the Council explain this inconsistency. Is this approach justified and effective?
73. Does the Plan accord with paragraph 10 of PPTS? If not, why not?
74. Table 6 in the Plan shows the supply of gypsy and traveller pitches up to 2032. Does this need updating to cover the whole of the Plan period up to 2042?
75. Table 6 appears to include in the supply calculation 44 existing pitches that are already occupied. Is this the case and if so, is this approach justified and effective?
76. Does the Council have a 5 year supply of gypsy and traveller sites? If not, what is the shortfall and how will it be remedied?
77. Does the Plan identify a supply of specific, deliverable sites, or broad locations for growth for years 6-10? If not, why not and what are the implications of this for the gypsy and traveller community?
78. Are there any potential problems with deliverability of the site at the former Bushbury Reservoir (GT1)? Is there evidence that the site is deliverable? What has prevented it coming forward in the past?
79. Was the Council's 'call for sites' exercise adequate in relation to gypsy and traveller sites?
80. Has any need for gypsy and traveller transit site provision been suitably assessed?
81. Should consideration be given to providing sites within housing allocations?

Travelling showpeople accommodation need, requirement and supply

82. Based on the December 2024 Planning policy for traveller sites (PPTS) Annex 1 definition of travelling showpeople what is the identified unmet need for travelling showpeople plots for the period 2024-2042? Is this figure based on up-to-date evidence?

83. Should the Plan set out a need and requirement figure for travelling showpeople plots for the Plan period as it does for bricks and mortar housing? If not, does the approach accord with PPTS?
84. Does the Plan accord with paragraph 10 of PPTS in respect of travelling showpeople? If not, why not?
85. Do the Council have a 5 year supply of travelling showpeople sites? If not, what is the shortfall and how will it be remedied?
86. Does the Plan identify a supply of specific, deliverable sites, or broad locations for growth for years 6-10? If not, why not and what are the implications of this for the travelling showpeople community?
87. Was the Council's 'call for sites' exercise adequate?
88. Should consideration be given to providing sites within employment allocations?

Policy HOU5

89. Does policy HOU5 accord with PPTS?
90. Is policy HOU5 too restrictive?

Matter 6: Employment needs, requirement and supply

Note: Questions relating to site allocations and delivery, and employment matters relating to retail centres etc will be set out under later matters.

Issue

Whether the identified employment needs and requirement figure is supported by robust and credible evidence and whether they have been positively prepared, justified and consistent with national policy?

Questions

91. Taking into account the Council's reasoning within the Employment Land Topic Paper (2025), is the approach of basing employment land needs on historical completions and development trends justified and supported by up-to-date and robust evidence?
92. Why have office uses not been included within this calculation of employment land need? Is the reliance on town centre policies consistent with the Framework and justified by evidence? How much office development is required to be planned for over the Plan period?

93. Were the scenarios used in the 2024 EDNA based on robust evidence, and are the economic growth assumptions justified having regard to the requirements of relevant sectors? Is it appropriate to base the employment land need on past completions when paragraph 7.15 of the Plan acknowledges that 56% of the need arising in Wolverhampton cannot be accommodated within the City?
94. Taking into account the average rate of 0.05 ha per annum loss of employment land to other uses in Wolverhampton between 2020-24 [CD8a], is the assumption that 11 ha of occupied employment land will be lost to housing development justified and based on robust evidence? What evidence is there that these sites will come forward for development during the plan period?
95. Is the employment land requirement of at least 42.9 hectares justified, effective and consistent with national policy? Is it reasonably aligned with the Plan's housing requirement and supporting evidence?
96. The Plan proposes that unmet employment land needs be accommodated by authorities with which Wolverhampton has an existing or potential functional economic relationship. Has this approach been agreed with neighbouring authorities and, if so, what is the nature and status of those agreements? Is the approach justified, effective and consistent with national policy? Have all reasonable options for meeting a greater proportion of the identified employment land need within Wolverhampton, and for increasing the Plan's employment land requirement, been robustly explored?
97. Overall, have the economic development needs assessment and resulting employment land requirement been positively prepared, justified, effective and consistent with national policy?

The overall supply of employment land

The Plan seeks to provide at least 42.9 ha of employment land through site allocations (39.5 ha) and windfall development.

98. The Council relies heavily on sites allocated in adopted Plans to meet the overall need. What evidence is there to show that these sites will come forward now when they have failed to do so since these Plans were adopted?
99. How does the employment land supply identified in the Wolverhampton Employment Land Supply Update (2025) relate to the requirement set out in Policy EMP1?
100. Policy EMP1 states that it will 'deliver a portfolio of sites of various sizes and quality to reach a range of business needs'. It is unclear what sizes and quality of sites are needed and how the Plan proposes to deliver these. Is it

through the site allocations or through other means? Can the Council please clarify?

101. What contribution if any, are Strategic Employment Areas and Local Employment Areas intended to make to the employment land requirement?
102. How will the supply and delivery of employment land from neighbouring authorities to meet the identified unmet needs of Wolverhampton be undertaken?

Matter 7: Infrastructure and Delivery

Issue

Whether the Plan's approach to infrastructure provision and delivery is justified, effective and consistent with national policy.

Questions

103. Is the Infrastructure Delivery Plan based on proportionate, up-to-date and robust evidence? Does it make clear what strategic infrastructure improvements are required to support the Plan's development strategy and delivery trajectory?
104. Are there any funding gaps in relation to sites that are expected to come forward in the first 5 years of the Plan? If so, what are they and how will it affect delivery?
105. Does the viability evidence remain sufficiently up to date and robust to demonstrate that the infrastructure requirements identified in the Infrastructure Delivery Plan can be delivered without undermining the viability of the Plan's policies and allocations?

Policy DEL1 – Infrastructure Provision

106. This policy sets out how the Council will secure infrastructure provision from future planned development and where viability evidence will be required.
 - a. Criterion 1 uses the term 'should be supported by' infrastructure when referring to new development, rather than 'must be supported by' infrastructure. Does this mean that in some cases development would be permitted without necessary infrastructure? If so, how would a decision-maker determine this? How does this wording relate to criterion 2?
 - b. Criterion 2 will only permit development if necessary infrastructure, amongst other things, is provided. Is this negatively worded policy justified and consistent with national policy and is the Plan clear on

what material circumstances or considerations are, to allow exceptions? Is it clear when necessary infrastructure will be provided?

- c. Criterion 3 states that the six infrastructure requirements listed are to be set out in other documents including supplementary planning documents and masterplans. Have these documents been produced and if so, where can these be found? Is this approach justified and effective? Is it clear what status these documents have and how do their provisions relate to the infrastructure and policy requirements referenced in paragraph 4.19?
- d. Are criteria 4 and 5, which relate to viability, justified and effective? Does the policy provide sufficient flexibility for any viability challenges that may arise?
- e. It has been suggested that Policy DEL1 reference rail, the historic environment, police infrastructure and the preparation and implementation of a Community Infrastructure Levy charging scheme. Are modifications to the wording of the policy or the supporting text necessary for effectiveness?
- f. Overall, is the policy effective and does it serve a clear purpose without unnecessary duplication?

Policy DEL2 – Balance Between Employment Land and Housing

107. This policy relates to windfall development on previously developed land. Are the criteria within the policy justified and effective? Does it serve a clear purpose or does it unnecessarily duplicate other policies in the Plan?

Policy DEL3 – Promotion of Fibre to the Premises and 5G Networks

108. Is this policy effective and consistent with national policy on setting out 'how high quality digital infrastructure...is expected to be delivered and upgraded over time...' and prioritises 'full fibre connections to existing and new developments...' (NPPF para 118)?