

# Wolverhampton Local Plan

Main Document  
Publication Consultation (Regulation 19)  
November 2024



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# How to Respond to the Consultation

We are consulting on the Wolverhampton Local Plan from **25 November 2024 to 9 January 2025** under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012.

## Have your say – we welcome your views

Please visit the website: [www.wolverhampton.gov.uk/localplan](http://www.wolverhampton.gov.uk/localplan)

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

We would encourage you to use the online representation form to provide representations regarding the 'legal compliance', compliance with the 'duty to co-operate' and 'soundness' of the Wolverhampton Local Plan.



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

- Wolverhampton Civic Centre, St Peter's Square, Wolverhampton, WV1 1SH (at the business reception by the mayoral entrance)
- Wolverhampton Central Library, Snow Hill, Wolverhampton, WV1 3AX
- Bilston Library, Mount Pleasant, Bilston, WV14 7LU
- Wednesfield Library, 2 Well Lane, Wednesfield, WV11 1XT

## Drop-in

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

<b>Wednesday 4th December, 9am – 5pm</b>	Wolverhampton Civic Centre, St Peter's Square, Wolverhampton, WV1 1SH
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<b>Thursday 5th December, 3pm – 7pm and Saturday 7th December, 10am – 2pm</b>	Wolverhampton Central Library, Snow Hill, Wolverhampton, WV1 3AX
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**If you need help** understanding the documents, completing the representation form, or would like to discuss with Planning Officers, please contact the Wolverhampton Local Plan Team:

Email: [localplan@wolverhampton.gov.uk](mailto:localplan@wolverhampton.gov.uk) or  
Tel: **01902 551155**

**Please send completed paper representations to:**

Wolverhampton Local Plan  
 City Planning  
 City of Wolverhampton Council  
 Civic Centre  
 St Peter's Square  
 Wolverhampton  
 WV1 1RP

Or hand them in at Wolverhampton Civic Centre

**What is the deadline for representations?**

The consultation will end at **5:00 pm**  
 on **Thursday 9th January 2025**

Please provide your representation to us by this date.

**How will my representation be used?**

We will use your representation to make any necessary minor changes to the Plan before it is submitted to the Government for public examination by an independent Planning Inspector. Please note that the representations will be made public - for more information see the privacy notice at [www.wolverhampton.gov.uk/localplan](http://www.wolverhampton.gov.uk/localplan)

*Thank you for your interest in the Wolverhampton Local Plan*

**Wolverhampton Local Plan Timetable**

Issues and Preferred Options Consultation	<b>26 February – 10 April 2024</b>
Publication Consultation	<b>25 November 2024 – 9 January 2025</b>
Submission to Government	<b>Early 2025</b>
Independent Examination by Planning Inspector	<b>Spring 2025 – Spring 2026</b>
Adoption by City of Wolverhampton Council	<b>Mid 2026</b>

# 1. Introduction

## What is the Purpose and Scope of the Wolverhampton Local Plan?

- 1.1 The Wolverhampton Local Plan (referred to as the WLP throughout this document) contains strategic planning policies and land allocations and targets to support the growth and regeneration of the City of Wolverhampton up to 2042.
- 1.2 The WLP sets out a vision and strategic priorities and a spatial and policy framework for delivery. This framework will guide and shape development across Wolverhampton and set clear parameters for growth and transformation. The policies and proposals will be used to help make planning decisions and guide investment and regeneration in Wolverhampton.
- 1.3 The WLP provides a strategy for bringing land forward with a clear presumption in favour of sustainable development. It provides certainty and transparency to residents, businesses and developers about how the city is expected to grow up to 2042.
- 1.4 The government requires all local authorities to develop a long-term plan that sets out how and where land can be developed over the next 15 years, to meet the growing needs of local people and businesses. The Development Plan for an area is made up of strategic policies (which address the strategic priorities for an area) and non-strategic policies (which deal with more detailed matters).
- 1.5 The WLP sets out strategic policies for Wolverhampton and housing and employment allocations for the whole of Wolverhampton, except for Wolverhampton City Centre. The WLP sits alongside non-strategic policies for Wolverhampton provided in the saved parts of the Wolverhampton Unitary Development Plan (2006), and Area Actions Plans for Bilston Corridor, Stafford Road Corridor and Wolverhampton City Centre. The policies in these Development Plan Documents, (together with national policies and policies in the Neighbourhood Plans for Tettenhall and Heathfield Park) provide the set of rules against which planning applications in Wolverhampton are assessed. A future review of the Wolverhampton City Centre Area Action Plan will provide up-to-date development allocations for Wolverhampton City Centre.
- 1.6 The WLP provides a policy framework to:
  - a) enable delivery of the right type of development to meet identified needs in the most sustainable places;
  - b) provide certainty about which types of development are likely to be approved where and help prevent uncoordinated development;
  - c) protect and enhance areas designated for their environmental value;
  - d) seek to meet housing needs up to 2042;
  - e) attract new businesses and jobs and offer existing businesses the space to grow by meeting employment land needs;
  - f) ensure infrastructure (such as roads, public transport, schools, healthcare, utilities, broadband, waste and sewage disposal) is provided at the right time to serve the new homes and employment premises it supports;



- g) increase employment opportunities to support the delivery of local and regional economic strategies;
- h) address the issues arising from climate change to support delivery of the Council's Climate Commitment (2020);
- i) promote and enhance health and well-being to reduce health inequalities and support the Council's Public Health Vision for 2030 and Health Inequalities Strategy.

### **What does the Wolverhampton Local Plan replace?**

- 1.7 Upon adoption, the WLP replaces:
- the Black Country Core Strategy (2011) for the Wolverhampton area
  - significant parts of the Stafford Road Corridor and Bilston Corridor Area Action Plans (2014)
  - some parts of the Wolverhampton City Centre Area Action Plan (2016)
  - parts of the Wolverhampton Unitary Development Plan (2006)
- 1.8 The impact of the WLP on existing Development Plan Documents and Neighbourhood Plans, including a list of the policies and allocations which the WLP replaces, is detailed in Appendix 1.

### **How does the Wolverhampton Local Plan relate to the Black Country Plan?**

- 1.9 The Black Country Core Strategy (BCCS) was produced by the four Black Country authorities (BCA) of Dudley, Sandwell, Walsall and Wolverhampton and covered the period up to 2026. The BCCS provided the strategic framework for the three Area Action Plans (AAPs) in Wolverhampton, which set out local policies and site allocations for the parts of Wolverhampton where regeneration and growth is concentrated.
- 1.10 The four authorities began a review of the BCCS in 2016, to roll forward the plan and address changes that had taken place since 2011. The Black Country population and economy were growing and there was a need to identify additional housing and employment sites beyond the capacity of the BCCS. There had been several changes to national planning policy and the national economic situation had also changed. The BCCS was prepared as the country was emerging from the global recession of 2008, and the Black Country was recovering from a period of economic and population decline. Therefore, the BCCS anticipated significant recycling of industrial land for housing. However, the manufacturing and industrial markets of the Black Country remained stable and have expanded in some cases, meaning that the expected surplus of vacant brownfield land has not occurred.
- 1.11 The BCCS review began in 2016 followed by an Issues and Options Consultation and Call for Sites in 2017. The scope of the review was wider than the BCCS, including detailed site allocations for housing and employment development across the Black Country, excluding Wolverhampton City Centre and other Strategic Centres. At this point the work was retitled the 'Black Country Plan'.

- 1.12 The Covid-19 pandemic of 2020–21 caused a significant shift in the way Black Country residents work, shop and access services, bringing about some longer term changes to the ways communities operate that may have implications for land uses which need to be addressed through robust yet flexible policies.
- 1.13 In 2021, consultation took place on a Draft Black Country Plan (BCP), which took into account Issues and Options consultation responses and a range of evidence produced to inform the Plan. The Draft BCP identified a vision and framework for future development of the Black Country up to 2039, addressing needs and opportunities in relation to housing, the local economy and infrastructure and seeking to safeguard the environment, enable adaptation to climate change and secure high quality and accessible design.
- 1.14 A number of consultation respondents raised concerns about the proposed release of land from the green belt for development, whilst others questioned whether the brownfield first approach could, alone, deliver sufficient capacity to meet needs. The consultations also demonstrated that there was support for housing to be built in sustainable locations and a desire to protect the environment of the Black Country. A summary of the key issues raised in the Draft BCP consultation is set out in the WLP Consultation Statement.
- 1.15 In autumn 2022 it was decided not to take forward the BCP, and for the four BCAs to instead pursue separate strategic plans and progress differing approaches to site allocations to meet identified needs. However, there has continued to be joint working across the Black Country on a number of planning issues, particularly transport, and some of the joint evidence prepared to support the BCP is still relevant for individual plans.
- 1.16 To progress the WLP as quickly as possible, it was important to build on the extensive work that took 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.
- 1.17 To facilitate this, the WLP has the same scope as the BCP – covering all strategic policies for Wolverhampton and all housing and employment allocations, with the exception of sites within Wolverhampton City Centre, as defined in Figure 2. This gap will be filled by a review of the Wolverhampton City Centre AAP to provide up-to-date site allocations for the city centre area. The WLP has a Plan period that extends to 2042, covering at least 15 years after adoption in line with national requirements.
- 1.18 The scope and timetable for the WLP reflected an urgent need to review and update Wolverhampton strategic policies and site allocations, for the following reasons:
- The large and increasing shortfall between housing and employment land needs and available development land;
  - The need to bring forward a strategic plan before 2025, when local plan system changes were expected to come into effect through implementation of the Levelling Up and Regeneration Bill.

## National, Regional, Black Country and Local Policy Context

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

### NATIONAL

- 1.20 The National Planning Policy Framework (NPPF) December 2023, under which this Plan was prepared, sets out the Government's planning policies for England and how these should be applied. It provides the framework within which locally prepared plans for housing and other development can be produced.
- 1.21 Planning law requires that applications for planning permissions are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF must be taken into account when preparing the Development Plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and other statutory requirements.
- 1.22 The Localism Act (2011) introduced a requirement on all local authorities to co-operate with neighbouring local authorities and other bodies with a regulatory or strategic interest in Local Plan issues. The duty requires ongoing, constructive, and effective engagement on areas of plan-making, which may have strategic cross-boundary implications. The WLP Duty to Co-operate Statement demonstrates how the City of Wolverhampton Council has fulfilled this duty through the WLP preparation process, and how the bodies referred to in the Act have helped to shape the WLP.
- 1.23 Statements of Common Ground have been agreed with relevant authorities and bodies on key Duty to Co-operate issues. These build on Duty to Cooperate engagement at a Black Country level associated with the preparation of the BCP as well as direct Wolverhampton engagement with neighbouring local plans, both during that time and in the period following the end of work on the BCP. The outcomes from this work, how it has shaped the emerging WLP, and the approach to addressing the Duty to Cooperate for the WLP is detailed in paragraphs 1.110 - 1.115 below.

### REGIONAL - WEST MIDLANDS COMBINED AUTHORITY

- 1.24 Wolverhampton is a constituent member of the West Midlands Combined Authority (WMCA) which was established in 2016. The WMCA overarching objective is to build 'a better connected, more prosperous, fairer, greener and healthier West Midlands'. To deliver this objective, the WMCA have developed a number of strategies and associated programmes relevant to the preparation of the WLP.

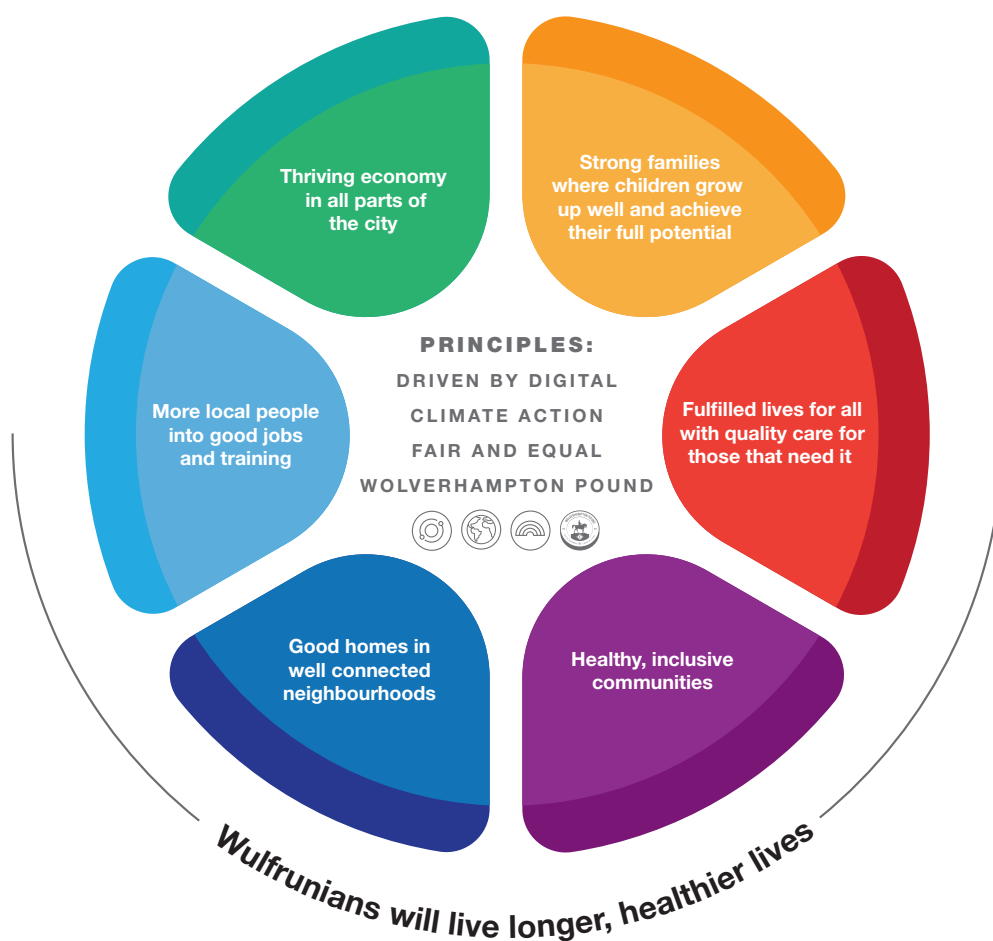
- 1.25 The WMCA Strategic Economic Plan (SEP) was adopted in 2016 and sets out the vision, objectives, strategy and actions needed to improve the quality of life for everyone who lives and works in the West Midlands. While this strategy pre-dates Britain leaving the European Union, the Covid-19 recession, and ongoing shifting economic turbulence, it outlines a number of high-level challenges facing the West Midlands which remain relevant. These include bringing forward land for housing and employment and accelerating the rate of housebuilding to match aspirations for growth.
- 1.26 Following the 2016 SEP, the WMCA produced the West Midlands Local Industrial Strategy (LIS) which was published in May 2019. The LIS demonstrates how the West Midlands is forging its future and building an inclusive and balanced economy. Together with the supporting documents published locally, it shows the West Midlands is taking action to continue growth in productivity and earning power for all.
- 1.27 In July 2022, the WMCA published a Plan for Growth which captures the key features of the West Midlands economy. The Plan for Growth pinpoints clusters where the West Midlands has comparative advantage and businesses are confident to invest. Working in conjunction with local authorities and universities as local anchor institutions, the WMCA will deliver conditions for growth through:
- New powers over economic development
  - Transport investment
  - Housing and land investment
  - Pioneering new approaches to regeneration
  - Developing skills
  - Working with investors
  - Committing to net zero by 2041
- 1.28 These strategies have formed the basis for a range of investment programmes supported by Government funding packages. One of the priorities for this funding is the delivery of projects which provide land for new homes and employment. WMCA has led the way nationally in the delivery of brownfield land, including sites in Wolverhampton, and moving forward, over the lifetime of the WLP, this activity will continue, providing valuable support to unlock constrained sites and deliver critical infrastructure. The focus of this future work includes supporting projects in town centres to enable them to thrive again, innovative approaches to the delivery of sustainable homes, carbon net zero homes and the delivery of land to support business needs. WMCA and partners have also developed a Design Charter.

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

## SUB-REGIONAL – THE BLACK COUNTRY

- 1.32 The Black Country – made up of the local authorities of Dudley, Sandwell, Walsall and Wolverhampton - forms a distinctive sub-region on the western side of the West Midlands conurbation. It shares an eastern boundary with the City of Birmingham and to the north, west and south it is bounded by districts in Staffordshire and Worcestershire, and it is in relative proximity to Shropshire and centres such as Cannock and Bromsgrove. The Black Country sub-region has a unique economic history, settlement form and topography and is very much shaped by its industrial past. The four Black Country Authorities (BCAs) have a shared set of social, economic, and environmental issues and challenges, and have a long history of successful joint working most notably through the Black Country Local Enterprise Partnership (LEP). The LEP was established in 2011 with an overarching objective of creating jobs and building a strong economy by tackling barriers to sustainable growth, securing and delivering a total of £2.4bn of funding. The LEP has now been disbanded, along with others throughout England, with key functions transferred to other organisations including WMCA.

- 1.33 The WLP will draw on work carried out to prepare the Draft BCP, which is firmly rooted in a robust understanding of sub-regional as well as local issues. Therefore, sub-regional issues are still of significant relevance to the WLP, as reflected in the issues and challenges set out below.
- 1.34 There are many planning issues which have cross-boundary impacts across the Black Country and continue to benefit from a common evidence base, assumptions and approach. These issues include:
- **Employment** – there are strong trading and commuting links between the BCAs, which form part of the same Functional Economic and Market Area (FEMA) with a joint Employment Development Needs Assessment (EDNA).
  - **Housing** – there are strong migration and commuting links between the BCAs and they form a sub-market of the Greater Birmingham and Black Country Housing Market Area (GBBC HMA).
  - **Transport** – much transport infrastructure and strategic transport planning is shared and access catchments overlap for some residential services. The BCAs carry out traffic modelling jointly to support Local Plans.
  - **Centres** – retail, leisure and commuting catchments overlap across the Black Country and the four Strategic Centres have complementary roles.
  - **Sport** – access catchments overlap for some facilities and there is a proposed sub-regional strategic approach to forward planning, based on jointly commissioned Playing Pitch and Outdoor Sports Strategies and Built Facilities planning.
  - **Nature Conservation** – the Black Country and Birmingham have a common Local Sites system and the BCAs have developed a common tree evidence base and a Nature Recovery Network approach which reflects the cross-boundary nature of wildlife corridors across the sub-region and will help inform the statutory West Midlands Combined Authority Local Nature Recovery Strategy.
  - **Historic Environment** – the BCAs have adopted a common approach to Historic Landscape Characterisation which seeks to protect areas of highest landscape character and was a key factor in the Draft BCP site assessment process.
  - **Air Quality** – the BCAs have an agreed approach to air quality impact mitigation set out in a joint Supplementary Planning Document. This is based on regional work which is currently being updated through the West Midlands Combined Authority.
  - **Waste** – Waste planning policy requires a strategic cross-boundary approach to ensure waste is appropriately managed and facilities appropriately located, therefore the BCAs have completed joint evidence.



## LOCAL

### Our City: Our Plan

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

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

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



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

- 1.37 The City's Vision for Public Health 2030 envisages that in 2030 Wolverhampton will be a healthy, thriving city of opportunity where we are serious about boosting health and wellbeing. Actions to achieve this include driving a city-wide focus on tackling the wider determinants of health and wellbeing by seeking improvements to the broad factors which impact on people's lives. These factors relate to lifestyle choices and socio-economic factors which are heavily influenced by the built environment and the housing, employment, education, leisure and other opportunities which it offers.
- 1.38 The Health Inequalities Strategy provides the strategic framework for addressing the stark and entrenched health inequalities within Wolverhampton. The framework provides an overarching set of guiding principles and tools that facilitate and embed an agreed approach to tackling health inequalities in a way that is tangible, and outcome focused. The strategy sees health inequalities as the result of the interplay between:
- Short term causes (ability to access a service or manage a condition)
  - Medium term risk factors (e.g. lifestyle, uptake of vaccination, access to healthcare information)
  - Longer-term causes (education and skills, economy, housing, and environment)
- 1.39 One of the key guiding principles is to "Pro-actively identify opportunities to have a positive impact on the wider determinants of health for example through planning, licensing and housing functions, use of assets and green space and provision of facilities for usage by community groups."

### **Our Climate Commitment (2020)**

- 1.40 Our Climate Commitment is the Council's commitment to action following its declaration of a Climate Emergency in July 2019. The Council pledged to make all council activities carbon net zero by 2028, and to ensure all strategic decisions and budgets are in line with the shift to carbon net zero. The Council have also pledged to work with partners across the city and region to make Wolverhampton carbon net zero by 2041, and produced a Wolverhampton Net Zero Strategy and Action Plan for consultation in autumn 2024.
- 1.41 Reaching this target will require the Council to embed low carbon practices within planning policy, development and regeneration, and to work closely with public and private sector partners to maximise the use of low carbon solutions.



## Wolverhampton Investment Prospectus (2019 onwards)

- 1.42 The Wolverhampton Investment Prospectus, originally produced in 2019, is now a live digital document which is regularly updated in response to changes in economic conditions, project development and delivery and the changing needs of the City, businesses and residents. The Prospectus reflects the City's ambitions for growth and presents a vision of how the city can grow through investment, development and regeneration - highlighting opportunities to build on the billions of pounds of public and private sector investment already on site or in the pipeline in Wolverhampton.
- 1.43 The Prospectus underpins the City's Levelling Up ambitions and Our City: Our Plan principles – providing inspiration and improving the quality of life for residents – and is supported by influential city partners, including Homes England and WMCA. The Prospectus will maximise opportunities to secure even more investment by prioritising, packaging and promoting key projects.

## Extract from Wolverhampton Investment Prospectus 2024



## Good Growth Strategy (2024)

- 1.44 The City Council has developed a Good Growth Strategy to enable all businesses, residents, families and communities to benefit from the growth and new opportunities in our city. The strategy outlines the Council's proposed approach to economic development and how the Council will work alongside partners to support the local economy to grow. The strategy is based on three interconnected themes of Place, Productivity and People and a central principle of 'good growth'. This means achieving both the right quantity and the right quality of growth; creating a strong, productive and resilient economy where a radical uplift in business competitiveness, productivity and profits goes hand in hand with access to good jobs that pay higher wages, and where all residents have access to opportunity and enjoy improved quality of life. The strategy explains the main focus of the Council's work, and actions that can propel Wolverhampton's economic prospects and, fundamentally, the life chances and wellbeing of residents.
- 1.45 The "Place" element of the strategy focuses on supporting the development of sustainable communities and workplaces, delivering inclusive low carbon transport network, and securing the potential of the city and town centres. Delivering these aims will require a positive planning framework.

## Evidence

- 1.46 A considerable body of evidence, background documents and data covering a range of planning issues supported the preparation of the BCP, and much of this is still relevant to the WLP. Further evidence has been produced specifically to support the WLP. Table 1 lists the significant evidence and background documents which have supported development of the WLP.

**Table 1: Evidence and Background Documents to support the Wolverhampton Local Plan**

Name	Published	Further Work Required
<b>WEST MIDLANDS</b>		
West Midland Combined Authority Black Country Brownfield Land Study (Chilmark)	2022	
West Midlands Strategic Employment Sites Study (Mace)	2024	
West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper (Stantec)	2021	
West Midlands Cycling and Walking Network Improvement Plan	2019	
Gear Change (DfT)	2020	
West Midlands Enhanced Partnership Agreement (Bus Service Improvements)	2021	
West Midlands Bus Services Improvement Plan	2024	
<b>BLACK COUNTRY</b>		
Black Country Core Strategy	2011	
Black Country Core Strategy Review Issues and Options Report, Sustainability Appraisal (Lepus) and Consultation Statement	2017/ 2019	
Black Country Plan Call for Sites Submissions and interactive site map	2020 / 2021	
Draft Black Country Plan (Regulation 18), Errata, Draft Policies Map and Sustainability Appraisal (Lepus)	2021	
Draft Black Country Plan consultation responses	2022	
Interim Habitat Regulations Assessment of the Draft Black Country Plan (Lepus)	2021	

## BLACK COUNTRY

Draft Black Country Plan Options Document	2021	
Draft Black Country Plan Reg 18 Duty to Cooperate Statement	2021	
Black Country Utilities Infrastructure Capacity Study (PBA Stantec)	2021	
Black Country Urban Capacity Review Update 2020	2021	
Black Country Gypsy and Traveller Accommodation Assessment (RRR)	2023 / 2024	
Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development)	2017 / 2021 / 2022 / 2023 / 2024	
Black Country Employment Area Review (BCA)	2021	
Black Country Employment Land Supply Technical Paper	2021 / 2023 / 2024	
Black Country Centres Study & Update / Addendum (Lambert Smith Hampton)	2021 / 2023 / 2024	
Black Country Traffic Modelling Reports (Sweco)	2023 / 2024	
Black Country Parking Study Stage 1 / Stage 2 (Aecom)	2021 / 2022	
Black Country Cycling and Walking Infrastructure Plan (Draft)	2024	
Black Country Landscape Sensitivity Assessment (LUC)	2019	
An Ecological Evaluation of the Black Country Green Belt (Wildlife Trust for Birmingham and the Black Country / EcoRecord)	2019	
Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord)	2022	

## BLACK COUNTRY

Black Country Natural Capital Valuation / Black Country i-Tree project (Treeconomics / Birmingham Tree People / Forest Research)	2022	
Black Country Level 1 Strategic Flood Risk Assessment (JBA)	2019	
Black Country Water Cycle Study: Phase 1 Scoping Study (JBA)	2020	
Black Country Historic Landscape Characterisation Study (Oxford Archaeology)	2019	
Black Country Waste Study and Update - Wolverhampton (Wood)	2020 / 2022 / 2023 / 2024	
Black Country Minerals Study and Update - Wolverhampton (Wood)	2020 / 2024	

## WOLVERHAMPTON LOCAL PLAN

Wolverhampton Local Development Scheme 2024-2027	2024	
Wolverhampton Statement of Community Involvement	2023	
Wolverhampton Local Plan Sustainability Appraisal Scoping Report (Lepus)	2022	
Wolverhampton Local Plan Issues and Preferred Options Sustainability Appraisal (Lepus)	2024	
Wolverhampton Local Plan Publication (Reg 19) Sustainability Appraisal (Lepus)	2024	
Wolverhampton Local Plan Habitats Regulations Assessment – Scoping Report (Lepus)	2023	
Wolverhampton Local Plan Habitats Regulations Assessment – Full Report at Reg 19 (Lepus)	2024	
Wolverhampton Draft Policies Map (Reg 19)	2024	

## WOLVERHAMPTON LOCAL PLAN

Wolverhampton Local Plan Consultation Statement (Reg 18) including summary of issues raised on proposed policies in Draft Black Country Plan consultation	2024	
Wolverhampton Local Plan Consultation Statement (Reg 19) including summary of WLP Issues and Preferred Options consultation responses	2024	
Wolverhampton Local Plan Duty to Cooperate Statement – Reg 18 / Reg 19 Update	2024	
Wolverhampton Local Plan Site Assessment Report - Reg 18 / Reg 19 Update	2024	
Wolverhampton Infrastructure Delivery Plan	2024	
Wolverhampton Housing Market Assessment (HDH)	2024	
Wolverhampton Strategic Housing Land Availability Assessment (SHLAA)	2024	
Major Investment in Our City's Strategic Transport Infrastructure (Report to Cabinet on 20 March 2024)	2024	
Wolverhampton Level 1 and Level 2 Strategic Flood Risk Assessment (JBA)Wolverhampton Water Cycle Study: Phase 2	2024	
Wolverhampton Water Cycle Study: Phase 2	2023	To be completed 2024/25, if required
Wolverhampton Local Site Assessment Reports (Wildlife Trust for Birmingham and the Black Country / Lepus)		



## WOLVERHAMPTON LOCAL PLAN

Wolverhampton Playing Pitch and Outdoor Sport Strategy Assessment and Action Plan / Black Country Playing Pitch and Outdoor Sport Overarching Strategic Framework (KKP)	2022 / 2023	
Wolverhampton Open Space Strategy and Action Plan (LUC)	2024	
Tree and Woodland Strategy for Wolverhampton 2019-2029	2020	
Wolverhampton Tree Planting Strategy	2023	
Wolverhampton Net Zero 2041 Strategy and Action Plan (City Science)	2024	
Wolverhampton Local Plan Viability Study (Aspinall Verdi)	2024	
Wolverhampton Digital Infrastructure Evidence Base	2024	
Planning for Health in Wolverhampton Evidence Base	2024	

## A Spatial Portrait and the Big Issues

### A Spatial Portrait of Wolverhampton

- 1.47 Wolverhampton is the city of the Black Country, forming the gateway between the West Midlands conurbation and the countryside of Staffordshire and Shropshire. The city has excellent transport connectivity with the sub-region and the rest of the UK. It is well served by the M54 and M6 motorways and benefits from good public transport links through the Metro, cross-country railway links and in its role as a hub of the sub-regional bus network.
- 1.48 Wolverhampton is a young, vibrant and diverse city with a population of c.270,000 people. The city covers an area of 69.4sq km and is served by Wolverhampton City Centre and the town centres of Bilston and Wednesfield.
- 1.49 While the city has the smallest population of the four Black Country local authorities, it is the second most densely-populated and the administrative boundary is very tightly drawn around the urban area. The northern, western and south-western fringes of the city lie within the West Midlands Green Belt, which also extends into the urban area via a series of green 'corridors'.

- 1.50 Wolverhampton has a long history as a settlement going back to the 10th century, and in the Middle Ages was a small market town specialising in the wool trade. From the 18th century, the industrial revolution transformed Wolverhampton into an important manufacturing town and a major centre for coal mining and lock-making and subsequently the manufacture of cars and motorcycles. This history has created a rich legacy of historic buildings and attractive parks and open spaces. The city has a strong sporting, cultural and leisure offer, and is home to Wolverhampton Wanderers Football Club, the Grand Theatre and nationally important Civic Halls concert venue.
- 1.51 Until the 1980s, Wolverhampton, together with the wider Black Country and Birmingham, was the powerhouse of Britain's manufacturing economy. The decline in heavy industry, and jobs associated with it, has left a legacy of difficult ground conditions and brownfield sites that present redevelopment and regeneration challenges.
- 1.52 There were 123,000 jobs in the city in 2022, concentrated in the city centre and a series of employment areas that are home to a wide range of manufacturing and logistics businesses. The city economy has traditional strengths in high value manufacturing and construction and is also developing clusters in other key sectors and retaining a strong focus on investing in skills. Wolverhampton is home to the University of Wolverhampton, which is investing £100m in the Springfield super-campus and international centre for urban innovation, and the City of Wolverhampton College and its Science, Technology, Engineering and Mathematics (STEM) orientated academies, which is investing in a new city centre campus.
- 1.53 Covid-19 hit the city hard, exacerbating existing social and economic challenges, including lower-than-average earnings, relatively high levels of unemployment and a need to enhance the skills base of the local workforce. But the city is bold and ambitious and has been driving forward, forging economic recovery and regeneration. The city is going through a period of significant transformation with new investment, new opportunities and new challenges. With effective planning, Wolverhampton has the right local conditions to deliver transformational and sustainable regeneration to benefit all of its people.

## The Big Issues

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



**The big issues are:**

1. Climate change and carbon net zero
2. A growing and changing population
3. Health and wellbeing
4. Economic recovery and growth
5. Centres
6. Transport and connectivity
7. The natural and built environment
8. Infrastructure

1.55 The role of the WLP in addressing these big issues is set out below.

**Issue 1 – Climate change and carbon net zero**

- 1.56 The climate emergency remains one of the biggest long-term challenges facing the world today. In July 2019, the City of Wolverhampton Council became the first local authority in the Black Country to declare a Climate Emergency. The Climate Emergency Declaration pledged to make all council activities carbon net zero by 2028, ensure all strategic decisions and budgets are in line with the shift to carbon net zero, and work with partners across the city to work towards a carbon net zero future.
- 1.57 The Council has made good progress towards becoming a net zero council. The Council's carbon footprint for 2022/23 was 11,500 tCO<sub>2</sub>e, compared to the 2019 Base Year of 16,050 tCO<sub>2</sub>e, a reduction of 4,550 tCO<sub>2</sub>e (28%). The majority of progress over the last 3 years has resulted from a reduction in emissions due to the LED Streetlight Programme, asset rationalisation and national grid decarbonisation.
- 1.58 The Council has also committed to supporting Wolverhampton to become a carbon net zero city by 2041. As of 2021, energy only emissions from the city were circa 900,000 tonnes (900KT) of carbon dioxide (CO<sub>2</sub>), from the following sources: Domestic (39%); Transport (27%); Industry (20%); Public Sector (7%); Commercial (7%). The city's per person emissions remain the joint second smallest across the region. Since 2005, Wolverhampton has seen a 44% reduction in absolute emissions, compared to 36% across the region, and 39% across the UK. A Net Zero 2041 Strategy for the City is currently being developed.
- 1.59 The WLP has a key role to play in delivering carbon net zero by: reducing carbon emissions from new developments; reducing the need to travel and enabling a shift to more sustainable travel modes; maximising the use of low carbon energy solutions; seeking to reduce the impact of flooding; and enhancing Wolverhampton's green and blue infrastructure, to protect the people, environment and economy of Wolverhampton.

## Issue 2 – A growing and changing population

- 1.60 Wolverhampton has a growing and changing population, which presents a range of planning and regeneration challenges. Wolverhampton is a young and diverse city of around 270,000 people. The population increased by 6% between 2011 and 2021 and is projected to rise to 295,000 by 2042, a further increase of 9%. As the population continues to grow, the city will also see changes in its characteristics and structure.
- 1.61 Although the city is younger than the England average, it still faces challenges from an ageing population. Between 2011 and 2021 the city saw significant growth of 25.8% in residents aged 90 years and over. A growing dependent population exerts significant pressure on services and housing.
- 1.62 Wolverhampton is proud of its diverse population. In 2021, 45% of the population were from ethnic minorities, above the Black Country average of 23% and the England average of 27%. 15% of Wolverhampton residents have a main language which is not English - also higher than the England average of 9%. Wolverhampton will continue to harness the talents of different groups of people to make for a more robust and resilient economy, and rich and vibrant culture.
- 1.63 Wolverhampton is the third most densely populated of the 30 local authorities in the West Midlands. The city is continuing to see an increase in new homes built, despite a temporary decline in 2020/21 due to Covid-19. In 2023, Wolverhampton had a total of 114,442 homes, an increase of 7,366 (+6.9%) since 2013.
- 1.64 A growing and changing population compounds local housing need pressures. The WLP has a role in addressing this issue by providing a range and choice of accommodation, house types and tenures to improve and diversify the Wolverhampton housing offer, and to meet the needs of current and future residents.

## Issue 3 – Health and wellbeing

- 1.65 Stark inequalities continue to exist in the conditions in which people are born and live in Wolverhampton, which in turn has an adverse effect on people's health and wellbeing.
- 1.66 Wolverhampton was ranked as the 24th most deprived local authority out of 317 using the ONS indices of deprivation measure (which has improved from the 2015 ranking at 17th). The city also experiences high levels of child poverty - 33.3% in 2022 compared to a national average of 20.1%.
- 1.67 Wolverhampton has lower rates of physical activity than the national average. In 2024, 32.9% of Wolverhampton's adult population were classed as inactive (doing less than 30 minutes of physical activity each week) - significantly higher than the regional (25.1%) and national (22.6%) averages. For children aged 5-16 years, 33% are less active (completing less than 30 minutes of physical activity a day) – close to the regional (32%) and national (30.2%) averages. Inactivity

levels are higher than average amongst women and girls. Both male and female life expectancy were lower in Wolverhampton (76.3 and 80.4 years respectively), than the national average (78.9 and 82.8 respectively) in the period 2020/22. Wolverhampton also has higher rates of obesity than the rest of England, and residents suffer from higher levels of alcohol abuse, smoking, depression and social isolation. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.

- 1.68 These issues vary significantly across Wolverhampton, with pockets of deprivation and poor health scattered across the city. Covid-19 has further exacerbated these existing health inequalities with negative impacts falling disproportionately on more deprived, disadvantaged and excluded groups. The role of the environment in shaping the social, economic and environmental circumstances that determine health and wellbeing is increasingly recognised and understood. There is also evidence to suggest that a high number of individuals in Wolverhampton are affected by gambling related harm.
- 1.69 The WLP has a role in addressing existing health and wellbeing issues in Wolverhampton by providing a built and natural environment that protects health and wellbeing through: supporting the making of healthier choices; minimising pollution (air, noise and other forms); providing healthy homes; providing a range of employment opportunities; supporting and facilitating investment in health infrastructure; reducing the negative health effects of climate change; and providing streets safe for active, low emission travel for all.

#### **Issue 4 – Economic recovery and growth**

- 1.70 Wolverhampton, like many post-industrial localities, faces long term social and economic challenges. Wolverhampton's economy and business community was hit hard by the major shocks of recent years. During this period, output and productivity decreased faster than the national average, and Wolverhampton had a significant "output gap", which has increased long-term. However, since 2020, Wolverhampton's GVA (per head) has grown from £18,725 to £22,675 (in 2022). Despite this growth, Wolverhampton still has a significant output gap, with national GVA (per head) standing at £33,976 in 2022.
- 1.71 Wolverhampton had a working age employment rate of 70.3% in 2023, 5.7% lower than the England average. Average hourly weekly pay for Wolverhampton residents working full-time was £613, £70.4 lower than the England average.
- 1.72 The Claimant Count rate for Wolverhampton (working age group) was 7.6% in June 2024. Wolverhampton now has the 4th highest working age Claimant Count rate in England, at 7.6%. Birmingham (9.8%), Bradford (7.8%), and Barking and Dagenham (7.6%) are the local authorities with equal or higher rates. Wolverhampton has a low long-term business survival rate, with 31.8% of businesses founded in 2017 surviving for 5 years compared to the England average of 44.4%. However, Wolverhampton's 1-and-2-year survival rates are higher than the English average.

- 1.73 Skills levels in Wolverhampton remain below the national average, and the Covid-19 pandemic has exacerbated some of the barriers young people face in accessing good skills training and employment prospects. Participation levels for 16- and 17-year-olds are amongst the best in the country, however these levels are not sustained and there is a drop off in participation in education, training or employment post-18 which is demonstrated by the high level of youth unemployment in the city. Around 1 in 10 adults in the city have no formal qualifications. This is a key area of focus for the Council through an Education, Skills and Employment Strategy.
- 1.74 Wolverhampton has significant economic potential, and an economy predicted to be worth £6.7 billion pounds by 2040, an increase of 43%, with particular strengths in Advanced Manufacturing (comprising 16% of the city's GVA), Health & Wellbeing, Public Administration and Building and Environmental Technologies.
- 1.75 The WLP has a role in addressing these issues by providing a balanced portfolio of employment sites with more energy efficient buildings, protecting and enhancing existing sustainable employment areas and encouraging new investment, allowing some poorer quality employment sites to be redeveloped for more beneficial alternative uses and enabling communities to share the benefits of economic growth through securing access to new job opportunities and enhanced skills and training programmes.

## Issue 5 – Centres

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

## Issue 6 – Transport and connectivity

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

## Issue 7 – The natural and built environment

- 1.83 Wolverhampton is rich in both its natural and built heritage and its environmental assets. There is an extensive waterbody and canal network which has the potential to provide a wide range of ecosystem services, including recreation, land drainage, flood protection, water supply, energy generation, carbon storage, heritage preservation and nature conservation. Water Framework Directive designated water bodies in Wolverhampton are currently classed as ‘moderate’ status due to diffuse and point source pollution, physical modifications and groundwater abstraction. The Plan can help deliver River Basin Management Plan measures and objectives for these water bodies by protecting and enhancing water quality. Parts of the Wolverhampton landscape have been recognised for their importance for nature and are protected under various laws or designations. The area is home to the Smestow Valley and Wyrley & Essington Canal Local Nature Reserves, as well as Ancient Woodlands such as Tettenhall Ridge.
- 1.84 The City’s Open Space Strategy and Action Plan (2024) identifies where there are surpluses and shortfalls in a range of types of open space across the City. It identifies a broadly adequate level of open space in Wolverhampton, although there are significant variations across the City producing some local surpluses and shortfalls, as well as an overall shortfall in allotment provision. The City’s Playing Pitch and Outdoor Sport Strategy (2022), whilst it identifies some local shortfalls in sports provision, suggests these can largely be addressed by improvements to existing facilities plus provision of additional 3G (third generation) pitches.

- 1.85 There are approximately 473,000 trees across Wolverhampton, that cover an area equivalent to 1,150 ha. They filter 14.5 tonnes of airborne pollutants and remove an estimated 6,150 tonnes of carbon from the atmosphere, each year. They also intercept around 151,000 m<sup>3</sup> of rainwater each year, equivalent to an estimated £149,000 in avoided water treatment costs.
- 1.86 While the City has the smallest population of the four BCAs, it is the second most densely populated, the administrative boundary being very tightly drawn around the urban area. The northern, western and south-western fringes of the City lie within the West Midlands Green Belt, which also extends into the urban area in a series of green 'corridors'.
- 1.87 In the industrial revolution Wolverhampton became a major centre for coal mining, lock-making and subsequently the manufacture of cars and motorcycles. This has created a rich legacy of historic buildings and attractive parks and open spaces. It has a strong sporting, cultural and leisure offer, and is home to Wolverhampton Wanderers Football Club, the Grand Theatre and nationally important The Halls Wolverhampton concert venue. The City's industrial heritage is an asset to the economy, but it has left a legacy of brownfield sites that can present redevelopment challenges.
- 1.88 The WLP will need to create a strategy for the protection and enhancement of the natural environment and strengthen the environmental infrastructure network to support sustainable growth. It will also need to protect, sustain and enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places.

## Issue 8 – Infrastructure

- 1.89 Physical and social infrastructure is required to enable and support the growth required over the Plan period. New housing and economic development will put pressure on existing services and utilities, including transport, wastewater treatment and electricity networks, but may also create opportunities to provide infrastructure solutions. Further detail is provided in the Wolverhampton Infrastructure Delivery Plan (2024).
- 1.90 Future-proofed digital infrastructure is the backbone of a modern thriving economy, driving productivity and spreading growth. Wolverhampton is making significant progress upgrading its digital infrastructure with gigabit coverage at 94% and full fibre coverage at 62% (2023), with all providers upgrading to full fibre in the city. Wolverhampton has an extensive digital infrastructure and is at the forefront of digital innovation. The City is also making progress supporting the upgrade of mobile connectivity, with 5G available for 99% of the city from at least one operator and 66% of the city from all operators. Digital connectivity will increasingly become important, with the switch over from analogue to digital, to support new ways of working, service delivery and consumer demand, so we need to continue to support the rollout to ensure digital infrastructure meets our needs now and in the future.



- 1.91 An estimated 11,660 households in Wolverhampton are without broadband and there are an estimated 118,000 limited and non-users of the internet in the City. Although older people generally use the internet less, 44% of those that are offline are under the age of 60. Digital is increasingly important for accessing services, skills, job search and employment along with keeping in touch with families and friends, with digital considered the 4th utility.
- 1.92 To maximise the benefit locally, the city is proactively supporting residents to get online by providing devices and connectivity through a network of trusted partners to improve digital skills and supporting businesses to digitalise and introduce smart technology to support the delivery of services.
- 1.93 The provision of high quality and aspirational physical development is an important element to help to create a virtuous cycle of attracting further investment; widening local demographics and increasing local spend; advancing pride in place and local aspirations; and driving productivity. Social infrastructure is also necessary to create capacity and resilience within communities.
- 1.94 The WLP has a role in addressing these issues by ensuring that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity.

## The Issues and Preferred Options Consultation

- 1.95 As required by Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012, public consultation took place in early 2024 on an Issues and Preferred Options report, to test the issues, scope and preferred options for the WLP. The WLP was then written up in detail for consultation at Publication stage (under Regulation 19) before submission to the Secretary of State (under Regulation 22) for an independent examination by the Planning Inspectorate.
- 1.96 It was important to identify and consult on the key issues which the WLP would need to address and then to identify options for the WLP - in terms of the vision and strategic priorities, spatial strategy, policies and site allocations. Given the amount of work undertaken recently on the BCP, it was also possible to select and consult on preferred options for the WLP.
- 1.97 Wolverhampton is a densely developed urban area, with small areas of green belt on the fringes. Most of the sites in the urban area which were proposed for allocation for housing and employment use in the Draft BCP were still considered suitable to include in the WLP. A continual “call for sites” in Wolverhampton had been open through the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) for over ten years. Since consultation on the Draft BCP, the SHLAA process had generated some new sites suitable for housing, which were included in the consultation. The Issues and Preferred Options consultation promoted and encouraged the submission of any further sites through the “call for sites” process.

- 1.98 As of 2024, even taking into account all suitable and deliverable sites in the urban area, uplifting housing densities and including housing windfall allowances and an ambitious estimate of the housing capacity of Wolverhampton City Centre, there were still significant shortfalls of development land for housing and employment use over the Plan period, and a shortfall of gypsy and traveller pitches. In particular, the housing shortfall was in the order of 11,400 homes.
- 1.99 At the heart of the National Planning Policy Framework (NPPF) is a **presumption in favour of sustainable development** which is detailed in paragraph 11. For plan-making purposes, this means that: *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>.”* Footnote 7 clarifies that the policies referred to include land designated as Green Belt.
- 1.100 In December 2023 there was a key change to national planning policy as set out in paragraph 145 of the NPPF: *“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process.”*
- 1.101 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.
- 1.102 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 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.
- 1.103 Taking these factors into account, the City of Wolverhampton Council has chosen not to review the green belt to address the housing and employment development shortfalls arising from the WLP. This means that none of the spatial options 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.



1.104 The preferred options which were consulted on covered:

- a) Vision and Strategic Priorities
- b) Growth Options – for Housing, Employment and Gypsy and Traveller Pitches
- c) Spatial Options
- d) Policies
- e) Site Allocations

1.105 The preferred growth options and the preferred spatial option which were consulted on at Issues and Preferred Options stage have been taken forward in this Plan (following amendments to update figures including the updated employment land requirement) as detailed below:

Type of Option	Description of Preferred Option	Assessment of Preferred Option
<b>Housing Growth Option</b>	<p>Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres, and export remaining housing need to neighbouring authorities:</p> <ul style="list-style-type: none"> <li>• Around 8,850 homes on existing supply in urban area</li> <li>• 61 homes on one new allocation (following discount)</li> <li>• Around 419 homes from density uplift and structural change in Centres</li> <li>• Around 10,398 homes exported through Duty to Cooperate</li> </ul>	<p>All of housing need 2024-2042 met</p> <p>Highly sustainable pattern of development</p> <p>35% cities and urban centres uplift of 5,115 homes met within Wolverhampton</p> <p>Existing and potential contribution offers from neighbouring authorities which have a strong relationship with Wolverhampton</p> <p>Birmingham and Black Country HMA Statement of Common Ground to address remaining unmet need</p>

Type of Option	Description of Preferred Option	Assessment of Preferred Option
<b>Gypsy &amp; Traveller Pitch Growth Option</b>	<p>Make use of existing and potential new sites to deliver new gypsy and traveller pitches up to 2032:</p> <ul style="list-style-type: none"> <li>• 2 pitches regularised on currently unauthorised site</li> <li>• 12 pitches on existing allocated site</li> <li>• 19 pitches exported through Duty to Cooperate</li> </ul>	<p>No shortfall against Wolverhampton gypsy and traveller pitch need up to 2032</p>
<b>Employment Growth Option</b>	<p>Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access, and explore remaining employment land need to neighbouring authorities:</p> <ul style="list-style-type: none"> <li>• 33.65 ha on existing employment land supply in urban area</li> <li>• 9.25 ha on new allocations</li> <li>• 83.5 ha exported through Duty to Cooperate</li> </ul>	<p>All of employment land need for Wolverhampton up to 2042 met.</p> <p>Sustainable pattern of development</p> <p>Existing and potential contribution offers available from neighbouring authorities which have a strong relationship with Wolverhampton</p> <p>Existing and potential contribution offers available from neighbouring areas to address employment land need across the Black Country FEMA as a whole.</p>

Type of Option	Description of Preferred Option	Assessment of Preferred Option
<b>Spatial Option</b>	<p>Balanced and Sustainable Growth – focus development in the central, north and east parts of Wolverhampton, to minimise climate change impacts, make best use of existing infrastructure and support urban regeneration.</p> <p>Key features: increased housing density in the most accessible locations; more housing in Wolverhampton City Centre</p>	<p>All of housing and employment need 2024-2042 met</p> <p>Highly sustainable pattern of development</p>

- 1.106 It was considered that the majority of policies in the Draft BCP were still supported by the evidence, subject to some changes to address valid planning issues raised by consultees and considerations specific to Wolverhampton. Therefore, the Issues and Preferred Options report proposed that the WLP should substantially repeat the Draft BCP strategic policies, but with some amendments to respond to: new evidence and national guidance; the new geography and timescale; and any valid planning issues raised during the Draft BCP consultation (2021).
- 1.107 The Issues and Preferred Options Report should therefore be read alongside the Draft Black Country Plan (2021) and published evidence and consultation responses. Some of the evidence prepared to support the BCP also supports the WLP – subject to updates in some cases.
- 1.108 Other evidence produced to support the WLP, including the Sustainability Appraisal report, is available at: [www.wolverhampton.gov.uk/localplan](http://www.wolverhampton.gov.uk/localplan). The WLP has been supported by a continual Sustainability Appraisal process which includes an Equalities Impact Assessment, as required by legislation and guidance, and there has been a full Habitats Regulations Assessment of the WLP at Publication stage.
- 1.109 A WLP Infrastructure Delivery Plan was also produced at Publication stage, and Statements of Common Ground have been agreed between the City of Wolverhampton Council and neighbouring authorities and organisations, as appropriate, to support the later stages of the Plan process. A full list of evidence and supporting documents is provided in Table 1.

## Duty to Cooperate

- 1.110 This Plan will provide for the great majority of development needs arising in Wolverhampton over the Plan period to be met within Wolverhampton. However, the capacity of Wolverhampton is finite and it is not possible to provide for all development needs within city boundaries. National guidance requires local planning authorities to make evidenced efforts, throughout the Plan-making process, to work with neighbouring authorities to seek to export such unmet development needs. The current position on Duty to Cooperate matters relating to the Wolverhampton Local Plan is set out in the Wolverhampton Local Plan Consultation Statement, Duty to Co-operate Statement and Statements of Common Ground.
- 1.111 As set out above, the Plan sets a housing target for Wolverhampton of 9,330 new homes over the period 2024-42, compared to a local housing need for 19,728 homes, creating a shortfall of 10,398 homes. For employment land, the EDNA establishes a need for 126.4 ha of land for employment development over the period 2024-42 and an anticipated supply of 42.9 ha, generating a shortfall of 83.5 ha up to 2042. The Plan also generates a shortfall of 19 gypsy and traveller pitches up to 2032.
- 1.112 The Council works with other Waste Planning Authorities to ensure that waste management capacity requirements likely to be generated by Wolverhampton up to 2042 and which cannot be met within the city will be met in other areas. The Council also works with other Minerals Planning Authorities to identify, monitor and manage minerals requirements over the Plan period, as set out in paragraphs 12.2 - 12.3.
- 1.113 National planning policy requires unmet housing and employment land need to be provided for across the Housing Market Area, Functional Economic Market Area (FEMA) and other areas with which Wolverhampton has a physical or functional relationship. Before and throughout the Plan preparation process the Council has worked openly and constructively with neighbouring authorities to help provide as much certainty as possible about how and where Wolverhampton's full housing and employment land needs will be delivered. The Council recognise that this approach may only address a proportion of the housing and employment shortfall, as it is inappropriate and beyond the powers of the Council to establish the limits of sustainable development in neighbouring authorities.
- 1.114 The Council is committed to continued and constructive engagement, through the Duty to Co-operate, with neighbours to secure the most appropriate and sustainable locations for housing and employment growth to meet Wolverhampton needs. In terms of housing, the engagement will extend beyond the adoption of this Plan and will build on the partnership approach developed across the Greater Birmingham and Black Country Housing Market Area (HMA) to address the combined housing shortfalls of the Birmingham and Black Country authorities in particular. As a significant housing shortfall remains over and above existing and anticipated contributions, the Council has agreed a single Statement of Common Ground across the HMA, which includes a commitment to further work to identify how the shortfall can be accommodated.

1.115 Reflecting the efforts of those neighbouring authorities who are supporting the delivery of the Wolverhampton and Black Country wider housing and employment land need, where it is shown to be desirable, appropriate, sustainable and deliverable, the Council will support neighbouring authorities to bring forward development and work in partnership to ensure infrastructure needs are met in full across administrative boundaries.

## The Structure of the Wolverhampton Local Plan

1.116 The Plan is structured as follows:

- Section 1 sets out the scope of the Plan and how the Plan has been prepared, and establishes the local context, highlighting the big issues Wolverhampton faces over the Plan period.
- Section 2 provides the vision and strategic priorities for the Plan that provide the basis for the spatial strategy, policies and site allocations
- Section 3 sets out the spatial strategy for Wolverhampton over the Plan period and other overarching strategic policies
- Sections 4-12 set out the strategic policies, organised by theme
- Section 13 provides detailed WLP site allocations (for housing, gypsy and traveller accommodation and employment development)
- Section 14 outlines how the Council will monitor and manage the Plan

1.117 The Appendices provide detail on changes to existing plans which will result from adoption of the WLP, the WLP housing trajectory and a glossary of terms.

## 2. Vision and Strategic Priorities

### Vision

- 2.1 The Vision for the WLP reflects what the city will be like in the future if the needs and aspirations of those who live, work in or visit the area are to be met, whilst also ensuring that it retains the characteristics that make it attractive and distinctive. The Vision is also flexible, to allow the city to respond to future challenges in a way that is right for Wolverhampton, its residents and its businesses.
- 2.2 The Vision for Our City: Our Plan (the City of Wolverhampton Council's strategic framework for improving outcomes for local people and delivering levelling up ambitions as explained in para's 1.35-1.36) has been used to provide a strong local vision and strategic priorities for the WLP.
- 2.3 Our City: Our Plan sets out an ambition that 'Wulfrunians will live longer, healthier lives', and is focussed on delivering three cross-cutting principles and six priorities. Of these six priorities, the WLP will be directly relevant to four:
- healthy, inclusive communities
  - good homes in well-connected neighbourhoods
  - more local people into good jobs and training
  - thriving economy in all parts of the city
- 2.4 The WLP will support the delivery of these four priorities by harnessing opportunities for strategic planning policies and land allocations to support the growth and regeneration of the City of Wolverhampton up to 2042, to benefit local people.

### Strategic Priorities

**Table 2: Wolverhampton Local Plan Strategic Priorities aligned to Our City: Our Plan Priorities**

Our City: Our Plan Priority	Wolverhampton Local Plan Strategic Priority	WLP Policies
Healthy, inclusive communities	<b>Strategic Priority 1:</b> To provide a built and natural environment that supports the making of healthier choices by encouraging physical activity and recreation, active travel and social interaction and discouraging harmful behaviours	CSP1; CSP2; DEL1; HW1-HW3; HOU2; HOU6; CEN1 – CEN4; TRAN1; TRAN3, TRAN5; TRAN6; ENV8; ENV9; ENV10

Our City: Our Plan Priority	Status	Further Work Required
Healthy, inclusive communities	<b>Strategic Priority 2:</b> To provide a built and natural environment that protects health and wellbeing by minimising pollution, providing healthy homes, reducing the negative health effects of climate change and providing streets which are safe for active and low emission travel	CSP1; CSP2; DEL1; HW1-HW3; HOU1 – HOU7; EMP1; CEN1 – CEN4; TRAN1-TRAN8; ENV3; ENV8 – ENV13
	<b>Strategic Priority 3:</b> To mitigate and adapt to climate change in a way that protects the people, environment and economy of Wolverhampton and meets wider national and international obligations by reducing carbon emissions, maximising use of low carbon energy solutions, actively reducing flood risk and enhancing green and blue infrastructure	CSP1; CSP2; DEL1; DEL3; HW1-HW3; HOU1; HOU2; EMP1; CEN1 – CEN4; TRAN1-TRAN8; ENV1 – ENV4; ENV7 – ENV14
	<b>Strategic Priority 4:</b> To protect and enhance the natural environment, including biodiversity, geological resources and landscapes, and ensure that residents have good access to a high quality network of green infrastructure	CSP1; CSP2; DEL1; ENV1-ENV4; ENV6 – ENV10
Good homes in well-connected neighbourhoods	<b>Strategic Priority 5:</b> To provide a range and choice of home types and tenures to meet the needs of current and future residents and diversify the city housing offer	HOU1 – HOU5; HOU7
	<b>Strategic Priority 6:</b> To prioritise sustainable and active travel and improve transport infrastructure to ensure safe, efficient and sustainable accessibility within an integrated transport network	CSP1; CSP2; HW3; HOU2; HOU6; CEN1; TRAN1 – TRAN8; ENV7; ENV10



Our City: Our Plan Priority	Status	Further Work Required
More local people into good jobs and training	<b>Strategic Priority 7:</b> To enable communities to share the benefits of economic growth by securing access to new job opportunities and enhanced skills and training programmes	DEL3; HOU6; EMP5; EMP6; TRAN1
Thriving economy in all parts of the city	<b>Strategic Priority 8:</b> To protect and enhance sustainable employment areas and provide a balanced portfolio of employment sites to support the development of key employment sectors and enable existing businesses to expand	CSP1; DEL1; DEL2; EMP1 – EMP4; TRAN1; TRAN2; TRAN4-TRAN6
	<b>Strategic Priority 9:</b> To enhance the vitality, diversification and performance of safe and secure centres which serve existing and future communities as high quality places to live, shop, work and visit	CSP1; CSP2; EMP6; CEN1 – CEN4; TRAN1; ENV10
	<b>Strategic Priority 10:</b> To protect, sustain and enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places	CSP2; ENV5 - ENV7; ENV10
	<b>Strategic Priority 11:</b> To ensure that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity	DEL1; DEL3; HW3; HOU6; CEN1; TRAN1-TRAN8; ENV8; ENV12; ENV13; W1; MIN1
	<b>Strategic Priority 12:</b> To manage waste as a resource and minimise the amount produced and sent to landfill	W1 – W5
	<b>Strategic Priority 13:</b> To safeguard and make the most sustainable use of Wolverhampton's mineral resources without compromising environmental quality	MIN1 – MIN3

## 3. Spatial Strategy

### Introduction

- 3.1 The Plan can help achieve sustainable development 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.
- 3.2 The Spatial Strategy, detailed in Policy CSP1 and illustrated in Figure 1, provides the overarching basis for the Plan's proposals for growth and infrastructure improvements. The Spatial Strategy Key Diagram is supplemented by thematic Key Diagrams for housing, employment land, transport, cycling, environment, waste and minerals in the relevant sections of the Plan.

### Policy CSP1 – Spatial Strategy

#### Spatial Strategy

#### Spatial Strategy

- 1) **To deliver sustainable economic and housing growth and to meet strategic planning targets based on the needs of local communities and businesses, the Council, working with local communities, partners and key stakeholders, will:**
  - a) Deliver at least 9,330 net new homes and create sustainable mixed communities including a range and choice of new homes that are supported by adequate infrastructure.
  - b) Deliver the development of at least 42.9 ha of employment land.
  - c) Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.
- 2) **The spatial strategy seeks to deliver this growth and sustainable patterns of development by:**
  - a) Delivering all development in the existing urban area;
  - b) Supporting and enhancing the sustainability of existing communities through the focussing of growth and regeneration into the Growth Network made up of Wolverhampton City Centre and Core Regeneration Areas;
  - c) Protecting and enhancing the quality of existing towns and Neighbourhood Areas and re-balancing the housing stock by delivering homes supported by jobs and local services;
  - d) Protecting the openness, integrity and function of the Wolverhampton Green Belt by resisting inappropriate development, except in very special circumstances;

## Spatial Strategy

- e) Protecting and enhancing Wolverhampton's character and environmental assets including heritage assets, natural habitats and open spaces;
  - f) Reducing and mitigating the likely effects of climate change, in particular through recognising and delivering the multifunctional benefits both green and blue infrastructure play in doing so.
- 3) Table 3 shows how the housing and employment land targets for Wolverhampton will be met. 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.**

## Growth Network

- 4) The Growth Network, consisting of Wolverhampton City Centre and the Core Regeneration Areas, will be the primary focus for new development, regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to Wolverhampton communities.**
- 5) Wolverhampton City Centre will provide:**
- a) Re-energised core commercial areas providing a rich mix of uses and facilities, set in a high quality built and natural environment;
  - b) The principal location for major commercial, cultural, leisure, entertainment, sports, recreation and community facilities, providing the widest possible range of such facilities appropriate for its catchment;
  - c) 4,676 new homes of mixed type and tenure - the majority built at high densities as part of mixed use developments;
  - d) Excellent public transport links, making the city centre highly accessible to its catchment area;
  - e) Green infrastructure.
- 6) The Core Regeneration Areas will provide:**
- a) The principal concentrations of strategic employment areas. These are high quality employment areas that will be safeguarded and enhanced for manufacturing and logistics activity to support the long-term success of the Wolverhampton economy (see Policy EMP2);
  - b) The main clusters of local employment land that are vital to provide local jobs (see Policy EMP3);
  - c) The principal locations for new industrial and logistics development - providing a minimum of 42.9 ha of developable employment land to meet growth needs;
  - d) A minimum of 2,038 new homes in sustainable locations well-supported by centres (particularly Bilston and Wednesfield Town Centres), community services and local

## Spatial Strategy

shops, set within and linked by comprehensive networks of attractive green infrastructure with cycling and pedestrian routes;

- e) The focus for investment in existing, new, and improved transportation infrastructure with a focus on public transport routes and hubs which will maximise use of the public transport network by residents, workers and visitors;
- f) Strong links with surrounding communities and the network of centres (particularly Bilston and Wednesfield Town Centres) - spreading regeneration benefits by knitting together old and new to create a richer, varied, and integrated sense of place;
- g) A strong network of high quality green and blue infrastructure.

### Neighbourhood Areas and Green Belt

#### 7) The Neighbourhood Areas will provide:

- a) A mix of good quality residential areas where people choose to live;
- b) A minimum of 2,616 new homes through:
  - i. A limited supply of large-scale brownfield sites providing new homes within the urban area through the repurposing of redundant employment sites and other surplus land;
  - ii. A supply of small-scale housing development opportunities;
  - iii. Housing renewal areas.
- c) Clusters of Local Employment Land that provide an important source of land and premises to meet more localised business needs;
- d) An integrated and, where possible, continuous network of green infrastructure, and walking and cycling routes, and strong networks of district & local centres, and health, leisure, sports, recreation and community facilities (taking into account provision in neighbouring areas);
- e) Strong and seamless links to regenerated areas in Core Regeneration Areas and Wolverhampton City Centre, via access and design improvements to spread regeneration benefits and ensure integration of existing and new communities;
- f) A strong network of high quality green and blue infrastructure.

#### 8) The green belt areas as defined on the Policies Map will be protected from development as set out in national policy. Protection of the green belt will help to promote regeneration within the urban area and provide easy access to the countryside for local residents. Green belt landscapes will be safeguarded and enhanced where possible. Opportunities will be taken to enhance the value of the green belt for heritage, recreation, sports, agricultural and biodiversity, including through improving footpath and cycleway networks and protecting tranquil areas.

## Justification

- 3.3 Policy CSP1 provides the overarching spatial strategy for Wolverhampton, setting out the scale and distribution of new development for the Plan period to 2042. The economy and population of Wolverhampton is growing. Wolverhampton needs to plan for economic recovery and growth, enhanced business productivity and 9,330 new homes within the plan period. To accommodate this future growth, locations that are both sustainable and deliverable have been identified for development, at levels and in locations that do not breach the environmental capacity of the area.
- 3.4 The spatial strategy is based on a number of considerations, including:
- a) National planning policy;
  - b) The Plan's Vision, objectives and aims;
  - c) Environmental constraints;
  - d) The availability and viability of land for development.
- 3.5 The spatial strategy has been developed through a comprehensive assessment of a range of alternative options, as set out in the Issues and Preferred Options report. It is one of seven spatial options considered through this process and corresponds to Spatial Option G – Balanced and Sustainable Growth. The 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.
- 3.6 The spatial strategy is illustrated in Figure 1. Table 3 sets out the spatial distribution of housing and employment development across the growth network, in line with the site allocation information set out in Table 12 of Section 13.
- 3.7 This Plan forms an essential part of the Our City: Our Plan Vision, supporting the re-energising, diversification and re-purposing of the city centre, supporting the recovery and growth of the economy, and providing for a continuous supply of new homes to meet the needs of local and wider communities. At the same time, the Plan will protect key environmental assets – the green belt, the network of high quality green and blue spaces, and local character and heritage.

- 3.8 This Plan supports the delivery of 9,330 new homes and 42.9 ha of employment land by 2042, to support the projected growth of the city's population by 23,000, to 295,000 people (using ONS 2018-based projections), and growth of the resident workforce. To plan for this growth, locations that are both sustainable and deliverable have been prioritised. Development and investment will be focussed on Wolverhampton City Centre and three Core Regeneration Areas as summarised in Table 3.
- 3.9 This growth will be supported by transport investment, focused on enhancing the rail and rapid transit network and the key road corridors and investment in walking and cycling. Development will help to green the city, by increasing tree cover and providing biodiversity net gain and will help to deliver priority environmental improvements to ensure residents have easy access to a range of healthy recreation opportunities. These priorities will include those set out in the emerging Local Nature Recovery Strategy and Wolverhampton Open Space and Playing Pitch Strategies, and opportunities to improve the canal network and restore the Bradley Arm Canal Link (as set out in Bilston Corridor Area Action Plan Policy BC7).



Figure 1: Spatial Strategy Key Diagram

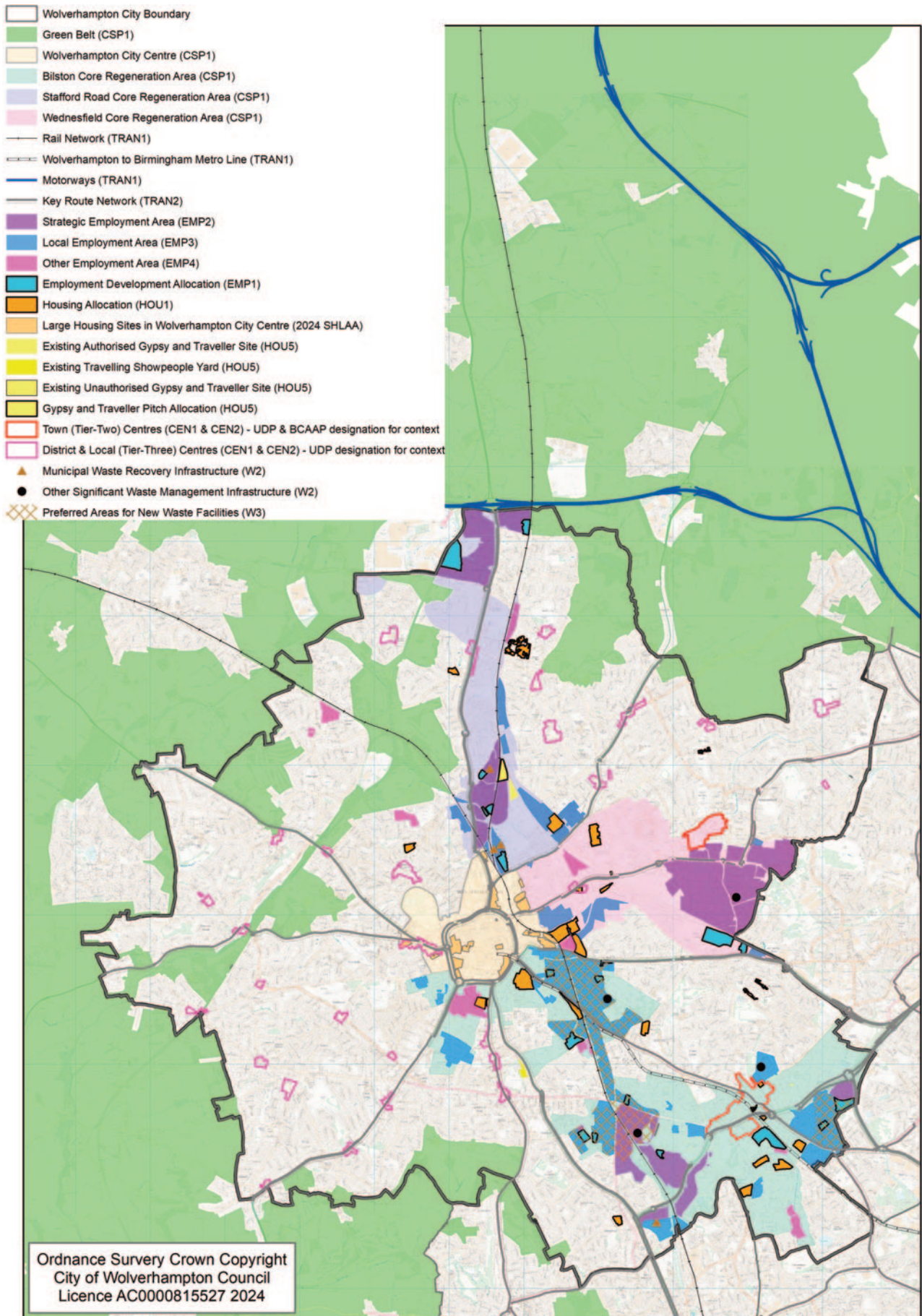




Table 3: Spatial Distribution of Housing and Employment Growth

Location	Housing (net homes including density uplift and discount)	Employment Development Land Allocations (ha)
Wolverhampton City Centre	Identified Sites: 4,194 Small Site Windfalls: 273 Structural Change Surplus Floorspace: 209 <b>Total: 4,676</b>	0
Stafford Road Core Regeneration Area (SRCRA)	Housing Site Allocations: 121 Other sites: 38 <b>Total: 159</b>	13.17 (33%)
Wednesfield Core Regeneration Area (WCRA)	Housing Site Allocations: 484 Other sites: 116 Wednesfield Town Centre Small Site Windfalls and Structural Change Surplus Floorspace: 19 <b>Total: 619</b>	7.95 (20%)
Bilston Core Regeneration Area (BCRA)	Housing Site Allocations: 976 Other sites: 207 Bilston Town Centre Small Site Windfalls and Structural Change Surplus Floorspace: 77 <b>Total: 1,260</b>	18.36 (47%)
<b>Total Growth Network</b>	<b>6,714 (72%)</b>	<b>39.5 (100%)</b>
<b>Total Neighbourhoods Area</b>	Identified Sites: 913 Small Site Windfalls: 1,703 <b>Total: 2,616 (28%)</b>	0
<b>Wolverhampton Total</b>	<b>9,330 (100%)</b>	<b>39.5 (100%)</b>

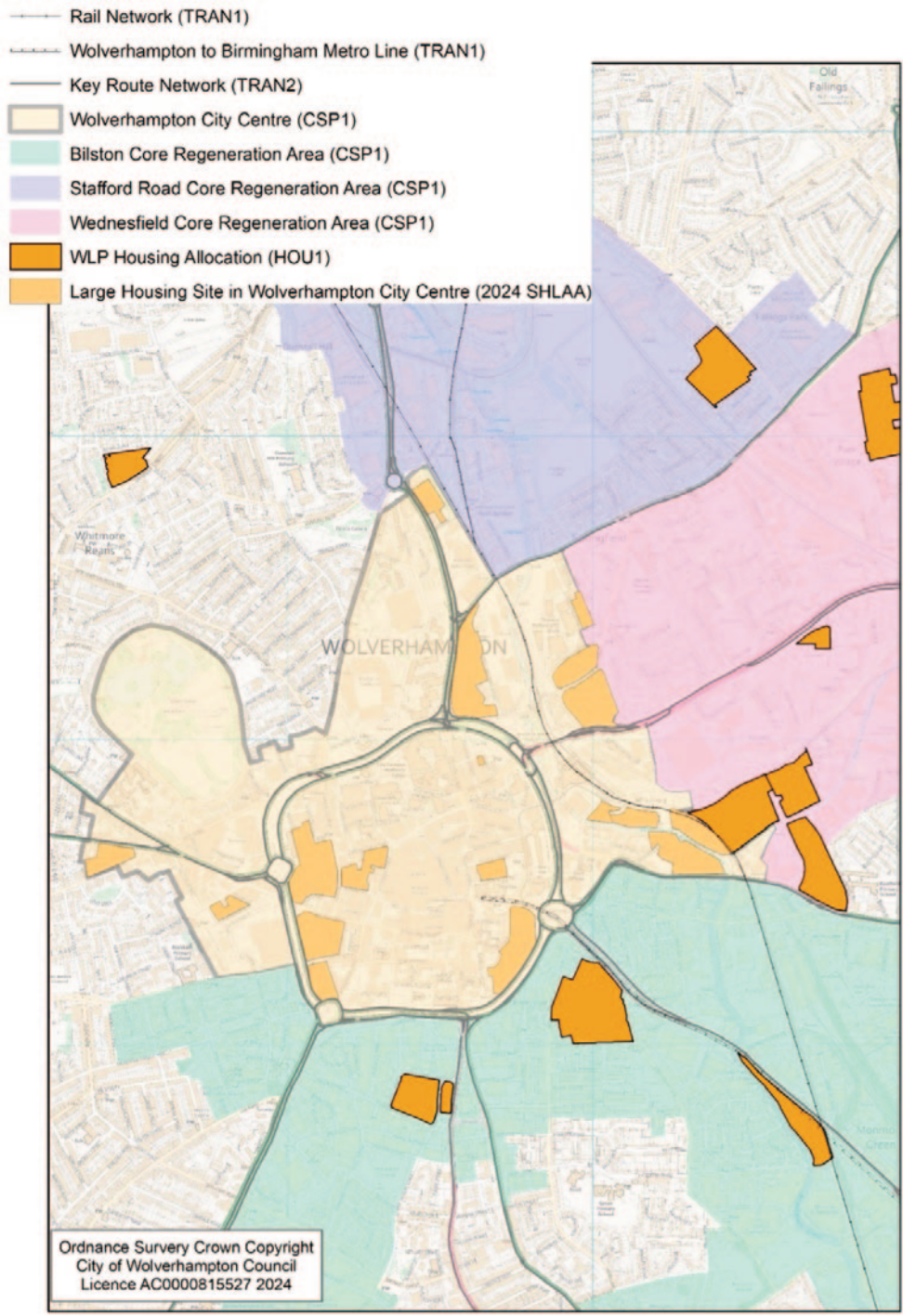
## The Spatial Strategy

- 3.10 The Growth Network – made up of Wolverhampton City Centre and the Core Regeneration Areas - is the primary focus for co-ordinated and sustained regeneration and infrastructure investment to support the delivery of regionally significant growth and promote wider benefits to local communities. The Growth Network is the focus for the delivery of these objectives and contains most of the areas where regeneration and land use change will be concentrated over the Plan period. Although this plan does not make development allocations within Wolverhampton City Centre, it sets out deliverable development targets for the city centre, based on up-to-date evidence, which will be met through a review of the Wolverhampton City Centre Area Action Plan
- 3.11 The Growth Network is already served by an extensive transport system and therefore provides the most suitable locations for economic and housing growth. However, some improvements are required to enhance connectivity, accessibility and environmental quality.
- 3.12 The Neighbourhoods Area makes up most of the existing urban area and is where most residents live. While most change and intervention will be focussed on the Growth Network, some small-scale developments will be brought forward within the Neighbourhoods Area, to enable vibrant and diverse communities to thrive and prosper. The overall land use pattern within the Neighbourhoods Area is not expected to alter greatly by 2042, but there will be some incremental change through housing renewal, windfall developments and town centre regeneration activity.
- 3.13 Strong links will be created between the Growth Network and the Neighbourhoods Area through high quality design, green infrastructure and transport investment, to help spread regeneration benefits, improve community cohesion and create an effective network of centres.
- 3.14 The spatial strategy aims to use land efficiently by making best use of previously developed land, vacant properties and surplus industrial land, and maximising housing densities where appropriate. This will maximise deliverable sites for housing and employment development, as required by the NPPF, and ensure land is available in a variety of locations and at a range of scales to meet needs over the whole Plan period. The housing trajectory (Appendix 2) demonstrates that the Plan will be able to deliver an even supply of housing development land over the Plan period to meet a consistent housing target of 518 homes per annum (Policy HOU1).
- 3.15 The spatial strategy also seeks to protect green spaces within Wolverhampton, the green belt on the edges of the urban area and the ‘wedges’ of open land providing valuable open breaks between settlements and access to the wider countryside, including for wildlife.

## Wolverhampton City Centre

- 3.16 The Wolverhampton City Centre boundary for the purposes of the city centre's housing target (Table 3 and para 3.10) is shown on Figure 2 and the Policies Map. The WLP sets out a strategy for the city centre and deliverable development targets (in Policy CSP1 and Table 3) which are based on up-to-date, detailed evidence. This evidence is set out in the Wolverhampton SHLAA (2024) and includes: a thorough review and update of information on existing Wolverhampton City Centre Area Action Plan (AAP) allocations and planning permissions; and an estimated uplift from surplus floorspace due to structural change, based on evidence including the Black Country Centres Study. Housing site allocations and sites which have permission for 50 or more homes within the city centre are shown for context on Figure 2. 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. The Blakenhall and Graiseley and All Saints Character Areas of the AAP fall outside the Wolverhampton City Centre boundary, therefore AAP development allocations in these areas have been replaced through the WLP (see Appendix 1).
- 3.17 Wolverhampton City Centre is the administrative, commercial and cultural heart of the city and has a key role as the city centre of the Black Country. The city centre is highly accessible by a range of public transport options and is served by a rail, metro and bus interchange. It is the focus for a wide range of civic, retail, cultural and leisure functions and is currently securing levels of investment not seen in generations. To build on this recent success, the re-energising, physical enhancement and repurposing of the city centre is of fundamental importance to the regeneration of Wolverhampton as a whole and the wider sub-region.
- 3.18 The city centre is the engine of the city economy and the main hub at the centre of transport networks. It is in the most sustainable location and best placed to provide all parts of the community with easy access to comparison (non-food) shopping, leisure, entertainment and cultural facilities and office-based employment.

Figure 2: Wolverhampton City Centre Boundary



- 3.19 To secure the future prosperity of the city centre it is important to build on its existing strengths, respond to live and future opportunities and effectively manage the impact of shifts in consumer shopping habits. The key elements of this strategy are:
- a) delivery of a series of transformational, place-based, mixed use investments in key landmark locations;
  - b) maximising housing development in all locations, including through conversion of vacant and under-used buildings and upper floors;
  - c) increased flexibility to allow consolidation of the shopping core and reduce vacancy rates;
  - d) supporting and strengthening commercial sectors, including a high quality leisure offer and Grade A offices to focus employment in the city centre;
  - e) ongoing investment in key education assets, including the University of Wolverhampton and City of Wolverhampton College;
  - f) Improving the character and quality of both the cultural and civic function of the city centre and the built and natural environment, helping to make the city centre a sustainable, healthy and attractive place to shop, live, work and visit;
  - g) continued investment in transport infrastructure and the public realm to provide high quality connections across the city centre, to the neighbourhoods around it, and to wider regional and national networks.
- 3.20 This approach builds on the Wolverhampton City Centre Area Action Plan strategy, which aimed to consolidate the shopping core, encourage complementary activities (such as leisure, office and residential) and allow for flexibility to capture future investment. The WLP supports this diversification, repurposing and rejuvenation of the city centre, promoting a well-balanced mix of commercial, business, civic and education uses. This will be achieved, in particular, through: Policy CSP1 which sets out the critical role of Wolverhampton City Centre as the key driver to deliver the overall spatial strategy; Policy CEN2 which sets out the role of the city centre in the Wolverhampton hierarchy of centres; more detailed policies to be developed through the Wolverhampton City Centre AAP review; and a range of city centre regeneration projects being promoted by the Council and partners.
- 3.21 Promoting the distinctive strengths and unique opportunities provided by the city centre will also help to encourage investment, building on the current wave of development activity. These include: promoting high density uses to increase footfall and patronage of city centre facilities; exploring the potential to attract more visitors, particularly to the family-orientated evening economy; improving the perception and safety of the city centre; improving accessibility; and maximising use of technology, such as rapid 5g rollout.

- 3.22 The Wolverhampton Investment Prospectus sets out a number of projects, schemes and funding programmes which will drive regeneration in the city centre, with several major investment and regeneration opportunities underway:
- a) Mixed use regeneration in the Canalside Quarter and at City Centre West and St George's;
  - b) A new city centre campus for City of Wolverhampton College under construction at The City Learning Quarter;
  - c) 'Accelerated Sites Programme' – commercial space at the Interchange, a potential hotel at Broad Street and housing at the Steam Mill, Sack Works and Brewers Yard sites;
  - d) Future High Streets Fund - public realm, connectivity and events space improvements helping to boost footfall and the evening economy, and unlock wider investment
- 3.23 Much of the housing growth taking place in Wolverhampton up to 2042 will be concentrated in the city centre and locations within the Core Regeneration Areas which are close to the city centre. This provides an opportunity to enhance the sustainability and viability of the city centre and allows future housing growth to be well served by the existing network of centres.

### The Core Regeneration Areas

- 3.24 The Core Regeneration Areas (CRAs) broadly reflect the distribution of large areas of employment land across Wolverhampton and accommodate the majority of manufacturing and logistics businesses and jobs in the City. The CRAs are supported by a network of sustainable transport routes including the extensive canal system, allowing easy movement by rail, metro, bus, bike and foot. The key characteristics of the CRAs is that they are:
- a) recognised as priority locations for multi-agency public sector intervention;
  - b) the focus of multi-modal transport infrastructure;
  - c) locations with clusters of housing and employment development opportunities.
- 3.25 The CRAs represent an update of the network of Regeneration Corridors identified in the 2011 Core Strategy. These Regeneration Corridors served the Black Country well, providing a clear focus for concerted intervention and growth. The WLP took the opportunity to review the Regeneration Corridors in the light of more up-to-date information on the deliverability of previously allocated development opportunities, changing infrastructure priorities and to reflect where planned investment and growth has already taken place.
- 3.26 The WLP strategy for the CRAs reflects two key issues arising from the evidence base – the need to protect and enhance sustainable employment land and premises to promote economic growth; and the need to deliver housing growth through the release of poor quality and underused land to support ongoing regeneration. Achieving the right balance of jobs and housing by 2042 is a key aim of the spatial strategy. The Black Country Economic Development Needs Assessment (EDNA) and Black Country Employment Area Review (BEAR) provide key evidence on demand and supply of employment land to 2042 and this work has directly informed the employment development and housing allocations in this Plan.



### Stafford Road Core Regeneration Area

- 3.27 The Stafford Road Core Regeneration Area is focussed on the A449 Stafford Road and is one of the main gateways into Wolverhampton and the Black Country. It contains important road, canal and rail infrastructure that links the city with Staffordshire, Shropshire, Telford and northwest England.
- 3.28 The WLP supports the role of this area as one of the premier employment locations in the Black Country, building on the success of the adjacent i54 Business Park in South Staffordshire and the Green Innovation Corridor with initial phases of delivery focussed on Wolverhampton Science Park and the Springfield Campus. The Plan seeks to safeguard jobs in existing Strategic and Local Employment Areas, complemented by sites to provide new, high quality employment development in Fordhouses and Wolverhampton Science Park. The area is served in particular by Stafford Road (3 Tuns) District Centre. There are also more limited opportunities for residential development.
- 3.29 The Plan also promotes enhancements to public transport, walking, cycling and highway networks, particularly along the A449, to maintain sustainable travel patterns and secure private sector investment. Development will respect and enhance the historic character and local distinctiveness of the area, with investment in environmental infrastructure including the canals, open spaces and wildlife habitats.

### Wednesfield Core Regeneration Area

- 3.30 The Wednesfield Core Regeneration Area is centred on the Walsall to Wolverhampton Growth Corridor, recognised as a priority for investment in the West Midlands Housing Deal. The area contains a range of facilities, including New Cross Hospital, Wednesfield Town Centre, the Bentley Bridge retail centre and the Wednesfield employment area. It is subject to a number of existing regeneration projects including:
- a) The ongoing transformation of the Heath Town Estate, including the delivery of new high quality housing;
  - b) Wednesfield Town Centre enhancements – the Investment Prospectus identifies the town centre as a priority area for investment, particularly improvements to Wednesfield Market to enhance facilities, increase footfall and attract further investment and development;
  - c) A454 Eastern Gateway enhancement programme – a key transport corridor linking the City with Walsall and the M6 motorway
- 3.31 The WLP supports the protection and enhancement of the Wednesfield employment area by identifying a number of sites for development and safeguarding existing business premises from redevelopment to non-employment uses. The WLP also promotes enhanced connectivity, both through and into the area, to better meet the needs of businesses and local people. Key projects include the A454 enhancement programme and access to New Cross Hospital.



## Bilston Core Regeneration Area

- 3.32 The Bilston Core Regeneration Area acts as a gateway linking Wolverhampton to the heart of the Black Country and Birmingham by rail, Metro, road and canal. At the centre of the Core Regeneration Area is the largest concentration of industrial land in the City, providing thousands of jobs and reflecting the area's industrial heritage. This industrial core, fringed by housing, is anchored by Wolverhampton City Centre in the north and Bilston Town Centre in the south, which acts as a significant focus for the local community, offering a range of shopping, leisure and community facilities.
- 3.33 The WLP supports the protection and enhancement of the employment function of the area by identifying new development opportunities and encouraging the refurbishment and enhancement of existing premises. The Plan also identifies opportunities for residential development on poor quality, surplus industrial land clustered around the city centre and Bilston Town Centre, building on the success of flagship partnership-led regeneration schemes such as Bilston Urban Village, Steelhouse Lane and Ward Street.
- 3.34 Regeneration opportunities identified within Bilston Town Centre include The Orchard, and the Investment Prospectus highlights the importance of enhancing Bilston Market and improving Bilston High Street and linkages, particularly to Bilston Urban Village. Other key projects nearby include delivery of Bilston Health & Wellbeing Centre and employment development at Bilston Urban Village East. City of Wolverhampton College has recently completed development of an Advanced Technology and Automotive Centre at the Wellington Road campus in Bilston.
- 3.35 The WLP promotes enhanced connectivity and high quality networks of open space focussed on the canal and Metro corridor to serve new communities, with significant environmental projects completed recently at Ward Street and Bilston Urban Village, and further improvements planned for East Park and the Bradley Canal Arm Link

## Neighbourhoods Area

- 3.36 The Neighbourhoods Area of the City forms the majority of the built-up area of Wolverhampton and is where most residents live. The Neighbourhoods Area includes Tettenhall and Penn to the west, Bushbury, Wednesfield and Ashmore Park to the north and Ettinghshall to the south. The Area is served by a network of open space, health and education facilities and supported by a range of district and local centres as defined in Policies CEN1 and CEN2. There are also a small number of employment areas subject to Policy EMP4, providing a valuable source of jobs for local people.
- 3.37 An essential requirement of any strong and stable community is for residents to have access to decent and secure homes. A key aim of the Plan is to support the delivery of a constant supply of new housing development. A limited amount of new housing development will be accommodated in the Neighbourhoods Area, on appropriate identified sites and windfall sites.

- 3.38 In the past, significant housing renewal and regeneration programmes have taken place in Wolverhampton to address poor quality housing and living environments. Housing renewal also provides opportunities to upgrade housing stock to meet carbon reduction and climate change mitigation and adaptation requirements. Past interventions have been successful, and there are now a limited number of areas where housing renewal (involving demolition and rebuild) is planned over the early years of the Plan period – at New Park Village and Tarran properties at Lincoln Green, Wood End and Portobello.
- 3.39 The WLP seeks to sustain and enhance the Neighbourhoods Area by ensuring that residents have good access to jobs, shopping, health, recreation, open space and other facilities to meet day-to-day community needs. The Neighbourhoods Area will provide for enhanced housing choice through the bringing forward of a constant supply of development opportunities.

### Green Belt Areas

- 3.40 Green belts are identified and designated to prevent urban sprawl, including the coalescence of settlements, by keeping land permanently open. National green belt policy aims to prevent inappropriate development within green belt areas. Parts of the West Midlands Green Belt fall within Wolverhampton. The detailed boundaries of green belt areas in Wolverhampton are shown on the Policies Map. A strong green belt is critical to the spatial strategy, as this helps to promote urban renaissance within the urban area and provides easy access to the countryside and recreational opportunities for local residents.
- 3.41 The Wolverhampton urban area is fringed by open countryside to the north and west. This is complemented by a network of green wedges and corridors which effectively bring the countryside and its landscape into the heart of the built-up area. Much of this is green belt and makes a valuable contribution to the urban area through a variety of uses and functions. The green belt areas contain some rural landscapes, including agricultural land and rural settlements such as Penn Village. However, much of the green belt in Wolverhampton is urban in character and provides a network of natural and formal open space, education buildings, recreational facilities (such as Aldersley Leisure Village, Dunstall Park Racecourse and golf courses), and other infrastructure (such as sewage works, sub-stations and cemeteries).
- 3.42 The Smestow Valley Local Nature Reserve, focused on the canal network, a disused railway line and the Smestow Brook, runs north-south through the western part of the City. This is a particularly important wedge of green belt of high value for wildlife and people and is a priority for improvement and extension. Northcote Farm Country Park is another key community facility located in the green belt, which is a priority for protection and enhancement.
- 3.43 Parts of the green belt are also identified as being of significant historic landscape character and particularly high quality design and materials will be expected in such locations, in line with Policy ENV5.

## Evidence

- Wolverhampton SHLAA (WCC, 2024)
- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)
- Black Country Employment Area Review (BEAR) (BCA, 2021)
- Wolverhampton Viability Study (Aspinall Verdi, 2024)
- Black Country Traffic Modelling Reports (Sweco, 2024)
- Black Country Historic Landscape Characterisation Report (Oxford Archaeology 2019)
- Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord, 2022)
- Wolverhampton Investment Prospectus (WCC, 2024)

## Delivery

- Annual update of SHLAA
- Review of Wolverhampton City Centre Area Action Plan
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

## Placemaking – Achieving Well Designed Places

- 3.44 Where people live has a major impact on their wellbeing. The Council is committed to ensuring that the design, planning and layout of developments is to a high standard and enhances local places. Policy CSP2, together with policies in Section 10: Environment and Climate Change and other Development Plan Documents, set out the standards developments will need to meet to ensure they are well designed and function as attractive places which will improve people's wellbeing and the overall attractiveness of the City as a place to live and work.
- 3.45 Achieving the environmental transformation of Wolverhampton, including mitigation and adaptation to climate change and promotion of carbon net zero, underpins the Vision and all Spatial Priorities. Placemaking and high quality urban design are key mechanisms through which this transformation will be achieved.

## Policy CSP2 – Placemaking: Achieving Well Designed Places

### Placemaking: Achieving Well Designed Places

- 1) Wolverhampton's ongoing transformation will be supported by the development of well designed places and buildings providing a range of functions, tenures, facilities, and services, intended to support the needs of diverse local communities. 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. Development proposals should, wherever possible, make use of intelligent site layout and building orientation, efficient building design and low carbon materials to promote climate change mitigation and adaptation and reduce reliance on carbon-based products, energy and non-renewable resources, in accordance with Policies ENV10, ENV14 and W5.
- 3) All development proposals should demonstrate a clear understanding of the historic character and local distinctiveness of the site location, in accordance with Policy ENV5, and how the proposal makes a positive contribution to Wolverhampton place-making and environmental improvement. Designs should recognise and reflect the significance of local heritage and retain and protect historic significance to the greatest extent possible.
- 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) Wolverhampton will be a safe and secure place to live and work in, through organising the urban environment in ways that encourage people to act in a responsible manner (see Policy EMP6(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.

### Placemaking: Achieving Well Designed Places

- 6) An integrated and well-connected multifunctional open space network will be pursued throughout Wolverhampton, including through the design and layout of new housing and employment developments, in accordance with Policy ENV8. This will deliver opportunities for sport and recreation and help establish and support a strong natural environment. Properly designed and well-located open spaces will help mitigate flood risk in accordance with Policies ENV12 and ENV13, provide space for wildlife in accordance with Policies ENV1 and ENV3, and encourage informal recreation for local people as well as help create a high quality living environment.
- 7) The protection and enhancement of Wolverhampton’s historic canal network and natural waterways will be sought to the extent possible through the design and layout of appropriately located housing and employment development and by the integration of waterways into those proposals to create attractive waterside development, in accordance with Policies ENV7 and ENV12. This will act as a unifying characteristic within Wolverhampton’s urban structure and landscape.

### Justification

- 3.46 The importance of high quality design in creating places where people want to live, work and invest with renewed confidence is a fundamental plank of both national and local policy. The NPPF explains that: “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.” (paragraph 31). The NPPF requires each Local Planning Authority to prepare design guides or codes consistent with the principles of the National Design Guide and National Model Design Code. The National Design Guide states that permission should be refused for development of poor design, especially where it fails to reflect local design policies and government guidance on design. The Design Guide for Wolverhampton consists of: Policy CSP2; other strategic design policies in Section 10; non-strategic design policies adopted in other Development Plan Documents and Neighbourhood Plans; and detailed design guidance provided in Supplementary Planning Documents, development briefs and masterplans.
- 3.47 The WLP aims to create the conditions for economic and social growth, by fostering a safe, attractive and accessible built and natural environment. The WLP also encourages and supports the growth of locations that encourage participation and community engagement. Successful placemaking will foster community stability and incorporate elements that create resilience to adverse economic and environmental impacts. Wolverhampton enjoys a unique heritage, reflected in its urban structure, which requires a sensitive approach to place-making and an insistence on a high quality of design for proposals that affect the historic built and natural environment.

- 3.48 Vibrant streets and spaces, defined by surrounding buildings and with their own distinct character, will provide the framework for a coherent and interconnected network of places. These will support ease of movement, social interaction and a sense of personal wellbeing, and will display a clear hierarchy of private, commercial and civic functions. Wolverhampton's network of centres will provide a focus and concentration for essential local services and activities with easy access by walking, cycling and public transport to residential areas, as detailed in policies in Section 8: Centres, Section 9: Transport and Policy HOU2 – Housing Density, Type and Accessibility. Its diverse, accessible, affordable and active villages, towns and neighbourhoods will encourage commercial activity, promote prosperity and support the wellbeing of residents. Sport England's Active Design Guidance promotes public health and community activity through building an infrastructure that creates opportunities for all types of physical activity, and the Council welcomes its use in designing schemes and housing layouts.
- 3.49 Great opportunities exist across Wolverhampton to transform areas into high quality places for people to live, work and invest in. This will involve reinforcement, or in some cases reinvention, of a sense of place and local identity. Wolverhampton needs a collective commitment to high quality design if it is to maximise the potential benefits of transformation at scale.
- 3.50 In particular, the opportunity exists to transform Wolverhampton City Centre and Wolverhampton's Core Regeneration Areas into distinctive places that provide a good quality of life for all who live in, work in and visit them. Investment in high quality places will result in environmental, economic and social benefits, including community safety, health and wellbeing, inclusive communities, better public services, environmental sustainability, climate resilience, greater financial value of buildings and improved worklessness. Creating a better quality of life for Wolverhampton's communities depends on addressing many factors and will play an increasingly important role in attracting private sector investment and skilled workers.
- 3.51 The importance of high quality design and place-making is central to the ambitions of the WMCA. WMCA have produced a West Midlands Design Charter in collaboration with public bodies, which was tested with developers, designers and investors from the private sector. The Charter represents a regional commitment to good place-making and aims to secure high quality design in housing, civic architecture, urban spaces, parks and transport infrastructure. The Charter is used to help determine applications for WMCA funding. The key themes, reflected in Policy CSP2, are:
- a) character;
  - b) connectivity and ambition;
  - c) climate resilience;
  - d) health and wellbeing;
  - e) engagement and stewardship;
  - f) delivery.

## Evidence

- National Design Guide (MHCLG, 2021)
- West Midlands Design Charter (WMCA, 2022)
- Black Country Historic Landscape Characterisation Report (Oxford Archaeology, 2019)
- Active Design Guidance (Sport England, 2023)

## Delivery

- Planning application process, legal and funding mechanisms
- Preparation of Supplementary Planning Documents, development briefs and masterplans for specific sites and areas, as appropriate

## Monitoring

Policy	Indicator	Target
CSP1	Delivery of net new homes and employment development by location	Targets by 2042 as set out in Table 3



# 4. Infrastructure & Delivery

## Introduction

- 4.1 A key role of the WLP is to plan for the growth required for a sustainable and prosperous Wolverhampton. Ensuring effective delivery of this growth will require strong collaborative working between the Council and public, private and third sector partners, involving a robust process of infrastructure planning and delivery. The provision of appropriate infrastructure in a timely manner underpins the transformational and regeneration strategy of the WLP.
- 4.2 The NPPF highlights that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. It requires planning policies and decisions to support the expansion of electronic communications networks, including next generation mobile technology and full fibre broadband connections. The expansion of these networks in Wolverhampton will support the vision and spatial strategy of the Plan by supporting economic growth and sustainable development.

## Delivery Constraints

- 4.3 Physical and social infrastructure is necessary to enable and support the growth required over the Plan period. New housing and economic development will put pressure on existing services and utilities but may also create opportunities to provide robust and innovative infrastructure solutions.
- 4.4 The WLP is supported by an Infrastructure Delivery Plan (IDP), which draws upon a range of evidence including transport modelling, a Utilities Infrastructure Capacity Study, a Water Cycle Study and a Viability Study. The IDP also draws on up-to-date information and advice from key infrastructure partners, including water and electricity providers, the local education authority and health bodies. This evidence and input underpins the WLP by identifying infrastructure investment required to support development, potential constraints to delivery and the key delivery mechanisms and partners.
- 4.5 The WLP adopts a brownfield first approach to maximise delivery of development within the urban area. However, poor ground conditions that are a legacy of Wolverhampton's mining and industrial past are a significant constraint, in both physical and financial terms. Therefore, tackling significant and structural delivery constraints are a priority for interventions, as they affect much of the development land supply in the urban area. The Council is working to ensure that brownfield land is prioritised for development and intervention, in particular through partnership with the West Midlands Combined Authority.
- 4.6 Where valuable mineral resources are present, and it is viable to extract them as part of a remediation scheme, this may also help offset the costs.

## Transport and Access to Residential Services

- 4.7 Parts of Wolverhampton's existing highway infrastructure, and the motorway network, suffer from congestion. Detailed transport modelling work has informed the WLP. Assuming that key projects to improve highways, public transport, walking and cycling infrastructure are delivered, as set out in Section 9, it is anticipated that the development of new housing and employment land will not have a significant negative impact on highways infrastructure.
- 4.8 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.
- 4.9 Infrastructure investment will be required to support development, including:
- recreational open space
  - transport provision
  - school places
  - health facilities
  - affordable housing
  - sustainable drainage systems
  - wastewater treatment
  - waste management
- 4.10 The Wolverhampton urban area is well-served by infrastructure and 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 relatively limited in terms of both cost and extent and are unlikely to prevent development from going ahead, as evidenced by the Viability Study. Major changes may be required to the way that Wolverhampton is powered over the Plan period, together with an increasing reliance on digital solutions. Where gaps in service provision exist, service providers are aware of and will work to address them. The detailed spatial aspects of implementation and delivery for Wolverhampton City Centre will be set out as part of a review of the Wolverhampton City Centre Area Action Plan.

## Economic activity

- 4.11 As identified in the Black Country Economic Development Needs Assessment (EDNA), the Black Country authorities comprise a clearly defined functional economic market area (FEMA) with strong employment and labour market links to a hinterland with Birmingham and South Staffordshire districts in particular. It is a fast-growing functional economy and has the capacity to deliver significant growth, given the diversity, resilience and concentration of key national sectors located in the area. However, skills challenges are holding it back.

- 4.12 Economic development strategies, including the WMCA Strategic Economic Plan (SEP) and Wolverhampton Good Growth Strategy, seek to address these challenges to accelerate the growth of the local economy. There are major investment plans for Wolverhampton, including for the transport infrastructure crucial to meeting the ambitions in the WMCA SEP and Local Transport Plan.
- 4.13 Considerable investment will be taking place within or close to Wolverhampton over the Plan period, including:
- West Midlands Interchange at Four Ashes (north of Wolverhampton)
  - Expansion of I54 employment site (on the northern edge of Wolverhampton)
  - M54 - M6/ M6 (toll) Link Road to improve east-west connections to the north of the Black Country
- 4.14 Other infrastructure investment likely to impact Wolverhampton during the Plan period:
- Rollout of a fast-charging network for electric vehicles
  - Rollout of full fibre broadband and 5G networks

## Planning Obligations

- 4.15 Planning obligations currently deliver local infrastructure improvements necessary to mitigate the impact of development on the local area. Examples include affordable housing provision, access improvement and recreational open space.
- 4.16 Financial viability has always impacted on the extent of planning obligations that can be secured in Wolverhampton, particularly in areas suffering from poor ground conditions. In recent years, national biodiversity net gain requirements have increased viability constraints on sites which include any greenfield areas, and future tightening of national standards for accessible and sustainable homes set out in Building Regulations is expected to add further costs.
- 4.17 In order to deliver sufficient development which is of a sustainable design and supported by enough infrastructure the WLP introduces limited new requirements for development, where these are supported by the Viability Study. These requirements vary according to development size, type and location. It is expected that the majority of allocations and windfall developments will be able to sustain the full range of planning obligations required, as evidenced by the Viability Study.

## Infrastructure Provision

- 4.18 The following policy sets out how the Council will secure infrastructure provision from future planned development. It also sets out the requirement for viability evidence where, in exceptional circumstances, proposals are unable to comply with the policies of the WLP.

## Policy DEL1 – Infrastructure Provision

### Infrastructure Provision

- 1) All new developments should be supported by the necessary on and off-site infrastructure to serve its needs, mitigate its impacts on the environment and the local community and ensure that it is sustainable and contributes to the proper planning of the wider area.
- 2) Unless material circumstances or considerations indicate otherwise, development proposals will only be permitted if all necessary infrastructure improvements, mitigation measures and sustainable design requirements and proposals are provided and /or can be phased to support the requirements of the proposed development. These will be secured through planning obligations, planning conditions or other relevant means or mechanisms, to an appropriate timetable.
- 3) The Council will set out in Development Plan Documents, Infrastructure Delivery Plans, Supplementary Planning Documents, and where appropriate, masterplans:
  - a. The infrastructure that is to be provided or supported;
  - b. The prioritisation of and resources for infrastructure provision;
  - c. The scale and form of obligation to be applied to each type of infrastructure;
  - d. Guidance for integration with adjoining local authority areas, where appropriate;
  - e. The procedure for maintenance payments and charges for preparing agreements;
  - f. The defined circumstances and procedure for negotiation regarding infrastructure provision.
- 4) The WLP has been subject to a Viability Study to ensure the policies are deliverable. In the exceptional circumstances where site-specific issues generate viability concerns, applicants should discuss these with the Local Planning Authority at the earliest possible stage in the planning application process.
- 5) Proposals that are unable to comply with WLP policies on viability grounds should be accompanied by a detailed Financial Viability Assessment.

### Justification

- 4.19 The scale of growth proposed in the WLP will have significant impacts on the local environment and the capacity of a range of infrastructure and facilities. It is important that the appropriate investment takes place to ensure, future development is sustainable. The definition of infrastructure in this context is wide. The types of infrastructure for which overall targets and

standards are set in the WLP include: fibre to the premises (Policy DEL3), healthcare facilities (Policies HW3 and HOU2), affordable, accessible and self build housing (Policy HOU3), education facilities (Policies HOU2 and HOU6), transport measures (Policy TRAN3), trees (Policy ENV4), recreational open space (Policy ENV8), playing fields and sports facilities (Policy ENV9), air quality and flood risk mitigation measures (Policies ENV11 and ENV12), sustainable drainage systems (Policy ENV13) and renewable energy generation (Policy ENV14). There are also locally specified infrastructure requirements, such as crime prevention measures, cross-boundary requirements, such as Cannock Chase SAC impact mitigation (Policy ENV2), and national requirements, such as biodiversity net gain (Policy ENV3). Impacts on environmental infrastructure can include loss of open space or wildlife habitat on site, which must be mitigated.

- 4.20 These requirements are set out in the appropriate sections of the WLP and in other Development Plan Documents, with further detail provided in Supplementary Planning Documents. WLP policy requirements have been subject to a proportionate assessment of viability to ensure that the requirements are realistic, and that the cost of meeting these requirements will not undermine the deliverability of the Plan.
- 4.21 Each development proposal must address its own impacts through on-site and off-site provision or enhancements, secured through planning obligations, conditions or other relevant means. Where the combined impact of several developments creates the need for infrastructure, it may be necessary for developer contributions to be pooled to allow the infrastructure to be secured in a fair and equitable way.
- 4.22 The amount of money secured and spent by the Council under planning obligations for different types of infrastructure is reported in the Wolverhampton Annual Infrastructure Funding Statement.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (PBA Stantec, 2019)
- Black Country Water Cycle Study: Phase 1 Scoping Study (JBA, 2020)
- Wolverhampton Water Cycle Study: Phase 2 (to be produced 2024/25, if required)
- Wolverhampton Viability Study (Aspinall Verdi, 2024)
- Wolverhampton Infrastructure Delivery Plan (WCC, 2024)
- Wolverhampton Annual Infrastructure Funding Statements (WCC)

## Delivery

- Through DPDs and SPDs for various types of infrastructure and planning obligations.
- Investment will be sought through negotiations as part of the planning application process.

## Balance Between Employment Land and Housing

4.23 New housing and employment developments on previously developed land not allocated for these uses can make an important and positive contribution towards meeting future development needs. The following policy sets out the approach for assessing windfall employment and housing developments, ensuring they are located in suitable and sustainable locations. Other national and local policies will also apply to such developments.

## Policy DEL2 – Balance Between Employment Land and Housing

### Balance Between Employment Land and Housing

- 1) **Development of housing or employment (E(g) (ii) (iii), B2 or B8 class uses) on previously developed land that is not allocated for these uses (known as windfall sites) will be permitted where the proposal accords with other Development Plan Document policies, and subject to meeting all the following criteria:**
  - a. **They are in sustainable locations that are suitable for the proposed use;**
  - b. **They demonstrate a comprehensive approach, by making best use of available land and infrastructure;**
  - c. **Incremental development will only be allowed where it would not prejudice the master-planning of the wider area;**
  - d. **Proposals for new development must take account of existing adjacent activities where the proposed development could have an adverse effect on or be affected by neighbouring uses. Mitigation of the impact of noise and other potential nuisances will need to be demonstrated.**

## Justification

- 4.24 Locating the right development in the right place ensures that proposals are sustainable, have a positive relationship with the surrounding area and uses and integrate well with and complement the character of their location.
- 4.25 Policies HOU1 and EMP1 allocate sites for housing and employment uses based on the anticipated availability of land for development at the time of the preparation of the Plan. However, there will always be windfall sites put forward for development in areas where it is not currently anticipated, and it is important that such development is brought forward in a comprehensive way.

- 4.26 Existing businesses wanting to grow should not have unreasonable restrictions put on them because of a change in nearby land uses since they were established. Therefore, new developments will need to reflect the ‘agent of change’ principle by proving that the person or business responsible for the proposed new development / change is responsible for managing the impact of that change in relation to noise and other potential nuisances generated by existing land uses in the vicinity. Similarly, where an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant will need to provide mitigation before the development has been completed.

### Evidence

- Black Country Employment Area Review (BCAs, 2021)

### Delivery

- Through the planning application process.

## Promotion of Fibre to the Premises and 5G Networks

- 4.27 Planning policy can play an important role in helping to address the key digital connectivity infrastructure needs of Wolverhampton. The following policy sets out proposals for ensuring the provision of full fibre broadband connectivity is considered in all new major development proposals. It also sets out the approach for supporting and assessing 5G Network infrastructure proposals.

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

### Promotion of Fibre to the Premises and 5G Networks

#### Fibre to the Premise

- 1) **Fibre to the Premises (FTTP) is essential infrastructure and is vital to the delivery of sustainable development. All major developments that provide ten or more new homes or more than 1,000 sqm of non-residential floorspace will be required to deliver FTTP capacity / infrastructure to all individual properties. This requirement will only be reduced where it can be clearly demonstrated that it is not practical or viable to deliver FTTP.**
- 2) **Where FTTP cannot be delivered, non-Next Generation Access technologies that can provide speeds in excess of 30MB per second should be provided as an alternative.**



### Promotion of Fibre to the Premises and 5G Networks

- 3) All eligible proposals should be supported by an FTTP Statement that details how FTTP will be provided to serve the development and confirms that FTTP will be available at first occupation.

#### 5G Networks

- 4) Any proposals for infrastructure to support the delivery of 5G networks will be supported in principle, subject to meeting the requirements of other local policies and national guidance, and an assessment of the impact of the siting and appearance on a case by case basis.
- 5) Proposals should be sensitively sited and designed to minimise impacts on the environment, amenity, and character of the surrounding area. Proposals should not have an adverse impact on areas of ecological interest or areas of landscape importance, and should protect and, where possible, enhance the significance of heritage assets and their settings. Proposals should demonstrate that proper regard has been given to location and landscaping requirements.
- 6) Operators proposing 5G network infrastructure are strongly recommended to enter into early discussions with the Local Planning Authority.

## Justification

### Fibre to the Premises

- 4.28 Full fibre broadband or fibre to the premises (FTTP), is the future of connectivity and increases speeds from the 30 MB available for superfast broadband to 1000 MB (1GB). The Council has taken a proactive approach to FTTP coverage, allowing coverage to reach 82% of Wolverhampton in 2024, above the average UK coverage of 66%. However, it is important to ensure that all homes and businesses have access. FTTP is required to meet future demands for connectivity, as highlighted by a 50% increase in demand each year, and there are wider economic, health and service delivery benefits.
- 4.29 At the local level, the availability, reliability and speed of broadband provision is a key consideration for home buyers and many view it to be as essential as more traditional utilities. Wider adoption will help reduce the need to travel, improve highway safety and mitigate the transport impacts of new development, as reflected in the Key Route Network's 'Connecting Communities' programme. Similarly, it is also a key concern in the public health and business sectors. However, despite the obvious benefits to developers and end-users, FTTP is not always provided in new housing and commercial developments.

- 4.30 Planning policy can play a role in helping to achieve the necessary transformation in broadband connectivity. The NPPF clearly recognises this and supports the delivery of advanced, high quality communications infrastructure and the expansion of high-speed broadband where possible.
- 4.31 The Council is committed to supporting the rollout of digital infrastructure for the future. Wolverhampton's Digital Infrastructure Strategy supports both the rollout of full fibre broadband and wireless connectivity including 5G. The Council has nominated a Digital Infrastructure Champion and Co-ordinator to drive this agenda forward and is working as part of the WM5G Digital Forum to support the rollout of future proofed digital infrastructure across the region.
- 4.32 Currently most properties in Wolverhampton are connected to gigabit broadband but the future is FTTP. FTTP is recognised by the Government as a Next Generation Access (NGA) technology and as a priority for investment. NGA are wired access networks that include optical elements capable of delivering broadband access services with enhanced characteristics compared to existing copper networks. While superfast speeds can be achieved on current generation copper networks, it is widely accepted that NGA technologies should be prioritised.
- 4.33 The Government has committed to gigabit-capable broadband by 2025 and it is the aspiration of the Council to support rollout of FTTP across Wolverhampton as soon as possible. As part of the WM5G work, an options appraisal case is being pulled together around full fibre. By seeking FTTP, the Council is aiming to provide a futureproof solution for broadband delivery within Wolverhampton. Adopting this approach will prevent the need for fibre retrofitting programmes in the future, which have significant cost implications and cause considerable disruption through road works. In Wolverhampton, waterway corridors can provide alternative opportunities for communications infrastructure.
- 4.34 To help deliver this aspiration, Policy DEL3 requires developers to ensure FTTP is available at every new property on all major developments, except in the limited cases where this is not practical or viable. The cost of installing FTTP in the build phase of new development is neutral or relatively small. On larger sites (around 25 or more homes) the provider will generally meet the cost voluntarily, with a contribution requested on smaller sites. Any costs to the developer could be balanced by increased sales values generated by fast and reliable broadband being available. The Viability Study has concluded that FTTP is not costly for developers to provide and is unlikely to affect development viability.
- 4.35 By implementing this policy approach, the Council is seeking to ensure that future developments remain at the forefront of advances in broadband technology, allowing Wolverhampton to be a market leader and remain an attractive location for businesses and residents alike.

- 4.36 Where it is considered that delivery of FTTP is not viable or practical, evidence should be provided to demonstrate that a departure from policy is justified. Such evidence could include issues of viability, the ability to undertake the physical work required to install it and proximity to the nearest breakout point on the fibre network. There may also be circumstances where the operators themselves have concluded that servicing the site is not practical. Where a FTTP solution is not deemed possible, provision of technologies capable of providing speeds in excess of 30MB should be delivered instead.
- 4.37 The intention of Policy DEL3 is not to require developers to deliver FTTP solutions themselves. Instead, it focuses on the need to conduct early dialogue with telecom providers in order to best understand what their infrastructure specifications are and how these can be accommodated as part of the new development. The involvement of multiple telecoms providers at build stage will minimise the impact later.
- 4.38 To facilitate this, any application for a qualifying development should be supported by an “FTTP Statement”, which provides details of dialogue with the telecom operators, explains how FTTP will be provided to serve the development and confirms that this process will be completed upon occupation of the first property on the development. Conditions will then be applied to any subsequent permission to ensure that FTTP will be secured as envisaged by the statement. For outline applications, the statement may be more limited on specific details relating to the imminent implementation of FTTP and provide a commitment to supply these details later, including how and when the telecom operators will be consulted.

## 5G Networks

- 4.39 5G is mobile internet, which is as fast as fibre, with speeds up to 1GB – five to ten times faster than current home broadband connectivity. 5G benefits include huge capacity, with the ability to connect thousands of users and devices at the same time at consistently ultrafast speeds and ultra-reliable, secure, and low latency, which will be transformational for industry. The demand for mobile data in the UK is growing rapidly, and as households and businesses become increasingly reliant on mobile connectivity, the infrastructure must be in place to ensure supply does not become a constraint on future demand.
- 4.40 The Government wants to be a world leader in 5G, the next generation of wireless connectivity, and for communities to benefit from investment in this new technology. The NPPF expects planning policies and decisions to support the expansion of next generation mobile technology such as 5G. The West Midlands has been selected as the UK’s first multi-city 5G test bed, paving the way for the future rollout of 5G across the UK, making the region the first in the UK ready to trial new 5G applications and services at scale.

- 4.41 To deploy 5G and improve coverage in partial “not-spots” (a place where wireless internet, especially broadband, services are not available), mobile network operators will need to strengthen existing sites to accommodate additional equipment. To extend coverage into total not-spots or to add capacity in areas of high demand, mobile network operators will also need to identify and develop new sites. Masts may need to be higher than at present to accommodate 5G, which may impact on local amenity and character in some areas. Mobile Network Operators are encouraged to have early discussions with the Local Planning Authority and to communicate and consult with local communities, especially in the case of new sites, to ensure that the best sites are selected for 5G infrastructure and that equipment is sympathetically designed, in line with principles set out in the NPPF and relevant Development Plan Document policies.
- 4.42 Where larger developments are planned, developers can consider the incorporation of potential sites for telecoms equipment to ensure 5G coverage.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (PBA Stantec, 2019)
- Wolverhampton Digital Infrastructure Evidence Base (WCC, 2024)
- Tackling Health Inequalities – Digital Inclusion (Black Country & West Birmingham Sustainability and Transformation Partnership. 2021)
- Commission Recommendation 2010/572/EU of 20 September 2010 on regulated access to Next Generation Access Networks

## Delivery

- Planning application process

## Monitoring

Policy	Indicator	Target
DEL1	Delivery of sufficient infrastructure to support new development	Annual Wolverhampton Infrastructure Funding Statement

# 5. Health and Wellbeing

## Introduction

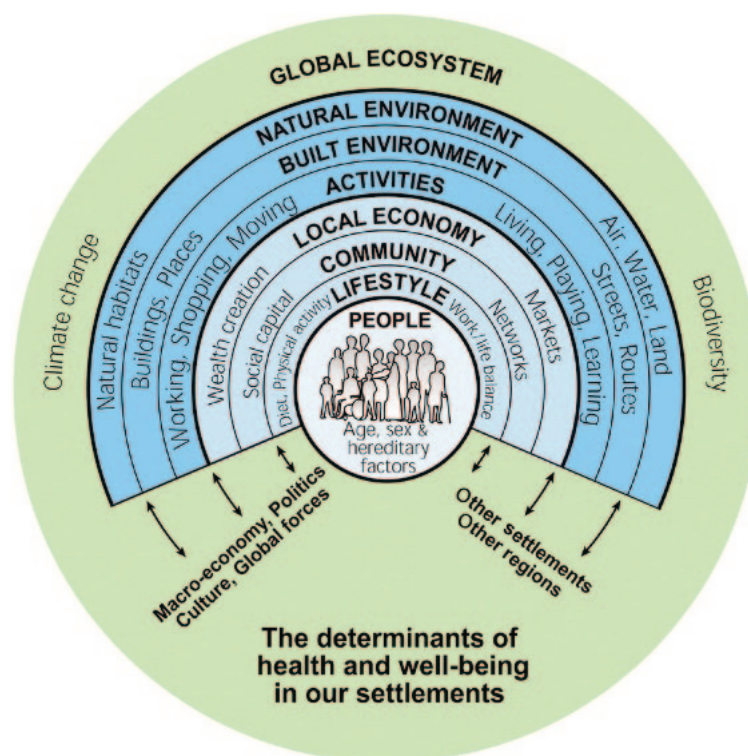
- 5.1 The purpose of the planning system in England is to contribute to the achievement of sustainable development. The built and natural environments are key determinants of health and wellbeing. The NPPF states that one of the three overarching objectives of the planning system is supporting strong, vibrant, and healthy communities. The Health and Social Care Act (2012) gave local authorities new duties and responsibilities for health improvement and requires every local authority to use all levers at its disposal to improve health and wellbeing; Local Plans are one such lever.
- 5.2 Planning policies and decisions should make sufficient provision for facilities such as health infrastructure and aim to achieve healthy, inclusive, and safe places that support healthy lifestyles, especially where they address identified local health and well-being needs. Engagement between Local Planning Authorities and relevant organisations will help ensure that local development documents support both these aims.
- 5.3 Wolverhampton's unique circumstances give rise to several challenges to health and well-being, which are reflected in its related strategies. Ensuring a healthy and safe environment that contributes to people's health and wellbeing is a key objective of the City of Wolverhampton Council and its partners in the health, voluntary and other related sectors.
- 5.4 The City of Wolverhampton Council, the Royal Wolverhampton NHS Hospital Trust and NHS Black Country Integrated Care Board (ICB) (formerly the Clinical Commissioning Group) have worked together to prepare the Wolverhampton Local Plan, to ensure it is aligned with the ICB's plans, as well as with the Council's Health and Wellbeing Strategy, informed by its Joint Strategic Needs Assessment.
- 5.5 The ICB recognises that reducing health inequalities will help reduce financial burdens on the NHS. It also recognises that residents of Wolverhampton, on average, suffer from poorer health outcomes than people in the rest of England.
- 5.6 The ICB has identified a number of key drivers that play a significant role in the development of future illness in the Black Country and which directly link to demand for health provision. These are education, employment, wealth, housing, nutrition, family life, transport and social isolation. These are all influenced by the built and natural environment.

## Linkages between health and the built and natural environment

- 5.7 The linkages between health and the built and natural environment are long established and the role of the environment in shaping the social, economic, and environmental circumstances that determine health is increasingly recognised and understood. Climate change will have a negative impact on health and wellbeing and actions to eliminate emissions and adapt to climate change, such as promoting active travel and improving the energy efficiency of buildings, will also benefit public health through outcomes such as reduced obesity and fuel poverty.

- 5.8 An increasing body of research indicates that the environment in which people live is linked to health across their lifetime. For example, the design of neighbourhoods can influence physical activity levels, travel patterns, social connectivity, food consumption, mental and physical health, and wellbeing outcomes. These are illustrated below in the Barton and Grant (2010) Health Map.

**Figure 3: Determinants of health and wellbeing (Barton and Grant, 2010)**



- 5.9 Evidence shows that important determinants of health include the following:
- Inclusive and secure environments
  - Physical activity including active travel
  - Quality homes
  - Good air quality and appropriately low-level noise environments
  - Access to education and employment opportunities
  - Access to cultural and other services
  - Access to high quality natural greenspace
  - Healthy eating

- i) Digital inclusion; and
- j) Reducing exposure to harmful and addictive behaviour

This means that addressing health inequalities needs a comprehensive approach and joint working across various services to achieve desired outcomes, as illustrated by Sport England's Active Design Guidance with its Ten Principles of Active Design (2023).

- 5.10 The value of accessible, high quality natural greenspace to local communities is increasingly understood. For example, the *Dasgupta Review* (2021) stated that access to green spaces can reduce socio-economic inequalities in health, and cited a longitudinal study covering over 10,000 UK residents that found that living in greener urban space was associated with greater life satisfaction (White et al. 2013).
- 5.11 Public Health England and the Institute of Health Equity's report, *Healthy High streets: Good place-making in an urban setting*, (2018) highlights the many factors which make for an unhealthy high street, from lack of diversity in the retail offer to lack of green infrastructure, levels of crime and non-inclusive designs. In the same year a report, *Running on Empty*, from the Royal Society for Public Health, found that Wolverhampton had the eight unhealthiest high street in the UK due to the proliferation of uses they judged to be bad for health, such as fast food takeaways, payday lenders and bookmakers alongside the lack of those they judged to be good for health.
- 5.12 The Marmot Review (2010) highlighted that socio-economic inequalities, including the built environment, have a clear effect on the health outcomes of the population. One of the key policy objectives aimed at reducing the gap in life expectancy between people of lower and higher socio-economic backgrounds, is to “*create and develop healthy and sustainable places and communities*”.
- 5.13 In February 2020, The Institute of Health Equity published The Health Foundation's *Health Equity in England: The Marmot Review 10 Years On*. The report highlights that poor health is increasing, that the health gap has grown between wealthy and deprived areas and that place matters to health. The review goes on to recommend:
- Investment in the development of economic, social and cultural resources in the most deprived communities;
  - 100% of new housing to be carbon neutral by 2030, with an increased proportion being either affordable or in the social housing sector; and
  - Aiming for net zero carbon emissions by 2030 ensuring inequalities do not widen as a result.
- 5.14 There is therefore a need for the Plan to support initiatives aimed at: encouraging healthier lifestyle choices; promoting mental wellbeing; and addressing socio-economic and environmental issues contributing to poor health and inequalities. The Plan supports these aims by ensuring that any new development meets the following aims through the policies identified:



- a) Is inclusive, safe, and attractive, with a strong sense of place; encourages social interaction; and provides for all ages, social groups and abilities as set out in Policies CSP2, ENV5, ENV6, ENV8 and ENV9;
- b) Is designed to enable active and healthy lives through prioritising access by inclusive, active, and environmentally sustainable form of travel and through promoting road safety and managing the negative effects of road traffic as set out in Policies CSP2 and TRAN2, TRAN4 and TRAN5;
- c) Provides a range of housing types and tenures that meet the needs of all sectors of the population including: older people and those with disabilities requiring varying degrees of care; extended families; low income households; and those seeking to self-build, as set out in Policies HOU2, HOU3 and HOU4;
- d) Is energy efficient and minimises fuel poverty; provides good standards of indoor air quality and ventilation; is low carbon; mitigates against climate change; and is adapted to the effects of climate change as set out in Policies CSP2, ENV10 and ENV14 in particular;
- e) Is designed and located to achieve acceptable impacts on residential amenity and health and wellbeing arising from: noise; ground and water contamination; flood risk; vibration; and poor indoor and outdoor air quality as set out in Policies CSP2, ENV10, ENV12, MIN3 and TRAN7 in particular;
- f) Provides a range of quality employment opportunities for all skillsets and abilities, along with the education and training facilities to enable residents to fulfil their potential, and supports initiatives to promote local employment and procurement during construction as set out in Policies HOU6, EMP2, EMP3 and EMP5;
- g) Protects, enhances and provides a range of social infrastructure such as: social care; health; leisure; indoor sport and recreation; retail; and education facilities close to where people live, which are accessible by means of inclusive, active and environmentally sustainable forms of travel as set out in Policies HOU2, HOU5, ENV9 and HW2 below;
- h) Protects, enhances and provides outdoor sports facilities, including playing fields, as well as play and recreation opportunities, to support access for all and meet identified needs, as set out in Policies ENV8 and ENV9;
- i) Protects, enhances and provides new green and blue infrastructure, allotments and gardens for physical activity, mental wellbeing, recreation and healthy locally produced food as set out in Policies CSP2, ENV1, ENV3, ENV4, ENV8 and ENV9 in particular;
- j) Provides high-quality broadband and other digital services to homes, educational facilities, employers, and social infrastructure, to support digital inclusion and the application of new technology to improved health care as set out in Policy DEL3; and
- k) Supports vibrant centres and local facilities, which offer services and retail facilities that promote choice and which enable and encourage healthy choices, as set out in Policies CEN1 to CEN4 (inclusive) and Policy HW1 below.

## Health and Wellbeing

5.15 This policy provides a context for how the effects upon health and wellbeing of proposed development will be assessed

### Policy HW1 – Health and Wellbeing

#### Health and Wellbeing

1. All developments will be expected to contribute to an environment that reduces health inequalities and protects and improves the physical, social and mental health and wellbeing of its residents, employees and visitors, in particular children, other young people and vulnerable adults. In doing so, the Council aims to support vibrant centres and local facilities which offer services and retail facilities that promote choice and that enable and encourage healthy choices, as set out in Section 8: Centres.
2. Where new shops are granted planning permission a condition will be imposed that prevents their subsequent use as a stand-alone off-licence without obtaining separate planning permission.
3. Any development that has the potential to have a negative impact, either city-wide or localised, on health and wellbeing, will only be permitted where it can be demonstrated to the satisfaction of the Local Planning Authority that it will not, in isolation or in conjunction with other pre-existing, planned, committed or completed development, contribute either individually or cumulatively to negative health and wellbeing impacts on the city's population.
4. Such negative impacts include, but are not limited to, contributing to adults or children being overweight or obese, antisocial behaviour, increased crime, alcohol harm, tobacco harm, gambling addiction and debt. Such developments include, but are not limited to:
  - a) Hot food takeaways (sui generis) or hybrid uses incorporating such uses.
  - b) Off-licences, where a condition on any planning permission for new shops prevents the subsequent establishment of a stand-alone off-licence without the need to apply for planning permission.
  - c) Public houses, wine bars and other establishments for the drinking of alcohol.

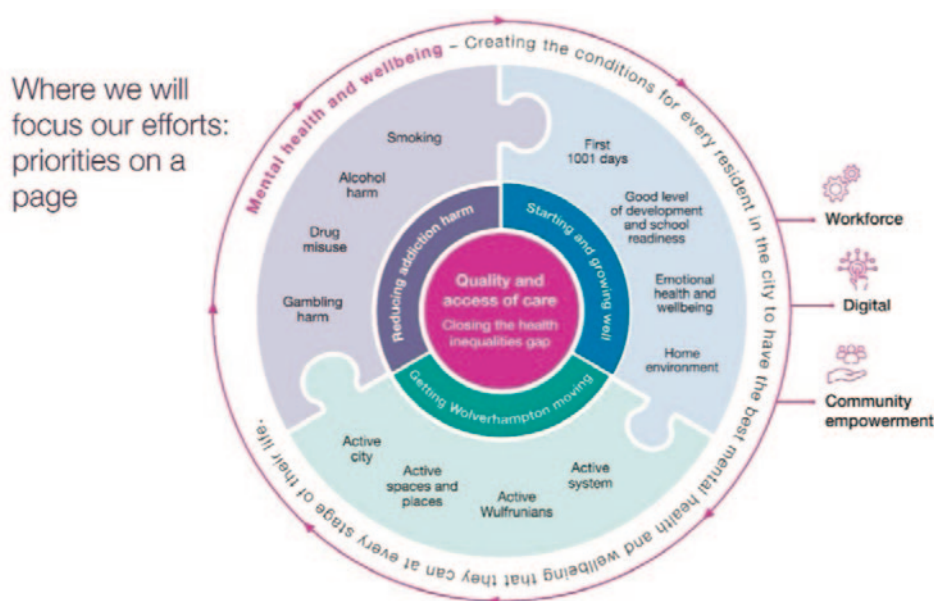
## Health and Wellbeing

- d) Premises to be used for shisha smoking, which the Local Planning Authority will regard as falling into a sui generis use subject to planning control.
  - e) Amusement arcades, betting shops and payday loan outlets.
5. In assessing the likely health impact of proposed developments, the Local Planning Authority will consider national, regional and local evidence which it considers to be of relevance and may require a Health Impact Assessment as outlined in Policy HW2.
  6. Measures will be required, where considered necessary by the Local Planning Authority, to mitigate any negative effects which are identified.
  7. Where developments are permitted they may be subject to controls on their operation, including opening hours, with the aim of minimising their negative impact.

## Justification

- 5.16 Evidence demonstrates that residents of Wolverhampton suffer from poorer health outcomes than the rest of England across a broad range of indicators, including those linked to the built and natural environment. Wolverhampton's Vision for Public Health 2030 recognises that the public health challenges in Wolverhampton include high obesity levels, smoking, alcohol misuse, poor mental health and an ageing, unhealthy population. The biggest factors which influence these challenges are lifestyle choices (such as smoking, diet, exercise and alcohol) and socio-economic factors (such as housing, environment and community). These factors are interrelated and no single initiative can make sustained progress on its own. Instead a 'whole system' partnership is required to achieve good long term health for our population through a range of improvements and initiatives in the broad factors that have an impact on people's lives.
- 5.17 Health Inequalities are systemic, unfair and preventable differences in health, both across the population and between different groups in society. The Wolverhampton Health Inequalities Strategy 2021-2023 recognises the contribution that behavioural risks, such as smoking, and of wider determinants, such as quality of housing, have on health inequalities. Health inequalities shorten people's lives and lead to avoidable years of people living with impaired health and wellbeing. The Strategy states that effectively tackling differences in people's health inequalities starts with a recognition of the different inter-related drivers of health inequalities, many of which are influenced by the built and natural environment. For example, the high rate of households living in fuel poverty means people are exposed to the risk of cold housing in winter, thereby exacerbating long-term health conditions.

- 5.18 Wolverhampton's Health and Wellbeing Strategy 2023-2028 was informed by its Joint Strategic Needs Assessment. The Strategy reports that both life expectancy and healthy life expectancy are lower in Wolverhampton than the national average, meaning people not only die earlier but live more of their life with ill health, which has implications for their ability to be productive and for how they use the built and natural environment. Child poverty, deprivation, unemployment and fuel poverty are all above the national average while the prevalence of depression has risen to be in line with the national average. It identifies positive influences on the people's health as including having a healthy and balanced diet, an environment that enables physical activity and living in good quality housing. Risk factors include smoking, adverse childhood experiences, crime and violence plus drug and alcohol misuse. It concludes that giving people the best start in life and providing a joined up partnership response enabling people to stay well and manage their own health and wellbeing are key to improving the health of our local population.
- 5.19 Ambitions of the Health and Wellbeing Strategy include reducing addiction harm with priority actions included on smoking, alcohol harm and gambling harm. Adult smoking rates, alcohol mortality and hospital admissions for alcohol related conditions are all higher than the average for England. Another ambition is getting Wolverhampton moving more as physical inactivity rates are higher than regional and national averages, with those living in the more deprived areas less physically active. Obesity rates among adults and children are higher than the England and regional averages. Levels of active travel are also below the England and West Midlands averages. Physical activity benefits both mental and emotional wellbeing, contributes to healthy weights and has a protective effect across a range of chronic conditions such as coronary heart disease, obesity and type 2 diabetes. The Health and Wellbeing Together partnership have since developed a Physical Activity Strategy. A further key concern of the Strategy is improving mental health and wellbeing. Self-reported wellbeing in Wolverhampton is worse than for England and the West Midlands; smoking, alcohol misuse, lack of physical activity and obesity are all interlinked with mental health and wellbeing. The diagram below demonstrates the 'priorities on a page' for the Health and Wellbeing Strategy. Both reducing addiction harm and getting Wolverhampton moving are influenced by the built environment and the policies of this Plan.
- 5.20 The Council and its partners are engaged in a range of long term actions to address the issues raised above, as well as to encourage people to take greater responsibility themselves for the choices they make. Planning is one aspect of these actions. In some instances a proposed development may have a direct impact on people's health. In other cases Planning may contribute to poor health by encouraging or making it easy for individuals to make unhealthy choices. Our evidence clearly shows that making it more difficult for people to make these unhealthy choices reduces the likelihood that they will do so; and that this change in behaviour will improve health outcomes over time. Policy HW1 sets out our approach to managing development to influence these issues. Policy HW1 will be implemented as part of a whole



systems approach to improving health and wellbeing across the city, including not just the Local Planning Authority but the Highway Authority, Public Health, Licensing, Environmental Services, the Integrated Care Board and other services and agencies both within and outside the city council.

- 5.21 Providing and improving a range of open space and sports and leisure facilities for physical activity, including active travel, are key to tackling obesity and improving physical and mental health and wellbeing. The protection and provision of allotments and other forms of urban horticulture provides the additional benefit of supporting healthy eating. Public Health England's guidance Using the planning system to promote healthy weight environments, February 2020, provides guidance on different approaches to creating healthy food environments through managing the location and concentration of hot food takeaways. Applicants will be expected to demonstrate that their development will not contribute to health issues such as obesity. Wolverhampton has lower rates of both adults and children who are physically active than both England and the West Midlands region.
- 5.22 Wolverhampton has lower rates of the population eating 'five a day' than the West Midlands or England. It also has, historically, a higher number of fast food outlets per 100,000 population. Proposals for hot food takeaways will be assessed against both city-wide and ward-based evidence, such as obesity rates in children at Reception and in Year 6, as well as proximity to schools, colleges and other locations where children and young people congregate. Between 2020/21 and 2022/23, seventeen out of the city's twenty wards had Year 6 overweight (including obesity) rates which were above the England average of 36.6%. The council's current Hot Food Takeaway Supplementary Planning Document 2018, which restricts hot food takeaways within 400m of secondary schools, will be reviewed and updated as part of a Healthy Places Supplementary Planning Document.

- 5.23 Wolverhampton has smoking rates as well as rates of both smoking-attributable mortality and alcohol-related mortality above those for England and the West Midlands. While smoking rates are falling across the general population, shisha smoking is growing in popularity with a lack of public awareness of its health risks.
- 5.24 There is widespread awareness of the issues for individuals and society arising from tobacco and alcohol related harm. In recent years, however, national concern about the harms associated with gambling has increased. In 2022 it was estimated that 3.75% of adults across the West Midlands may require some form of treatment or support for gambling compared to 3.55% for England. If applied to the population of Wolverhampton at the 2021 Census, this would equate to approximately 9,900 people.
- 5.25 Shop uses currently fall within Class E - Commercial, Business and Service of the Town and Country Planning (Use Classes) Order 1987 (as amended) and therefore any condition preventing the subsequent establishment of a stand-alone off-licence would apply to any permission within Class E or any successor use class should there be changes within the lifetime of the Local Plan.
- 5.26 The Council is a designated licensing authority under the Licensing Act 2003. Its Statement of Licensing Policy 2024 relates to alcohol and premises licences and includes a Cumulative Impact Policy and Special Consideration Policy.
- 5.27 The Cumulative Impact Policy contains Cumulative Impact Zones which aim to limit the number of premises with alcohol licenses in problem areas of crime and disorder, street drinking and antisocial behaviour. There are currently five Cumulative Impact Zones - in the city centre, Bilston, Wednesfield, Dudley Road and the Avion Centre, Whitmore Reans - where there is a presumption against new alcohol licenses. Special Consideration Areas are where premises licenses are considered carefully for their potential to add to the cumulative impact of adjoining Cumulative Impact Zones.
- 5.28 Licenses are also required for premises selling food between 11:00 and 05:00 which applies to hot food takeaways and shisha cafes open between these hours.
- 5.29 The Council is a designated licensing authority under the Gambling Act 2005. The Act's three licensing objectives are:
- a) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
  - b) Ensuring that gambling is conducted in a fair and open way.
  - c) Protecting children and other vulnerable persons from being harmed or exploited by gambling.

These are reflected in the council's Statement of Gambling Policy 2022. The DCMS white paper *High Stakes: gambling reform for the digital age*, April 2023, includes plans to introduce Cumulative Impact Areas. These would allow licensing authorities to consider the cumulative impact of gambling premises in a particular area, as used for alcohol licensing, and establish a presumption against granting a premises licence in certain areas experiencing problems of crime, disorder and antisocial behaviour as well plus related environmental health and public health issues.

- 5.30 While licensing and planning regulations should not duplicate each other, there are common objectives to both regulatory systems and a complementary approach to their operation can better achieve wider aims relating to regenerating the city, preventing crime and disorder, reducing health inequalities and reducing harm related to alcohol, tobacco and gambling.

## Evidence

- Strengthening the links between planning and health in England, The BMJ (2020)
- A health map for the local human habitat, H. Barton & M. Grant, Journal of the Royal Society for the Promotion of Health, 2006
- Active Design Guidance (Sport England, 2023)
- The Economics of Biodiversity: The Dasgupta Review (HM Treasury, 2021)
- Healthy High Streets: Good place-making in an urban setting (Public Health England & Institute of Health Equity, 2018)
- Health on the High Street: Running on empty (Royal society for Public Health, 2018)
- Fair Society, Healthy Lives: The Marmot Review - Strategic Review of Health Inequalities in England post-2010 (Institute of Health Equity, 2010)
- Health Equity in England: The Marmot Review 10 Years On (Institute of Health Equity, 2020)
- Health Impact Assessment in spatial planning (Public Health England, 2020)
- Using the planning system to promote healthy weight environments (Public Health England, 2020)
- Wolverhampton Health Inequalities Strategy 2021-2023 (City of Wolverhampton Health and Wellbeing Together, 2021)
- Wolverhampton Joint Health & Wellbeing Strategy 2023-28 (City of Wolverhampton Health & Wellbeing Together, 2023)
- Wolverhampton Joint Strategic Needs Assessment (City of Wolverhampton Health & Wellbeing Together, 2024)
- Wolverhampton's Physical Activity Strategy (City of Wolverhampton Health & Wellbeing Together, 2023)
- City of Wolverhampton Council Statement of Licensing Policy (WCC, 2024)



- City of Wolverhampton Council Statement of Gambling Policy (WCC, 2022)
- High Stakes: gambling reform for the digital age (DCMS, 2023)
- Planning for Health in Wolverhampton: Evidence Base for Wolverhampton Local Plan Policy HW1 - Health and Wellbeing (WCC, 2024)

## Delivery

- Through the planning application process and Local Development Documents
- Implementation and funding will be sought through planning conditions, planning agreements and planning obligations as well as through external funding sources

## Health Impact Assessments

5.31 This policy provides for the Local Planning Authority to require Health Impact Assessments for development proposals, where they are considered necessary.

## Policy HW2 – Health Impact Assessments

### Health Impact Assessments

Where required by the Local Planning Authority, the following Health Impact Assessments must be produced for proposed developments, including changes of use, to provide an assessment of their potential impacts on the mental and physical health and wellbeing of communities, and to propose measures to mitigate any potential negative impacts, maximise potential positive impacts and help reduce health inequalities:

- a) A Comprehensive or Rapid Health Impact Assessment for developments which will provide more than 150 homes or create over 10,000 sqm gross of new non-residential floorspace or for minerals-related or waste developments.
- b) A Rapid or Desktop Health Impact Assessment for developments which will provide 20 to 150 homes or create 1,000 to 10,000 sqm gross of new non-residential floorspace.
- c) A Rapid or Desktop Health Impact Assessment, which may be incorporated into a Design and Access Statement or Planning Statement, for any other development that the Local Planning Authority considers has the potential to have a negative impact, either city-wide or localised, on health and wellbeing as identified in Policy HW1.

Measures will be required, where considered necessary by the Local Planning Authority, to mitigate any negative effects which are identified.

## Justification

- 5.32 A Health Impact Assessment (HIA) can be a useful tool in assessing development proposals where there are expected to be significant impacts on health and wellbeing. They should be used to reduce adverse impacts and maximise positive impacts on the health and wellbeing of the population, as well as to reduce health inequalities, through influencing the wider determinants of health. This may include provision of infrastructure for health services or for physical activity, recreation and active travel. HIAs help to achieve sustainable development by finding ways to create a healthy and just society and to enhance and improve the places where people live.
- 5.33 There are three types of HIA:
- a) Comprehensive HIA – most in depth and only appropriate for larger and more complex developments with issues that have not already been addressed through the site allocation process. They require extensive literature research, data collection, stakeholder engagement and public consultation.
  - b) Rapid HIA – require a brief assessment of impacts, including a literature review and consultation with local stakeholders which may involve a steering group and stakeholder workshop.
  - c) Desktop HIA – more limited and require a review of evidence and consultation with key stakeholders.
- 5.34 Policy HW2 requires either a Comprehensive, Rapid or Desktop Health Impact Assessment for developments of 20 homes or over or of 1,000 square metres gross of new non-residential floorspace. The type of HIA should be determined by an initial screening submitted to and agreed with the Local Planning Authority prior to the submission of a planning application. Comprehensive HIAs will not be required for developments of over 150 dwellings or over 10,000 sqm gross of new non-residential floorspace where the site has been allocated and relevant issues have been addressed in the preparation of this Local Plan or of other Development Plan Documents.
- 5.35 Policy HW2 also requires either Rapid or Desktop Health Impact Assessments for any other development that the Local Planning Authority considers has the potential to have a negative impact, either city-wide or localised, on health and wellbeing in the city. Such developments, as outlined in Policy HW1, will only be permitted where the Local Planning Authority is satisfied that they will not, in isolation or in conjunction with other pre-existing, planned, committed or completed development, contribute either individually or cumulatively to negative health and wellbeing impacts on the city's population.

- 5.36 HIAs can be carried out at any stage in the development process but are best undertaken at the earliest stage possible. This should ideally be prior to the submission of planning applications, to ensure that health and wellbeing issues are considered and addressed fully at the outset. Where this is not appropriate, they should form part of the material submitted to support the relevant planning application. This can be provided as a stand-alone assessment or as part of the Design and Access Statement or Planning Statement, as required by the Local Planning Authority.
- 5.37 Guidance on Health Impact Assessments is contained in Public Health England's *Health Impact Assessment in spatial planning* guidance, October 2020.

### Evidence

- As for Policy HW1
- Health Impact Assessment in spatial planning, Public Health England, 2020

### Delivery

- Through the planning application process, Development Plan Documents and Supplementary Planning Documents

### Healthcare Facilities

- 5.38 This policy sets out the requirements for the provision of health infrastructure to serve the residents of new developments.

## Policy HW3 – Healthcare Facilities

### Healthcare Facilities

1. New healthcare facilities must be:
  - a) Well-designed and complement and enhance neighbourhood services and amenities.
  - b) Well-served by public transport infrastructure, walking and cycling facilities and directed to a centre appropriate in role and scale to the proposed development, and its intended catchment area, in accordance with Policies CEN1 and CEN2. Proposals located outside centres must be justified in terms of relevant policies, including CEN3 and CEN4.
  - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed.

## Healthcare Facilities

- d) Where possible, co-located with a mix of compatible community services on a single site.
2. Existing primary and secondary healthcare facilities will be protected. Where, however, healthcare facilities are declared surplus as part of an NHS strategy or service transformation plan which includes investment in modern, fit for purpose facilities, their redevelopment for other uses will be permitted. Requirements for new or improved healthcare facilities will be established by local health organisations and, where appropriate, included in Development Plan Documents.
  3. Proposals for major housing developments of ten homes or more must be assessed against the capacity of existing primary healthcare facilities as assessed by local health organisations. Where the demand generated by the residents of the new development would have unacceptable impacts upon the capacity of these facilities, developers will be required to contribute to their provision or improvement. The method of calculation will be:
    - Number of projected residents per development/ number of patients per consulting room = number of consulting rooms required.
    - Number of consulting rooms required x build costs per consulting room = developer contribution.
    - Further details of costs and methodology will be set out in Local Development Documents.
  - 4) Any healthcare contributions will be used to support provision of healthcare facilities to best serve the needs of residents, in line with relevant NHS strategies and service transformation plans.
  - 5) The effects of the obligations on the financial viability of development will be a relevant consideration, in accordance with Policy DEL1.

## Justification

- 5.39 Health services in Wolverhampton are currently experiencing limitations on their physical and operational capacity, which inhibit their ability to respond to the city's health needs. Meeting Wolverhampton's future housing needs will have an impact on existing healthcare facilities and generate demand for both extended and new facilities and services across the city as the population grows. At the same time demographic change will result in the requirement for new and altered services, including additional medical interventions, to meet the needs of the city's diverse communities.

- 5.40 In light of these changes, the City of Wolverhampton Council and its partners in the NHS and elsewhere, including the Black Country Integrated Care Board, have a critical role to play ensuring Wolverhampton's healthcare facilities and services continue to deliver high quality services and are maintained, improved and, where necessary, expanded. Healthcare infrastructure planning is necessarily an on-going process and the Council will continue to work closely with these partners and the development industry to assess and meet existing and emerging healthcare needs.
- 5.41 Such infrastructure needs to be in locations that support wider aims of supporting centres and of ensuring accessibility by a range of sustainable and inclusive forms of transport. It is also proposed to explore the co-location of health and other community facilities such as community centres, libraries and sport and recreation facilities.
- 5.42 Decisions on the development and redevelopment of healthcare facilities, including for non-healthcare uses, will be informed by the relevant national and local NHS strategies and service transformation plans for providing modern, fit for purpose facilities. The relevant strategies are currently the NHS Long Term Plan (2019), NHS Black Country Primary Care Network draft service and estate strategies and Black Country Integrated Care Board Primary Care Estates Strategy 2023-2027. The Council will support and work with the NHS and other partners to ensure the development of health facilities where these are needed to serve new development.
- 5.43 Funding for many healthcare infrastructure projects will be delivered from mainstream NHS sources. However, for primary healthcare services, an element of this funding may also include contributions from developers. In establishing the need for and level of any developer contribution sought, an assessment will take place of the ability of nearby primary healthcare services to be delivered without being compromised by demand from additional residents.
- 5.44 Assessment of the capacity of existing healthcare facilities to meet the demand generated by residents of new development uses an established methodology adopted by the ICB, based upon the Department for Health and Social Care's guidance 'Health Building Note 11-01: Facilities for primary and community care services', 2013. Policy HW2 contains a formula which follows this methodology for the calculation of the appropriate level of developer contributions for primary healthcare facilities. It is the Council's intention to issue more detailed guidance on the methodology used for calculating developer contributions in the form of a Supplementary Planning Document developed in partnership with the ICB. Applicants should consult the ICB in advance of the submission of a planning application where a significant amount of housing is to be provided.
- 5.45 The Viability Study indicates that, depending on the extent of other planning obligations required, contributions may not be viable on some sites, particularly those located in lower value zones as shown on Figure 5. Where it can be proved that it is not viable for a housing development to fund all its own primary healthcare needs, the developer should work with the NHS and other partners to investigate available options and ensure that these needs can and will be met.

5.46 Reference to healthcare facilities in Policy HW3 is to built facilities. For WLP housing allocations (as detailed in Table 12 of Section 13), no requirement has been identified for new on-site healthcare facilities. Developer contributions are therefore expected to be in the form of funding for either new off-site facilities or for the extension, reconfiguration or alteration of existing facilities. Where a need for new on-site health facilities is identified in the future it may be included in relevant Local Development Documents. Any new facilities will be expected to be provided at locations which meet the wider aims of Policy HW3 in terms of supporting centres and ensuring accessibility by a range of sustainable and inclusive forms of transport.

## Evidence

- Wolverhampton Infrastructure Delivery Plan (WCC, 2024)
- Health Building Note 11-01: Facilities for primary and community care services (Department for Health and Social Care, 2013)
- Five Year Forward view (NHSE, 2014)
- The General Practice Forward View (NHSE, 2016)
- The NHS Long Term Plan (NHSE, 2019)
- Delivering a Net Zero NHS (NHSE, 2022)
- 2023/24 NHS priorities and operational planning guidance (NHSE)
- Black Country Digital First Primary Care Programme
- Black Country Primary Care Network draft service and estate strategies
- Black Country Integrated Care Board Primary Care Estates Strategy 2023-27
- Black Country Integrated Care Board Primary Care Wolverhampton Estates Pack v0.2 (2023)
- SHAPE | Strategic Health Asset Planning and Evaluation (shapeatlas.net)
- The Black Country Integrated Care System Draft Infrastructure Strategy (2024)

## Delivery

- Through the planning application process and preparation of a Supplementary Planning Document
- Implementation and funding will be sought through planning conditions, planning agreements and planning obligations

## Monitoring

Policy	Indicator	Target
HW2	% of Health Impact Assessments produced for eligible developments	100%

# 6. Housing

## Introduction

- 6.1 The policies in this section will help to create a network of cohesive, healthy and prosperous communities across Wolverhampton, which is a fundamental element of the Vision. The provision of sufficient land to promote sustainable housing growth is the corner stone of this approach. However, the policies also ensure the provision of a balanced range of housing in terms of type, tenure, wheelchair accessibility and affordability, and sufficient specialist provision for Gypsies, Travellers and Travelling Showpeople and for those who wish to self-build or custom build. New housing will be of a high build quality and well-designed, meeting national space and water efficiency standards, and meeting high levels of mitigation and adaptation to climate change, as set out in Policies CSP2, ENV10 and ENV14.
- 6.2 Maximising sustainable transport access to key residential services and focusing high density increases in areas of greatest accessibility is at the heart of the Spatial Strategy. Providing a balanced network of quality education facilities, and health facilities as set out in Policy HW2, is a further key part of this approach. Creating fit-for-purpose and modern learning environments that enable pupils to concentrate on their studies in welcoming and safe environments will in turn support future economic prosperity.

## Delivering Sustainable Housing Growth

- 6.3 A key role of the WLP is to set out realistic targets to deliver sustainable housing growth over the plan period up to 2042.



## Policy HOU1 – Delivering Sustainable Housing Growth

### Delivering Sustainable Housing Growth

1. Sufficient land will be provided to deliver at least 9,330 net new homes over the Plan period 2024 – 2042. The key sources of housing land supply are summarised in Table 3 and illustrated in the Housing Spatial Diagram. WLP Housing Site Allocations are detailed in Table 12 of Section 13.
2. The majority of the requirement will be met through sites with existing planning permission and sites allocated for housing by this Plan and the Wolverhampton City Centre Area Action Plan. Additional housing supply will also be secured on windfall sites throughout the urban area and through the update of allocations in the Wolverhampton City Centre Area Action Plan, where appropriate. The estimated net effect of housing renewal up to 2042 will be reviewed annually and taken into account in the calculation of housing land supply.
3. The minimum housing target over the period 2024-42 and for each of the Plan phases: 2024-32, 2032-37 and 2037-42 is set out in Table 4.
4. The development of sites for housing should demonstrate a comprehensive approach, making best use of available land and infrastructure and not prejudicing neighbouring uses. Incremental development of an allocated site will only be allowed where it would not prejudice the achievement of high quality design on the allocation as a whole.

Figure 4: Housing Key Diagram

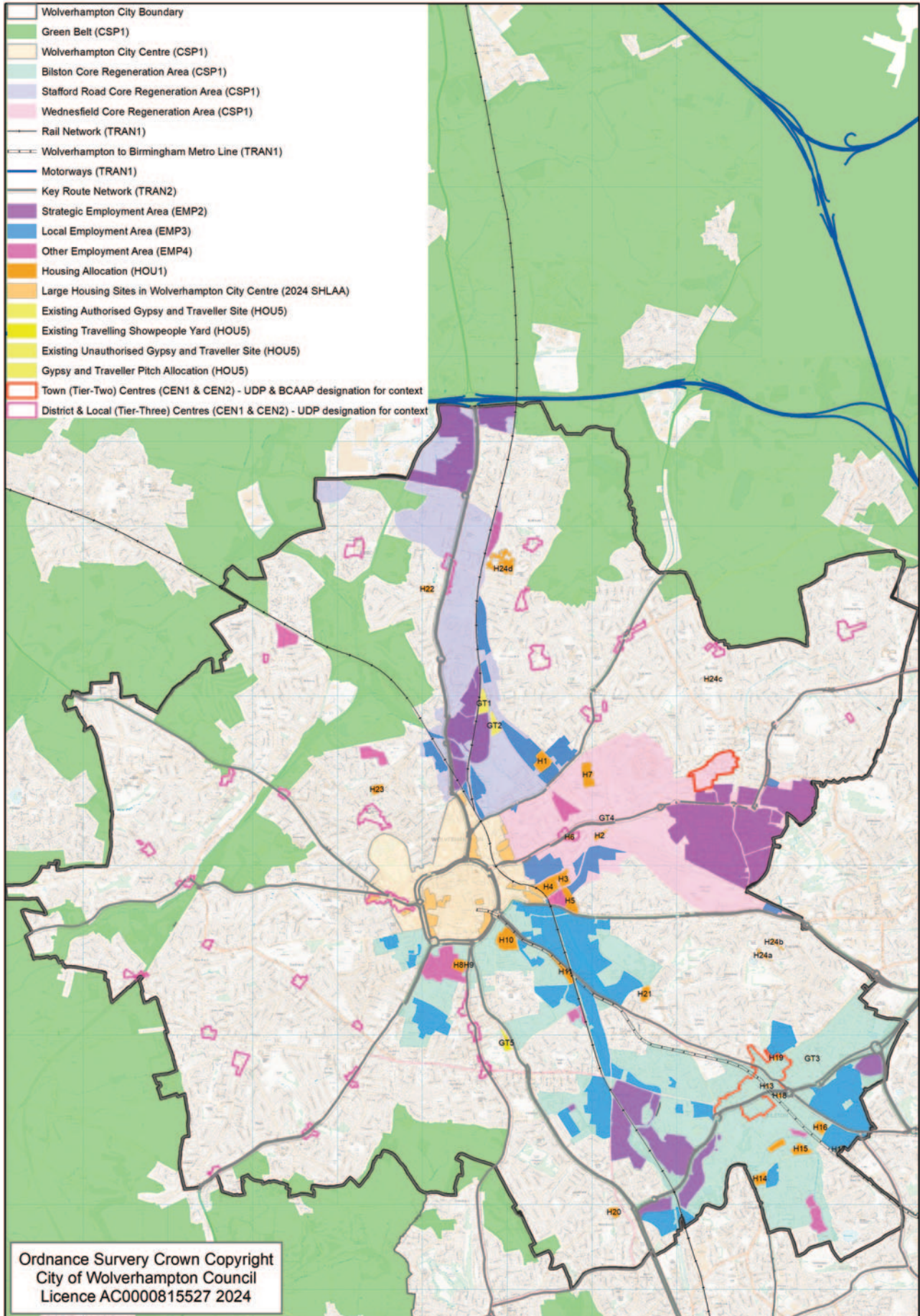


Table 4: Wolverhampton Housing Land Supply and Indicative Phasing 2024-42

Source of Supply		Total	2024-2032	2032-2037	2037-2042
CURRENT SUPPLY as of April 2024	Sites Under Construction	371	371	0	0
	Sites with Planning Permission or Prior Approval *	3,150	3,150	0	0
	Sites with Other Commitment (as set out in 2024 SHLAA) **	7	7	0	0
	Existing Housing Allocations in Wolverhampton City Centre **  (not subject to review through the Wolverhampton Local Plan)	2,184	100	1,787	297
HOUSING	Occupied Employment Land ***	680	194	0	486
ALLOCATIONS IN WOLVERHAMPTON LOCAL PLAN (excluding sites with permission)	Other **	942	669	254	19
SMALL SITE WINDFALL ALLOWANCES (<10 homes / 0.25 ha)	Wolverhampton City Centre	273	63	105	105
	Elsewhere (including Tier Two and Tier Three centres)	1,755	405	675	675
ADDITIONAL CAPACITY IN CENTRES FROM STRUCTURAL CHANGE	Wolverhampton City Centre: Surplus Floorspace	209	48	80	81
	Tier Two Centres: Surplus Floorspace	44	10	17	17
	Tier Three Centres: Surplus Floorspace	100	23	38	39
<b>TOTAL GROSS HOMES</b>					
TOTAL LOSS HOMES	Estimated Housing Renewal Demolitions	-331	-331	0	0
	Small-scale demolition windfalls	-54	-24	-15	-15
TOTAL NET HOMES		9,330	4,684	2,941	1,705
PHASED HOUSING TARGETS (NET)		9,330	4,144	2,590	2,590
Per annum		518	518	518	518

\* Discounted by 5%

\*\* Discounted by 10%

\*\*\* Discounted by 15%

## Justification

- 6.4 The WLP identifies sufficient land to provide 9,330 additional homes by 2042. This will deliver a 9% increase in housing stock and will accommodate 47% of current local housing need up to 2042 (19,728 homes) within Wolverhampton. 97% of supply is on brownfield land and 3% of supply is on greenfield land. The Housing Key Diagram illustrates the distribution of larger housing sites across Wolverhampton. A balanced range of sites has been provided, in terms of size, location and market attractiveness, which will help to maximise housing delivery over the Plan period. 38% of identified supply is on sites of under 1 ha, well above the 10% required in the NPPF (paragraph 70).
- 6.5 The detail of housing allocations is provided in Table 12 of Section 13 and all sites are shown on the Policies Map. Housing capacity from all sources has been identified in accordance with the Spatial Strategy and based on the following information:
- a) 2024 Strategic Housing Land Availability Assessment (SHLAA) and the Black Country Employment Area Review (BEAR);
  - b) An estimate of the likely scale of housing renewal up to 2042;
  - c) An estimate of likely windfall development on small sites up to 2042;
  - d) An assessment of the likely capacity of centres above existing supply, drawing on the Wolverhampton City Centre Area Action Plan and Black Country Centres Study;
  - e) Application of a density uplift to existing allocations likely to gain permission after adoption (2027), in line with Policy HOU2;
  - f) A comprehensive site assessment process, which has identified new sites suitable and available for release for housing development, and deliverable within the Plan period.
- 6.6 The housing supply from allocations on occupied employment land has been discounted by 15% in order to take account of the multiple delivery constraints that typically affect such sites and that are likely to reduce delivery on a minority of sites. Delivery constraints include poor ground conditions and the need for large-scale master-planning, land assembly, business relocations and residential service access improvements.
- 6.7 The supply from allocations on other land in the urban area and on small (<10 home / 0.25 ha) sites without planning permission has been discounted by 10% to allow for non-implementation, as some of these sites are also affected by delivery constraints such as poor ground conditions.
- 6.8 The supply from sites with planning permission but not yet under construction has been discounted by 5% in accordance with historic lapse rates. These discounts are balanced rates that take account of the likely availability of external funding to address constraints, as set out in the Viability Study.
- 6.9 Together, these discounts provide sufficient flexibility in the housing land supply to meet any unforeseen circumstances.



- 6.10 A robust small windfall site allowance has been included in the housing supply, which reflects historic completion rates for sites of less than ten homes. The small windfall site allowance for Wolverhampton City Centre has been provided separately for clarity. Windfall sites are likely to include surplus public land, small non-conforming employment uses, sites in Tier 2 and Tier 3 centres and residential intensification sites, subject to policy, sustainability, and detailed site considerations.
- 6.11 The WLP does not make or review allocations within Wolverhampton City Centre. However, additional housing capacity above existing supply is expected to come forward on surplus vacant floorspace as a result of structural change within Wolverhampton City Centre over the Plan period, as set out in Table 4 and detailed in the SHLAA (2024). Existing allocations will be reviewed, and new allocations may be made in line with WLP housing targets when the Wolverhampton City Centre Area Action Plan is reviewed immediately following adoption of the WLP.
- 6.12 A structural change allowance on surplus vacant floorspace has also been included in the housing supply for Tier 2 and Tier 3 Centres (as defined in Policy CEN1).
- 6.13 The structural change allowances made in the WLP are over and above the small windfall site allowance. The latter represents a continuation of historic rates, whereas the former represents a structural change in the factors giving rise to new housing sites which it is predicted will give generate additional supply over the Plan period. These factors include changes to shopping patterns, changes to permitted development rights and changes to work patterns arising from Covid impacts.
- 6.14 Parts of Wolverhampton have been identified as needing some form of housing market intervention over the Plan period. Selective renewal of the existing housing stock and the surrounding residential environment will help to create more sustainable communities and support regeneration. The likely amount of housing demolitions for known Wolverhampton housing renewal sites (H7 - New Park Village and H24 – Tarrans) has been estimated for the purposes of the WLP, as set out in Table 4. These sites are anticipated to replace existing homes at rates of almost one for one. The Council is also considering further housing renewal to replace outdated non-traditional (concrete construction) properties across the city and will increase the number of replacement homes where suitable land is available.
- 6.15 The Plan period has been divided into three phases, covering five years, ten years, and 15 years from the anticipated year of adoption - 2027. A housing target for each phase is provided in Table 4. These targets are based on the housing trajectory set out in Appendix 2, with further detail provided in the 2024 SHLAA. The trajectory demonstrates a relatively steady supply of housing completions over the Plan period, justifying consistent housing targets throughout the Plan period. As set out in the NPPF (para 76), the City of Wolverhampton Council is seeking to confirm through the WLP the existence of a 5 year housing land supply from the year of adoption (2027). For this purpose, there will be no buffer applied to housing supply, in line with the most recent Housing Delivery Test results (2022).

## Evidence

- Wolverhampton SHLAA (WCC, 2024)
- Black Country Employment Areas Review (BEAR) (BCAs, 2021)
- Wolverhampton Viability Study (Aspinall Verdi, 2024)

## Delivery

- Annual update of SHLAA
- Review of Wolverhampton City Centre Area Action Plan
- Housing renewal will be delivered through local authority intervention
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

## Housing Density, Type and Accessibility

6.16 It is important that the new homes delivered over the Plan period are located in places with good sustainable transport access to key residential services and provide a mix of types and densities which are appropriate to their location and help to meet local needs.

## Policy HOU2 – Housing Density, Type and Accessibility

### Housing Density, Type and Accessibility

1. The density and type of new housing provided on any development site should be informed by:
  - a) The need for a range of types and sizes of accommodation to meet identified local needs;
  - b) The level of accessibility by sustainable transport to residential services, including any improvements to be secured through development, as set out in Table 5; and
  - c) The need to achieve high quality design (including the provision of sufficient good quality amenity and play space for residents) and minimise amenity impacts, considering the characteristics and mix of uses in the area where the proposal is located.
2. Developments of ten homes or more should provide a range of house types and sizes that will meet the accommodation needs of both existing and future residents, in line with the most recently available information.
3. All developments of ten homes or more should achieve the minimum net density set out below, except where this would prejudice historic character and local distinctiveness as defined in Policy ENV5 or fail to achieve high quality design in accordance with other Development Plan Document policies:

### Housing Density, Type and Accessibility

- a) 100 dwellings per hectare where Table 5 accessibility standards for very high density housing are met and the site is located within Wolverhampton City Centre, Bilston Town Centre or Wednesfield Town Centre.
  - b) 45 dwellings per hectare where Table 5 accessibility standards for high density housing are met;
  - c) 40 dwellings per hectare where Table 5 accessibility standards for moderate density housing are met.
4. Table 12 of Section 13 provides details of the appropriate density to be sought on each housing allocation site, in accordance with the requirements set out in this Policy.
  5. All new housing development (including the conversion of buildings) and the creation of houses in multiple occupation will be required to meet the Nationally Described Space Standards (NDSS), except where it can be clearly evidenced that implementation of the NDSS would cause harm to the significance of a heritage asset.

**Table 5: Housing Accessibility Standards**

Density (homes per hectare net)	Very High: 100+ Only appropriate within Wolverhampton City Centre, Bilston Town Centre or Wednesfield Town Centre	High: 45+	Moderate: 40+
Indicative proportion of flats	100%	>15%	0 – 15%
Indicative amount of housing suited to families	Low	Medium	High
<b>Accessibility (by either walking or public transport, unless stated)</b>			
Employment – Strategic Centre or other employment area	20 mins	20 mins	30 mins
Health – Primary Care e.g. GP Surgery or Health Centre	10 mins	10 mins	15 mins
Fresh Food – Centre or food store	N/A	10 mins	15 mins
Education – Primary School (walking distance only)	N/A	15 mins	10 mins
Education – Secondary School	N/A	25 mins	20 mins



## Justification

- 6.17 Achieving an appropriate density and house type mix is crucial both to the success of each new housing development and the overall sustainability of the Spatial Strategy. It is important that every major development, of ten homes or more, contributes to providing an appropriate house type mix and density, aligned with current local needs. Achieving the right density and mix of house types will also help to protect and improve physical, social and mental health and wellbeing, as set out in the Health and Wellbeing section.
- 6.18 The accessibility of all housing developments to a range of residential services by walking, cycling or public transport is key to achieving sustainable communities. As higher density developments tend to accommodate more people, they should generally be located in those areas with best access to services, to encourage use of sustainable transport modes. The highest densities of over 100 homes per hectare should be in areas with the best access to public transport and services, but also where a high proportion of flats will provide design solutions that best reflect historic character and local distinctiveness. Therefore, such densities will only be acceptable within Wolverhampton City Centre and Town Centres. Conversely, lower density developments, accommodating more families, should have high levels of accessibility to schools. Not all developments with good sustainable access to services will be suited to the highest densities – in some cases a lower density will be more appropriate, for example in areas of historic character, to reflect the density of adjacent uses or to meet the need for a mix of housing types.
- 6.19 Table 5 provides access standards for differing house type mixes / densities, in relation to four priority residential services: employment, health, fresh food and education. Proxies have been selected for each service. Employment is represented by Wolverhampton City Centre and retained employment areas. The proxy used for fresh food is a centre, or an existing food store outside a centre that currently provides a range and choice of fresh food. The access standards have been developed based on survey evidence regarding the distance people are prepared to travel to each service by foot and public transport and are designed to help create well-connected and walkable neighbourhoods. Although open space does not form one of the priority residential services for the purposes of establishing the appropriate density and type of housing, Policy ENV8 taken together with local standards and policies will ensure that a sufficient quantity and quality of different types of open space is available close to where people live.
- 6.20 Housing developments of ten homes or more will be expected to meet the accessibility standards set out in Table 5, which vary according to density and likely house type mix. The priority is for the service needs of future growth in Wolverhampton to be served by the existing network of centres to ensure their future vitality and viability and secure future regeneration, as set out in Section 8. Where there is an identified gap in service provision against one or more of these standards, investment will be sought to improve either service provision or access to existing services sufficient to ensure standards are met. New service provision, including for centre uses, should be located and justified in accordance with Policies CEN1-CEN4, HW2 and HOU6.

- 6.21 Current accessibility to residential services by sustainable transport modes across Wolverhampton has been modelled, as set out in the Site Assessment Report (2024). This modelling shows the high levels of accessibility achieved by the Spatial Strategy. However, there are some gaps in provision that will need to be addressed through service or access improvements. Any service provision or accessibility improvements currently required to meet accessibility standards is identified in Table 12 of Section 13. The model will be updated on a regular basis to reflect changes in service provision and public transport services. Local circumstances, such as planned changes to service provision, will be considered when assessing accessibility on a site by site basis.
- 6.22 The Wolverhampton Housing Market Assessment (HMA) 2024 demonstrates that new households generated by 2042 will need the mix of home tenures and types provided in the table below. It is important that, wherever possible, new housing reflects the needs of these new households, allowing for at least one bedroom per person, and also provides a range of home sizes that will improve choice in the local area.

	One bedrooms	Two bedrooms	Three bedrooms	Four + bedrooms
Market Housing	22.5%	28.5%	19.8%	29.2%
First Homes	13.8%	21.4%	23.9%	41.0%
Shared Ownership	20.9%	33.6%	27.5%	18.0%
Social Rent / Affordable Rent	24.6%	19.9%	20.5%	35.0%

- 6.23 There are three optional national technical standards for housing which can be adopted through planning policy. Policy HOU2 adopts one of these standards for new housing in Wolverhampton, covering internal space standards, and Policies HOU3 and ENV14 adopt the remaining two standards. The Viability Study demonstrates that the introduction of these standards is unlikely to have a significant impact on development viability.
- 6.24 The Council believes that everyone has the right to a high standard of residential accommodation, with sufficient space to meet their needs. Wolverhampton overcrowding rates are higher than the national average. In order to address this, Policy HOU2 adopts national space standards covering internal floor area and dimensions for key parts of the home. The standard is modest and is generally met in most new build housing across Wolverhampton. However, in a minority of cases the standard would help to achieve better living conditions. The requirement for a minimum space standard can also add to the attractiveness of a development and increase the marketability of properties. The standard will apply to all tenures.

## Evidence

- Wolverhampton Housing Market Assessment (HDH, 2024)
- Wolverhampton Site Assessment Report (WCC, 2024)
- Housing: Optional Technical Standards (MHCLG, 2015)

## Delivery

- Through Development Plan Documents and Supplementary Planning Documents
- Through the planning application process

## Delivering Affordable, Accessible and Self Build / Custom Build Housing

6.25 In order to meet local needs, a sufficient proportion of new homes provided over the plan period should be affordable and wheelchair accessible, and enough plots should be provided to meet local demand for self-build and custom build housing. Viability should be taken into account when setting targets.

## Policy HOU3 – Delivering Affordable, Accessible and Self Build / Custom Build Housing

### Delivering Affordable, Accessible and Self Build / Custom Build Housing

#### Affordable Housing

1. All developments of ten homes or more should provide a range of tenures that will meet the needs of existing and future residents, in line with the most recently available information. Such developments should, where this is financially viable, provide:
  - a) 10% affordable housing on sites in lower and medium value zones;
  - b) 15% affordable housing on sites in higher value zones.
2. Beyond any national requirement for First Homes, the tenure of affordable homes sought in Wolverhampton will be social or affordable rent.

#### Accessible and Adaptable Homes

3. All new build homes should meet the Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings unless it can be demonstrated that:
  - a. this is not achievable given the physical characteristics of the site;

### Delivering Affordable, Accessible and Self Build / Custom Build Housing

- b) site specific factors mean that step-free access to the home cannot be achieved; or
  - c) the home is located on the first floor or above of a non-lift serviced multi-storey development;
  - d) the home meets the Buildings Regulations Requirement M4(3)(a) or M4(3)(b).
4. On developments of ten homes or more in medium or higher value zones and on developments of 100 homes or more in lower value zones, at least 10% of all new build homes should meet the Building Regulations Requirement M4(3)(a): Wheelchair Adaptable Dwellings or M4(3)(b), where this is financially viable. All remaining new build homes should meet the Building Regulations Requirement M4(2): Accessible and Adaptable Dwellings.

#### Self-Build and Custom Build Plots

5. On developments of 100 homes or more (excluding those which are 100% flats), where there is currently a demand for self-build and custom build plots (defined as the number of entries added to the self-build and custom build register in the most recent base period for Wolverhampton), at least 5% of plots should be made available for self-build or custom build, or sufficient to match demand if lower. Any plots that have not been sold after six months of thorough and proportionate marketing, including making details available to people on the self-build and custom housebuilding register, will revert to the developer to build.
6. The use of smaller development sites for self-build and custom build plots will be supported.
7. All self-build or custom build plots should be provided with:
- a) legal access onto a public highway;
  - b) water, foul drainage, broadband connection and electricity supply available at the plot boundary;
  - c) sufficient space to build without compromising neighbouring properties and their amenity; and
  - d) an agreed design code or plot passport.

## Delivering Affordable, Accessible and Self Build / Custom Build Housing

### Financial Viability Assessments

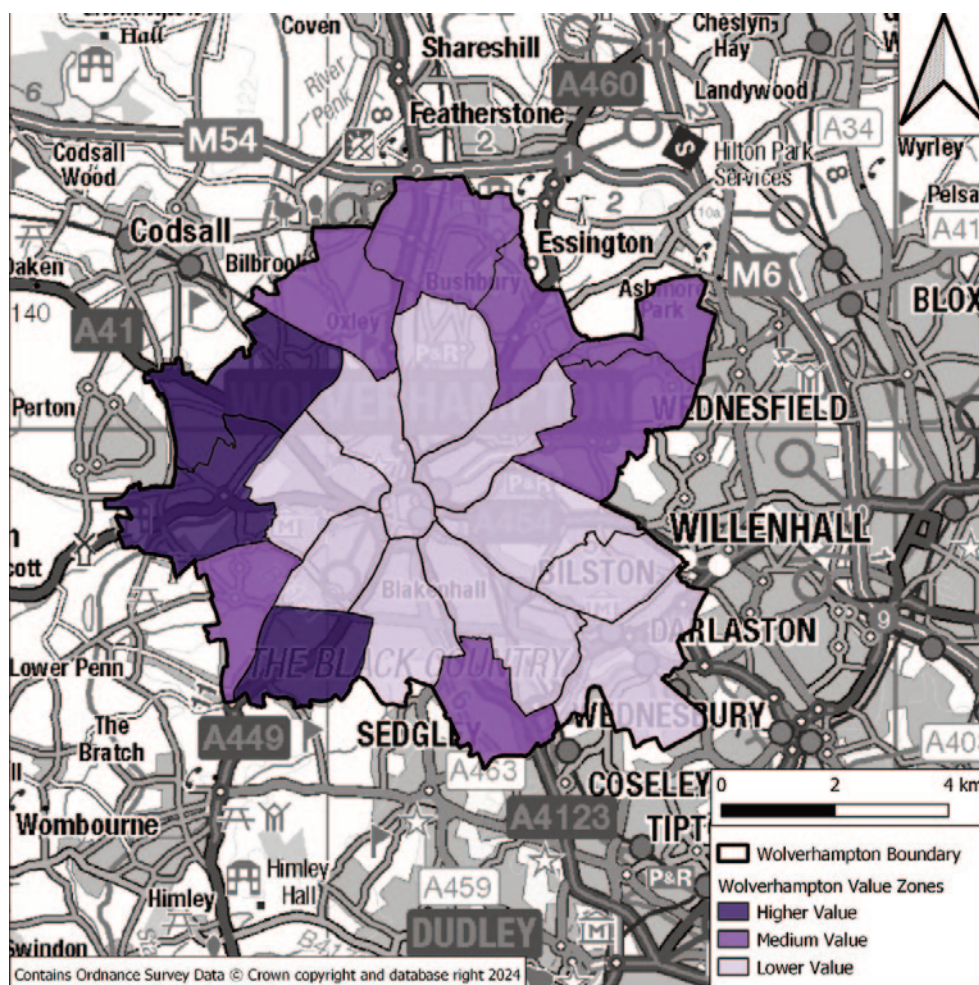
8. On sites where applying the requirements set out in this Policy can be demonstrated to make the development unviable, the maximum proportion of such housing will be sought that will not undermine the viability of the development, subject to achieving optimum tenure mix and securing other planning obligations necessary for the development to gain planning permission.
9. Financial viability assessments conforming to national guidance will be required to be submitted and, where necessary, independently appraised by an appropriate professional appointed by the Local Planning Authority at the cost of the applicant. Flexible arrangements will be sought through planning agreements, wherever possible, to allow for changing market conditions in future years. Any viability assessment should be prepared on the basis that it will be made publicly available other than in exceptional circumstances, and in such circumstances an executive summary will be made publicly available.

## Justification

- 6.26 Rising house prices and low average incomes over a long period have made market housing increasingly unaffordable for many Wolverhampton households. The Wolverhampton HMA (2024) identifies a requirement for 17.8% of new homes to be made available for affordable or social rent, 9.1% to be shared ownership and 7.9% to be First Homes. To meet this level of need over the Plan period, 34.8% of new housing would have to be affordable. The City of Wolverhampton Council aspires to provide this level of affordable housing, through a range of schemes delivering up to 100% affordable housing, funded through grant and other financial sources, and supported by developer contributions where viable.
- 6.27 The Viability Study demonstrates that viability on housing sites in Wolverhampton varies according to local housing values (as set out in Figure 5). Therefore, a sliding scale of affordable housing requirements, ranging from 10% to 15%, has been set out in Policy HOU3 which reflects this variation. This approach should ensure that viability appraisals are not required at planning application stage for the majority of sites. However, viability issues can vary significantly from site to site and are often caused by poor ground conditions, the extent of which cannot be accurately assessed until planning application stage. Therefore, to maximise delivery of affordable housing over the Plan period, it is important that affordable housing is sought on all eligible sites, that viability is assessed on a site by site basis where required, and that a flexible approach is employed wherever possible to allow for changing market conditions.



Figure 5: Wolverhampton Housing Value Zones



(Source: Wolverhampton Viability Study 2024)

6.28 The tenure of affordable housing to be funded by developers through planning obligations is currently constrained by national planning policy. A Ministerial Statement (2021) requires 25% of affordable homes secured through developer contributions to be First Homes tenure – a specific kind of discounted market sale housing to be sold at 30% below current market value, to eligible persons only, at every future sale. National guidance allows for evidenced local variations in First Homes requirements, however there is no evidence that such variations are required in Wolverhampton. The NPPF (para 66) also requires at least 10% of all homes on major developments (of 10 homes or more) to be affordable home ownership tenure, unless this would “significantly prejudice the ability to meet the identified affordable housing needs of specific groups”. However, the most significant proportion of need in Wolverhampton over the Plan period will be for social or affordable rent homes and the Viability Study demonstrates that in the Lower and Medium Value zones, where the majority of housing site allocations are located, it is generally not viable to provide more than 10% affordable housing of any tenure. Therefore, it is clear that, for Wolverhampton, application of the NPPF para 66 10% requirement would significantly prejudice meeting the identified affordable housing needs

of a specific group – the specific group in question being the majority of households with identified housing need in Wolverhampton. Therefore, following application of any national First Homes requirement, rent will be the tenure of affordable housing sought on the majority of sites over the Plan period.

- 6.29 In order to contribute to the objective of achieving mixed and balanced communities, as set out in paragraph 64 of the NPPF (2023), a mix of tenures will generally be required within each major housing development. However, there may be circumstances where this objective is better achieved through a 100% affordable housing development to boost affordable housing provision, or a 100% market housing development with off-site provision of the affordable housing requirement.
- 6.30 The City of Wolverhampton Council will work with partners to meet identified needs to accommodate older people (including those who require retirement housing, housing-with-care and care homes), people with disabilities, students and those with other special needs.
- 6.31 The Wolverhampton HMA (2024) concludes that an additional 3,964 accessible and adaptable homes, including 503 wheelchair user homes, will be required by Wolverhampton households by 2042 due to disability or old age. There is a need for these types of home across all tenures. This implies that a significant uplift will be required to the number of homes that meet these standards currently - to 2.6% / 0.3% of the total stock. Although some improvements to existing homes funded through Disabled Facilities Grants may contribute towards this uplift, the provision of new homes meeting the standards would reduce the need for adaptations to be retrofitted and make the housing stock more responsive to the evolving needs of the local population.
- 6.32 People's housing needs change as they get older, and homes designed in a way that makes them more easily accessible and adaptable allows people to stay in their own homes for longer. With public health and social care strategies placing more emphasis on supporting people in their own homes rather than moving to residential care it is important that more adaptable and accessible homes are provided. Studies have shown that older properties are generally less accessible, and harder to adapt.
- 6.33 Accessible and adaptable homes that meet the M4(2) Building Regulations are designed and built to a standard that meets the needs of occupants with differing needs, including some older or disabled people, and are only slightly more expensive to build than M4(1) standard housing. They must also allow adaptation to meet the changing needs of occupants over time. Homes built to this standard are more flexible and readily adaptable as people's needs change, for example if they have children and require easy access for pushchairs, if they have a temporary or permanent disability or health issue, or as they gradually age and their mobility decreases.



- 6.34 In 2022, the Government announced that M4(2) would soon become the new regulatory baseline for all new build homes, and the Viability Study assumes that this will be the case. Therefore, unless and until the M4(2) standard becomes mandatory, Policy HOU3 will ensure that a condition is attached to all planning permissions for new homes, which requires them to be constructed to the M4(2) standard.
- 6.35 Wheelchair user homes that meet the M4(3) Building Regulations are required by less households and involve a significantly increased cost. The evidence suggests that, in Wolverhampton, it is only viable to require 10% M4(3)(a) housing – which is wheelchair adaptable – on major housing sites in medium and higher value zones and on large housing sites in lower value zones. M4(3)(b) standard housing – which is ready for occupation by a wheelchair user – would be welcomed in lieu of M4(3)a, however this is more expensive than M4(3)(a) and can only be applied to homes where the local authority is responsible for allocating or nominating a person to live in that home.
- 6.36 Policy HOU3 allows for an element of flexibility in recognition of the practicalities of delivering these standards, in particular given the challenges that may arise given the topography of some sites, where access within the gradients specified in the standards may not be achievable.
- 6.37 National guidance requires local authorities to permit sufficient serviced plots of land to meet the demand for self-build and custom housebuilding in their area, defined as the number of entries to the authority’s self-build and custom housebuilding register in the most recent base period (12 months running from 31 October to 30 October). Current demand for the base period between 31 October 2022 and 30 October 2023 is 20 for Wolverhampton. The HMA found that, of the 313 Local Authorities in England for which data was available in 2022, Wolverhampton had the 61st smallest demand for self-build homes per head.
- 6.38 Therefore, where there is identified demand in Wolverhampton at the time when an application is submitted, developers of larger sites (excluding 100% flatted sites) will be expected to make available a small proportion of the development as serviced self-build and custom build plots, as defined in national guidance and legislation. Appropriate marketing of these plots, for example through specialist plot finding services, residential property websites and local estate agents, will be required for at least six months. These plots will not form part of the affordable housing requirement for the development. Detailed guidance for the plots, for example on design, will be provided at a local level where appropriate.

## Evidence

- Wolverhampton Housing Market Assessment (HDH, 2024)
- Wolverhampton Viability Study (Aspinall Verdi, 2024)
- Wolverhampton Housing Strategy (WCC, 2024)
- Wolverhampton SHLAA (WCC, 2024)
- Housing: Optional Technical Standards (MHCLG, 2015)

## Delivery

- Development Plan Documents and negotiations with developers through the planning application process
- Implementation of the Housing Strategy
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

## Housing for People with Specific Needs

6.39 The Council continues to work with partners to meet the identified needs of all sections of the community, including older people, people with disabilities and other people with special needs.

## Policy HOU4 – Housing for People with Specific Needs

### Housing for People with Specific Needs

1. Proposals for specific forms of housing to meet identified needs, including children's homes, care homes, nursing homes and extra care facilities will be supported and considered in relation to the following criteria:
  - a) Accessibility to public transport links and appropriate residential services;
  - b) Compatibility with adjacent uses and potential impact on the character and overall amenity of the surrounding area;
  - c) Potential impact on parking provision and highway safety.

## Justification

- 6.40 The HMA found that the number of Wolverhampton residents aged 65 or over is likely to increase by over a third during the Plan period, although the age profile of the Wolverhampton population will remain younger than the West Midlands and national averages. It is anticipated that, in 2042, most older person households will live in the general housing stock, however there are specific identified needs for more housing which is suitable for older people. This will include accessible and adaptable housing (as required by Policy HOU3) and specialist accommodation. The HMA identifies a need for 1,481 new sheltered or retirement homes, plus 399 new extracare or supported living homes (Class C3 dwellings) – requiring a doubling of existing provision. There will also be a need for around 547 additional Registered Care spaces (Class C2) – requiring a 32% increase above existing provision. Therefore, applications for such specialist accommodation for older people will be supported, where in accordance with other national and local policies.
- 6.41 To plan effectively for people with specific needs, the Council has developed a Housing Strategy to help address these needs, which will be implemented over the Plan period.
- 6.42 It is considered that accommodation for people with specific needs is best located in areas that are close to local facilities and amenities and accessible by public transport, whilst not having a negative impact on the surrounding area. Therefore, when identifying sites for these facilities, the accessibility criteria set out in Policy HOU2 should also be applied.

## Evidence

- Wolverhampton Housing Market Assessment (HDH, 2024)
- Wolverhampton Housing Strategy (2024)

## Delivery

- Development Plan Documents and negotiations with developers through the planning application process
- Implementation of the Housing Strategy
- Securing funding to facilitate delivery
- Working with key partners and delivery agencies

## Accommodation for Gypsies and Travellers and Travelling Showpeople

- 6.43 Wolverhampton has small, settled communities of Gypsies and Travellers, and Travelling Showpeople. In accordance with national guidance, the WLP aims to provide sufficient, appropriately designed and integrated sites to accommodate the needs of these communities over the Plan period.

## Policy HOU5 – Accommodation for Gypsies and Travellers and Travelling Showpeople

### Accommodation for Gypsies and Travellers and Travelling Showpeople

1. Existing Gypsy and Traveller sites (GT1-GT4 as detailed in Table 6) and the existing Travelling Showpeople site at Phoenix Road (GT5), will be protected unless it can be demonstrated that they are no longer required or that suitable alternative provision can be made. These sites are shown on the Policies Map.
2. Sufficient land will be provided to deliver at least 14 additional Gypsy and Traveller permanent pitches by 2032. WLP Gypsy and Traveller allocations are detailed in Table 12 of Section 13.
3. Accommodation need for Gypsies and Travellers and Travelling Showpeople over the Plan period will be met through sites with planning permission, allocated sites and other sites granted planning permission during the Plan period in accordance with the criteria set out below. City of Wolverhampton Council will pursue funding and / or management arrangements for new sites, where necessary.
4. Proposals for permanent Gypsy and Traveller pitches and Travelling Showpeople plots will be assessed against the following criteria:
  - a) The site should be suitable as a place to live, particularly regarding health and safety, and the development should be designed to provide adequate levels of privacy and amenity for both occupants and neighbouring uses;
  - b) The site should meet moderate standards of access to residential services as set out in Policy HOU2;
  - c) The site should be located and designed to facilitate integration with neighbouring communities;
  - d) The site should be suitable to allow for the planned number of pitches, an amenity block, a play area, access roads, parking and an area set aside for work purposes where appropriate, including, in the case of Travelling Showpeople, sufficient level space for outdoor storage and maintenance of equipment;
  - e) The site should be served or capable of being served by adequate on-site services for water supply, power, drainage, sewage and waste disposal (storage and collection).
5. The location, design and facilities provided on new sites will be determined in consultation with local Gypsies and Travellers and Travelling Showpeople and will also consider / reflect any available national guidance. Proposals should be well designed and laid out in accordance with Secured by Design principles as set out in Policy ENV10.

## Justification

- 6.44 A Black Country Gypsy and Traveller Accommodation Assessment (GTAA) was completed in 2022 and updated in 2024, in accordance with national guidance. This identifies the likely future local need for Gypsy and Traveller and Travelling Showpeople accommodation in Wolverhampton over the Plan period.
- 6.45 Permanent Gypsy and Traveller pitches, and Travelling Showpeople plots, have fixed infrastructure with all the normal residential amenities and are used as a base to travel from. They are intended to allow Gypsies and Travellers to obtain good access to education, health, and other services. It is important that pitches and plots are well designed in line with Secured by Design principles, and it is recommended that advice is sought from West Midlands Police Design Out Crime Officers.
- 6.46 The GTAA identified that Gypsies and Travellers prefer small, family-sized sites with approximately 10-15 pitches, but will accept larger sites if carefully planned and designed in consultation with the Gypsy community. Local authorities may assist Gypsies and Travellers living on their own land without planning permission to obtain retrospective planning permission where this is deemed appropriate.

## Gypsy and Traveller Permanent Pitches

- 6.47 The WLP aims to meet the accommodation needs of gypsies and travellers as defined in the national Planning Policy for Travellers Sites 2015 (PPTS), by protecting existing and approving new privately and publicly owned sites and pitches. The GTAA identifies a need for 75 permanent pitches up to 2032 (including 42 existing authorised pitches), plus 18 pitches from 2032 to 2042.
- 6.48 The evidence supports the following approach towards meeting need up to 2032:
- i) safeguard existing gypsy and traveller pitches;
  - ii) allocate existing temporary or unauthorised sites for permanent use (subject to other planning considerations);
  - iii) intensify and extend existing sites, where appropriate;
  - iv) carry forward existing pitch allocations from adopted Plans;
  - v) allocate new pitches on suitable sites which have emerged since adopted Plans.

**Table 6: Supply of Gypsy and Traveller Pitches up to 2032**

Source	Number of pitches
Protection of existing authorised pitches: GT2: Wolverhampton Council Showell Road Site – 40 pitches GT3: 36-38 Beckett Street, Bilston – 2 pitches	42
Allocation of existing unauthorised site for permanent use: GT4: 189 Wolverhampton Road, Heath Town – 2 pitches	2
Carried forward pitch allocation: GT1: Former Bushbury Reservoir, Showell Road – 12 pitches	12
<b>Total Pitches</b>	<b>56</b>

- 6.49 This approach will deliver 56 permanent pitches up to 2032, as shown in Table 6. This is not sufficient to provide a five-year deliverable supply of pitches from adoption of the WLP in 2027 (as required by the PPTS), with a remaining need for 19 pitches up to 2032.
- 6.50 It is not possible or appropriate to intensify or extend the existing permanent pitch sites, and no further suitable sites have emerged or been identified within Wolverhampton to address this unmet need. No deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which included three “call for site” opportunities and an assessment of publicly owned land and privately-owned housing sites. Duty to Cooperate requests to neighbouring authorities to provide pitches to help address this unmet need have also been unsuccessful.
- 6.51 Therefore, remaining needs up to 2032 and beyond will be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. This is consistent with past trends, where small windfall sites have come forward within the urban area, and these have been approved where in accordance with other planning policies.
- 6.52 The GTAA identifies an additional need for 21 pitches over the Plan period for those families / individuals that do not meet the PPTS definition but do meet the ethnic definition set out in the GTAA and whose needs are not met by bricks and mortar accommodation. This need will also be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies.

### Travelling Showpeople Plots

- 6.53 There is one existing Travelling Showpeople yard in Wolverhampton, GT5: Phoenix Park Travelling Showpeople Yard - 4 plots. It is not possible or appropriate to intensify or extend this site. The GTAA identifies the need for an additional four Travelling Showpeople plots over the Plan period. It is not possible to identify and allocate sites to meet this need, as no deliverable site options were put forward through the Black Country Plan and WLP preparation processes, which have included three “call for site” opportunities. Therefore, this need will be met within the “broad location” of the urban area, through the planning application process, with proposals considered against the criteria set out in Policy HOU5 and any other relevant Development Plan Document policies. This is consistent with past trends, where small windfall sites have come forward within the urban area, and these have been approved where in accordance with other planning policies.
- 6.54 Travelling Showpeople have different accommodation requirements to those of Gypsies and Travellers, and form part of a different community. They require large plots capable of accommodating lorries and equipment, which are more suited to mixed use areas.

### Evidence

- Black Country Gypsy and Traveller Accommodation Assessment (2022) and Wolverhampton Update (2024)

### Delivery

- Allocations in Development Plan Documents and bids for Government funding where required.
- Planning application process.

### Education Facilities

- 6.55 A variety of services are required to meet the needs of new residents, including education facilities. It is important that these facilities can be easily accessed by sustainable forms of transport and meet the variety of needs for different age groups and educational needs.



## Policy HOU6 – Education Facilities

### Education Facilities

1. The existing network of education facilities will be protected and proposals that seek to enhance this network will be supported. The physical enhancement and expansion of higher and further educational facilities and related business and research will be supported where it helps to realise the educational training and research potential of Wolverhampton. Proposals involving the loss of part or all of an education facility will be permitted only where adequate alternative provision is available to meet the needs of the community served by the facility.
2. New nursery, school and further and higher education facilities must be:
  - a) Well-designed and complement and enhance neighbourhood services and amenities;
  - b) Well-served by public transport infrastructure, walking, and cycling facilities, particularly in centres, and located to minimise the number and length of journeys needed in relation to its intended catchment area;
  - c) Wherever possible, located to address accessibility gaps in terms of the standards set out in Policy HOU2, particularly where a significant amount of new housing is proposed.
3. New and improved education facilities will be secured through a range of funding measures. Where a housing development of ten or more homes would increase the need for education facilities to the extent that new or improved facilities would be required to meet this need, planning obligations will be secured sufficient to meet the need in a timely manner, where this is financially viable. Contributions will be secured retrospectively where forward funding of improvements is necessary to meet immediate needs.
4. On sites where the education facility requirement is proven not to be viable, the maximum proportion of funding will be sought that will not undermine the viability of the development, subject to securing other planning obligations necessary for the development to gain planning permission. A financial viability assessment will be required to demonstrate this, meeting the requirements set out in Policy HOU3.
5. New and redeveloped education facilities should include provision for wider community use of sports and other facilities where this would be in accordance with evidence of need, secured through a suitably worded community use agreement.

## Justification

- 6.56 In recent years, rising demand for school places (due to a combination of high birth rates, inward migration, retention levels and housing growth) has prompted the expansion of a significant number of existing schools across Wolverhampton. This investment has largely been funded by the Local Education Authority as housing sites within the urban area have not typically demonstrated sufficient viability to provide for their own school place needs. The significant national “bulge” in school age children has now passed through primary to secondary schools. However, birth rates are difficult to predict, and it is possible that housing growth over the Plan period may generate the need for further investment in education provision for all age groups, including nursery and further and higher education.
- 6.57 National guidance sets out the presumption that housing developments will fund the provision of education facilities sufficient to meet their own needs, including the provision of land for the construction of new buildings where necessary. However, the Viability Study indicates that, depending on the extent of other planning obligations required, this may not be viable on some sites, particularly those located in lower value zones as shown on Figure 5. Where it can be proved that it is not viable for a housing development to fund all its own education facility needs, the developer should work with the Local Education Authority to investigate available options and ensure that these needs can and will be met.
- 6.58 Improvements to existing educational settings should be explored to help address low educational attainment, which is a key priority for Wolverhampton. It is important that any investment in educational settings is focussed to support centres, address accessibility gaps, generate maximum service improvements and secure community benefits. Increasing community use of school sports facilities would make a major contribution towards meeting open space, sport and recreation standards and improving health through increased sports participation.
- 6.59 The preferred location for major education facilities, which generate a large number of trips, is the network of identified centres. However, there may be cases where a development is isolated from a centre or provision within a centre may not be possible. In such cases the priority, when selecting a location, should be addressing accessibility gaps in accordance with access standards set out in Policy HOU2, to maximise sustainable access to the facility.
- 6.60 Higher and further education institutions and research facilities, particularly the University of Wolverhampton, play a major role in the Wolverhampton economy and have a key role in helping deliver economic and social transformation. Attracting and retaining graduates within Wolverhampton is also key to securing a knowledge-based economy. The higher and further education sector is a major driver of economic, social, and cultural regeneration and ongoing investment in the existing network of this sector is supported. Initiatives that strengthen linkages between the sector and the wider economy will also be supported.

## Evidence

- Wolverhampton Viability Study (Aspinall Verdi, 2024)
- Wolverhampton Infrastructure Delivery Plan (WCC, 2024)

## Delivery

- Local Education Authority school expansion and improvement programmes
- National Department for Education Free School Programmes
- Use of planning obligations or other funding mechanisms to address the impact of development on the need for education facilities
- Securing community use agreements
- Identification of sites to support implementation of university and college estate strategies

## Houses in Multiple Occupation

6.61 In recent years, as house prices have risen in comparison with local wages, the demand for houses in multiple occupation (where facilities are shared by separate households) has increased across Wolverhampton and now requires a policy approach. The approach needs to balance the growing demand for HMOs with the need to avoid loss of amenity, increased social and environmental problems and the undermining of the health and stability of communities. Proposals for new HMOs will need to address detailed local amenity issues, including local parking pressures and impacts on neighbours.

## Policy HOU7 – Houses in Multiple Occupation

### Houses in Multiple Occupation

1. Proposals for the creation of Houses in Multiple Occupation, including through the conversion of buildings and sub-division of existing homes, will be permitted only where:
  - a) the development would not result in the loss of family-sized homes in areas where there is a proven demand for such accommodation;
  - b) the development is unlikely to be detrimental to the amenities of the occupiers of adjoining or neighbouring properties by way of noise, overlooking, general disturbance or impact on visual amenity;
  - c) the development would not have a significant adverse impact on the character or appearance of the area, or the historic or natural environment, taking account of the character of the existing use compared to the character of the proposed use;

## Houses in Multiple Occupation

- d) the development would not give rise to unacceptable adverse cumulative impacts on security, crime, anti-social behaviour or the fear of crime;
- e) provision for off-street car and cycle parking is sufficient and appropriately incorporated and would not have an adverse impact on the surrounding area by way of increased on-street parking, impaired highway safety or impeding proper access to the area;
- f) the site is in an area that has good access by walking and public transport to residential services, as set out in Policy HOU2;
- g) the development meets Nationally Described Space Standards as set out in Policy HOU2 and provides a good standard of living accommodation which ensures that the occupiers have adequate floor space (including shared kitchen, lounge and bathroom space) and that the internal layout is shown to be suitable for the number of units proposed in terms of daylight, outlook and the juxtaposition of living rooms and bedrooms;
- h) adequate provision is made for the storage and disposal of refuse and recycling; and
- i) adequate provision of residential amenity space is made, including outdoor amenity space for sitting out, play and drying clothes and external storage space, including cycle storage.

## Justification

6.62 Houses in Multiple Occupation (HMO) are defined as homes accommodating three or more unrelated households who typically share kitchens, lounges, and bathrooms. HMOs are different in character to other types of housing. There is concern about the proliferation of HMOs in Wolverhampton because they can give rise to anti-social behaviour and cause a fear of crime. Police evidence is that crimes are more likely to be committed in HMOs than in other types of housing in Wolverhampton. To address this issue, the Local Planning Authority has introduced an Article 4 Direction covering the whole City, which means that any proposal for the conversion of an existing home to a HMO designed to accommodate three or more people requires planning permission.

- 6.63 HMOs are part of the housing market within many areas of Wolverhampton. As rooms can be rented individually, they provide additional affordable accommodation options, used primarily by students, young people and those on lower incomes. Whilst the area's stock of HMOs is making a contribution to meeting certain housing needs, increased numbers of multiple occupancy properties have the potential to create harmful impacts and lead to social and environmental problems for local communities.
- 6.64 Harmful impacts associated with high numbers of HMOs can include:
- a) reduced social cohesion resulting from demographic imbalance and unsustainable communities;
  - b) reduced housing choice resulting from housing type / tenure imbalance (e.g. a shift from permanent family housing to more transient accommodation and a growth in the private sector at the expense of owner occupation);
  - c) reduced community engagement from residents resulting from an increase in the transient population of an area;
  - d) noise and disturbance resulting from intensification of the residential use and / or the lifestyle of occupants;
  - e) detriment to the visual amenity and character of the area resulting from poor or accumulative external alterations to properties and / or poor waste management;
  - f) increased anti-social behaviour and fear of crime resulting from the lifestyles of some HMO occupants, the transient nature of the accommodation and inadequately designed / maintained properties;
  - g) highway safety concerns resulting from congested on-street parking.
- 6.65 Concentrations of HMOs within neighbourhoods can lead to imbalanced and unsustainable communities and harm the social mix and fabric of the area by increasing the proportion of short-term households. HMOs can also damage the residential amenity and character of surrounding areas, as the level of activity associated with a HMO is significantly greater than a typical family house, thus increasing the potential for noise and disturbance.
- 6.66 Alongside this, an increase in HMO properties can be associated with a loss of family-sized homes. This, in turn, can lead to an increase in the overall number of homes unsuited to family occupation. This can pose a serious issue for maintaining a sustainable, mixed housing offer across Wolverhampton. The Wolverhampton HMA (2024) found that the greatest demand over the Plan period will be for homes of three bedrooms or more. It is therefore important that an approach is taken to the creation of HMOs and the sub-division of existing properties that only allows proposals which will not impact upon the overall supply of family-sized homes. In applying this policy, 'family-sized homes' means homes with three or more bedrooms.

## Evidence

- Wolverhampton Housing Market Assessment (HDH, 2024)

## Delivery

- Through the planning application process

## Monitoring

Policy	Indicator	Target
HOU1	Annual net housing completions	Phased Housing Targets set out in Table 4
HOU3	% affordable housing delivery on eligible sites	Minimum % set out in Policy HOU3
	% M4(2) accessible and adaptable homes delivery	100%
	% M4(3)(a) wheelchair adaptable home delivery on eligible sites	Minimum 10%
	% self-build and custom build plot availability on eligible sites	Minimum 5%
HOU5	Annual Gypsy and Traveller residential pitch and Travelling Showpeople plot completions	56 gypsy and traveller permanent pitches in total by 2032  93 gypsy and traveller permanent pitches in total by 2042  8 travelling showpeople plots in total by 2042

# 7. Economy

## Employment Land

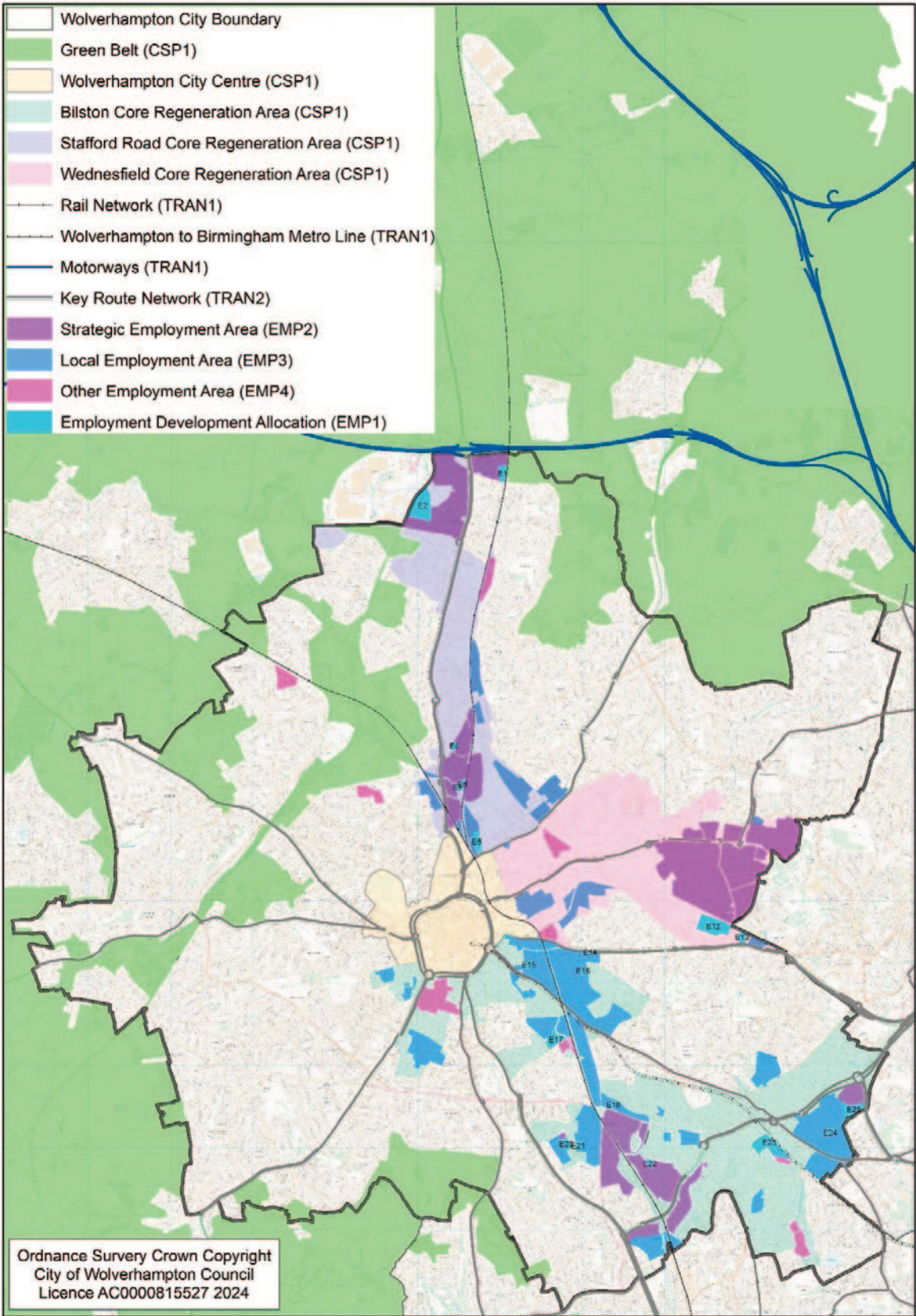
- 7.1 The policies in this section relating to Employment Land (EMP1- EMP5) focus on promoting and supporting employment in manufacturing, research and development (Use Class E(g)(ii), E(g)(iii) and B2), warehousing (Use Class B8) and other uses that are appropriately located in industrial employment areas. Offices (Use Class E(g)(i)) are not classed as an employment use for the purposes of these policies and are covered by Policies CEN1 – CEN4, which relate to uses that are more appropriately located in town centres.
- 7.2 An agenda for economic growth is reflected in the ambitions of relevant national and regional strategic documents, especially:
- the National Planning Policy Framework (NPPF), which states that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development, and that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
  - the West Midlands Combined Authority (WMCA) “Plan for Growth (2022)” which states that WMCA will deliver economic growth through new powers over economic development, transport investment, investing in skills and working with investors, and committing to net zero targets, especially around suitable employment clusters, including aerospace, electric vehicles and battery technology, and logistics and distribution, delivered through levers for growth, including developing future skills pathways and securing direct competitive funding;
  - the West Midlands Local Industrial Strategy (WMCA, 2019) which sets out a path for raising productivity via several key employment sectors; and
  - the West Midlands Strategic Employment Sites Study (WMSESS) (2024) sets out a review of the current portfolio of strategic employment sites across the West Midlands and provide recommendations on the number, phasing and broad location of sites going forward to meet forecast demand.
- 7.3 Previous economic growth strategies relating to the former Black Country Local Enterprise Partnership (now defunct), including the Black Country Strategic Economic Plan (2014) and the Black Country Economy of Together (2021), have effectively been subsumed by the regional WMCA strategies.
- 7.4 This growth agenda, when transposed at a local (Wolverhampton) level, underlies the importance of meeting city wide employment land needs expressed in strategic targets, including the projected demand for jobs from existing and future working age residents. This builds on Wolverhampton’s rich industrial heritage and adapting the existing portfolio of industrial land within the city to provide the right environment, flexibility and interventions to encourage investment, especially in sustainable and progressive businesses. It provides a framework for meaningful long term employment opportunities and the creation of a prosperous, and economically strong and more sustainable city.



- 7.5 In recognition of the strong economic functional relationship between the Black Country Authorities (BCAs), the Council has continued to work in partnership with the other BCAs to update the economic evidence base for the Black Country Functional Economic Market Area (FEMA) – see further details below. The evidence base for the employment land policies primarily consists of a three stage Black Country Economic Development Needs Assessment (EDNA) and the Black Country Employment Area Review (BEAR). The EDNA provides an objective assessment of the industrial land needs for the Black Country up to 2042, based on an independent assessment of the area’s economic development needs.
- 7.6 The key conclusions of the EDNA studies are:
- a) the Black Country is a clearly defined geographical unit that has strong employment and labour market links to a hinterland that includes southern Staffordshire, north Worcestershire, Birmingham, and Solihull. The links with the City of Birmingham and the district of South Staffordshire are particularly significant;
  - b) the Black Country has been hit hard by the Covid19 recession but is expected to recover strongly and has the capacity to deliver significant growth, given the diversity, resilience and concentration of key national sectors located in the area;
  - c) even pre-COVID19, recent growth was achieved against a backdrop of a weak local skills base, low business start-up rates and low GVA per head in comparison with the West Midlands and UK averages;
  - d) economic development strategies seek to address these challenges to accelerate the growth of the local economy;
  - e) the Black Country employment land supply in 2020 was largely that inherited from the Core Strategy and the suite of Tier 2 Plans which supported it. This land supply is dominated by small sites in the urban area;
  - f) going forward, attracting high-growth, knowledge-based industries in line with strategic ambitions will require the provision of more prestigious sites and high quality space with easy access to key transport hubs and good connectivity;
  - g) the Plan also needs to ensure that Wolverhampton can accommodate a variety of business needs, including start-ups and smaller businesses. This means that a mixed portfolio of sites will need to be made available, including larger and smaller sites and spaces, and including areas of both higher and lower specification;
  - h) it is imperative to protect the existing supply of land to meet future needs that will arise from a high growth-driven economy; and
  - i) there is a significant gap between the employment land supply, inherited from the Core Strategy and subsequent Tier 2 Plans, and forecast future needs.

- 7.7 To address these issues, the strategy that underpins the employment land policies is made up of the following elements:
- a) to facilitate the growth and diversification of the economy, the Plan allocates land for new development within Wolverhampton, to accommodate jobs and output growth (Policy EMP1);
  - b) to accommodate a variety of business needs including high technology manufacturing and logistics sectors, the Plan provides for a balanced portfolio of sites (Policy EMP1);
  - c) to protect and enhance land and premises within existing employment areas, where this provides for the needs of jobs and businesses (Policies EMP2, EMP3 and EMP4);
  - d) to recognise that some sites will become unsuitable for continued employment uses and to facilitate their redevelopment to alternative uses including housing (Policy EMP4). However, the number of such sites is expected to be considerably less than was envisaged by the Black Country Core Strategy adopted in 2011; and
  - e) to enable local communities to share the benefits of economic growth (Policy EMP5).
- 7.8 The latest EDNA (2024) provides an employment land target for Wolverhampton of 138 hectares (ha) between 2020 and 2042. To this requirement a further 11 ha needs to be added to allow for the replacement of operational, occupied employment land which is likely to be developed for housing. The need for the replacement of such losses will be monitored as the Plan is implemented. The total requirement 2020-42 is therefore 149 ha.
- 7.9 The spatial strategy in relation to employment land is to focus new development on sites within the Core Regeneration Areas, as set out in Policy CSP1. This will be achieved through the development of currently vacant sites allocated for development in the Plan (as detailed in Table 12 of Section 13) and the redevelopment and 'intensification' of existing premises. The great majority of existing employment areas which accommodate most of the city's existing manufacturing and logistics jobs and businesses are also located within the Core Regeneration Areas.

Figure 6: Employment Land Key Diagram



## Providing for Economic Growth and Jobs

7.10 Policy EMP1 seeks to ensure a sufficient quantum of development opportunities are provided to meet the demand for economic growth and support the diversification of the Wolverhampton and wider Black Country economy.

## Policy EMP1 – Providing for Economic Growth and Jobs

### Providing for Economic Growth and Jobs

1. Sufficient land will be provided to deliver at least 42.9 ha of employment development over the Plan period 2024-42, in Use Classes E(g)(ii), E(g)(iii), B2, and B8, to support the growth of the city and sub-regional economy and increase productivity, through:
  - a) development of the Employment Development Sites allocated in this Plan, comprising 39.5 ha of land; and
  - b) development, redevelopment, intensification, conversion and enhancement of land mainly located within existing employment areas and premises, including the development of non-allocated sites.
2. The Plan will deliver a portfolio of sites of various sizes and quality to meet a range of business needs. This land is in addition to sites currently occupied for employment purposes.
3. Individual Employment Development Site Allocations are listed in Table 12 of Section 13 and key clusters of sites are shown on the Employment Land Key Diagram. These sites will be safeguarded for industrial employment uses within Use Classes E(g)(ii), E(g)(iii), B2, and B8.
4. The Council will support the regeneration and renewal of designated Strategic and Local Employment Areas and, as appropriate, Other Employment Areas, especially those Local Employment Areas which are located within Core Regeneration Areas, to enable Wolverhampton's employment areas to be fit-for-purpose in the long term, and to grow and rejuvenate the local economy, especially through:
  - a) environmental enhancements;
  - b) access improvements, including for pedestrians and cyclists;
  - c) the incorporation of renewable energy measures, and, as appropriate, installations, measures and/or facilities which contribute towards a circular economy approach, in accordance with Policies ENV14 and W5;



## Providing for Economic Growth and Jobs

- d) the marketing and promotion of employment areas; and
- e) with particular regard to Local Employment Areas, opportunities to enable those areas to be more open to, and inclusive of, the local communities which they serve.

## Justification

- 7.11 Building a strong, responsive, and competitive economy is one of the three overarching objectives of the NPPF. This should be achieved by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth, innovation, and improved productivity, and by identifying and co-ordinating the provision of infrastructure.
- 7.12 The NPPF specifically advises that for forecasting future trends:
- a) Plan makers should consider forecasts of quantitative and qualitative need (i.e. the number of units and floorspace for other uses needed) but also its unique characteristics (e.g. the footprint of economic uses and proximity to infrastructure). The key output is an estimate of the scale of future needs, broken down by economic sectors.
  - b) Local authorities should develop an idea of future needs based on a range of data that is current and robust. Authorities will need to take account of business cycles and make use of forecasts and surveys to assess employment land requirements.
  - c) Emerging sectors that are well-suited to the area being covered by the analysis should be encouraged where possible. Market segments should be identified within the employment land under consideration.
  - d) The available stock of land should be compared with the particular requirements of the area so that gaps in local land provision can be identified.
- 7.13 To contribute towards meeting the evidenced need for 149 ha of employment development land in Wolverhampton over the period 2020-42, there have been 22.6 ha of completions during 2020-24, reducing the residual need to 126.4 ha. There are 3.4 ha of planning permissions for employment development which are not allocated in this Plan, and there are 39.5 ha of Employment Development Sites allocated in this Plan (as set out in Table 12 of Section 13). To ensure that Employment Development Sites make an effective contribution towards meeting needs, they will be safeguarded for industrial employment uses within Use Classes E(g) (ii), E(g) (iii), B2 and B8, with consideration given to restricting development to these suitable uses through the application of appropriate planning conditions.

- 7.14 Further contributions to the supply of land to meet the remaining need are likely to come forward through the redevelopment, intensification, conversion and enhancement of land within existing employment areas and premises, including the development of small sites of between 0.25 and 0.4 ha.
- 7.15 Current evidence states that 83.5 ha (or 56%) of employment land need arising in Wolverhampton cannot be met solely within the City. This unmet need should be exported, as far as possible, to authorities that have a strong existing or potential functional economic relationship with Wolverhampton, for example in terms of migration patterns, commuting links and / or connectivity through physical infrastructure such as rail and motorway. These are authorities evidenced as, primarily, being within the same Functional Economic Market Area (FEMA) as Wolverhampton – the Black Country FEMA – and also those authorities outside the FEMA, which have strong or moderate economic relationships with Wolverhampton.
- 7.16 The Black Country FEMA has identified areas of strong economic transaction with South Staffordshire and Birmingham, and identified areas of moderate economic transaction with Wyre Forest, Bromsgrove, Solihull, Tamworth, Lichfield and Cannock Chase. Wolverhampton's strongest FEMA relationships with authorities outside the Black Country, based on net migration patterns, are with South Staffordshire, Birmingham, Telford & Wrekin and Shropshire.
- 7.17 The work to export unmet employment land need through the Duty to Cooperate process is ongoing, as evidenced by relevant Statements of Common Ground. South Staffordshire is an area of strong economic transaction with the Black Country and has generally been able to demonstrate a surplus of employment land to meet its needs. Therefore, the siting of the West Midlands (Strategic Rail Freight) Interchange (WMSRFI) within South Staffordshire (near J12 of the M6) has been the subject of an assessment (Stantec, 2021), to determine how much land could be exported to neighbouring authorities with strong functional economic ties with South Staffordshire.
- 7.18 The assessment concluded that 16 ha of the 193 ha WMSRFI site can be directly apportioned to Wolverhampton to meet its employment land needs. Given this robust evidence, and the support and agreement of South Staffordshire Council, that figure of 16 ha can be considered a committed contribution towards Wolverhampton's employment land shortfall. As WMSRFI is Europe's largest new logistics development site, this contribution can be directly attributed towards Wolverhampton's logistics need.
- 7.19 There are a limited number of appropriately sized and located vacant sites in Wolverhampton which can be allocated as Employment Development Sites. Therefore, there is a need to look beyond the churn of land and premises within existing employment areas to contribute towards meeting Wolverhampton's need, by actively seeking the renewal and rejuvenation of those employment areas so that they can adapt to accommodate long term, sustainable economic development, particularly by providing premises for companies involved with modern, cutting-edge technologies. The majority of designated employment areas fall

within Core Regeneration Areas, and these are a priority for such renewal. Policies in the WLP and other Local Development Documents support environmental and infrastructure improvement in these areas, including sustainable design, drainage and transport measures, and allowing employment areas to become better integrated with the local communities which they serve.

## Evidence

- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)
- Black Country Employment Area Review (BEAR) (BCAs, 2021)
- Wolverhampton Site Assessment Report (2024)
- Black Country Employment Land Supply Technical Paper (WCC, 2024)
- West Midlands Strategic Rail Freight Interchange – Employment Issues Response Paper (Stantec, 2021)
- Statements of Common Ground

## Delivery

- Through the planning application process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

## Strategic Employment Areas

7.20 Policy EMP2 provides for a sufficient stock of strategic employment land suitable for a growing and diversified economy.

## Policy EMP2 – Strategic Employment Areas

### Strategic Employment Areas

1. The Strategic Employment Areas are shown on the Policies Map. They are characterised by excellent accessibility, high quality environments and clusters of high technology growth sector businesses. These areas will be safeguarded for manufacturing and logistics uses within Use Classes E(g)(ii), E(g)(iii), B2 and B8.
2. Within Strategic Employment Areas, high quality development or redevelopment of sites and premises will be required, and planning applications that prejudice or dilute the delivery of appropriate employment activity, or deter investment in such uses, will be refused.



## Strategic Employment Areas

- 3. Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii), and Class-B2 and B8 uses, such as childcare facilities and small-scale food and drink outlets, may also be permitted in Strategic Employment Areas, where they:**
- a) can be shown to solely strongly support, maintain or enhance the business and employment function and attractiveness of the area;**
  - b) are of an appropriate scale (up to 280 sqm gross) and use; and**
  - c) meet the requirements of Policy CEN3.**

## Justification

- 7.21 Strategic Employment Areas (SEAs) are high quality employment areas that are considered essential to the long-term success of the city economy. They correspond to areas of the strongest occupier and market demand and are of high environmental quality with excellent links to the Strategic Highway Network, and therefore should be protected from non-employment uses that could impact upon their viability as employment locations. These areas contain, or have the potential to attract, those knowledge-based growth sector businesses whose success will be critical to the delivery of the City's economic ambitions.
- 7.22 Policy EMP2 is based on the approach set out in the 2011 Core Strategy, which distinguished between Strategic High Quality Employment Areas and Local Employment Areas. The SEAs in the WLP are equivalent to the Strategic High Quality Employment Areas in the Core Strategy. The EDNA recommended that the approach set out in the Core Strategy has served the Black Country well and, subject to some refinement, should be carried forward into the WLP.
- 7.23 The characteristics and extent of the SEAs reflect the findings of the Black Country Employment Area Review (BEAR). The BEAR re-examined the totality of the Black Country's employment areas against a set of criteria based on those set out in the Core Strategy and the recommendations of the EDNA.
- 7.24 The key characteristics of SEAs are as follows:
- a) To be highly accessible to the Strategic Highway Network, preferably well- located in relation to the motorway network, to provide good accessibility to international, national, and regional markets and supply chains;
  - b) To have good public transport accessibility;
  - c) To maintain a critical mass of active industrial and logistics sites and premises that are well suited to the needs of modern industry;

- d) To maintain an existing (or develop a potential) high quality environment, including suitable landscaping and greenspace and an attractive and functional built environment; and
- e) To be attractive to national and / or international investment.

- 7.25 The majority of the defined SEAs satisfy all of these characteristics or are considered capable of acquiring them. The BEAR has found that it is not always necessary for an area to display all of these characteristics to attract high quality development. The broad extent of the SEAs is shown on the Employment Land Key Diagram and detailed boundaries are provided on the Policies Map.
- 7.26 The Plan seeks to safeguard land and premises within SEAs for industrial and logistics activity and supports proposals that involve the improvement and renewal of land and premises within them. This process of redevelopment, intensification and enhancement of existing Local Employment Areas will provide a significant source of land to meet future growth needs.
- 7.27 Some small-scale ancillary uses will be supported in SEAs, where this will only meet the day-to-day needs of employees of businesses within that SEA. While Policy EMP2 considers development for uses that are not within an industrial employment use class, these will only be supported in exceptional circumstances, in order to safeguard SEAs from non-manufacturing / logistics uses (B Use Classes).

## Evidence

- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)
- Black Country Employment Area Review (BEAR) (BCAs, 2021)

## Delivery

- Through the planning application process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

## Local Employment Areas

- 7.28 In order to achieve the appropriate balance and underpin the local economy, it is essential to make provision for those types of industrial, logistics and commercial activities that do not need to be situated in Strategic Employment Areas and are not appropriate for town centres or residential locations.

## Policy EMP3 – Local Employment Areas

### Local Employment Areas

1. Local Employment Areas are shown on the Policies Map. They are characterised by a critical mass of industrial, warehousing and service activity with good access to local markets and employees.
2. These areas will provide for the needs of locally-based investment and will be safeguarded for the following uses:
  - a) Industry and warehousing (E(g)(ii), E(g)(iii)), B2 and B8 use);
  - b) Motor trade activities, including car showrooms and vehicle repair;
  - c) Haulage and transfer depots;
  - d) Trade, wholesale retailing and builders' merchants;
  - e) Scrap metal, timber and construction premises and yards; and
  - f) Waste collection, transfer and recycling uses as set out in Policy W3.
3. Some ancillary employment-generating non-Class E(g)(ii), E(g)(iii) and B uses, such as childcare facilities and small food and drink outlets of less than 280sqm, may also be permitted in Local Employment Areas where they:
  - a) can be shown to solely strongly support, maintain or enhance the business and employment function and attractiveness of the area;
  - b) are of an appropriate scale (up to 280 sqm gross) and use; and
  - c) meet the requirements of Policy CEN3.

### Justification

- 7.29 Local Employment Areas (LEAs) are particularly prevalent in the city and play an important role in the local economy. They offer a valuable source of mainly low cost industrial units that are vital in providing local jobs and a balanced portfolio of sites of different sizes and quality.
- 7.30 LEAs are the equivalent of Local Quality Employment Areas in the Core Strategy. The EDNA recommended that the approach set out in the Core Strategy has served the Black Country well and, subject to some refinement, should be continued.

- 7.31 The characteristics and extent of the LEAs reflect the findings of the BEAR. The BEAR re-examined all of the Black Country's employment areas against a set of criteria based on those in the Core Strategy and with regard to the recommendations of the EDNA.
- 7.32 The key characteristics of LEAs are as follows:
- A critical mass of active industrial and service uses and premises that are fit for purpose;
  - Good access to local markets, suppliers, and employees;
  - The existing or potential use and / or the traffic generated by the use does not have an unacceptable impact on the amenity of surrounding land uses or on the highway network; and
  - Good public transport accessibility.
- 7.33 The broad extent of the LEAs is shown on the Employment Land Key Diagram and detailed boundaries are provided on the Policies Map. The Plan seeks to safeguard LEAs as locations for industrial and logistics activity and uses that share the characteristics of Class E(g)(ii), E(g)(iii) and B2 and B8 uses, which are typically located within industrial areas.
- 7.34 The Plan also supports proposals that involve the improvement and renewal of land and premises within them, particularly where this involves older outdated industrial premises that are no longer fit for purpose. This process of redevelopment, intensification and enhancement of existing LEAs provides a significant source of land to meet future growth needs.
- 7.35 LEAs are often vulnerable to pressure for redevelopment to other uses such as housing. However, the loss of too much local employment land will compromise the successful delivery of the WLP employment strategy. It would inhibit economic development, endanger the viability of businesses, and affect the balance of jobs and workers. Workers located at companies in LEAs who are displaced by new forms of development would have to travel increased distances to work and the viability and sustainability of firms would be put at risk. These areas will therefore be primarily safeguarded from non-employment uses.
- 7.36 Sites within LEAs may also be appropriate for uses that serve the needs of businesses and employees working in the LEA. Such uses include food and drink or childcare facilities. Such uses should be of a scale, nature, and location to only serve the needs of the employment area, where existing facilities are inadequate and where such needs cannot be met in adjacent town centres.

## Evidence

- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)
- Black Country Employment Area Review (BEAR) (BCAs, 2021)

## Delivery

- Through the planning application process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

## Other Employment Sites

7.37 The Council recognises that there are a number of older employment areas across the city that are not of the quality of Strategic or Local Employment Areas. Sites and premises within these areas may be suitable for redevelopment for a continued employment use, or to alternative uses such as housing. Policy EMP4 provides a flexible policy framework to guide development proposals in these areas.

## Policy EMP4 – Other Employment Sites

### Other Employment Sites

1. For employment sites that do not fall within a Strategic Employment Area or a Local Employment Area, but comprise land that is occupied, or if vacant was last used, for employment purposes, development will be supported for:
  - a) new industrial employment uses within Class E9G0(ii), Eg(iii), and Class B2 and B8; or
  - b) housing or other non-ancillary non-industrial employment uses.
2. Development of uses under 1(b) will only be supported where there is robust evidence that all of the following criteria are met, where relevant:
  - a) if the site is vacant, it has been marketed for employment use for a period of at least 6 months, including by site notice and through the internet or as may be agreed by the Local Planning Authority;
  - b) if the site is occupied or part occupied, that successful engagement has been undertaken with the occupiers to secure their relocation;
  - c) if the site forms part of a larger areas occupied or last occupied for employment, that residential or any other use will not be adversely affected by the continuing operation of employment uses in the remainder of the area;
  - d) the site could be brought forward for housing in a comprehensive manner and would not lead to piecemeal development;

### Other Employment Sites

- e) housing development would not adversely affect the ongoing operation of existing or proposed employment uses on the site or nearby; and
- f) the site is suitable for housing or other non-ancillary non-employment uses in accordance with local or national policies relating to these uses.

### Justification

- 7.38 There are a number of existing employment sites and areas that are not designated as Strategic or Local Employment Areas. These tend to be older, less marketable employment sites close to or within residential areas, where proposals for redevelopment to other uses could give rise to significant regeneration benefits, and that, when assessed through the BEAR, did not meet the thresholds for being designated as a Local Employment Area. The larger areas (of over 0.4ha) subject to this Policy are shown on the Policies Map.
- 7.39 While these existing businesses will continue to be supported, it is also necessary for the Plan to allow flexibility for them to be reused for alternative forms of appropriate development. The circumstances where such redevelopment will be permitted are set out in section 2) of the Policy. In addressing criteria a) and b), applicants will be required to submit an Economic and Market Assessment that demonstrates that the site is unsuitable for continued employment use. The sustainability of the location (including its accessibility by a choice of modes of transport) will be one matter that should be considered in this context. In assessing the potential of attracting continued employment use, the Economic and Market Assessment should consider whether the costs of the necessary remediation works would make reuse or redevelopment for employment uses unviable. The Economic and Market Assessment should also include evidence that the site is vacant (unless it can be demonstrated that occupiers are to be relocated) and has been marketed over a reasonable period of time and at realistic rental and capital values.

### Evidence

- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)
- Black Country Employment Area Review (BEAR) (BCAs, 2021)
- Wolverhampton Site Assessment Report (2024)
- Black Country Employment Land Supply Technical Paper (WCC, 2024)

## Delivery

- Through the planning application process.
- Through partnership with Economic Development Partners in promoting development opportunities and improvement programmes.

## Improving Access to the Labour Market

7.40 Restructuring the City's economy is one of the key principles of the Vision for Wolverhampton, but the provision of land and premises alone will not deliver the necessary economic transformation without new skills and training in the workforce to help it meet the challenges of changing work requirements and patterns.

## Policy EMP5 – Improving Access to the Labour Market

### Improving Access to the Labour Market

1. Planning applications for new major job-creating development will be required to demonstrate how job opportunities arising from the proposed development will be made available to the residents of the City, particularly those in the most deprived areas and priority groups.
2. Planning conditions or obligations will be negotiated with applicants and applied as appropriate to secure initiatives and/or contributions to a range of measures to benefit the local community, including the potential for working with local colleges and universities, to ensure:
  - a) The provision of training opportunities to assist residents in accessing employment opportunities;
  - b) The provision of support to residents in applying for jobs arising from the development;
  - c) Enhancement of the accessibility of the development to residents by a choice of means of transport, including walking, cycling and public transport (see Policy TRAN1);
  - d) Child-care provision which enables residents to access employment opportunities; and
  - e) Measures to assist those with physical or mental health disabilities to access employment opportunities.



## Justification

- 7.41 The Plan plays a key role in ensuring that people who suffer from social exclusion and disadvantage are able to fully contribute to the regeneration of the city. It is therefore important that jobs created through new developments across the city are accessible to as many of Wolverhampton's residents as possible, especially those in the most deprived areas or priority groups.
- 7.42 There are several aspects to improving the accessibility of job opportunities to residents. Firstly, it may be necessary for improvements to public transport infrastructure and services to be funded, and better facilities for pedestrians and cyclists to be provided, to ensure that residents are able to travel to and from their places of employment within reasonable timescales.
- 7.43 Support may also need to be provided to assist residents, particularly those from disadvantaged groups or areas, in applying for new jobs and to receive training that will assist them in accessing employment opportunities. Childcare provision may also help in enhancing access to employment and individuals with mental or physical health difficulties may also require support to enable them to access jobs.
- 7.44 There are existing support structures and facilities in place across the city to help ensure that local people can access and receive appropriate training to develop the necessary skills to compete successfully for jobs. To assist with this, where major new employment-creating development is proposed, the Council will negotiate with companies to devise suitable bespoke training and recruitment programmes that can benefit local people.
- 7.45 Attracting graduates to, and retaining them within, Wolverhampton will also be key to securing a knowledge-based economy. The higher and further education sector is a major driver of economic, social and cultural regeneration and ongoing investment in this sector is supported. The Council will also support initiatives that strengthen linkages between the education sector and the wider economy.

## Evidence

- Black Country Economic Development Needs Assessment (EDNA) (Warwick Economics and Development, 2017 / 2021 / 2022 / 2023 / 2024)

## Delivery

- Through the planning application process and negotiations on planning obligations.
- Through recruitment programmes and partnership working between economic and employment organisations.

## Cultural Facilities and the Visitor Economy

- 7.46 The Vision for Wolverhampton involves the delivery of transformational change whilst respecting and promoting the area's unique heritage. The protection, promotion and expansion of existing cultural facilities, visitor attractions and associated activities will ensure their role as key economic drivers stimulating and regenerating the local economy is supported and enhanced.
- 7.47 As well as contributing directly to Wolverhampton's economy, the visitor economy promotes health and wellbeing as well as generating additional demand and growth in supporting services and facilities, which will also benefit residents and businesses.

## Policy EMP6 – Cultural Facilities and the Visitor Economy

### Cultural Facilities and the Visitor Economy

#### Development proposals

1. Cultural, tourist and leisure facilities within Wolverhampton will be protected, enhanced and expanded (where appropriate) in partnership with key delivery partners and stakeholders.
2. Proposals for new development or uses that contribute to the attractiveness of Wolverhampton as a visitor destination will be supported in principle, subject to other national and local policy requirements (particularly Policy CEN1).
3. Proposals for new or expanded facilities or uses should:
  - i. be of a high quality design;
  - ii. be highly accessible, particularly within centres;
  - iii. not adversely impact on residential amenity or the operation of existing businesses;
  - iv. be designed to be flexible, adaptable, and where possible be capable of alternative or community use; and
  - v. where developments are likely to attract large numbers of people, be supported by an assessment which demonstrates how potential security and crime-related vulnerabilities have been identified, assessed and, where necessary, addressed in a manner that is appropriate and proportionate.
4. Well designed and accessible ancillary facilities will be supported in appropriate locations. Additional facilities that support the visitor economy and business tourism sectors (including hotels and other accommodation with strong links to key destinations and associated facilities) will be encouraged and promoted within centres, in line with Policies CEN1 - CEN4.

## Cultural Facilities and the Visitor Economy

5. As part of the design of new developments likely to attract large numbers of people, an assessment should be undertaken to demonstrate and document how potential security and crime-related vulnerabilities have been identified, assessed and where necessary, addressed in a manner that is appropriate and proportionate.
6. Development that would lead to the loss of an existing cultural or tourism facility must meet the criteria set out in Wolverhampton UDP Policy C3 (or any successor) and will be resisted unless:
  - i. the intention is to replace it with a facility that will provide an improved cultural or tourist offer; or
  - ii. it can be demonstrated that there would be significant benefits to the local and wider community in removing the use and / or redeveloping the site.

### The Visitor Economy

7. Improvement and further development of visitor attractions will be supported where appropriate, to ensure that accessibility is maximised and to continue to raise the quality of the visitor experience throughout Wolverhampton. This can be achieved by:
  - i. Retaining and enhancing / extending current attractions;
  - ii. providing inclusive access, particularly within centres;
  - iii. enhancing the visitor experience; and
  - iv. delivering necessary infrastructure.
8. Links should be made to centres and those parts of the Black Country and beyond that are well connected by public transport, considering the needs of business as well as leisure visitors, to encourage more local use of cultural and tourist attractions.
9. The canal network is also a significant visitor attraction for Wolverhampton, providing waterway links to the Black Country, Birmingham, Staffordshire, Worcestershire and beyond. Facilities adjoining and serving the canal network should be maintained and expanded to help provide a network of linked amenities and visitor hubs (see also Policy ENV7 - Canals).
10. Physical and promotional links to visitor attractions close to Wolverhampton will be enhanced and encouraged, particularly in relation to Birmingham as a Global city and a business economy destination.

## Cultural Facilities and the Visitor Economy

11. Proposals for heritage-related tourism will be supported where they provide positive opportunities for social, educational and / or economic activity that does not adversely impact on the heritage assets themselves or their environment. Any development must achieve a high quality of design in accordance with other national and local policies.

### Cultural facilities and events

12. Wolverhampton has a significant cultural history of performance art, especially in relation to live music. To ensure it remains a fertile and thriving location for associated cultural and economic growth opportunities, the retention and protection of venues providing performance spaces, recording facilities and practice amenities will be sought. The provision of new venues and facilities will also be welcomed and supported, particularly within centres.

13. In cases where proposed development would prejudice the ongoing operation of a successful cultural and / or performance venue, the “agent of change” principle will be applied in accordance with Policy ENV10. This will protect the amenities of incoming residents while at the same time it will preserve and protect the existing adjacent use / activity.

14. The promotion and protection of attractions and events that represent and celebrate the wide cultural and ethnic diversity across Wolverhampton will be encouraged, including spectator sports such as football, motorsports and other activities. This will include the protection of valuable cultural and religious buildings and the promotion of cultural, religious and community festivals on a Wolverhampton-wide basis in a range of suitable locations.

## Justification

7.48 Wolverhampton has a unique past, having been at the forefront of the Industrial Revolution, which left a rich and varied industrial and cultural legacy as well as an extensive and historically significant canal network. The area’s industrial history and geological richness is also reflected in a distinctive natural and built topography, consisting of small villages and settlements that retain their individual characteristics, as recognised in Policy ENV5 and supporting evidence. There are other areas where attractions and facilities are clustered due to their industrial heritage or cultural value. The Black Country also contains one of the world’s few urban geoparks, identified by UNESCO as a single, unified geographical area where sites and landscapes of international geological significance are located, as set out in Policy ENV6.

- 7.49 These assets are attracting an increasing number of visitors to the sub-region and the visitor economy is a key growth sector. Business tourism is also a growing sector, particularly in terms of high-quality hotel and conferencing facilities and the proximity of the Black Country to Birmingham, a global business destination.
- 7.50 The range and diversity of cultural and tourist assets in Wolverhampton include a historic built environment, museums and art galleries, markets, music venues and theatres, which are often part of centres; parks and open spaces; and high level sporting venues. These include the following venues and locations:
- a) Wolverhampton Art Gallery
  - b) Wolverhampton Grand Theatre
  - c) Wolverhampton Civic Hall and Wulfrun Hall (The Halls) concert venues
  - d) Dunstall Park Racecourse
  - e) Molineux stadium – home of Wolverhampton Wanderers FC
  - f) West Park
  - g) Monmore Green Stadium
  - h) The Canal Network
- 7.51 The sensitive development of heritage and cultural facilities appealing to the very diverse range of local communities will also contribute to social inclusion, health and wellbeing and improvements in quality of life for all sectors of the local population. Culture is also recognised by national government as making a significant contribution to ‘place making’ and delivering sustainable communities. It is important to protect the value of cultural facilities and the visitor economy. These can include community uses (currently including relevant uses within F1 and F2 use-class and comparable sui generis designations), which are protected under Wolverhampton Unitary Development Plan Policy C3: Community Meeting Places.
- 7.52 The nature and scale of cultural festivals and entertainment events may mean that they are best delivered at an open air location. In Wolverhampton, such sites are likely to include key outdoor venues such as West Park and Northcote Farm Country Park. Suitable locations for outdoor events will have appropriate levels of infrastructure, car parking and accessibility to local travel networks and use of them for events and activities should be in accordance with the other national and local policies, legislation and guidance.
- 7.53 Public venues used for entertainments and leisure purposes will also produce waste, especially relating to food and its packaging. Entertainment and environmental considerations are not always compatible, with a significant amount of waste being generated by festivals and large events. Consideration will be given to requiring the developers, operators and organisers of large-scale public events on open spaces in Wolverhampton to design in systems to manage waste and litter at outdoor sites, should such systems not already be in place.

7.54 The canal network is a significant part of the heritage of Wolverhampton and forms an integral part of both its cultural history and its attraction for tourists.

### Evidence

- West Midlands Regional Tourism Strategy 2019-29, West Midlands Growth Company (2019)

### Delivery

- Planning application process
- Promotion of visitor attractions in association with West Midlands Combined Authority and Growth Company

### Monitoring

Policy	Indicator	Target
EMP1	Employment development completed on site allocations	39.5 ha by 2042
EMP2	Redevelopment of employment land and premises in Strategic Employment Areas to non-employment uses.	0 ha
EMP3	Redevelopment of employment land and premises in Local Employment Areas to non-employment uses.	0 ha

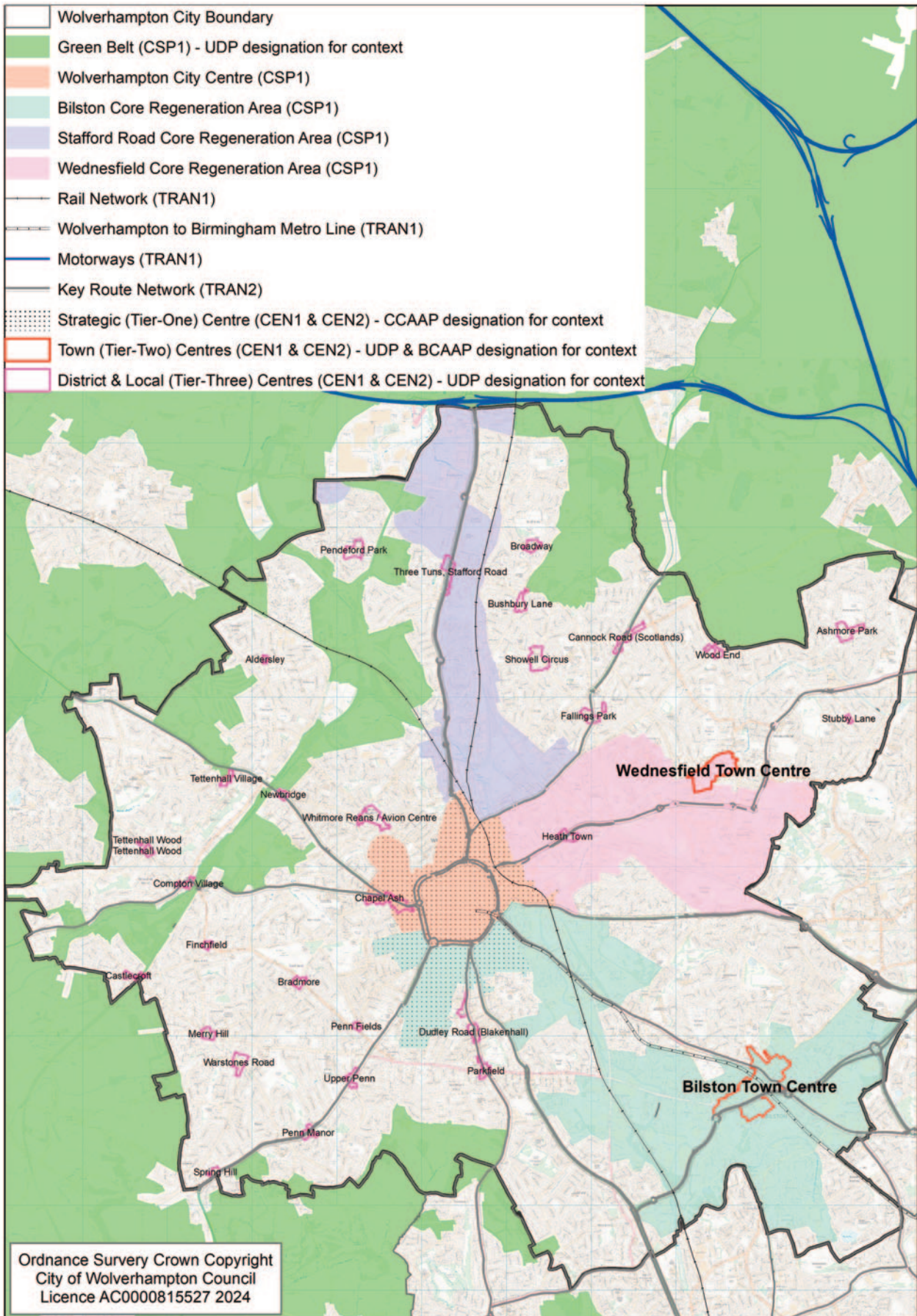
# 8. Centres

## Introduction

- 8.1 The purpose of the centres policies is to help address challenges resulting from structural change (such as economic challenges and the rise of online shopping) to secure the investment, jobs and regeneration needed to create a mature, balanced, well-functioning network of centres where residents can shop, work, live and spend their leisure time safely. Concentrating development in centres that are highly accessible by a variety of sustainable means of transport contributes towards priorities such as brownfield regeneration, fostering healthy communities and wellbeing, and addressing climate change and poor air quality. All Centres policies promote the health and well-being of local communities (Policy HW1) by providing services and retail facilities that promote choice and that enable and encourage healthy choices.
- 8.2 Ensuring a vital and viable network of centres will significantly contribute towards meeting the current and future service needs of Wolverhampton's residents, particularly serving future housing and employment growth (Policy CSP1). It will also provide a unique opportunity to improve the quality and experience of the built environment, by protecting and supporting cultural facilities and heritage assets, and creating pleasant, safe public green infrastructure, which will increase social interaction and cohesion.
- 8.3 Whilst the WLP does not allocate sites within Wolverhampton City Centre (see Policy CSP1, para 3.10 and Fig. 2) or allocate sites for centre uses, this Section sets out the priorities and strategy for all centres, including Wolverhampton City Centre. It defines the hierarchy of centres and details, where subject to planning control, policy requirements and linkages to other relevant policies, for:
- a) determining proposals relating to appropriate uses (including a local threshold of 280sqm (gross) for edge/ out-of-centre proposals to undertake impact tests) that will be supported to serve centres; and
  - b) bringing forward guidance, policies and allocations in future Development Plan Documents (particularly the Wolverhampton City Centre Area Action Plan review) to facilitate the consolidation, diversification, enhancement, protection and regeneration of Wolverhampton's centres.
- 8.4 This Section consists of three parts relating to: centre-wide proposals (Policy CEN1), in-centre proposals (Policy CEN2) and edge-of-centre & out-of-centre proposals (Policies CEN3 and CEN4).



Figure 7: Centres Key Diagram



## Centres and Centre Uses

- 8.5 Wolverhampton's centres are evolving and subject to change, with a shifting balance between retail, leisure, commercial, housing, community service, health, further education, local facility and civic uses. The priority is for future growth in Wolverhampton to be served by the existing network of centres. This will help to maintain and enhance centres, in a manner appropriate to their scale, role, and function and which reflects the vital role they play in the city. A flexible approach, facilitating the repurposing and diversification of centres, will help to secure their future vitality, viability and regeneration.

## Policy CEN1 – Centres and Centre Uses

### Centres and Centre Uses

1. The priority for Wolverhampton's centres is to ensure they remain focused on serving the needs of their communities, while enabling centres to repurpose and diversify by providing a well-balanced mix of commercial, business and service functions. This includes both retail provision and a mix of leisure, office, residential and other appropriate, complementary uses (see para 8.7) that are accessible by a variety of sustainable means of transport.
2. The hierarchy of Wolverhampton's centres is set out in Table 7, comprising Wolverhampton City Centre as a tier-one strategic centre providing the main focus for higher order sub-regional retail, office, leisure, cultural and service activities; supported by Bilston and Wednesfield as tier-two town centres, and balanced by the network of 29 tier three district and local centres, providing for centre uses including meeting day-to-day needs of local communities, particularly convenience (food) shopping. This hierarchy will be supported and protected by ensuring that development in centres is facilitated in a manner that reflects their scale, role, and function, and resisting proposals that would undermine this strategy.
3. Proposals for 'Centre Uses' (para 8.7) that are:
  - a) 'in-centre' are subject to specific policy requirements set out in Table 7 and Policy CEN2, as well as relevant policies/ guidance in Development Plan Documents.

## Centres and Centre Uses

- b) not 'in-centre' (i.e. edge-of-centre / out-of-centre) locations must comply with Policies CEN3 and CEN4. They are subject to requirements set out in Table 7: national guidance (such as the sequential test and impact assessments - for which a locally set floorspace threshold of 280sqm (gross) for retail and leisure proposals applies); as well as other relevant policies/ guidance in the WLP and other Development Plan Documents. When undertaking impact tests, particular regard should be given to the priorities and protection in relevant centres set out in Policy CEN2.
4. Future growth in Wolverhampton, particularly housing and employment development, should have their service needs met by, and contribute to the regeneration of, the existing network of centres.
  5. Where planning permission is granted effective planning conditions will be used as set out in para 8.12.
  6. Appropriate flexibility should be adopted to suit local circumstances, through supporting:
    - a) the diversifying and repurposing of centres. Proposals involving the loss of Community Facilities should comply with Wolverhampton UDP Policy C3, and proposals involving the loss of uses related to cultural facilities and the visitor economy should also comply with Policy EMP6 (6);
    - b) the consolidation and reconfiguration of vacant sites and floorspace into a mix of uses, especially the use of upper floors, and / or extensions to existing floorspace, with any new development being well-integrated with existing provision; and
    - c) enhancing the vitality, accessibility and sustainability of centres, and supporting the evening economy, including: maximising the extent, safety and security of new development, the public realm and open space (subject to Policies CSP2, EMP6 (5) and ENV10).

**Table 7: Wolverhampton Hierarchy of Centres**

Name of Centre		For proposals subject to planning control relevant main Policies/ Guidance, Test requirements and thresholds		
		Location		
Tier	Type	a. In-centre	b. Edge-of-centre	c. Out-of-centre
One	Strategic Centre	<p>*WLP Policies: CEN1 &amp; CEN2</p> <p>*City Centre AAP policies:</p> <p>'In-centre' defined as: for Retail: within Primary Shopping Area (CC1 &amp; CA1, includes Frontage Policy in CA1e) for Offices: within City Centre AAP boundary (CC2) for Leisure: within the city centre ring-road (CC3)</p>	<p>*WLP Policies: CEN1</p> <p>'Edge-of-centre' defined as: for Retail: well-connected and within easy walking distance (within 300m) of Primary Shopping Area for Offices: within 300m of City Centre AAP boundary or within 500m of a public transport interchange for Leisure: within 300m of city centre ring-road (see also City Centre AAP Policies CC1 para 3.1.7, CA1, CC2 and CC3) CEN3 (if floorspace uplift/ unit size &lt;280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3, and HOU2</p> <p>CEN4 Sequential Test Retail/ Leisure Impact Tests (if total floorspace &gt;280sqm)</p> <p>*Hot Food Takeaway SPD Guidelines HFT1</p>	<p>*WLP Policies: CEN1</p> <p>'Out-of-centre' defined as a location which is not in or on the edge of a centre CEN3 (if floorspace uplift/ unit size &lt;280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3, and HOU2 CEN4 Sequential Test Retail/ Leisure Impact Tests (if total floorspace &gt;280sqm) *Hot Food Takeaway SPD Guidelines HFT1</p>



		For proposals subject to planning control relevant main Policies/ Guidance, Test requirements and thresholds		
Name of Centre		Location		
Tier	Type	a. In-centre	b. Edge-of-centre	c. Out-of-centre
Two	Town Centres	<p>*WLP Policies: CEN1 &amp; CEN2</p> <p>'In-centre' defined as:</p> <p>for Retail: within Primary Shopping Area and for Offices &amp; Leisure: within the Town Centre boundary inset (Bilston Corridor AAP Policy BC:10 – includes Frontage Policy, Fig. 13 &amp; p.90, and UDP Policy SH4)</p> <p>*Hot Food Takeaway SPD Guidelines HFT2</p>	<p>*WLP Policies:</p> <p>CEN1</p> <p>'Edge-of-centre' defined as:</p> <p>for Retail: well-connected and within easy walking distance (within 300m) of Primary Shopping Area</p> <p>for Offices: within 300m of Town Centre boundary, including within 500m of a public transport interchange</p> <p>for Leisure: within 300m of Town Centre Boundary</p> <p>CEN3 (if floorspace uplift/ unit size &lt;280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3 and HOU2</p>	<p>*WLP Policies:</p> <p>CEN1</p> <p>'Out-of-centre' defined as a location which is not in or on the edge of a centre</p> <p>CEN3 (if floorspace uplift/ unit size &lt;280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2 EMP3, and HOU2</p> <p>CEN4</p> <p>Sequential Test</p> <p>Retail/ Leisure Impact Tests (if total floorspace &gt;280sqm)</p> <p>*Hot Food Takeaway SPD Guidelines HFT1</p>
		<p>*WLP Policies CEN1 &amp; CEN2</p> <p>'In-centre' defined as:</p> <p>for Retail: within Primary Shopping Area</p> <p>for Offices &amp; Leisure: within the Town Centre boundary inset (UDP Policies WVC1, WVC6 – includes Frontage Policy, WVC2, 5 &amp; 7-9, and UDP Policy SH4)</p> <p>*Hot Food Takeaway SPD Guidelines HFT2</p>	<p>*UDP Policies:</p> <p>WVC2 &amp; 5-9</p>	

		For proposals subject to planning control relevant main Policies/ Guidance, Test requirements and thresholds			
Tier	Type	Location			
		a. In-centre	b. Edge-of-centre	c. Out-of-centre	
Three	District and Local Centres	Stafford Road (Three Tuns)	*Stafford Road Corridor AAP Policy SRC3 (includes Frontage Policy)	*WLP policies: CEN1	*WLP Policies: CEN1
		Tettenhall Aldersley, Castlecroft, Compton Village Finchfield & Tettenhall Wood	*Tettenhall Neighbourhood Plan Policy TMP3 (includes Frontage Policy)	'Edge-of-centre' defined as: Well connected and immediately adjoining or close to existing in-centre shopping/ service provision of Centre Boundary	'Out-of-centre' defined as a location which is not in or on the edge of a centre
		Heath Town	*Heathfield Park Neighbourhood Plan Policy 10	CEN3 (if floorspace uplift/ unit size <280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3 and HOU2	CEN4
		Chapel Ash	*Hot Food Takeaway SPD Guidelines HFT2	Sequential Test	
			*City Centre AAP Policy CA5 (includes Frontage Policy)	Retail/ Leisure Impact Tests (if total floorspace >280sqm)	
			*WLP Policies CEN1 & CEN2	*Hot Food Takeaway SPD Guidelines HFT1	
		Cannock Road (Scottlands), Whitmore Reans / Avon Centre, Broadway, Bushbury Lane, Snowell Circus, Wood End, Stubby Lane, Parkfield, Spring Hill, Penn Manor, Upper Penn, Penn Fields, Bradmore, Merry Hill, Newbridge, Penderford Park, Fallings Park, Ashmore Park, Warstones Road Dudley Road (Blakenhall)	*WLP Policies CEN1 & CEN2 'In-centre' defined as within the centre boundary (UDP Policies SH4 and SH10 - Frontage Policy)  *Hot Food Takeaway SPD Guidelines HFT2	*WLP policies: CEN1 & CEN2  'Edge-of-centre' defined as: Well connected and immediately adjoining or close to existing in-centre shopping/ service provision of Centre Boundary	*WLP Policies: CEN1  'Out-of-centre' defined as a location which is not in or on the edge of a centre  CEN3 (if floorspace uplift/ unit size <280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3, and HOU2
			*Hot Food Takeaway SPD Guidelines HFT2	CEN3 (if floorspace uplift/ unit size <280sqm). CEN3 also applies to proposals for relevant uses through Policies EMP2, EMP3,y HOU2	Sequential Test Retail/ Leisure Impact Tests (if total floorspace >280sqm)
				Retail/ Leisure Impact Tests (if total floorspace >280sqm)	*Hot Food Takeaway SPD Guidelines HFT1

## Justification

- 8.6 Centres are evolving and are subject to structural change, as a result of challenges such as changing patterns of shopping, working and leisure. Therefore, in future, market-led growth and investment in centres will not necessarily be focussed on the retail sector and providing additional floorspace, and there will be continuing potential for centres to consolidate and diversify.

## Uses

- 8.7 Appropriate uses that will be supported to serve centres include business, commercial, service and community uses, and comprise:
- a) *Centre Uses* - those uses and “sui generis” designations that should be directed to defined centres in the first instance, currently including ‘Main Town Centre Uses’ as set out in NPPF Annex 2; and
  - b) additional uses that are highly compatible with main town centre uses and / or are well-placed to serve and complement centres, such as housing and social infrastructure (including health, education and community uses).

## Hierarchy and network of centres - locations and requirements

- 8.8 To support, protect and enhance provision to serve Wolverhampton’s communities, a hierarchy and network of centres, consisting of three tiers, is identified in Table 7.
- 8.9 For the appropriate uses defined in para 8.7, Table 7 sets out the locations that are classed as ‘in’, ‘edge’ and ‘out-of-centre’ for Wolverhampton’s centres and the main relevant national and local policy and guidance requirements that apply. These include:
- the sequential test and impact assessments (for which Policies CEN1 and CEN4 provide a locally set floorspace threshold of 280sqm gross for edge/ out-of-centre retail / leisure proposals);
  - the Wolverhampton Hot Food Takeaway SPD (which will be reviewed and updated as part of a Healthy Places SPD);
  - Frontage Policy set out in other Development Plan Documents (where reference to former use-classes should be ‘translated’ into their current use-classes e.g. former A1 is currently E(a) and former A5 is currently *Sui Generis*);
  - UDP Policies SH14 (Catering Outlets), SH15 (Drive-Through Facilities), SH16 (Amusement Centres & Arcades) and SH17 (Retailing At Petrol Filling Stations).



### Use of latest available evidence

8.10 Supporting information and assessment of proposals should be informed by the latest available evidence, especially regarding quantitative (e.g. retail capacity) and qualitative (e.g. relating to the vitality and viability of centres) elements, particularly evidence from the Black Country Centres Study. Further information regarding evidence required to inform impact assessments is set out in Policy CEN4 (para 8.49). This is particularly important as, based on benchmark sales, current modelling suggests a lack of capacity to support future additional centre-use floorspace, making it crucial to test the impact of edge/ out-of-centre proposals. Supporting assessments should also address Policies HW1, HW2 and HW3 where relevant.

### Flexibility

8.11 In addition to facilitating the short-term occupation of units for innovative uses, an appropriately flexible approach to encouraging reoccupation, reconfiguration and re-purposing of floorspace should be applied. This can include supporting hybrid uses relating to the daytime and evening economy, and material considerations such as giving due weight to proposals for units that would contribute to maintaining an active street frontage where these have been vacant for a long period of time and have been actively marketed for retail use e.g. for at least six months.

### Effective Use of Conditions

8.12 Effective use will be made of planning conditions and planning obligations to support the WLP's policy approach and regeneration strategy, and to minimise impacts on centres. For example, the description of proposals and conditions should reflect specific (sub) categories of uses, such as E(a) for the former A1 retail use and clearly set out the specific types of goods and services permitted. They will also, where considered relevant and particularly for proposals in edge and out-of-centre locations (Policies CEN3 and CEN4), define such elements as unit sizes, sales areas and mezzanine floors; restrict future sub-division of units; and control opening hours.

### Other relevant considerations

8.13 Proposals will also have to meet other relevant WLP and Development Plan Document policies and guidance, with support given to:

- a) qualitative improvements through the reoccupation, reconfiguration, and re-purposing of existing floorspace, particularly through residential development, including as a part of mixed-use development; use of upper floors; and on under-utilised and redundant or vacant sites that can serve centres;

- b) services and non-transactional uses such as health, education, civic facilities and sports & recreation. Community Facilities (currently including relevant uses within F1 and F2 use-class and comparable sui generis designations) are important and the loss of such facilities should meet UDP Policy C3. Proposals involving the loss of uses related to cultural facilities and the visitor economy also need to meet the criteria of Policy EMP6 (6);
  - c) centres providing an enhanced experience and unique sense of place, such as through natural and cultural heritage and tourism (See Policy EMP6 (11)) and functioning as community meeting and focal points. These uses can generate footfall and facilitate alternative (particularly mixed) uses that function both during the day and in the evening. In order to have a successful evening economy it is important that a variety of facilities, appealing to a wide range of age and social groups, are provided in such a way to ensure a safe, accessible and inclusive environment and any anti-social behaviour is discouraged (e.g. through management, improved lighting and CCTV coverage where appropriate). Necessary advice from safety organisations and any issues concerning community safety, crime, and disorder should be fully taken into account (Policies EMP6 (5) and ENV10 (1) (e));
  - d) supporting independent operators, local shops and markets (particularly the Wolverhampton, Bilston and Wednesfield markets), and short-term occupation of units for innovative uses;
  - e) centres sustainably serving their communities' needs by sustainable transport modes (Wolverhampton City Centre and Bilston Town Centre in particular) will be appropriate locations for public transport interchanges / hubs, with Town, District and Local Centres having the potential to assist with encouraging more active travel and provide more sustainable, localised access to key residential services, consistent with Policy HOU2.
- 8.14 The approach set out in Policy CEN1 supports more detailed policies in Development Plan Documents and Neighbourhood Plans, and other future Development Plan Documents (particularly the Wolverhampton City Centre AAP review), which may adjust centre boundaries, designate new local centres, or remove existing local centres from the hierarchy.

## Evidence

- Black Country Centres Study and Update / Addendum / Refresh (Lambert Smith Hampton, 2021 / 2023 / 2024)

## Delivery

- Through the planning application process
- Through the preparation and delivery of Development Plan Documents, Council projects, and sub-regional, regional, and national schemes and funding mechanisms

## Wolverhampton's Centres

- 8.15 Whilst the WLP does not allocate sites for centre uses, or sites within Wolverhampton City Centre, Policies CSP1 and CEN2 include a deliverable housing target for the city centre based on up-to-date evidence. Policy CEN2 takes a specific flexible approach to Wolverhampton's centres to facilitate, promote and maximise their: consolidation, diversification, enhancement, protection and regeneration. The Policy also contributes to meeting priorities such as sustainability, tackling climate change and improving health and wellbeing. This policy will inform the development of more detailed guidance, policies and allocations in future Development Plan Documents, especially through the Wolverhampton City Centre Area Action Plan review.
- 8.16 In-centre locations for appropriate uses are those defined in Policy CEN1 Table 7, which for retail constitute the Primary Shopping Areas of Wolverhampton City Centre and Bilston and Wednesfield Town Centres, and the centre boundaries of Wolverhampton's District and Local Centres.

## Policy CEN2 – Wolverhampton's Centres

### Wolverhampton's Centres

1. It is a priority for Centres to serve the housing and employment growth aspirations of the WLP and to be diversified, providing a re-purposed well-balanced mix of appropriate uses. The distinctive offer, unique character and special role played by individual centres should be given due weight in the determination of planning proposals.

2. Each tier of the hierarchy has the following priorities:

#### A. Wolverhampton City Centre

- i. Wolverhampton City Centre, as a tier-one strategic centre plays a crucial role as a key focus in the Growth Network (Policy CSP1), serving the city's and the sub-region's economy. It will be the location for large-scale proposals to serve the wider catchment, to maximise linked trips, promote the use of sustainable modes of transport and regeneration.
- ii. Residential provision will be maximised, to facilitate regeneration and strengthen communities, with a target of 4,676 new homes for the city centre by 2042, including projects at the Canalside, City Centre West and St George's.
- iii. For 'in-centre' locations (CEN1 Table 7) support will be given to the protection and provision of:

## Wolverhampton's Centres

- a) Retail - particularly the protection of Wolverhampton Market, 'convenience' (food) and 'comparison' (non-food), focussed in the Shopping Core to meet both local shopping needs and large-scale provision to serve the wider catchment; focused on re-purposing vacant floorspace (Policy CEN1 (6)); and Wolverhampton City Centre AAP Policies CC1 and CA1 (which includes Frontage Policy);
- b) Offices - particularly developing the high quality Grade A cluster in proximity to the City Centre Interchange and maintaining a suitable portfolio of sites available to meet future demand (see para 8.25, Wolverhampton City Centre AAP Policy CC2 and UDP Policy B7);
- c) Leisure – particularly large-scale public and commercial facilities including cinema provision, and hotels, where they help to diversify the city centre, encourage linked trips and enhance the evening economy and visitor experience (see para 8.24, Policies CEN1 (6) (c) and EMP6; and Wolverhampton City Centre AAP Policy CC3);
- d) Complementary uses - particularly community, health and education uses (see para 8.7 Policies HOU6 and HW3);
- e) Accessibility to proposals/ facilities by a variety of means of transport, particularly walking, cycling and public transport. Proposals for commercial, leisure and business development that require a Transport Assessment and are located within Wolverhampton Strategic Centre (Fig 2) should evidence how they are compatible with the objectives of achieving sustainable development (see para 8.26); and meet relevant requirements set out in Section 9: Transport;
- f) Environment - high quality public realm including greenspace and a built environment (particularly heritage and culture) to facilitate the city centre's various functions, supported through related policies and priorities.

### B. Bilston and Wednesfield Town Centres

- i. Bilston and Wednesfield, as tier-two town centres, play a crucial role as a key focus for serving the needs of their respective catchment areas, including Core Regeneration Areas (Policy CSP1). Regeneration priorities include the enhancement of Bilston Market and Wednesfield Town Centre public realm and connectivity improvements.

## Wolverhampton's Centres

- ii. For 'in-centre' locations (Policy CEN1 Table 7) support will be given to the protection and provision of appropriate uses (para 8.7 and frontage policies in Bilston Corridor AAP Policy BC10 and for Wednesfield in UDP Policy WVC6) particularly where they are of a scale that serves the day-to-day needs of their catchment and contribute to providing a diverse mix of uses:
- iii. For retail uses, priority will be given to:
  - a) the protection of Bilston and Wednesfield Markets;
  - b) convenience (food) retailing, focussed in the Primary Shopping Areas; and
  - c) proposals to extend or refurbish existing stores where they are well-integrated with the centre (Policy CEN1 (6)).
- iv. Office, leisure, residential, community, health, education and cultural facilities

### C. District & Local Centres

- i. As tier-three centres, Wolverhampton's network of 29 District and Local Centres play a crucial role as a key focus for, and serving the needs of, local communities including Wolverhampton's Growth Network, particularly Neighbourhood Areas (Policy CSP1).
  - ii. Appropriate uses (para 8.7) within tier-three centres, to serve the day-to-day shopping and service needs of local communities, will be protected and new provision supported (Policy CEN1 Table 7). In particular, convenience (food) retail stores that anchor centres and encourage linked trips will be protected, and their provision supported, including proposals to extend or refurbish existing stores where they are well-integrated with the centre.
  - iii. In making planning decisions, proposals should comply with other relevant policy requirements, including Frontage Policy and Hot Food Takeaway SPD guidance (Policy CEN1 Table 7).
3. Proposals in edge-of-centre and / or out-of-centre locations (Policy CEN1 Table 7) should meet the relevant requirements of Policies CEN3 and CEN4, including the sequential test and Impact tests for retail/ leisure proposals over 280sqm (gross).

## Justification

- 8.17 The priority is for future growth in Wolverhampton, especially that identified in housing and employment site allocations, to support and be served by the existing network of centres.
- 8.18 A pragmatic and flexible approach should be taken to addressing the future growth of centres. Current evidence shows there is a lack of capacity to support additional retail (based on benchmark sales), leisure, and office floorspace. Therefore, it would not be appropriate to include specific formal targets for such uses in policy. Planning decisions relating to applications and future Development Plan Document site allocations should be informed by the latest available evidence, with an emphasis on the consolidation of core areas. Any future potential for new floorspace is likely to be met through infill development, reuse and reconfiguration of vacant units, changes of use and extensions to existing stores.
- 8.19 Additional capacity for new housing in all of Wolverhampton's centres is a priority (see Policy CSP1 and Policy HOU1 and Table 4), particularly as part of mixed use development and through upper floor conversions (Policy CEN1).
- 8.20 The challenges facing centres identified by the Centres Study include: the condition of the commercial market across all sectors, changes in shopping patterns (with the continued growth of online shopping) and high vacancy rates. These mean it is important to have robust tests for new proposals to protect centres, minimise negative impacts upon them and ensure their vitality and viability. Therefore, edge and / or out-of-centre proposals (as defined in Table 7 and para 8.29) must meet the relevant requirements of Policies CEN1, CEN3 and CEN4, particularly the sequential test and impact assessments for proposals over the locally set floorspace threshold of 280sqm (gross) for retail / leisure proposals. When undertaking impact tests particular regard should be given to the priorities and protections identified in Policy CEN2.
- 8.21 Proposals must also comply with relevant WLP and Development Plan Document policies and local guidance, including Hot Food Takeaway SPD guidance and Frontage Policies (Policy CEN1 Table 7 and paras 8.9 and 8.13).
- 8.22 Wolverhampton City Centre plays a crucial role as a key focus in the Growth Network (Policy CSP1). It is essential to provide appropriate flexibility to enable the city centre to diversify and be re-purposed, supporting a mix of uses, including the temporary use of units, to ensure future vitality and viability. This means placing emphasis on service uses, civic uses, the value of natural and cultural aspects of the city centre for the visitor economy, for example the canal network, incorporating qualitative enhancements to existing provision, and prioritising the public realm e.g. provision of high quality open space, green infrastructure, pedestrian and cycle networks and electric vehicle charging points (Policies CSP2, HW1, HW3, TRAN5, TRAN8 and ENV8).

- 8.23 City living and housing development in centres is likely to be a growth area over the Plan period and will make a positive contribution to regeneration, particularly through mixed use development and conversion of upper floors. Housing provision should therefore be maximised, fulfilling the potential of centres, particularly the city centre, to supporting a resident population and local service provision. Identified housing capacity for centres, detailed in the Wolverhampton SHLAA (2024), has informed the development of housing targets in Policy HOU1 (Table 4), Policy CSP1 and this policy. The housing target for Wolverhampton City Centre will be delivered through the future review of the Wolverhampton City Centre Area Action Plan.
- 8.24 It is important that commercial and public leisure provision, particularly of a large scale, is focussed in Wolverhampton City Centre, to support its role as a Strategic Centre, encourage linked trips and enhance the evening and visitor economy (Policies CSP1 and EMP6; and Wolverhampton City Centre AAP Policy CC3).
- 8.25 Changing working patterns mean that future office provision is likely to be configured differently and predominantly market-led. The city centre is an important place of work and offices contribute to ensuring its vitality and viability. Identifying a portfolio of potential office sites, including requiring a minimum 'reservoir' of office floorspace is maintained (Wolverhampton City Centre AAP Policy CC2), ensures that sites are available for office development when demand emerges. Identifying office sites as part of a mix of uses ensures other appropriate uses can also come forward.
- 8.26 It is recognised that Wolverhampton City Centre has its own vehicle parking regime, both within and outside the influence of the planning system. It is intended to enhance sustainability and encourage a modal shift in transport towards publicly accessible transport, cycling and walking. This can be assisted by ensuring relevant proposed developments within the city centre contribute to facilitating this objective. Evidence in support of proposals should incorporate provisions for the enablement and / or enhancement of sustainable and integrated modes of transport to and within the city centre. This should: pay due regard to any sustainable transport projects and measures proposed in the Local Transport Plan and Local Planning Documents; include helping to manage the demand for, and the impact of, car-borne traffic and car parking regimes; and be consistent with Policies TRAN3, TRAN6 and TRAN7.
- 8.27 In addition to serving the needs of their catchment areas, it is a priority for Bilston and Wednesfield Town Centres to serve the housing and employment growth ambitions of the Bilston and Wednesfield Core Regeneration Areas, which they fall within. Housing development within these centres will be supported (Policy CSP1 (6), Table 3 and paras 3.30-3.35 and Policy HOU1 Table 4), particularly as part of mixed use development and upper floor conversions.



8.28 The network of tier three centres is crucial to serving in the most sustainable way the local needs of Wolverhampton's communities, particularly future development in Wolverhampton's Growth Network and housing development in Neighbourhood Areas (Policy CSP1 (7) and paras 3.36-3.39). Of particular importance is Stafford Road (Three Tuns) District Centre serving Stafford Road Corridor Core Regeneration Area (Policy CSP1 (6) and paras 3.27-3.29). Such centres are often dependent on smaller supermarkets and / or convenience stores to anchor their retail offer.

## Evidence

- Black Country Centres Study and Update / Addendum / Refresh (Lambert Smith Hampton, 2021 / 2023 / 2024)
- Wolverhampton SHLAA (WCC, 2024)
- Wolverhampton Investment Prospectus (WCC, 2024)

## Delivery

- Through the planning application process
- Through the preparation and delivery of Development Plan Documents, Council projects, and sub-regional, regional, and national schemes and funding mechanisms

## Edge-of-Centre and Out-of-Centre Proposals

8.29 Proposals in edge and out-of-centre locations need to meet the requirements of Policies CEN3 and CEN4. Policy CEN1 Table 7 sets out the specific locations that are defined as edge or out-of-centre for various uses, to assist with applying relevant policies and national tests:

- Edge-of-centre locations for Wolverhampton City Centre and for Bilston and Wednesfield Town Centres - for retail purposes, this is a location that is well-connected to, and up to 300m from, the primary shopping areas. For the city centre, locations within 300m of the ring road are classed as edge-of-centre for leisure proposals, and locations within 300m of the Wolverhampton City Centre AAP boundary are classed as edge-of-centre for office proposals. For Bilston and Wednesfield Town Centres locations within 300m of the centre boundaries are classed as edge-of-centre for leisure and office proposals. Locations immediately adjoining the boundaries of District and Local Centres are defined as edge-of-centre. In addition, for office proposals, locations outside centres but within 500m of a public transport interchange are classed as edge-of-centre
- Out-of-centre locations are those locations not in or on the edge of a centre.

8.30 Proposals will also have to comply with other policies and guidance which apply to edge / out-of-centre locations, such as Policies EMP2, EMP3 and HOU2, and the Hot Food Takeaway SPD.

### Provision of Local Facilities

8.31 Policy CEN3 applies to proposals for local facilities (centre uses and complementary uses including social infrastructure and community uses) not in a centre (in edge/ out-of-centre locations), particularly small-scale commercial uses which have a proposed unit floorspace of under 280sqm (gross). The priority is for local service needs, particularly those generated by future growth (Policy CSP1 and CEN1), to be met by the existing network of centres, to ensure their vitality and viability. However, some small-scale provision may be justified in certain circumstances to meet local community needs.

### Policy CEN3 – Provision of Local Facilities

#### Provision of Local Facilities

1. Proposals subject to planning control for small-scale local facilities (centre uses and complementary uses (para 8.7) in edge / out-of-centre locations that have a proposed unit floorspace of up to 280sqm (gross)) will only be permitted if all of the following requirements are met:
  - a) The proposal does not unduly impact on the health and wellbeing of the community it will serve;
  - b) The proposal is of an appropriate scale and nature to meet the specific day-to-day needs of a population within convenient, safe walking distance to the new or improved facilities;
  - c) Local provision could not be better met by investment in a nearby centre (which for centre uses (para 8.7) is subject to the sequential test as set out in national guidance);
  - d) Existing facilities that meet day-to-day needs will not be undermined; and
  - e) Access to the proposal by means other than by car can be demonstrated and will be improved, evidenced by the proposal being within convenient, safe walking distance of the community it will serve.

## Provision of Local Facilities

2. Development involving the loss of a local facility, particularly a convenience shop, pharmacy, community facility or post office, will be resisted where this would result in an increase in the number of people living more than a convenient, safe walking distance from alternative provision. Proposals involving the loss of Community Facilities (including Public Houses) must comply with UDP Policy C3, proposals involving the loss of a health facility must comply with Policy HW3 and proposals involving the loss of uses related to cultural facilities and the visitor economy must comply with Policy EMP6 (6).
3. Proposals should also comply with other WLP policies, including Policy HW2, any other relevant policies in Development Plan Documents and relevant local guidance, such as the Hot Food Takeaway SPD.
4. Where planning permissions are granted, effective planning conditions and / or planning obligations will be required to support the regeneration strategy and minimise impacts (Policy CEN1 (5) and para 8.12).
5. Proposals where total floorspace exceeds 280sqm (gross) will also have to meet the requirements of Policy CEN4 (see paras 8.34-8.36).

## Justification

- 8.32 The existing network of centres plays a crucial role in serving the local needs of Wolverhampton. Centres are dependent on smaller units, such as supermarkets and convenience stores, to anchor their retail and service offer. It is therefore a priority to protect and support these stores. Local facilities are also provided in existing stand-alone locations and by small parades of shops. It is recognised that stand-alone provision to serve local communities, particularly where it offers social infrastructure, plays a positive role under certain, specific circumstances.
- 8.33 Cultural facilities and the visitor economy are important to protect and can include local facilities (currently including relevant uses within F1 and F2 use-class and comparable sui generis designations). Proposals involving the loss of such facilities should meet Policy EMP6 (6) and UDP Policy C3.
- 8.34 Policy CEN3 relates to proposals for small-scale local facilities (uses as defined in paragraph 8.7) for units of up to 280sqm (gross) of floorspace and extensions (including internal floorspace increases such as the provision of mezzanine floors) where the proposed uplift in floorspace is up to 280sqm (gross) and applies to new development, changes of use and variations of conditions, including:

- a) proposals related to petrol filling stations and drive-through facilities (see also UDP Policies SH17 and SH15 respectively);
  - b) proposals for ancillary uses under Policies EMP2 and EMP3; and
  - c) proposals related to new housing provision, where the requirements of Policy HOU2 also have to be met, particularly demonstrating high levels of accessibility by sustainable modes of transport.
- 8.35 Proposals that have unit sizes under 280sqm (gross) but comprise a number of units where the total floorspace of the proposal exceeds 280sqm (gross), and / or where the proposed uplift in floorspace of unit size(s) is under 280sqm but would create unit(s) over 280sqm (gross), will also have to meet the requirements of Policy CEN4.
- 8.36 Proposals whose unit size(s) are over 280sqm (gross) will have to meet the requirements of Policy CEN4.
- 8.37 For the purposes of applying the criteria, nearby centres include those centres whose catchment areas overlap with the catchment area of the proposal, with 400m being a safe, convenient walking distance.
- 8.38 The strategy is for investment to be focussed in centres, with the priority for the existing network of centres to serve Wolverhampton's needs, particularly identified growth on housing and employment allocations (Policies CSP1 and CEN1). Therefore, strong justification is required for edge and out-of-centre schemes that could otherwise undermine the strategy for the regeneration of Wolverhampton and ensuring the vitality of centres.
- 8.39 Part 2 of the policy notes that certain existing local facilities that are not in a centre provide an important service to a local area and will wherever possible be protected.
- 8.40 In making planning decisions, other relevant policies and guidance include Policies HW1, HW2 and HW3, and the Hot Food Takeaway SPD. Where planning permissions are granted, effective planning conditions and /or planning obligations will be required to support the regeneration strategy and minimise impacts. Conditions should, for example, clearly define: the types and (sub)categories of uses that are acceptable and goods and service to be sold; unit sizes and sales areas, including relating to mezzanine floors; future sub-division of units; and opening hours (Policy CEN1 (5), para 8.12).

## Evidence

- Black Country Centres Study and Update / Addendum / Refresh (Lambert Smith Hampton, 2021 / 2023 / 2024)
- Wolverhampton SHLAA (WCC, 2024)

## Delivery

- Through the planning application process
- Through the preparation and delivery of Development Plan Documents, Council projects, and sub-regional, regional, and national schemes and funding mechanisms

## Edge-of-Centre and Out-of-Centre Development

- 8.41 Policy CEN4 applies to proposals not in a centre (in edge and / or out-of-centre locations), which have a proposed floorspace of over 280sqm (gross), as set out in Policy CEN1 Table 7 and para 8.9.
- 8.42 The approach is intended to focus appropriate uses within the existing network of centres. A lack of capacity to support additional retail (based on benchmark sales) and leisure floorspace means that any growth not in centres can cause adverse impacts. This policy sets out robust requirements that will ensure that investment in centres is maximised and significant adverse impacts are prevented.

## Policy CEN4 – Edge-of-Centre and Out-of-Centre Development

### Edge-of-Centre and Out-of-Centre Development

1. There is a clear presumption in favour of focusing appropriate uses (para 8.7) in centres. It is a priority for future growth and development in Wolverhampton to be met by the existing network of centres (Policies CSP1 and CEN1)

#### Sequential Test

2. All edge-of-centre and out-of-centre proposals (as defined in Policy CEN1 Table 7 and para 8.29) for centre uses (para 8.7) should meet the requirements of the sequential test set out in the latest national guidance.
3. Edge and out-of-centre proposals should be assessed for accessibility by a choice of modes of transport, in particular public transport, walking and cycling, and support both social inclusion and cohesion, and the need to sustain strategic transport links. Edge-of-centre proposals will need to demonstrate that they will be well-integrated with existing in-centre provision.
4. When assessing sequentially preferable locations, proposals will need to demonstrate flexibility in their operational requirements, particularly in terms of format and types of goods sold (para 8.11 and 8.47).

## Edge-of-Centre and Out-of-Centre Development

### Impact Tests

5. The locally-set floorspace thresholds for edge and out-of-centre retail and leisure proposals to meet the requirements of the Impact Assessment as set out in the latest national guidance is 280sqm (gross) (see Policy CEN1 Table 7). Impact tests should be proportionate to the nature and scale of proposals. When undertaking impact tests particular regard should be had to the impact of proposals on the priorities and protections identified for centres in Policies CSP1 (particularly parts 5-7 and paras 3.16-3.23 and 3.27-3.39), CEN1 (particularly parts 1 and 4) and CEN2 (particularly parts 2 - A.iii, B.iii and C.ii).
6. Proposals should be informed by the latest available evidence (para 8.10 and 8.49).
7. Proposals should also comply with other WLP policies, including Policy HW1, any other relevant policies in Development Plan Documents and relevant local guidance, such as the Hot Food Takeaway SPD.
8. Where planning permissions are granted, effective planning conditions and / or planning obligations will be applied to support the regeneration strategy and minimise adverse impacts (Policy CEN1 (5) and paras 8.12 and 8.50).
9. Proposals that include unit sizes under 280sqm (gross) will also have to meet the requirements of Policy CEN3 (paras 8.45-46).

### Justification

- 8.43 The rationale of Policy CEN4 is to ensure that investment is focused in centres, with the priority for the existing network of centres to serve Wolverhampton's needs, particularly future growth identified for housing and employment allocations (Policies CSP1 and CEN1 (5)). Therefore, strong justification is required for edge-of-centre and out-of-centre schemes that could otherwise undermine the strategy for promoting the regeneration of Wolverhampton and ensuring the vitality of centres.
- 8.44 The Centres Study identifies a lack of capacity to support additional retail (based on benchmark sales) and leisure floorspace, which means that edge and out of centre proposals can adversely impact upon the vitality and viability of centres. The regeneration strategy for centres is focussed on bringing vacant floorspace back into use, and a consolidated retail and leisure offer is essential to facilitate diversification through, for example, encouraging linked trips. Centres are also dependent on units such as supermarkets and convenience stores to anchor their retail and service offer. It is therefore a priority to protect and support this approach. Consequently, the impact of proposals for centre uses not in centres are a

cause for concern. There is a need for an appropriately robust policy approach to ensure all potential options to focus development in centres are thoroughly explored, and proposals are tested for their potential significant adverse impacts on existing centres. This is particularly the case for large-scale out-of-centre speculative retail and/ or leisure proposals.

- 8.45 For the purposes of applying the Impact Assessment, 280sqm (gross) is the locally set threshold for undertaking impact tests on retail and leisure proposals as set out in national guidance in edge and out-of-centre locations (Policy CEN1 Table 7). This applies to new development, changes of use, variations of conditions, extensions to / increase the floorspace of existing unit(s) (e.g. through increasing sales areas, mezzanine floors) that would create outlets with floorspace over 280sqm (gross), and / or proposals whose unit sizes are under 280sqm but the total floorspace of the proposal is over 280sqm (gross), including;
- a) proposals related to petrol filling stations and drive-through facilities;
  - b) proposals for ancillary retail and leisure uses under Policies EMP2 and EMP3;
  - c) where potential for an element of on-site provision of new local facilities is identified in Development Plan Documents to serve the specific needs of future development, or in the exceptional circumstances where such proposals are brought forward through speculative planning applications (whereby the requirements of Policy HOU2 also have to be met particularly with respect to demonstrating high levels of accessibility by sustainable modes of transport).
- 8.46 There are instances where proposals will have to meet the requirements of both this policy (particularly the impact tests) and Policy CEN3 requirements such as where proposals have a floorspace uplift or unit sizes under 280sqm (gross) but total floorspace exceeds 280sqm (gross) (Policy CEN3 para 8.36).
- 8.47 Flexibility should be demonstrated when assessing potential in-centre locations, including in terms of specific types of goods & services and elements of the business models of proposals, such as 'drive through' facilities not necessarily needing to be outside a centre solely for vehicular access and circulation reasons.
- 8.48 It is important to ensure edge-of-centre proposals do not cause significant adverse impacts, particularly as they share catchment areas with in-centre provision. Edge-of-centre proposals should support regeneration through being well integrated, particularly through direct pedestrian linkages complementing and enhancing adjacent in-centre provision.
- 8.49 Impact tests should be proportionate to the nature and scale of proposals, and to assist with the determination of proposals should include as a minimum the estimated turnover and trade draw from relevant centres of the proposal. Additional evidence should include information regarding capacity, catchment areas, the health of centres and existing retail commitments.



8.50 Where planning permissions are granted effective planning conditions and/or planning obligations will be required to support the regeneration strategy and minimise impacts. Conditions should, for example, clearly define: the types and (sub)categories of uses that are acceptable and the goods and service to be sold: unit sizes and sales areas, including relating to mezzanine floors, the potential future sub-division of units; and opening hours (as set out in Policy CEN1 (5)).

### Evidence

- Black Country Centres Study and Update / Addendum / Refresh (Lambert Smith Hampton, 2021 / 2023 / 2024)
- Wolverhampton SHLAA (WCC, 2024)

### Delivery

- Through the planning application process
- Through the preparation and delivery of Development Plan Documents, Council projects, and sub-regional, regional, and national schemes and funding mechanisms

### Monitoring

Policy	Indictaor	Target
EMP3	Redevelopment of employment land and premises in Local Employment Areas to non-employment uses.	0 ha

# 9. Transport

## Introduction

- 9.1 Wolverhampton shares many transport needs and challenges with the three neighbouring Black Country Authorities (BCAs) of Dudley, Sandwell and Walsall. The delivery of an improved and integrated transport network within the Black Country which is well linked to regional and national networks is fundamental to achieving the Vision and helping to transform the area, deliver housing growth and improve economic performance. To this end Black Country Transport has been established by the BCAs as a resource to work across the sub-region to deliver on its strategic transport ambition.
- 9.2 The development of transport networks in the Black Country is focused on achieving a step change in public transport provision serving and linking centres, improving sustainable transport facilities and services across the area, improving connectivity to national networks and improving the efficiency of strategic highway routes.
- 9.3 Transport strategy in Wolverhampton, and the wider Black Country, also has a key role to play in reducing carbon emissions and associated impacts on the natural environment. To help address the climate crisis, strategic and local transport policies, plans and programmes must emphasise the delivery of a modernised and sustainable transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, promoting walking and cycling networks and reducing the need to travel. These priorities are set out in Gear Change (2020), a Department for Transport policy document in support of active travel. National policy also focuses on the need for the transport network to support sustainable economic growth.
- 9.4 The policies in this Section, and other parts of the WLP, therefore focus on ensuring the sustainable location and design of development, increasing investment in infrastructure, improving the quality, equality and accessibility of public transport, supporting walking and cycling, enhancing road safety and reducing the amount of emissions produced by transportation.



## Priorities for the Development of the Transport Network

- 9.5 High quality public transport remains at the heart of the Black Country transport strategy. The development of the transport network is focused on a step change in public transport provision serving and linking centres, improving sustainable transport facilities and services across the area, improving connectivity to national networks and improving the efficiency of strategic highway routes. The improvements needed within Wolverhampton to deliver the transport strategy over the Plan period are shown on the Transport Key Diagram, and the current key transport priorities (taken in part from Black Country Transport - Connected for Growth) are listed in Policy TRAN1.

## Policy TRAN1 – Priorities for the Development of the Transport Network

### Priorities for the Development of the Transport Network

1. Land needed for the implementation of priority transport projects will be safeguarded to allow for their future delivery.
2. All new developments must provide adequate access for all modes of travel, including walking, cycling and public transport. Housing development will be expected to meet the accessibility standards set out in Policy HOU2.
3. Key transport corridors will be prioritised through the delivery of infrastructure to support active travel (walking, cycling), public transport improvements, traffic management (including localised junction improvements) and road safety.
4. Key transport priorities for Wolverhampton identified for delivery during the lifetime of the WLP currently include (but are not limited to) the following:
  - a) Motorways:
    - i. M54 - M6 / M6 (Toll) Link Road
  - b) Rail:
    - i. Wolverhampton - Walsall – Willenhall – Aldridge Rail Link
    - ii. Midlands Rail Hub
    - iii. Wolverhampton – Shrewsbury Line Improvements
    - iv. New Stations – including Brinsford Parkway
  - c) Rapid Transit:
    - i. Wolverhampton – New Cross Hospital – Wednesfield

## Edge-of-Centre and Out-of-Centre Development

- d) **Key Road Corridors (schemes to improve general reliability, public transport, cycling and walking):**
- i. **A454 Willenhall Road Wolverhampton – Walsall Corridor Improvement**
  - ii. **A4123 Birmingham Road Walk Cycle and Bus Corridor**
  - iii. **A449 Stafford Road Walk Cycle and Bus Corridor**
  - iv. **City Centre Ring Road**

## Justification

- 9.6 Good connectivity to the wider region, national transport networks and Birmingham International Airport for both passengers and freight has been identified as necessary to support the regeneration of the Black Country and economic growth, through improved access to major global economies.
- 9.7 The West Midlands Local Transport Plan (LTP): Movement for Growth aims to enable all residents to access at least three strategic centres within 45 minutes (AM peak). It envisages this being achieved through a combination of frequent rapid transit services and high quality “turn up and go” bus services. A strategic public transport “spine” of high quality, reliable, fast and high capacity rapid transit between the strategic centres of Brierley Hill, Walsall, West Bromwich, Wolverhampton and Birmingham remains a crucial element of the Black Country transport strategy and is necessary to support the role of these centres as a focus for employment, shopping and leisure and increasingly, housing.
- 9.8 Currently Metro line 1 provides the required standard of link between Wolverhampton, West Bromwich and Birmingham but it is important that the public transport modes of rail, metro and bus are better integrated to ensure that people can use them to travel where and when they need to. The combination of the Wednesbury to Brierley Hill metro extension and the proposed Dudley port Integrated Transport Hub will add Brierley Hill (and Dudley) to the rapid transit network. The Black Country Rapid Transit Study (2016) concluded that full delivery of the public transport spine would best be achieved by completing the Stourbridge to Walsall corridor as a tram-based facility (subject to the adoption of Tram-Train technology) whilst the Walsall to Birmingham link should be catered for through bus rapid transit.

- 9.9 The WLP supports the delivery of an enhanced transport network for Wolverhampton to ensure a seamless integration of land use and transport planning and to demonstrate the strong interdependency of future land use decisions and adequate servicing by a variety of travel modes. The exact mode of public transport should reflect existing demand and also take account of potential future economic or housing growth points to ensure an integrated approach to sustainable development and travel patterns. This is essential to support the scale of growth proposed for the Growth Network and to create an effective transportation system to support sustainable communities. This transport network will provide communities with access to employment, leisure, education and health care and will facilitate improved access to employment sites.
- 9.10 In this regard the re-opening of rail corridors such as Walsall to Aldridge, and the delivery of an upgraded Wolverhampton to Shrewsbury line and the Midland Rail Hub (developed through Midlands Connect) will support housing growth both within the Black Country and in those areas meeting housing and employment need beyond the sub-region's boundaries.
- 9.11 The operation of the highway network needs to be improved to support the growth and long-term viability of the Wolverhampton economy whilst limiting the environmental effect of transport usage. Movement for Growth sets out a strategy of making the best of the existing highway network in a coordinated way through a programme of West Midlands Key Route Network (KRN) corridor-based multi-modal improvements.
- 9.12 New highway building will be mainly in support of regeneration, but some key junctions on the DfT's Major Road Network and the West Midlands KRN, such as important links for public transport and to the motorway network for freight will be improved through major construction schemes. Highway improvements will be expected to address the needs of all users, especially pedestrians and cyclists, and to cater for bus priority in line with current Government guidance.
- 9.13 Strategic Employment Areas are defined in terms of good access standards to the motorway network. As no new motorways are planned within the Plan period the M6, M5 and M54 motorways will remain vital transport links for Wolverhampton and wider Black Country business and freight.
- 9.14 Buses will continue to dominate local public transport provision in Wolverhampton and the wider Black Country throughout the Plan period. 85% of all passenger miles were catered for by bus before the Covid-19 pandemic and bus services have since recovered at a faster rate than either rail or metro. The National Bus Strategy (2021) requires bus priority to be an integral part of all highway improvements. Therefore, work on the key highway corridors identified through KRN Action Plans will play a significant role in delivering this requirement through a partnership of Transport for West Midlands (TfWM), Local Highway Authorities and operators. Specific local measures to help buses will be delivered in other locations, where appropriate, along with the upgrading of bus stations in strategic and other centres, where demand resulting from the concentration of new developments requires it.



- 9.15 Beyond identified key infrastructure improvements, the Council also engages with the rest of the West Midlands region through the Enhanced Partnership and Bus Service Improvement Plan to raise the quality and consistency of bus journeys. Coaches also have a role to play in providing affordable, long-distance connectivity and access facilities to major Wolverhampton and wider Black Country destinations, and their use will be encouraged.
- 9.16 While improvement of accessibility to bus services will be a priority, some people will have little choice but to make the first part of their journey by car. The success of Park and Ride in contributing to a sustainable travel pattern will depend on minimising the distance driven before transferring to public transport. Well located Park and Ride facilities can provide a realistic alternative for many car drivers and contribute to environmental improvement by reducing congestion on radial routes into centres at peak times and by improving public transport patronage. New Park and Ride sites will be developed in accordance with the adopted West Midlands Park and Ride strategy.
- 9.17 As transport projects reach the design stage there will be a need to safeguard the land needed for the implementation of schemes. When projects are sufficiently advanced, improvement lines will be imposed, or land will be safeguarded in appropriate Development Plan Documents.

## Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016) Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Reimagining Transport in the West Midlands: Local Transport Plan Core Strategy (TfWM 2023)
- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)
- West Midlands Rail Limited - Single Network Vision (WMRE 2017)
- Driving a Revolution in Rail Services for West Midlands - A 30-year Rail Investment Strategy 2018-2047 (WMRE, 2018)
- Priority Projects (Black Country Transport, 2023)
- Black Country Transport Modelling (Sweco 2021 / 2024)
- Black Country Rapid Transit Study (TfWM & BCA 2016)
- West Midlands Park & Ride Strategy (TfWM 2020)
- West Midlands Freight Strategy - Supporting our Economy, Tackling Carbon (TfWM 2016)
- Midlands Connect Transport Strategy (2017)
- Midlands Rail Hub Statement of Business Case (2019)



## Delivery

- Delivery of the transport priorities will rely on several agencies and multiple funding sources. The main delivery agencies will be;
  - Transport for West Midlands (TfWM)
  - West Midlands Rail Executive (WMRE)
  - Local Highway Authorities
  - National Highways
  - Network Rail
  - Midlands Connect
- The principal vehicles for delivery will be the West Midlands Strategic Transport Plan – Movement for Growth, the West Midlands Rail Investment Plan and the national Road and Rail Investment Strategies (RIS). Funding will be sought through a combination of national programmes, competitive funding streams such as the Major Route Network Fund and the Large Local Majors Fund, the City Region Sustainable Transport Settlement and through devolved local transport settlements with third party contributions wherever appropriate

## Safeguarding the Development of the Key Route Network

9.18 The West Midlands Key Route Network (KRN) caters for the main strategic demand flows of people and freight across the metropolitan area whilst providing connections to the national Strategic Road Network. Highway capacity will be used to effectively cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, lorries, vans and private cars. This will involve the reallocation of roadspace where appropriate to provide reliable, fast high volume public transport and an enhanced role for Urban Traffic Management and Control via the Local UTC facilities and West Midlands Regional Traffic Control Centre.

## Policy TRAN2 – Safeguarding the Development of the Key Route Network

### Safeguarding the Development of the Key Route Network

1. **The Wolverhampton Highway Authority will, in conjunction with other West Midlands Highway Authorities and Transport for West Midlands (TfWM), identify capital improvements and management strategies to ensure the Key Route Network meets its designated function of serving the main strategic demand flows of people and freight across the metropolitan area, providing connections to the national strategic road network, serving large local flows that use main roads and providing good access for businesses reliant on road-based transport.**

### Safeguarding the Development of the Key Route Network

- 2) Land needed for the implementation of improvements to the Key Route Network will be safeguarded in order to assist in their future delivery.
- 3) Where new development is expected to result in adverse impacts on the Key Route Network, appropriate mitigation measures must be identified through transport assessments and provided through planning obligations.

### Justification

- 9.19 The West Midlands KRN not only serves the main strategic demand flows of people and freight across the metropolitan area and provides connections to the national strategic road network. It also serves large local flows which use main roads and will need to provide good access for businesses reliant on road-based transport. The network will use highway capacity effectively to cater for movement by rapid transit and core bus routes, the Metropolitan Cycle Network, lorries, vans and private cars. This will involve the reallocation of roadspace where appropriate to provide reliable, fast high volume public transport and enhanced cycling facilities.
- 9.20 The KRN has been defined on the basis of a WMCA definition agreed with the seven highway authorities, in consultation with neighbouring highway authorities, and features agreed performance specifications drawn up for different types of link in the network in accord with their role for movement ("link"), and their role as a destination in its own right e.g. a suburban/town centre high street ("place").
- 9.21 Improvements will be designed to meet the agreed performance specification for the links and junctions involved, in order to support road based rapid transit proposals such as SPRINT (Bus Rapid Transit) and Metro. Improvements will take into account guidance contained in the National Bus Strategy and the West Midlands Vision for Bus. Where routes also form part of the Metropolitan Cycle Network, the standards contained in Local Transport Note 1/20 will be applied.
- 9.22 Capital scheme improvements will be identified where appropriate. It is also vital that this network is managed efficiently through the collaboration of West Midlands Local Highway Authorities.

### Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)

- West Midlands' Key Route Network Evidence Report (TfWM 2018)
- West Midlands Vision for Bus (TfWM 2018)
- Local Transport Note 1/20 (DfT 2020)

## Delivery

- The overarching responsibility for the development and improvement of the Key Route Network sits with the West Midlands Mayor and Transport for West Midlands. The framework for improvement forms part of Movement for Growth with implementation guided by a series of KRN Corridor Action Plans.
- Funding for individual improvements will be sought through a combination of competitive funding streams, such as the DfT's Major Route Network and Large Local Majors Funds and from devolved local transport settlements with third party contributions wherever appropriate.
- Where proposals cover key public transport routes, funding will also be sought through the Government's Better Deal for Bus initiative.

## Managing Transport Impacts of New Development

9.23 To ensure that the transport elements of the WLP are deliverable, it is essential that both new developments and existing facilities identify travel and transportation impacts and proposals for mitigation. It is important that accessibility by a choice of sustainable modes of transport is maximised. Transport Assessments and Travel Plans produced by developers, employers, schools and facility operators are essential to bring about sustainable travel solutions.

## Policy TRAN3 – Managing Transport Impacts of New Development

### Managing Transport Impacts of New Development

1. Planning permission will not be granted for any development that is likely to have significant transport implications, unless accompanied by mitigation schemes that demonstrate an acceptable level of accessibility and safety can be achieved using all modes of transport to, from and through the development. Mitigation schemes must address, in particular, access by walking, cycling, public transport and car sharing.
2. Proposals should be in accordance with an agreed Transport Assessment, where required, and include the implementation of measures to promote and improve sustainable transport facilities through agreed Travel Plans and similar measures.

## Justification

- 9.24 All developments will be assessed both in terms of their impact on the transport network and the opportunities that could be realised to ensure that the site is accessible by sustainable modes of transport. The supporting documentation required will either take the form of a full Transport Assessment (TA) or a less detailed Transport Statement (TS), depending on the land use and size and scale of development and other factors determined by the local planning authority. A TA will sometimes be required for reasons other than spatial thresholds, such as road safety concerns, existing congestion problems, air quality problems, concerns over community severance or likelihood of off-site parking being generated.
- 9.25 TfWM's guide for developers should be routinely consulted for larger developments. Where a development is considered to have a potential significant effect on the Strategic Road Network, National Highways will be involved. The recently-founded Active Travel England are now a statutory consultee on larger developments with a remit to ensure that the principles set out in Gear Change and Local Transport Note LTN1/20 are considered in relation to internal active travel arrangements and connections to the wider highway network.

## Evidence

- Transport for West Midlands Guide for Developers (TfWM 2021)
- Gear Change (DfT 2020)
- Local Transport Note 1/20 (DfT 2020)

## Delivery

- Delivery of this policy will be through the planning application process and via Planning Obligations or other legal and funding mechanisms. Detail will be set out in appropriate Supplementary Planning Documents and guidance.

## The Efficient Movement of Freight

- 9.26 New freight railways and rail sidings will present economic opportunities for Wolverhampton businesses. Improved journey times on the highway network will support economic prosperity and switching traffic to rail or inland waterways will relieve the highway network of traffic, thereby reducing congestion and improving air quality and the environment. The siting of businesses producing heavy flows of freight vehicles in locations with good access to the principal highway network will also help to deliver environmental improvements.

## Policy TRAN4 – The Efficient Movement of Freight

### The Efficient Movement of Freight

1. The movement of freight by sustainable modes of transport such as rail and waterways will be encouraged. Road-based freight will be encouraged to use the Key Route Network whenever practicable.
2. Junction improvements and routing strategies will be focussed on those parts of the highway network evidenced as being of particular importance for freight access to employment sites and the motorway network.
3. Proposals that generate significant freight movements will be directed to sites with satisfactory access to the Key Route Network.
4. Selected existing and disused railway lines will be safeguarded for rail-related uses.
5. Sites with existing and potential access to the rail network for freight will be safeguarded for rail-related uses.

### Justification

- 9.27 Within Wolverhampton and the wider Black Country, freight traffic has always been particularly important, reflecting the area's past level of manufacturing, and it remains significant today, with industry, distribution and logistics giving rise to much freight traffic. This is evident on both the M5 and M6 motorways, where the proportion of heavy goods vehicles can be 30% of total traffic, and the local road network where the traffic on many main routes has an exceptionally high percentage of Heavy Goods Vehicles (HGVs).
- 9.28 HGVs account for 21% of all transport emissions with Light Duty Vehicles accounting for 13%, meaning the road freight sector contributes 34% of transport emissions, despite freight representing just 19% of all vehicle miles undertaken in the UK. Making the most efficient use of the highway network whilst providing facilities to transfer freight from road to rail and inland waterways will play a major part in achieving regional and local climate change targets.
- 9.29 The design and layout of much of the KRN in the Black Country dates from a period when goods vehicles were significantly smaller and lighter than those currently in use and this gives rise to problems of reliability and with deliveries and servicing. In many cases upgrading of these routes is neither economically viable or environmentally desirable.

- 9.30 The Council is a member of the West Midlands Freight Quality Partnership, as are freight operators and their national representative bodies. The Regional Freight Strategy sets a context for planning for freight within Wolverhampton and the wider Black Country. Removal of freight from the road to rail or canal will reduce congestion, and support investment in rail and canals.
- 9.31 The railway network serving Wolverhampton and the wider Black Country suffers from capacity problems during the day when there is high demand for passenger services and this has shifted much freight traffic to night time operation. The Regional Freight Strategy notes a shortage of private sidings in the West Midlands Region. Sites with existing or potential rail access along existing and proposed freight routes will be protected for rail related uses.
- 9.32 The Freight Strategy notes the need to address the increased importance of 'last mile' logistics and the role that transport innovation can play in this; parcel hubs, EV charging for delivery vehicles. Where appropriate, locations for infrastructure to facilitate this will be identified through Development Plan Documents.

## Evidence

- West Midlands Freight Strategy - Supporting our Economy, Tackling Carbon (TfWM 2016)
- Black Country and southern Staffordshire Regional Logistics Site Study (CBRE 2013)
- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016) Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Black Country Transport - Connected for Growth (BCLEP and TfWM 2019)
- West Midlands' Key Route Network Evidence Report (TfWM 2018)

## Delivery

- The West Midlands Freight Strategy will guide the delivery of measures to improve the movement of freight both within the Black Country and to markets beyond the sub-region. The rail-related elements will ultimately be delivered through a combination of Network Rail and the private sector against the background of the national Rail Investment Strategy and the regional freight strategy.
- The overarching responsibility for the development and improvement of the Key Route Network (KRN) sits with the West Midlands Mayor and Transport for West Midlands. The framework for improvement forms part of Movement for Growth with implementation guided by a series of KRN Corridor Action Plans.

## Creating Coherent Networks for Cycling and for Walking

9.33 The development of sustainable modes of travel and encouraging people out of their cars, particularly for shorter and commuter journeys, is crucial to delivery of the Plan Vision. Places need to be well-connected with attractive, convenient, direct and safe routes available to non-car users, thus providing real choice.

9.34 The cycle network in the West Midlands consists of three tiers;

- The National Cycle Network (NCN) – identified and developed by Sustrans in partnership with local authorities and shown on the Transport Key Diagram. This network provides long distance routes across the country linking major destinations.
- The Metropolitan Network (known as the Starley Network) – identified by WMCA in Movement for Growth and developed through the West Midlands Cycling & Walking Infrastructure Plan (WM LCWIP). These routes link strategic locations in the West Midlands and are shown on the Transport Key Diagram.
- Local Networks – identified through individual authority's LCWIPs and will be a feature of Development Plan Documents.

The emerging Black Country Cycling Local Cycling and Walking Infrastructure Plan will provide greater detail on those sections of the Starley network and the most important links in the Local Network.

## Policy TRAN5 – Creating Coherent Networks for Cycling and for Walking

### Creating Coherent Networks for Cycling and for Walking

1. **Joint working between City of Wolverhampton Council and the other Black Country Authorities will ensure that the Black Country can create and maintain a comprehensive, high quality cycle network based on the four local cycle networks, including the use of common cycle infrastructure design standards.**
2. **Creating an environment that encourages sustainable travel requires new developments to link to existing walking and cycling networks. The links should be safe, direct and not impeded by infrastructure provided for other forms of transport.**
3. **Where possible, existing links including the canal network should be enhanced and the networks extended to serve new developments.**
4. **New developments should have good walking and cycling links to public transport nodes and interchanges.**



### Creating Coherent Networks for Cycling and for Walking

5. Secure cycle parking facilities should be provided at all new developments and should be in convenient locations with good natural surveillance, e.g. near to main front entrances for short stay visitors or under shelter for long stay visitors.
6. The number of cycle parking spaces required in new developments and in public realm schemes will be determined by local standards set out in Supplementary Planning Documents.
7. The design of cycle infrastructure should adhere as closely as possible to the standards set out in Local Transport Note 1/20 (DfT 2020) which accompanied the active travel policy document Gear Change.

### Justification

- 9.35 It is essential that walking and cycling facilities are an integral part of the transport system, delivered as part of the highway network, canal corridors, Public Rights of Way and other paths. Comprehensive cycle and walking networks within and beyond Wolverhampton will enable communities to access employment, public transport interchanges, services and facilities in a sustainable way. A transport network that facilitates car use and disadvantages walking and cycling can adversely affect the health and wellbeing of its communities. Identifying and overcoming barriers to walking and cycling during development processes will encourage a renaissance of walking and cycling within the Black Country and help improve the health and wellbeing of local communities by reducing the incidence of obesity, coronary heart disease, strokes, and diabetes. Both walking and cycling are active modes of travel with clear health benefits. Implementation should recognise the specific requirements of each mode, with dedicated, segregated cycling provision being the default objective along with a comprehensive network of walking opportunities available both on highway and off road.
- 9.36 Walking and Cycling Strategies are incorporated within Movement for Growth. The overarching framework is the West Midlands Local Cycling & Walking Infrastructure Plan. The Black Country Authorities have prepared a Black Country Cycling & Walking Infrastructure Strategy identifying priority routes for active travel improvement in each of the BCAs, which was consulted on in 2024.
- 9.37 All new cycle facilities should be designed in accordance with guidance set out in Local Transport Note 1/20.

## Evidence

- West Midlands Strategic Transport Plan - Movement for Growth (TfWM 2016)
- Movement for Growth - 2026 Delivery plan for Transport (TfWM 2017)
- Priority Projects (Black Country Transport, 2023)
- West Midlands Local Cycling & Walking Investment Plan (TfWM 2019)
- Black Country Cycling and Walking Infrastructure Strategy (Draft) (BCA 2024)
- Local Transport Note 1/20 (DfT 2020)
- Gear Change (DfT 2020)

## Delivery

- The Metropolitan (Starley) Network will be delivered through the West Midlands Local Cycling & Walking Infrastructure Plan. Funding will be sought from a variety of competitive and devolved sources such as the City Region Sustainable Transport Fund, Active Travel Fund, and Capability and Ambition Fund.
- The delivery of the majority of local cycle links will be through development of Local Cycling & Walking Infrastructure Plans. Where appropriate, infrastructure will be identified through Development Plan Documents and other local guidance.
- Wolverhampton's extensive network of canals affords numerous opportunities to contribute to the delivery of a comprehensive network of safe, off-road, cycle routes. The Canal & River Trust will therefore be a key delivery partner.
- Where appropriate, funding will be sought from National Highway's Designated Fund Programme which aims to address specific issues such as safety and severance resulting from the interface between the Strategic Road Network and local routes.

## Influencing the Demand for Travel and Travel Choices

9.38 The management of the demand for road space and car parking, together with influencing travel choices, is fundamental to achieving the Vision.

## Policy TRAN6 – Influencing the Demand for Travel and Travel Choices

### Influencing the Demand for Travel and Travel Choices

1. City of Wolverhampton Council is committed to considering all aspects of traffic management in the Wolverhampton centres and the wider area, in accordance with the Traffic Management Act 2004. The priorities for traffic management in Wolverhampton are:
  - a) identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres;
  - b) working together with the rest of the region to manage region-wide traffic flows through co-ordination of traffic signal operation by the West Midlands Urban Traffic Control scheme and further joint working;
  - c) promoting and implementing Smarter Choices measures that provide a greater range of more attractive opportunities which reduce the need to travel and facilitate a shift towards using sustainable modes of transport (walking, cycling, public transport, car sharing).

### Justification

- 9.39 A key aim of the Spatial Strategy is to make the network of centres in Wolverhampton – particularly Wolverhampton City Centre and Bilston and Wednesfield Town Centres - as attractive and accessible as possible, to encourage use of the most sustainable modes of travel. As part of demand management, it is important to prioritise the allocation of road space for sustainable methods of travel such as walking, cycling and buses. This can be achieved by using schemes such as traffic calming measures and full or time limited pedestrianisation, to make these modes more attractive to people visiting centres.
- 9.40 Other important elements of this approach include the promotion and marketing of sustainable transport through travel plans (as set out in Policy TRAN2), making use of planning conditions / obligations and the promotion of schemes and opportunities for walking, cycling, micro-mobility (such as e-Scooters), public transport and car sharing. These policies will reduce road traffic congestion and pollution, improve road safety, promote social inclusion and accessibility, therefore encouraging consumers to access the centres using sustainable transport.

## Evidence

- West Midlands Congestion Management Plan (TfWM 2018)
- West Midlands Park & Ride Strategy (TfWM 2020)

## Delivery

- The policy will be delivered through local authorities 'Network Management Duty Strategies' under the Traffic Management Act 2004, which places new network management duties on Local Highway Authorities. The main duty is to secure the expeditious movement of people and goods, including cyclists and pedestrians, on the road network and on adjacent road networks for which another authority is the traffic authority.

## Parking Management

9.41 The management of car parking has a key role to play in reducing the impact of vehicle trips on air quality and carbon emissions.

## Policy TRAN7 – Parking Management

### Parking Management

1. The priorities for traffic management in Wolverhampton include the sustainable delivery and management of parking in centres and beyond, through use of the following measures as appropriate:
  - a. the management and control of parking - ensuring that it is not used as a tool for competition between centres;
  - b. the type of parking – ensuring that, where appropriate, long-stay parking is removed from town centres, to support parking for leisure and retail customers and to encourage commuters to use more sustainable means and reduce peak hour traffic flows;
  - c. maximum parking standards – ensuring that a consistent approach to maximum parking standards is enforced in new developments as set out in local policy and guidance;
  - d. residential parking – ensuring that new residential developments in centres are designed to minimise space allocated for resident parking and maximise accessibility by active travel and public transport;

## Parking Management

- e. the location of parking – by reviewing the location of town centre car parks through the “Network Management Duty”, to ensure that the flow of traffic around the city centre and other centres is as efficient as possible.

### Justification

- 9.42 The correct balance needs to be found between managing and pricing parking to maximise the use of sustainable travel means to enter the city centre and town centres, whilst avoiding restricting parking to the extent that consumers are dissuaded from using such centres and deterring new development.
- 9.43 The control of and management of parking in centres will require a variety of approaches, recognising that not all publicly available car parking is in local authority control or management. The use of planning conditions to ensure that new public parking is managed appropriately will therefore be an important aspect of this policy.
- 9.44 Where substantial residential developments are proposed in the city centre and other centres, developers will be encouraged to minimise provision of resident parking within the development and ensure strong connection with the emerging active travel network, public transport and existing parking facilities.
- 9.45 The continued adoption of maximum parking standards for all but residential development is considered to be an important tool in managing demand for single-occupancy vehicle trips to centres and major employment destinations, leisure and other facilities. Reduced levels of long-stay car parking in centres will enable more efficient use of land.
- 9.46 In order to continue improving the character of the city centre, it is important to minimise provision of additional vehicle parking space within the ring road. To this end, developers will be required to provide substantial justification for any vehicle parking space proposed in development applications.

### Evidence

- Black Country Parking Study (BCA 2021)

## Delivery

- Through local authorities' network management duty and parking management policies.
- The management of new privately owned and operated public car parks will be controlled through Parking Management Plans via planning conditions or planning obligations.

## Planning for Low Emission Vehicles

9.47 The UK government has committed to banning the sale of petrol and diesel cars by 2030. The resultant societal shift from petrol and diesel internal combustion engine (ICE) vehicles to ULEVs will require widespread support from local authorities. It is projected that there will be an addition of 42,500 ULEVs within the Black Country by 2025. The Black Country ULEV strategy sets out a framework for how the authorities can support this transition.

## Policy TRAN8 – Planning for Low Emission Vehicles

### Planning for Low Emission Vehicles

1. **City of Wolverhampton Council will promote the increased use of low emission vehicles by:**
  - a) **Ensuring that new developments include adequate provision for charging infrastructure, in accordance with Building Regulations requirements. This will include provision of electric vehicle charging points in car parks and travel plan measures to encourage Low Emission Vehicle use;**
  - b) **Where appropriate, facilitating the introduction of electric vehicle charging points in public locations; and**
  - c) **Working with partners to explore support for alternative low emission vehicle technologies, such as hydrogen fuel cells, across a range of modes, including private cars, buses, and small passenger and fleet vehicles.**

## Justification

9.48 WMCA are committed to achieving carbon net zero by 2041, through an agreed Climate Action Plan (2020) and West Midlands Ultra Low Emission Vehicle (ULEV) Strategy, which focusses on sharing best practice, co-ordination and possible joint delivery of a large-scale network of rapid charging 'hubs'. A Black Country ULEV Strategy sits under the regional strategy and takes a more granular approach, providing a framework for the delivery of infrastructure on the ground.

9.49 The Black Country ULEV Strategy found that the Black Country lags behind the rest of the country when it comes to adoption of ULEVs. This is reflected in the availability of charging infrastructure across the sub-region, with around 80% of the area more than 1km from the nearest publicly available charge point. However, relative to median wages, all Black Country Authorities sit on or above the trend for ULEV adoption, indicating higher uptake than might be expected. The Black Country Air Quality Supplementary Planning Document (SPD) was adopted in 2016 and will continue to provide guidance for the provision of charge points through the planning process (see also Policy ENV11 – Air Quality).

## Evidence

- Black Country Air Quality Supplementary Planning Document (BCA 2016)
- West Midlands ULEV Strategy (TfWM 2020)
- Black Country ULEV Strategy (Cenex on behalf of BCA 2020)

## Delivery

- Use of the Black Country ULEV Strategy as a framework to support bids for Central Government funding for public EV charging infrastructure and as guidance for the provision of infrastructure in public sector-owned locations
- Black Country Air Quality SPD

## Monitoring

Policy	Indicator	Target
TRAN1 – TRAN8	% of eligible permissions that meet policy requirements	100%

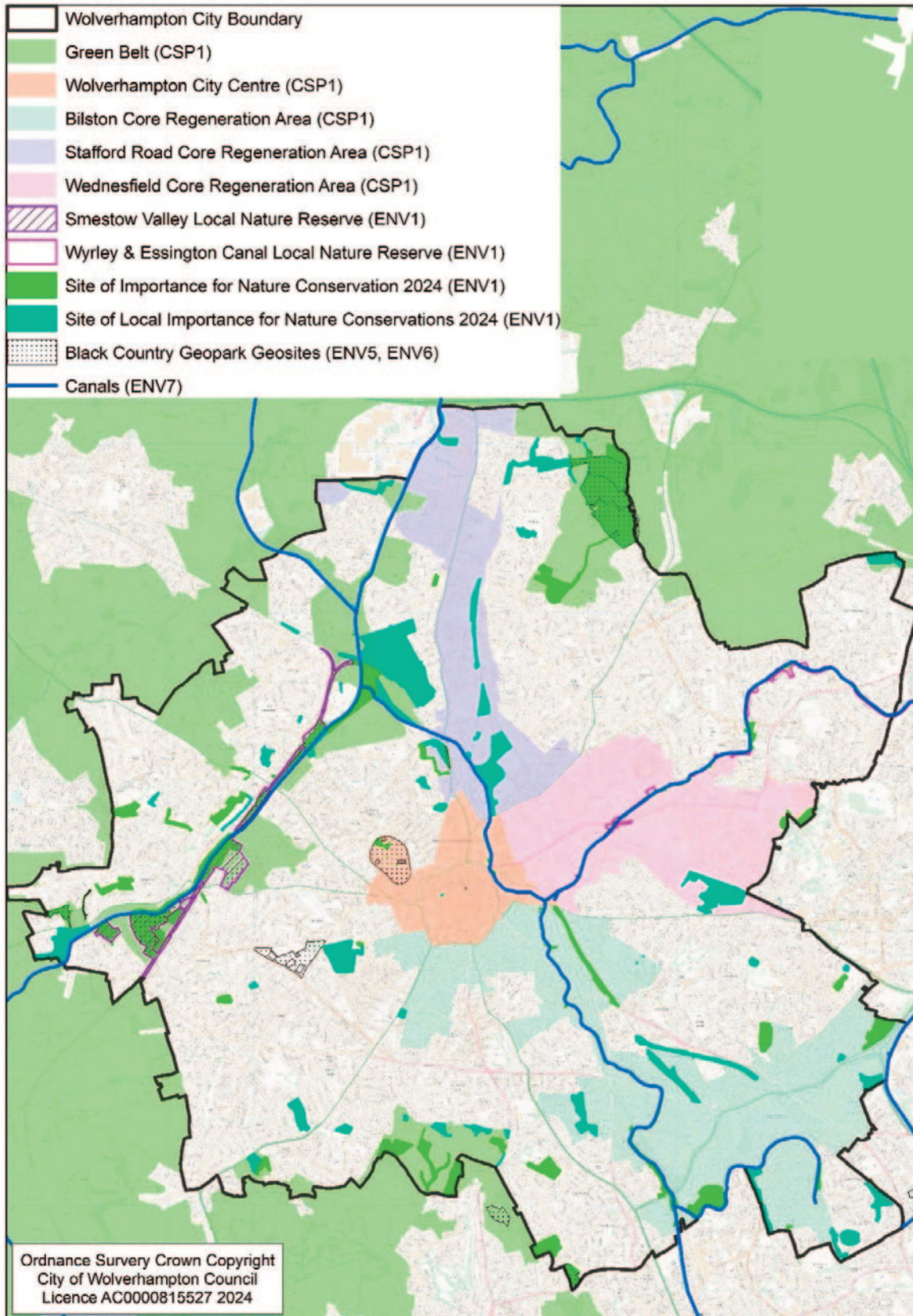


# 10. Environment and Climate Change

## Introduction

- 10.1 Wolverhampton enjoys a unique physical and cultural heritage thanks to its origins as a mainstay of heavy industry and driver of the Industrial Revolution. The geological complexity of the area, its topography, its settlement pattern and the existence of significant areas of green and open space within one of the most densely-developed parts of the country require a set of robust and relevant planning policies that will help to protect and enhance what gives Wolverhampton its unique physical, ecological and historic character and appearance.
- 10.2 The protection and improvement of Wolverhampton's biodiversity and geodiversity will also improve the attractiveness of the area for people to live, work, study and visit while at the same time improving the physical and natural sustainability of the city in the face of climate change.
- 10.3 This section addresses a number of established and new topic areas relating to environment and climate change, including the natural and historic environments, air quality, flooding and climate change.
- 10.4 There are specific policies designed to mitigate and adapt to a changing climate, including policies on the management of heat risk, the use of renewable energy, the availability of local heat networks and the need for increasing resilience and efficiency to help combat the changes that are affecting people and the environment.
- 10.5 The importance of green infrastructure in achieving a healthy and stable environment is reflected throughout the Plan and is supported in this section by policies on trees and nature conservation.
- 10.6 The importance of the Black Country in terms of its contribution to geological science and the environment is recognised by its UNESCO Geopark status, which is also reflected in a policy for the first time.
- 10.7 Development in Wolverhampton has the potential to impact on Special Areas of Conservation, including Cannock Chase. These sites are of European importance and it is important that their special environmental qualities are not impacted adversely by development.

Figure 9: Environment Key Diagram



## Nature Conservation

10.8 The protection and improvement of Wolverhampton's biodiversity and geodiversity will safeguard and improve the environmental attractiveness and value of the area for residents and visitors while at the same time improving the physical and natural sustainability of communities in the face of climate change.

### Policy ENV1 – Nature Conservation

#### Nature Conservation

1. Development within Wolverhampton will safeguard nature conservation, inside and outside its boundaries, by ensuring that:
  - a) development will not be permitted where it would, alone or in combination with other plans or projects, have an adverse impact on the integrity of an internationally designated site, including Special Areas of Conservation (SAC) which are covered in more detail in Policy ENV2;
  - b) development is not permitted where it would harm nationally (Sites of Special Scientific Interest and National Nature Reserves) or regionally (Local Nature Reserves and Sites of Importance for Nature Conservation) designated nature conservation sites;
  - c) locally designated nature conservation sites (Sites of Local Importance for Nature Conservation), important habitats and geological features are protected from development proposals that could negatively impact them;
  - d) the movement of wildlife within Wolverhampton and its adjoining areas, through both linear habitats (e.g. wildlife corridors) and the wider urban matrix (e.g. stepping-stone sites) is not impeded by development;
  - e) species that are legally protected, in decline or are rare within the Black Country, or that are covered by national, regional, or local Biodiversity Action Plans, will be protected when development occurs in accordance with Part I of the Wildlife and Countryside Act 1981.
- 2) Adequate information must be submitted with planning applications for proposals that may affect any designated site or important habitat, species, or geological feature, to ensure that the likely impacts of the proposal can be fully assessed. Where development is likely to impact upon a Site of Importance for Nature Conservation or Site of Local Importance for Nature Conservation, a Local Site Assessment must be

## Nature Conservation

undertaken and submitted to the Local Sites Partnership. Supporting information must include a data search from the Local Environmental Records Centre (currently Birmingham and Black Country EcoRecord). Where the necessary information is not made available, there will be a presumption against granting permission.

- 3) Where, exceptionally, the strategic benefits of a development clearly outweigh the importance of a local nature conservation site, species, habitat or geological feature, damage must be minimised. Any remaining impacts, including any reduction in area, must be fully mitigated. Compensation will only be accepted in exceptional circumstances. A mitigation strategy must accompany relevant planning applications.
- 4) Over the Plan period, the Council will update evidence on designated nature conservation sites and Local Nature Reserves as necessary in conjunction with the Local Sites Partnership and Natural England and will amend existing designations in accordance with this evidence. Consequently, sites may receive new, or increased, protection over the Plan period. The Local Environmental Records Centre hold, collate and disseminate the definitive and up-to-date register of locally designated nature conservation sites on behalf of City of Wolverhampton Council.
- 5) All development should positively contribute to the biodiversity and geodiversity of Wolverhampton by:
  - a) following the mitigation hierarchy of: avoiding harm; reducing harm; mitigating harm;
  - b) extending and improving the condition of nature conservation sites, where possible;
  - c) improving wildlife movement through the development site;
  - d) restoring or creating habitats / geological features that actively contribute to the implementation of Nature Recovery Networks, Biodiversity Action Plans (BAPs) and / or Geodiversity Action Plans (GAPs) at a national, regional or local level; and
  - e) ensuring that canal and natural watercourse-side developments deliver improved and extended corridors for the movement of wildlife and people.
- 6) Details of how improvements (appropriate to their location and scale) will contribute to biodiversity and geodiversity, should be provided with planning applications. Proposals should be informed by the relevant Local Nature Recovery Strategy, as set out in Policy ENV3.



## Justification

- 10.9 The past development and redevelopment of the city, as part of the wider Birmingham and Black Country area, has led to it being referred to as an “endless village” in the eponymous pioneering natural history study of an urban area. This term describes the interlinked settlements and patches of encapsulated countryside present today. The Black Country is home to internationally and nationally designated nature conservation sites and has the most diverse geology, for its size, of any area on earth – recognised in the UNESCO award of Black Country Geopark status. Many rare and protected species are found thriving within its matrix of greenspace and the built environment.
- 10.10 Sitting at the heart of the British mainland, the city can play an important role in helping species migrate and adapt to climate change as their existing habitats are rendered unsuitable. It is therefore very important to increase the ability of landscapes and their ecosystems to adapt in response to changes in the climate by increasing the range, extent, and connectivity of habitats. In order to protect vulnerable species, the development of a national Nature Recovery Network will allow isolated nature conservation sites to be protected, buffered, improved, and linked to others.
- 10.11 Work to identify a West Midlands Nature Recovery Network and develop a West Midlands Nature Recovery Strategy is underway. When completed, all development will be required to take this Strategy into account, as set out in national policy and Policy ENV3. In the interim, the Black Country Local Nature Recovery Map and Strategy (2022) will fulfil this role. Species dispersal will be aided by extending, widening, and improving the habitats of wildlife corridors. Conversely, fragmentation and weakening of wildlife sites and wildlife corridors by development will be opposed.
- 10.12 In Wolverhampton, Sites of Importance for Nature Conservation (SINCs) and Sites of Local Importance for Nature Conservation (SLINCs) are identified through the process of Local Site Assessment. This process is overseen by the Birmingham and Black Country Local Sites Partnership. The role of the Partnership is to provide expert advice to the area’s local authorities and other organisations as appropriate on the selection, management, protection and review of the network of local sites throughout Birmingham and the Black Country. The Partnership comprises representatives of all the organisations involved in the operation of the local sites system. Assessments will need to follow the most recent local sites guidance for selection. If local sites in Wolverhampton are endorsed by the Partnership, the Council will then seek authority to formally designate these sites. It is particularly important to protect and enhance SINCs and SLINCs, therefore an up-to-date Local Site Assessment will be required to support any proposal that could harm a SINC or SLINC.

10.13 Development offers an opportunity to improve the local environment and this is especially so in an urban area. The Council is committed to meeting its biodiversity duty under the Environment Act 2021 and to delivering the principles of the NPPF by proactively protecting, restoring and creating a richer and more sustainable wildlife and geology. This will include working, as part of the Birmingham and Black Country Local Nature Partnership and Local Sites Partnership, to identify, map and regularly review the priorities for nature protection and improvement, in accordance with the emerging West Midlands Local Nature Recovery Strategy.

10.14 There are three WLP site allocations which will result in loss of part of a SLINC. These are two employment development allocations (E12 – Land at Neachells Lane and E25 - South of Citadel Junction) and the only gypsy and traveller pitch allocation (GT1 – Former Bushbury Reservoir). These sites have been allocated for development because there are very limited site options available for suitable located employment development land in Wolverhampton, and no other site options available for gypsy and traveller pitches in Wolverhampton. The policy requirements for these allocations are robust, ensuring that development can only go ahead if sufficient satisfactory mitigation can be secured, in line with Policy ENV1 and national biodiversity net gain requirements (see Policy ENV3).

## Evidence

- Birmingham and Black Country EcoRecord (as of 2024)
- Birmingham and Black Country Local Sites Assessment Reports (as of 2024)
- Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord, 2022)
- Biodiversity Action Plan for Birmingham and the Black Country (2009)
- Geodiversity Action Plan for the Black Country (2005)
- The Endless Village, The Nature Conservancy Council (1978)

## Delivery

- Biodiversity and Geodiversity Action Plans
- Development and implementation of West Midlands Nature Recovery Strategy
- Updated ecological surveys and Local Sites Assessment Reports, as appropriate
- Planning application process

## Cannock Chase Special Area of Conservation

10.15 There are a number of Special Areas of Conservation (SAC) close to Wolverhampton which have the potential to be adversely affected by development within Wolverhampton over the Plan period. A policy approach is required to address any identified potential impacts.

### Policy ENV2 – Development Affecting Cannock Chase Special Area of Conservation

#### Development Affecting Cannock Chase Special Area of Conservation

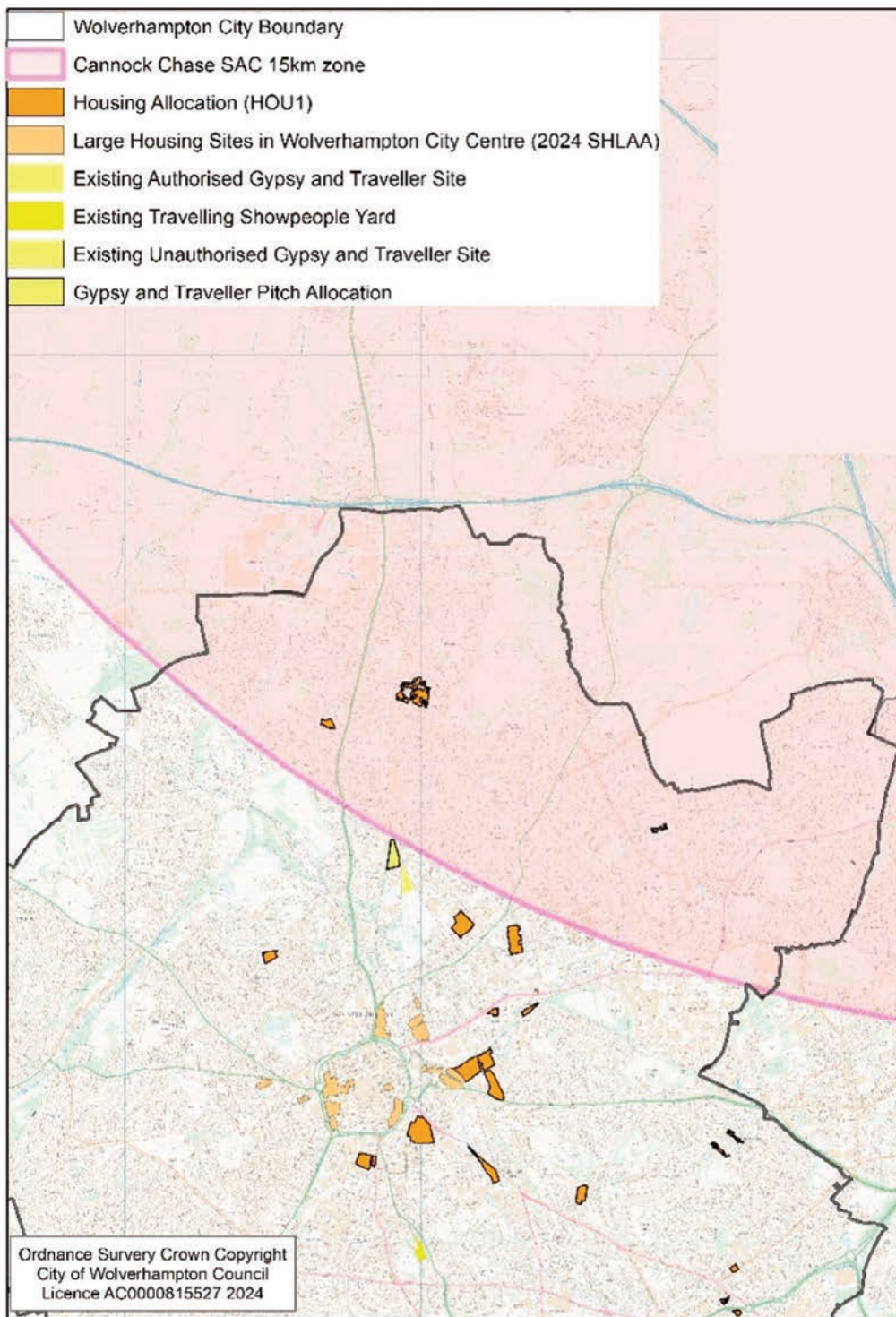
1. An appropriate assessment will be carried out for any development that leads to a net increase in homes or creates visitor accommodation within 15 km of the boundary of Cannock Chase SAC, as shown on the Policies Map.
2. If the appropriate assessment determines that the development is likely to have an adverse impact upon the integrity of Cannock Chase SAC, then the developer will be required to demonstrate that sufficient measures can be provided to either avoid or mitigate the impact.
3. Acceptable mitigation measures will include proportionate financial contributions towards the current agreed Cannock Chase SAC Partnership. Detailed Implementation Plans (DIPs) or any alternative mitigation strategies which may be agreed in future.

### Justification

10.16 Cannock Chase SAC, located to the north of Wolverhampton, is one of the best areas in the UK for European dry heath land and is the most extensive area of dry heath in the Midlands. The Council is part of the Cannock Chase SAC Partnership, which works together to prevent damage to the wildlife value of the SAC. Other members of the Partnership include Natural England, Staffordshire County Council, Walsall Council, Cannock Chase District Council, Lichfield District Council, East Staffordshire Borough Council, South Staffordshire District Council, the Forestry Commission and the Area of Outstanding Natural Beauty (AONB) Partnership. A key role of the Partnership is to ensure no adverse effect on the integrity of the SAC arises from new housing development through recreational pressures.



Figure 10: Cannock Chase SAC 15 Km Zone



- 10.17 A Visitor Survey and Planning Evidence Base Review (PEBR) completed by the Partnership during 2019-21 demonstrated that any development within 15 km of Cannock Chase SAC that could increase visitor use of Cannock Chase may have a significant impact on the integrity of the SAC. The PEBR recommended a package of Detailed Implementation Plans (DIPs), which are considered necessary to mitigate the cumulative impact of maximum potential housing development within the 15 km zone up to 2040. These measures include habitat management and creation; access management and visitor infrastructure; publicity, education and awareness raising; provision of additional recreational space within development sites where they can be accommodated; and measures to encourage sustainable travel. An updated Cannock Chase SAC Partnership Memorandum of Understanding (MOU) reflecting this new evidence was completed and implemented in 2022.
- 10.18 Parts of northern Wolverhampton, as shown on Figure 10 and the Policies Map, fall within 15 km of Cannock Chase SAC. Any development within this area over the Plan period that results in new homes or creates visitor accommodation, such as a hotel or caravan site, may lead to adverse effects on the SAC through increased visitor activities. Therefore, the Council will continue to seek contributions towards the total cost of the Cannock Chase SAC DIPs (or alternative mitigation strategies which may be agreed in future) in proportion to the amount of housing development anticipated to take place within the 15 km zone.
- 10.19 Policy ENV2, supported by guidance, will ensure that decisions made on planning applications in Wolverhampton will not have adverse effects on Cannock Chase SAC. If there are any potential adverse impacts, the development must be refused unless there are appropriate mitigation measures in place. Any proposals that comply with the current guidance are likely to result in a conclusion of no adverse impact on the integrity of Cannock Chase SAC.

## Evidence

- Cannock Chase SAC Planning Evidence Base Review: Stage 1 (Footprint Ecology, 2018)
- Cannock Chase Visitor Survey (Footprint Ecology, 2018)
- Cannock Chase SAC Planning Evidence Base Review: Stage 2 (Footprint Ecology, 2021)
- Cannock Chase SAC Partnership Memorandum of Understanding (2022)
- Habitats Regulations Assessment of Regulation 19 Wolverhampton Local Plan (Lepus, 2024)
- Wolverhampton Local Plan Duty to Cooperate Statement (2024)

## Delivery

- Delivery of Cannock Chase SAC Partnership Memorandum of Understanding
- Planning application process

## Nature Recovery and Biodiversity Net Gain

10.20 The Nature Recovery Network is a major commitment in the Government's 25 Year Environment Plan. The Environment Act (2021) requires a Local Nature Recovery Strategy (LNRS) to be prepared for each part of England, which:

- a) agrees priorities for nature recovery;
- b) maps the most valuable existing habitat for nature; and
- c) maps opportunities for creating or improving habitat.

10.21 LNRSs will help restore many ecosystem functions and improve the services upon which society depends, benefitting nature, people and the economy, and helping to address three of the biggest challenges society faces: biodiversity loss, climate change and human wellbeing. LNRSs will also provide a focus for delivery of the biodiversity duty set out in the Environment Act and support delivery of biodiversity net gain.

10.22 Biodiversity net gain is a national planning policy that attempts to leave the environment in a more valuable and richer condition than it was found to be in previously. Development proposals are required to provide a minimum 10% uplift in habitat quality where sites are being developed. A metric is used to quantify the impacts on habitats arising from a development and calculate how much new or restored habitat, and of what types, is required to deliver the 10% uplift – whether on or off site.

10.23 Policy ENV3 sets out how development proposals will be required to consider the LNRS covering Wolverhampton and how this will be taken into account in the national biodiversity net gain process. The Policy also sets out specific considerations to be taking into account when delivering the national biodiversity net gain policy in Wolverhampton.

## Policy ENV3 – Nature Recovery and Biodiversity Net Gain

### Nature Recovery and Biodiversity Net Gain

1. All development is required to consider the current Local Nature Recovery Strategy covering Wolverhampton in line with the following principles:
  - a) take account of where in the Local Nature Recovery Network the development is located and deliver benefits appropriate to that location;
  - b) follow the mitigation hierarchy of: avoiding harm; reducing harm; mitigating harm;
  - c) provide for the protection, enhancement, restoration and creation of wildlife habitat and green infrastructure as set out in the Local Nature Recovery Strategy.

## Nature Recovery and Biodiversity Net Gain

- 2) In Wolverhampton, no more than 10% biodiversity net gain will be sought in accordance with national biodiversity net gain requirements. Biodiversity net gain should be provided in accordance with the following principles:
- a) Implementation of this hierarchy:
    - I. Retention of existing habitat on site, where practical;
    - II. On site provision, where practical;
    - III. Off site provision within Wolverhampton;
    - IV. Off site provision within an authority adjoining Wolverhampton;
    - V. Off site provision elsewhere in England or purchase of statutory biodiversity credits.
  - b) the maintenance and, where possible, enhancement of the ability of plants and animals (including pollinating insects) to move, migrate and genetically disperse across Birmingham and the Black Country; and
  - c) wherever possible, the provision or enhancement of priority habitats identified at the national, regional, or local level, having regard to the scarcity of that habitat within Birmingham and the Black Country.

## Justification

10.24 Locally developed Nature Recovery Strategies (LNRSs) are required by the Environment Act (2021). LNRSs will help to map the Nature Recovery Network locally and nationally, and will help to plan, prioritise and target action and investment in nature.

10.25 The Environment Act (2021) introduced a duty on the Council to engage with the creation of the LNRS covering Wolverhampton and to have regard to this LNRS and take steps to support its delivery. The Council will also have to report on actions it has taken to deliver the biodiversity duty set out in the Environment Act, at least every five years.

10.26 The West Midlands Combined Authority is currently preparing a LNRS for the West Midlands area, including Wolverhampton. In 2022, the Black Country Authorities published a Black Country Local Nature Recovery Map and Strategy. Until the West Midlands LNRS is adopted, this document will carry weight as evidence and strategy supporting ENV3 and will inform that part of the biodiversity net gain metric that relates to strategic importance, in accordance with further guidance provided on the Council Planning Policy webpages.

- 10.27 The protections provided by Policy ENV1 and national guidance and legislation to international, European, national and locally designated nature conservation sites and irreplaceable habitats are separate to biodiversity net gain requirements.
- 10.28 However, habitats of biodiversity value frequently occur outside designated nature conservation sites, and the national biodiversity net gain policy allows for these habitats to be protected and enhanced and additional habitat created through development. National guidance expects biodiversity net gain to be delivered using a hierarchy approach i.e. firstly avoid harm, then minimise impacts, then mitigate for harm, including through restoration or compensation. In practice, the national policy allows developers considerable discretion as to how biodiversity net gain is provided, therefore this hierarchy approach can only be effectively delivered through local policy.
- 10.29 Policy ENV3 sets out a locally specific approach to delivery of biodiversity net gain for Wolverhampton which will help to maximise local improvements of benefit to delivery of the current LNRS. In this way, delivery of the national biodiversity net gain policy in Wolverhampton can help meet local objectives whilst contributing to wider nature recovery plans.
- 10.30 On site biodiversity improvements will be vital to enhancing the liveability of urban areas, and improving the connection of people to nature, particularly as development densities increase. Development should also contribute to wildlife and habitat connectivity in the wider area, in line with the current LNRS. Given viability and urban land constraints, in Wolverhampton it is not appropriate to seek more than the national 10% biodiversity net gain requirement.
- 10.31 The ways in which developments secure biodiversity net gain will vary depending on the scale and nature of biodiversity existing on the site. For some sites, the focus will be on the retention of existing habitats. For others, this may be impractical, and it may be necessary instead to improve or provide new habitats, either on or off site. However, it can be challenging to establish new habitats. It is essential that the most important and irreplaceable habitats in Wolverhampton are protected, and so mitigation rather than retention will not be appropriate in some circumstances. The importance of the aquatic environment in Wolverhampton (freshwater, wetlands, rivers and canals) is recognised, and the important role that biodiversity net gain can play in improving water quality, water resources, flood protection and other benefits by management of rivers and wetlands, including restoring natural processes. Government guidance is clear that River Basin Management Plan mitigation can contribute towards biodiversity net gain for a development.



## Evidence

- The Environment Act 2021
- A Green Future: Our 25 Year Plan to Improve the Environment (DEFRA, 2023)
- Making Space for Nature: A Review of England's Wildlife Sites (Lawton et al. 2010)
- Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord, 2022)

## Delivery

- Implementation of Local Nature Recovery Strategy, including through biodiversity net gain
- Planning application process, legal and funding mechanisms
- City of Wolverhampton Council reporting of biodiversity duty actions

## Trees and Hedgerows

10.32 A main theme of the Government's 25 Year Environment Plan is the need to protect existing trees and plant more trees, not only through creation of extensive new woodlands but also within urban areas – with a national ambition to deliver one million new urban trees. This is key to the Government's plans to achieve net zero and to create a Nature Recovery Network across England. The Forestry Commission and partners have produced a wide range of guidance on how to protect and manage the urban forest (trees and woodland in urban areas) which recommends that urban areas aim to provide tree canopy cover (the area of ground covered by trees when seen from above) of at least 20%.

10.33 Trees, woodlands and hedgerows provide a number of social, environmental and economic benefits and are an integral part of the ecological network, landscapes and the historic environment. They also have a crucial part to play in mitigating and adapting to climate change by storing carbon from the atmosphere, helping to cool the urban environment and supporting sustainable drainage.

10.34 The Council's Tree Planting Strategy (2023) aims to support a sustainable, high quality tree population across the City. This will be integral to meeting Our Climate Commitment (2020). As the benefits trees provide are proportionally linked to canopy size, a key aim of the Strategy is to increase the Wolverhampton tree canopy cover from 16.5% to at least 20% by 2035. Higher canopy cover goals of 24% - 36% by 2045 are set for wards which have high population densities and low existing canopy cover. These targets provide a solid basis to identify tree planting opportunities in line with the emerging Local Nature Recovery Strategy and to evidence design requirements for new development.

## Policy ENV4 – Trees and Hedgerows

### Trees and Hedgerows

#### Habitat Creation

1. The Council will support planting of new, predominantly native, trees and woodlands in appropriate locations where existing habitats are suitable for tree planting, in order to increase the extent of tree canopy cover in Wolverhampton to 20% by 2035 and achieve a more equal canopy cover in relation to population density across all wards by 2045.
2. Opportunities for increasing tree provision through habitat creation and the enhancement of ecological networks, including connecting areas of ancient woodland, will be maximised, in particular through biodiversity net gain and Local Nature Recovery Strategy initiatives (see Policy ENV3).

#### Trees and Development

##### Protection of Trees

3. Development that would result in the loss of or damage to ancient woodland will not be permitted. Development adjacent to ancient woodland will be required to provide an appropriate landscaping buffer with a minimum depth of 15m, and up to 50m where considered necessary.
4. Development that would result in the loss of or damage to ancient or veteran trees will not be permitted. Ancient or veteran trees likely to be impacted by development should be protected by the provision of a buffer around them of a minimum of 15 times the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times its diameter.
5. Development should be designed around the need to incorporate trees already present on site, using sensitive and well-designed site layouts to maximise their retention. Existing mature trees, trees that are ecologically important and ancient / veteran trees must be retained and integrated into the proposed landscaping scheme, recognising the important contribution of trees to the character and amenity of a development site and to local green infrastructure networks.



## Trees and Hedgerows

6. There will be a presumption against the removal of trees that contribute to public amenity or air quality management unless sound arboricultural reasons support their removal i.e. the tree is a clearly identified and immediate threat to human safety; disease is significantly impacting the tree's longevity and safety; the tree is causing clearly evidenced structural damage to property where remedial works cannot be undertaken to alleviate the problem; or the tree is creating a clearly identified danger or causing significant damage to the adopted highway / footpath network.
7. Trees on development sites must be physically protected during development. Care must be taken to ensure that site engineering and infrastructure works, the storage of plant and machinery, excavations and new foundations do not adversely impact retained trees, in line with current British standards for arboriculture and Building Regulation requirements.

### Replacement Trees

8. Where it is agreed that trees can be removed during development, these trees should be replaced at a ratio of at least three for one, of a suitable species and provided on site wherever possible. The species, size and number of replacement trees should be commensurate with the size, stature, rarity, and public amenity of the tree(s) to be removed. Where trees to be replaced form a group of amenity value (rather than individual specimens), replacement must be in the form of a group commensurate with the area covered, size and species of trees and established quality of the original group and, where possible, located in a position that will mitigate the loss of visual amenity i.e. as close as possible to the site of the removed trees.
9. Where sufficient and suitable replacement trees cannot be provided on site, off site planting or woodland enhancement (including support for natural regeneration) in the near vicinity of the removed trees must be provided, in line with the mitigation hierarchy (avoid harm; reduce harm; mitigate harm). Replacement trees should not be planted where they would negatively impact on existing habitat. Appropriate planning conditions will be used to secure timely and adequate alternative provision and ongoing maintenance.

## Trees and Hedgerows

### Tree Canopy Cover on Major Developments

10. In addition to protecting existing trees and providing replacement trees, new tree planting should be included in all major developments, as street trees, where appropriate, and as part of landscaping schemes. All major developments should be designed to include a minimum tree canopy cover of 24% - 36% (when fully grown) in line with the canopy cover goal set out in the Wolverhampton Tree Planting Strategy 2023 (or any replacement document) for the ward where the development is located. Where this canopy cover goal is already met through existing trees on site, there should be no reduction in overall canopy cover as a result of development.

### Design

11. Whilst recognising the key role of trees in mitigating climate change and providing appropriate levels of shade and cooling in new developments in accordance with Policy ENV10, buildings must be carefully designed and located to prevent an incompatible degree of shade being cast by existing and new trees that might result in future pressure for them to be removed.
12. The positioning of trees in relation to streets and buildings should not worsen air quality for people using and living in them. Care should be taken to position trees and / or design streets and buildings in a way that allows for street-level ventilation to occur, to avoid trapping pollution between ground level and tree canopies.

### Information Requirements

13. All available data on tree canopy cover and associated habitat (including from the Local Environmental Records Centre) will be considered when making decisions on the proposed loss of trees and woodland to accommodate infrastructure and other development proposals.
14. Where there are trees or hedgerows on site, an arboricultural survey, carried out to an appropriate standard, should be undertaken before any vegetation is removed or groundworks take place. This survey should be used to inform the development design and layout and should be submitted with the planning application.

## Trees and Hedgerows

15. Where proposed development will impact on the protection, safety and / or retention of a number of trees, or on the character and appearance of trees of importance to the environment and landscape, the use of an Arboricultural Clerk of Works will be required, to be made subject to a condition on the relevant planning permission.

### New Trees

16. All new trees should be native species or non-native species able to withstand climate change, and the majority of trees on any site should be native species, to maximise local biodiversity value and a healthy and diverse tree population.
17. Large-canopied tree species should be used where possible and appropriate, as these provide a wider range of health, biodiversity and climate change mitigation and adaptation benefits because of their larger surface area and make the greatest contribution to increasing overall tree canopy cover.
18. All new trees should be UK or Ireland sourced and grown, to help limit the spread of tree pests and diseases, while supporting regional nurseries where possible.
19. All new trees should be planted in accordance with arboricultural best practice, including the use of suitably sized planting pits<sup>1</sup>, supporting stakes, root barriers, underground guying, and appropriate protective fencing during the construction phase.
20. Appropriate conditions will be included in planning permissions to ensure that new trees that fail on development sites are replaced within a specified period by trees of a suitable size, species, and quality.

### Hedgerows

21. There will be a presumption against the removal of hedgerows for development purposes, especially where ecological surveys have identified them to be species-rich and where they exist on previously undeveloped land.

1. To allow for an appropriate volume of soil in which to develop a viable root system and to prevent future stress that might affect the trees' long-term health and lifespan

## Trees and Hedgerows

- 22. Hedgerow retention and reinforcement will be of particular importance where hedgerows form part of an established ecological network enabling the passage of flora and fauna into and out of rural, suburban, and urban areas. If hedgerow removal is needed to accommodate a high-quality site layout, replacement hedgerow planting will be required.**
- 23. Hedgerows must be protected before and during development through: provision of landscape buffers where appropriate; protective fencing; and careful management of plant and materials on site to avoid damage to the hedgerow(s) and its root system.**
- 24. New hedgerows will be sought as part of site layouts and landscaping schemes and should include a suitable mixture of species that are able to withstand climate change and promote local biodiversity.**

## Justification

- 10.35 The NPPF (particularly para 136) identifies the importance of trees in helping to create an attractive and healthy environment and expects Local Plans to identify, map and safeguard components of ecological networks and promote their conservation, restoration, and enhancement. Ancient woodlands and ancient and veteran trees are an irreplaceable aspect of both the ecological and historic landscape and the NPPF is very clear about the need to protect such resources where they occur. Hedgerows are also a finite and vulnerable resource which require protection and enhancement.
- 10.36 The Black Country iTree project (2022) demonstrated the importance of trees in the Black Country, including for the reduction and mitigation of poor air quality and climate change. This identified that the tree population of the Black Country (1.95 million trees) held nearly 0.844 million tonnes of carbon and was sequestering an additional 24,500 tonnes per annum, with associated values of around £767 million and £24.2 million respectively. The project also reported significant value and benefits provided by trees in terms of pollution removal, storm water alleviation and amenity. The loss of trees from urban environments has been demonstrated to have negative outcomes for human health. Social costs, such as an increase in crime, have also been associated with the loss of trees<sup>2</sup>. There is a growing body of evidence that the presence of trees in and around urban environments provides major public health and societal benefits.

1. Urban Trees and Human Health: A Scoping Review, University of Washington et al (2020)  
<https://www.mdpi.com/1660-4601/17/12/4371>

10.37 Trees in the urban landscape have a vital role to play in delivering ecosystem services, such as:

- a) helping to improve residents' physical health<sup>3</sup>
- b) helping to improve residents' mental health by reducing stress levels
- c) helping to mitigate climate change by sequestering carbon dioxide
- d) providing shading and cooling benefits (including associated savings to the NHS from avoided skin cancer and heat stroke<sup>4</sup>)
- e) improving air quality and reducing atmospheric pollution
- f) reducing wind speeds in winter, thereby reducing heat loss from buildings
- g) reducing noise
- h) improving local environments and bringing people closer to nature
- i) supporting ecological networks and green infrastructure
- j) maximising people's enjoyment of and benefits from their environment
- k) contributing towards the aesthetic value of the urban area

10.38 Tree canopy cover in Wolverhampton, at 16.5%, is currently higher than the Black Country average of 15.4% and the England average of 16%. However, ward level data shows that cover varies across the City. There is a need to increase overall tree canopy cover to at least the 20% target, and above in certain wards, to help prevent the further fragmentation of habitats across the city, support the Local Nature Recovery Strategy and provide more equal canopy cover in relation to population density across the city (see para 10.34).

10.39 Supporting wildlife corridors within the Local Nature Recovery Network is important to prevent and help overcome woodland habitat fragmentation, by ensuring that species can reach the resources they need and that their populations do not become isolated, inbred, and prone to the adverse impacts of climate change. Supporting wildlife corridors will mean:

- a) creating and maintaining a diverse tree population (including trees of all ages and sizes);
- b) controlling invasive species;
- c) promoting the reintroduction of native species in locations where they are appropriate and would have a positive impact on biodiversity;
- d) retaining dead wood;
- e) making sure that any new planting is in the right location and of the right species; and
- f) recognising that woodlands are not simple monoculture habitats and will also contain glades, wet areas, understoreys, and grassland.

3. Neighbourhood greenspace and health in a large urban center, Kardan, O. et al (2015)

4. Health Benefits of Street Trees, The Research Agency of the Forestry Commission (2011)

10.40 The requirements in Policy ENV4 to plant trees on development sites will also help support and deliver increased biodiversity and green network opportunities on sites that at present do not contain tree cover.

### Trees on development sites

10.41 The WLP aims to deliver a significant amount of development in the urban area. Given the need to increase tree canopy cover and the long establishment periods required for trees and hedgerows, it is important to protect and expand the existing stock as far as possible. Therefore, developers will be expected to give priority to the retention of trees, woodland and hedgerows, and the existing landscaping which supports them.

10.42 National planning guidance identifies trees worthy of retention on amenity grounds (through use of a Tree Preservation Order) as those that are visible in part or whole from a public place and / or those with individual, collective and wider impact (in terms of size, form, future potential, rarity, cultural / historic value, landscape contribution and / or contribution to a conservation area). Other factors such as value for nature conservation and climate change may also be considered.

10.43 There will be a requirement to:

- a) retain individual trees or groups of trees of landscape or amenity value, and design developments around them;
- b) replace trees and woodlands that cannot be retained with a variety of suitable tree specimens (in terms of species and size) in locations that will enhance the visual amenity of a development;
- c) increase tree canopy cover across the City through habitat creation schemes and specific requirements for major developments;
- d) encourage diversity in the tree population to help to counter ecological causes of tree loss, such as diseases, pests, or climate change.

10.44 To meet national biodiversity net gain requirements (see Policy ENV3) developers will need to provide adequate replacements for trees and woodlands lost to development. Policy ENV4 also requires all major developments to provide new trees and woodlands, sufficient to meet tree canopy cover targets set out in the Council's Tree Planting Strategy (2023). The primary aim will be to ensure that trees are maintained in good health on development sites in the first instance, but where this is not possible, planning permission will be conditional upon the replacement and enhancement of tree cover nearby.

- 10.45 Tree species specified in submitted planting plans should be evaluated by either a chartered Landscape Architect or accredited arboriculturist employed by the local authority. This will ensure that a suitable variety of species and standard / size of tree is being planted and will deliver the most appropriate solution for a specific location. Tree quality assessments, tree protection measures and other requirements set out in Policy ENV4 should accord with British Standard (BS 5837:2012) Trees in Relation to Design Demolition and Construction, or any successor.
- 10.46 Normally, for every tree removed from a development site a minimum of three replacement trees will be required to be planted on the site. There will be circumstances where the ratio of replacement planting will be greater than this, especially in cases where significant / mature trees contributing to the visual and ecological amenity of an area and its character are to be removed. Where a development site cannot accommodate additional planting, replacement trees will be expected to be planted in an appropriate off site location.
- 10.47 Housing layouts should ensure that tree shading does not adversely affect houses in winter when the sun is lower in the sky but maximises it when the sun is higher in summer (see also Policy ENV10). The solution will lie in part through choosing suitable species (e.g. deciduous trees) in proximity to housing and locating them at an appropriate distance from the properties.
- 10.48 The clearance of trees from a site before submission of a planning application is strongly discouraged. If the Local Planning Authority have evidence to prove that trees were recently present on a cleared site, there will still be a requirement to provide suitable and sufficient replacement trees.
- 10.49 To ensure that good tree protection measures are maintained throughout the construction project, the Council will support and encourage the use of an Arboricultural Clerk of Works where trees are to be managed, removed or planted on a site, in accordance with an approved Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP). An Arboricultural Clerk of Works is a suitably qualified arboriculturist acting on behalf of the developer, engaged to monitor and oversee works required within the protection area of retained trees. Where the likelihood of trees being adversely affected by construction activity is significant, the Council will use appropriate conditions to require this level of oversight.

### **Ancient woodland and veteran trees**

- 10.50 The NPPF defines ancient woodland and veteran trees as an irreplaceable habitat. Ancient woodland is an area that has been wooded continuously since at least 1600 AD and includes ancient semi-natural woodland and plantations on ancient woodland sites. An ancient or veteran tree is a tree which, because of its age, size, and condition, is of exceptional biodiversity, cultural or heritage value. Veteran trees are of exceptional value culturally, in the landscape, or for wildlife, due to their great age, size or location. The soils in which these trees sit has been identified as having a high biodiversity value, given the length of time the trees have been successfully established.



- 10.51 Individual trees can have historic and cultural value and can be linked to specific historic events or people, or they may simply have importance because of their appearance, contribution to landscape character and local landmark status. Some heritage trees may also have great botanical interest, for example as rare native trees or cultivars of historic interest.
- 10.52 Very few trees of any species can be classed as ancient or veteran. Such trees / areas are a finite resource of great biodiversity value. For this reason, it is considered essential to provide absolute protection for ancient and veteran trees and ancient woodland sites in Wolverhampton. Natural England and the Forestry Commission have produced 'standing advice' for ancient woodland, ancient trees and veteran trees, which has been used to develop the policy approach in ENV4.

## Hedgerows

- 10.53 The planting of hedgerows not only enhances opportunities for wildlife but can also significantly improve the appearance of new development. It is particularly suitable on frontages and along plot and site boundaries, both softening the appearance of the built form and supplementing the design of the overall scheme.
- 10.54 Hedgerows are integral to ecological networks, given their linear form, and will be essential elements of habitat linkages within and beyond Wolverhampton. Planting additional hedgerows will help to support and increase the movement of wildlife and plants through Wolverhampton. The planting of bare root plants is an economical way of providing green infrastructure on sites.

## Evidence

- Emergency Tree Plan for the UK (Woodland Trust, 2020)
- England's Urban Forests; Using tree canopy cover to secure the benefits of the urban forest (Urban Forest and Woodland Advisory Committee Network, 2020)
- How to Protect and Manage the Urban Forest (Forestry Commission, 2023)
- Ancient Woodland, Ancient Trees and Veteran Trees: Advice for Making Planning Decisions (Natural England and Forestry Commission, 2022)
- Black Country Natural Capital Valuation / Black Country i-Tree project (Treeconomics / Birmingham Tree People / Forest Research, 2022)
- Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country / EcoRecord, 2022)
- Tree and Woodland Strategy for Wolverhampton 2019-2029 (2020)
- Wolverhampton Tree Planting Strategy (2023)

## Delivery

- Planning application process, legal and funding mechanisms
- Implementation of Local Nature Recovery Strategy, including through biodiversity net gain

## Historic Character and Local Distinctiveness

- 10.55 The protection and promotion of the historic character and local distinctiveness of Wolverhampton's buildings, settlements and landscapes are key elements of sustainability and environmental transformation.
- 10.56 Local distinctiveness arises from the cumulative contribution made by many and varied features and factors, both special and commonplace. It is often the commonplace features of Wolverhampton that make it distinctive and help to create a unique sense of place. Preserving these features is beneficial for community identity and wellbeing as well as making places attractive for investment.
- 10.57 The Black Country Historic Landscape Characterisation (2009), along with other urban historic landscape characterisation studies, has provided a key evidence base to inform an understanding of the historic character of the Black Country. This work has been built upon with the preparation of the Black Country Historic Landscape Characterisation Study (2019), and this evidence should be used in considering how new development proposals and the enhancement of existing townscapes and landscape should respect the local character and distinctiveness of both Wolverhampton and the wider Black Country.
- 10.58 Policy ENV5 aims to ensure that physical evidence of local character is conserved. Where development takes place, every effort should be made to ensure that Wolverhampton's historic environment is fully appreciated and enhanced in terms of its townscape, landscape and individual heritage assets. New development should make a positive contribution to the local character and distinctiveness of Wolverhampton and the wider Black Country.

## Policy ENV5 – Historic Character and Local Distinctiveness

### Historic Character and Local Distinctiveness

1. All development should sustain and enhance the locally distinctive character of the area in which they are to be sited, whether formally recognised as a designated or non-designated heritage asset. They should respect and respond to its positive attributes in order to help maintain the cultural identity and strong sense of place of Wolverhampton and the wider Black Country area.

## Historic Character and Local Distinctiveness

2. Development proposals will be required to preserve and enhance local character and those aspects of the historic environment - together with their settings - that are recognised as being of special historic, archaeological, architectural, landscape or townscape quality.
3. Physical assets, whether man-made or natural that contribute positively to the local character and distinctiveness of the landscape and townscape should be retained and, wherever possible, enhanced and their settings respected.
4. The specific pattern of settlements (urban grain), local vernacular and other precedents that contribute to local character and distinctiveness should be used to inform the form, scale, appearance, details, and materials of new development.
5. Development should be designed to make a positive contribution to local character and distinctiveness and demonstrate the steps that have been taken to achieve a locally responsive design. Proposals should therefore demonstrate that:
  - a) all aspects of the historic character and distinctiveness of the locality, including any contribution made by their setting, and (where applicable) views into, from, or within them, have been fully assessed and used to inform proposals; and
  - b) they have been prepared with full reference to the Black Country Historic Landscape Characterisation Study (BCHLCS) (October 2019), the Historic Environment Record (HER), and to other relevant historic landscape characterisation documents, supplementary planning documents (SPD's) and national and local design guides where applicable.
6. All proposals should aim to sustain and reinforce special character and conserve the historic aspects of locally distinctive areas of Wolverhampton and the wider Black Country, for example:
  - a) The civic, religious, and commercial cores of the principal settlements of medieval origin such as Wolverhampton;
  - b) Surviving pre-industrial settlement centres of medieval origin such as Tettenhall, Bilston and Wednesfield;
  - c) Rural landscapes and settlements including villages / hamlets of medieval origin, relic medieval and post-medieval landscape features (hedgerows, holloways, banks, ditches, field systems, ridge and furrow), post-medieval farmsteads and associated outbuildings, medieval and early post-medieval

## Historic Character and Local Distinctiveness

industry (mills etc.) and medieval and post-medieval woodland (see Policy ENV4). The undeveloped nature of these areas means there is also the potential for archaeological evidence of much earlier activity that has largely been lost in the urban areas;

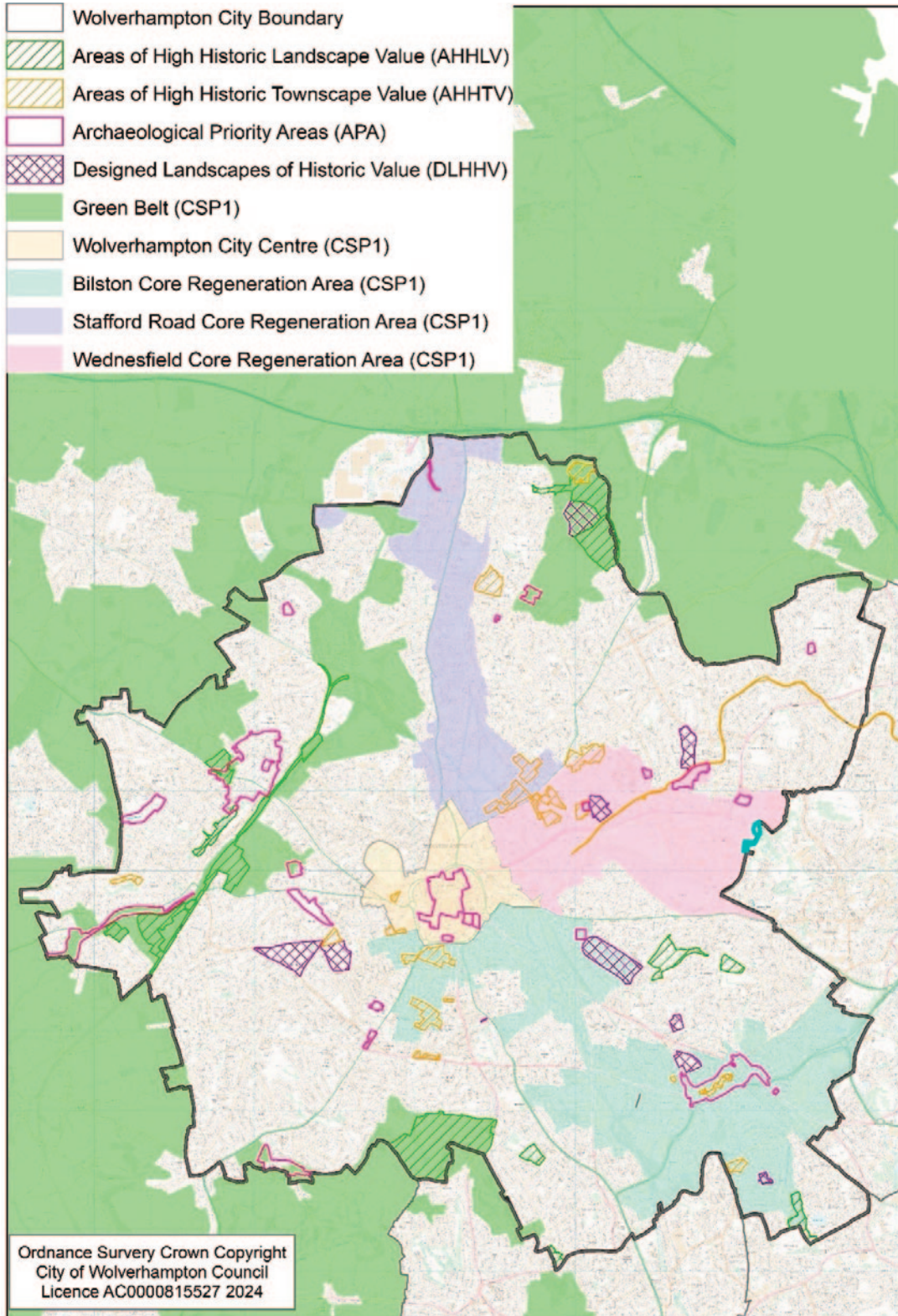
- d) Areas of Victorian and Edwardian higher-density development, which survive with a high degree of integrity including terraced housing and its associated amenities;
  - e) Areas of extensive lower density suburban development of the mid-20th century including public housing and private developments of semi-detached and detached housing;
  - f. Public open spaces, including Victorian and Edwardian municipal parks, often created from earlier large rural estates or upon land retaining elements of relict industrial landscape features;
  - g. The canal network and its associated infrastructure, surviving canal-side pre-1939 buildings and structures together with archaeological evidence of the development of canal-side industries and former canal routes (see Policy ENV7);
  - h. Buildings, structures and archaeological remains of the traditional manufacturing and extractive industries of Wolverhampton, such as enamelling / japanning, lock-making, steel toy making, iron working and coal mining;
  - i. Geosites of geological, historic, cultural, and archaeological significance within the UNESCO Black Country Geopark (see Policy ENV6);
- 7) In addition to designated heritage assets as defined in the NPPF, attention should be paid to the following non-designated heritage assets, which include the Historic Environment Area Designations (HEADS) described and mapped in the Black Country Historic Landscape Characterisation Study (2019):
- a. Areas of High Historic Townscape Value (AHHTV) that exhibit a concentration of built heritage assets and other historic features that, in combination, make a particularly positive contribution to local character and distinctiveness;

## Historic Character and Local Distinctiveness

- b. Areas of High Historic Landscape Value (AHHLV) that demonstrate concentrations of important wider landscape elements of the historic environment, such as areas of open space, woodland, watercourses, hedgerows, and archaeological features, that contribute to local character and distinctiveness;
  - c. Designed Landscapes of High Historic Value (DLHHV) that make an important contribution to local historic character but do not meet the criteria for inclusion on the national Register for Parks and Gardens;
  - d. Archaeology Priority Areas (APA) that have a high potential for the survival of archaeological remains of regional or national importance that have not been considered for designation as scheduled monuments, or where there is insufficient data available about the state of preservation of any remains to justify a designation;
  - e. Locally listed buildings / structures and archaeological sites;
  - f. Non-designated heritage assets of archaeological interest;
  - g. Any other buildings, monuments, sites, places, areas of landscapes identified as having a degree of significance, as defined in the NPPF.
8. Development proposals that would potentially have an impact on the significance of any of the above distinctive elements, including any contribution made by their setting, should be supported by evidence that the historic character and distinctiveness of the locality has been fully assessed and used to inform proposals. Clear and convincing justification should be provided in material accompanying planning applications.
9. In some instances, developers will be required to provide detailed Heritage Impact Statements and / or Archaeological Desk-based Assessments to support their proposals. Where this applies to site allocations made through this Plan, this policy requirement is set out in Table 12 of Section 13.
10. For sites with archaeological potential, local authorities may also require developers to undertake Field Evaluation to support proposals.



Figure 11: Historic Landscape Characterisation Policies Map



## Justification

- 10.59 Wolverhampton and the wider Black Country area within which it has evolved, has a rich and diverse historic environment, which is evident in the survival of individual heritage assets and in the local character and distinctiveness of the broader landscape. The geodiversity of the Black Country underpins much of the subsequent development of the area, the importance of which is acknowledged by the inclusion of the Black Country Geopark in the UNESCO Global Geopark Network (see Policy ENV7). The exploitation of abundant natural mineral resources, particularly those of the South Staffordshire coalfield, together with the early development of the canal network, gave rise to rapid industrialisation and the distinctive settlement patterns that characterise the area.
- 10.60 Towns and villages with medieval origins survive throughout the area and remain distinct in character from the later 19th century industrial settlements, which typify the coalfield and gave rise to the description of the area as an “endless village” of communities, each boasting a particular manufacturing skill for which many were internationally renowned.
- 10.61 Beyond its industrial heartland, the character of the Black Country can be quite different and varied. The green borderland, of which parts fall within Wolverhampton, is a largely rural landscape containing fragile remnants of the ancient past. Undeveloped ridges of high ground punctuate the urban landscape providing important views and points of reference that define the character of the many communities. Other parts of the Black Country are characterised by attractive, green suburbs with large houses in substantial gardens and extensive mid-20th century housing estates designed on garden city principles.
- 10.62 This diverse character is under constant threat of erosion from modern development, some small scale and incremental and some large scale and fundamental. As a result, some of the distinctiveness of the more historic settlements has already been lost to development of a “homogenising” character. In many ways the Black Country, including Wolverhampton, is characterised by its ability to embrace change, but future changes will be greater and more intense than any sustained in the past.
- 10.63 Whilst a legislative framework supported by national guidance exists to protect designated heritage assets (which include listed buildings, conservation areas and registered parks and gardens), the key challenge for the future is to manage change in a way that realises the regeneration potential of the proud local heritage and distinctive character of Wolverhampton and the wider Black Country, including non-designated heritage assets such as locally listed buildings and sites.
- 10.64 To ensure that all heritage assets make a positive contribution towards the wider economic, social and environmental regeneration of the Black Country, it is important that they are not considered in isolation but are conserved and enhanced within their wider context. A holistic approach to the built and natural environment maximises opportunities to improve the overall image and quality of life in Wolverhampton and the wider Black Country by ensuring that historic context fully informs planning decisions and provides opportunities to link with other environmental infrastructure initiatives.



- 10.65 A comprehensive analysis of the local character and distinctiveness of the Wolverhampton and wider Black Country area has been completed using historic landscape characterisation (HLC) principles. This Study categorised and defined locally distinctive areas of the Black Country, or Historic Environment Area Designations (HEADS). The Study built on evidence from the original Black Country Historic Landscape Characterisation (2009), other local HLC studies and plans, and the Historic Environment Record (HER). The HEADS fall into four categories: Areas of High Historic Townscape Value, Areas of High Historic Landscape Value, Designed Landscapes of High Historic Value, and Archaeology Priority Areas. Policy ENV5 sets out the policy approach for each of the four categories of HEADS designation. This is, as far as possible, consistent with the policy approach taken by the other Black Country authorities. The HEADS which fall within Wolverhampton are shown on Figure 11.
- 10.66 Policy ENV5 should be read alongside the comprehensive suite of non-strategic historic environment policies set out in the Wolverhampton Unitary Development Plan, Area Action Plans and Neighbourhood Plans. These include policies relating to Conservation Areas, Listed Buildings, Local List Buildings and Sites, Historic Parks and Gardens, Archaeological Sites, Monuments of National Importance, HLC site designations and heritage buildings at risk.
- 10.67 The potential heritage impact of all housing and employment site allocations has been assessed, including consideration of all heritage assets within 500m of the site, as summarised in Table 12 of Section 13. Where potential negative heritage impacts have been identified, a Heritage Impact Statement (HIS) is required, as detailed in this table, and should be submitted with any planning application to enable full consideration of these impacts and any proposed measures to avoid or mitigate harm.

## Evidence

- Black Country Historic Landscape Characterisation (2009)
- Black Country Historic Landscape Characterisation Study (Oxford Archaeology, 2019)
- Wolverhampton Historic Environment Record (HER, as of 2024)
- Conservation Area Appraisals (WCC, as of 2024)

## Delivery

- Planning application process
- A regularly updated and maintained Historic Environment Record (HER)

## Geodiversity and the Black Country UNESCO Global Geopark

10.68 The geology of the Black Country is very rich in industrial minerals. Limestone, ironstone, fireclay, coal and other industrial minerals provided the ingredients to make iron and paved the way for an intense and very early part of the Industrial Revolution to begin in the area. The Black Country UNESCO Global Geopark was declared in 2020, recognising the Black Country as a place with internationally important geology because of its cultural heritage and the extensive partnerships committed to conserving, managing and promoting it.

10.69 By raising awareness of the importance of the area's geological heritage, the Global Geopark designation aims to give local people a sense of pride in their area and boost tourism and the local economy, whilst protecting the geological resources of the area. Policy ENV6 recognises the importance of protecting and enhancing this geological heritage.

## Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

### Geodiversity and the Black Country UNESCO Global Geopark

1. Development proposals should:
  - a) wherever possible, make a positive contribution to the protection and enhancement of geodiversity, particularly within the boundaries of the Black Country UNESCO Global Geopark and in relation to the geosites identified within it;
  - b) be resisted where they would have significant adverse impact on the geodiversity value of a Black Country Geopark geosite in accordance with Government guidance;
  - c) give other locally significant geological sites, designated as SLINC and SINC as appropriate in accordance with Policy ENV1, a level of protection commensurate with their importance;
  - d) protect and enhance, where possible, the network of greenspace and public access between geosites within the boundary of the Black Country UNESCO Global Geopark;
2. The Council will promote public access to, appreciation and interpretation of geodiversity at identified geosites and other locally significant geological sites - both individually and as part of a network.

## Justification

- 10.70 Paragraph 170 of the NPPF (June 2019) requires local authorities to protect sites of geological value, “... *in a manner commensurate with their statutory status or identified quality in the development plan*”. The Overarching National Policy Statement for Energy expects developments to identify and avoid significant harm to geological conservation interests and provide mitigation where necessary.
- 10.71 Areas of geological interest form a significant part of the industrial landscapes of the Black Country. They reflect the area’s history of mining and extraction and will often co-exist with, and form part of the setting of, historic landscapes. In many cases they also form part of the green infrastructure network, contributing to landscape and ecological diversity as part of the wider natural environment. Some sites with geological interest in Wolverhampton are designated as SLINCs and SINC’s through the Local Sites Partnership and therefore protected under Policy ENV1.
- 10.72 The Black Country has been declared a UNESCO Global Geopark where sites and landscapes of international geological significance are located. It is an area of geological significance, managed with three main objectives in mind:
- a) to protect the geological landscape and the nature within it;
  - b) to educate visitors and local communities; and
  - c) to promote sustainable development, including sustainable tourism.
- 10.73 The Geopark contains internationally significant geology and is managed through a community-led partnership that promotes an appreciation of natural and cultural heritage while supporting the sustainable economic development of the area. UNESCO Global Geopark status is not itself a statutory designation, however the Geopark includes identified “geosites”, which are given special recognition and protection under Policy ENV6, as shown on the Environment Key Diagram and on the Policies Map.
- 10.74 As part of the wider strategic network of green infrastructure, locally significant geological sites should be retained wherever possible and their contribution to green infrastructure recognised and taken into account when development is proposed that would affect the networks they form part of. New development should take opportunities to conserve and enhance geological features through the form and design of development.
- 10.75 Where development is proposed that would affect an identified geological site the approach should be to avoid adverse impact to the existing geological interest. If this is not possible, the design should seek to retain as much as possible of the geological Interest and enhance this where achievable, for example by incorporating permanent sections within the design, or creating new interest of at least equivalent value by improving access to the interest. The negative impacts of development should be minimised, and any residual impacts mitigated.

## Evidence

- Information on Black Country UNESCO Global Geopark website

## Delivery

- Black Country UNESCO Global Geopark Management Team, delivering aims of the Geopark

## Canal Network

10.76 Wolverhampton's canal network is one of its most defining historical and environmental assets and its preservation and enhancement remains a major objective in the Vision for environmental transformation across the area. Canals play a multifunctional role, providing economic, social, environmental and infrastructure benefits. They form a valuable part of the green infrastructure and historic environment of Wolverhampton, with many designated as SINC or SLINC and Conservation Areas, and have a significant role to play in mental wellbeing and physical health, allowing people opportunities for exercise and access to nature.

## Policy ENV7 – Canal Network

### Canal Network

1. The Wolverhampton canal network comprises the canals and their surrounding landscape corridors, designated and non-designated heritage assets, character, settings, views and interrelationships. The canal network provides a focus for future development through its ability to deliver a high-quality environment and enhanced accessibility for boaters, pedestrians, cyclists, and other non-car-based modes of transport.
2. All development proposals likely to affect the canal network must:
  - a) demonstrate that they will not adversely affect the structural integrity of canal infrastructure to avoid increased flood risk, land instability and/or harm to the usability of the canal (including its towpath) as a green-blue infrastructure asset;
  - b) ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable;
  - c) protect and enhance its special historic, architectural, archaeological, and cultural significance and their setting, including the potential to record, preserve and restore such features;

## Canal Network

- d) protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;
  - e) protect and enhance its visual amenity, key views and setting;
  - f) protect and enhance water quality in the canal and protect water resource availability both in the canal and the wider environment;
  - g) reinstate, introduce and / or upgrade towpaths and access points and link them into high quality, wider, integrated pedestrian and cycle networks, particularly where they can provide links to transport hubs, centres and opportunities for employment. This may be secured through planning conditions or planning obligations, as appropriate and in accordance with Policy DEL1.
3. Where opportunities exist, all development proposals within the canal network must:
- a) enhance and promote its role in providing opportunities for leisure, recreation and tourism activities;
  - b) enhance and promote opportunities for off-road walking, cycling, and boating access, including for small-scale commercial freight activities;
  - c) protect and enhance the historical, geological, and ecological value of the canal network and its associated infrastructure;
  - d) positively relate to the opportunity presented by the waterway by promoting high quality design, including providing active frontages onto the canal and by improving the public realm;
  - e) sensitively integrate with the canal and any associated canal-side features and, where the opportunities to do so arises, incorporate canal features into the development.
4. Development proposals must be fully supported by evidence that the above factors have been fully considered and properly incorporated into their design and layout.
5. Where proposed development overlays part of the extensive network of disused canal features, the potential to record, preserve and restore such features must be fully explored unless canals have been entirely removed. Development on sites that include sections of disused canals should protect the line of the canal through the detailed layout of the proposal. Development will not be permitted that would sever the route of a disused canal or prevent the restoration of a canal link where there is a realistic possibility of restoration, wholly or in part.

## Canal Network

- 6. Safeguard the amenity of existing residential moorings when planning consent is sought on sites in close proximity or adjacent to existing moorings**

### Residential Canal Moorings

- 7. For residential moorings, planning consent will only be granted for proposals that include the provision of:**
- a) the necessary boating facilities;**
  - b) appropriate access to cycling and walking routes;**
  - c) an adequate level of amenity for boaters, not unduly impacted upon by reason of noise, fumes or other nearby polluting activities.**
- 8) In determining a planning application for residential moorings, account will be taken of the effect that such moorings and their associated activities may have on the amenities or activities of nearby residential or other uses.**

## Justification

10.77 The development of the Wolverhampton and wider Black Country canal network had a decisive impact on the evolution of industry and settlement during the 18th – 20th centuries. It was a major feat of engineering and illustrates a significant stage in human history - development of mercantile inland transport systems in Britain's industrial revolution during the pre-railway age. As such, the historic value of the Wolverhampton canal network today should be acknowledged, promoted, protected, and enhanced. The network also plays a major part in the Black Country Geopark, as the mineral wealth of the area meant that canals were a vital link to areas within and beyond the Black Country and continue to provide this link today.

10.78 The canal network is a major unifying characteristic of Wolverhampton's historic landscapes. The routes of the canals that make up the network have created landscape corridors with a distinctive character and identity based on the industries and activities that these transport routes served and supported. The network has significant value for nature conservation, tourism, health and wellbeing and recreation and the potential to make an important contribution to economic regeneration through the provision of high quality environments for new developments and a network of pedestrian, cycle and water transport routes.

- 10.79 Much of the towpath network within the City has been upgraded, except for parts of the Wyrley and Essington Canal north of Wednesfield. Growth over the Plan period, in Wolverhampton (and neighbouring authorities), is likely to increase the use of towpaths, particularly in and around the city centre. The improvement or introduction of access points to the canal network, together with provision of wayfinding, would enhance the use of the towpaths for active travel and recreation. Improving towpath connectivity by providing a more direct link via a new access point from the Old Mainline Canal to Wolverhampton Railway Station, is a key example.
- 10.80 The canal network forms a valuable continuous habitat network, that links to other ecological sites. Many canals are also designated as SINC or SLINC in part or for whole sections of the canal corridor, and the Wyrley and Essington Canal is also a Local Nature Reserve.
- 10.81 Canal infrastructure which developments should consider includes towpaths, waterway walls, embankments, cuttings, locks, culverts, weirs, aqueducts, tunnels and bridges. It is also important for development in Wolverhampton to take account of disused canal features, both above and below ground. Only 54% of the historic canal network has survived in use to the present day; a network of tramways also served the canals. Proposals should preserve the line of the canal through the detailed layout of the development. Where appropriate, opportunities should be explored for the potential to preserve the line of the canal as part of the wider green infrastructure network. Where feasible and sustainable, proposals should consider the potential for the restoration of disused sections of canal.
- 10.82 There is an aspiration to restore a disused section of the canal network at the Bradley Arm Canal Link, which is supported through Policy BC7 of the Bilston Corridor Area Action Plan. The restored Bradley Canal would recreate a 1.5 mile link on the Birmingham Canal Navigations between the Walsall Canal and the Wednesbury Oak Loop, leading to the main line of the Birmingham Canal. Any development proposals that come forward to restore sections of the canal network will be expected to demonstrate that the proposals are sustainable, sufficient water resources exist, and that works will not adversely affect the existing canal network or the environment.
- 10.83 Residential moorings must be sensitive to the needs of the canal-side environment in conjunction with nature conservation, green belt and historic conservation policies but also, like all residential development, accord with sustainable housing principles in terms of design and access to local facilities and a range of transport choices.

## Evidence

- Black Country Historic Landscape Characterisation Study (2019)
- Conservation Area Character Appraisals
- Historic England Good Practice Advice Notes (GPAs) and Historic England Advice Notes (HEANs)



## Open Space, Sport and Recreation

- 10.84 The principles of national planning policy on open space, sport and recreation need to be applied in a Wolverhampton context to support the vision for urban renaissance and environmental transformation and in particular to deliver opportunities for safe, attractive, functional, linked and accessible green spaces for people to exercise and play sport in and enjoy. This resource also promotes the enhancement of the natural environment to support greater biodiversity, maximises benefits for health and wellbeing, helps to mitigate and adapt to climate change and promotes economic regeneration. Publicly accessible urban open space, play and sports facilities all have a vital role to play in helping to promote healthy lifestyles.
- 10.85 All open spaces and sport and recreation facilities in Wolverhampton, both existing and proposed, are protected through national and local planning policies. These protections apply to all areas with an open space, sport or recreation function, regardless of whether they are shown on the Wolverhampton Policies Map or identified in the relevant needs assessment or strategy. Policy ENV8 sets out the overarching, strategic approach to open space and recreation in Wolverhampton, whereas Policy ENV9 relates specifically to playing fields and built sports facilities. These policies should be read alongside the NPPF, which sets out national policy for the protection of existing open space, sports and recreational buildings and land, and non-strategic policies in other Wolverhampton Development Plan Documents, which set out detailed local policies on open space and recreation including planning obligations for new housing development.
- 10.86 Up-to-date local need assessments for open space, playing pitches and built sports facilities are central to the implementation of national policy. Local standards for different types of open space and recreation facilities have been developed for Wolverhampton, based on robust audits and needs assessments. These standards will form the basis for the application of national planning guidance in Wolverhampton.
- 10.87 To promote healthy living, it is important that open space and sports facilities, and places that people visit every day such as shops and schools, are located and designed so that people are encouraged to walk or cycle to them from their homes. This can be achieved through:
- a) Location of key facilities in the most accessible locations, as set out in Policies HOU5 and HW2;
  - b) Meeting open space quantity, quality and access standards, as set out in Policy ENV8 and local DPDs and SPDs;
  - c) Setting of accessibility standards for new housing developments, as set out in Policy HOU2;
  - d) Co-location of key facilities and promotion of community use, such as dual use schools, as set out in Policies HOU5 and HW2;
  - e) On and off-site measures such as signage and cycle storage, as set out in Policy TRAN5;
  - f) Encouraging implementation of Active Design principles, in accordance with Policy ENV10.

## Policy ENV8 – Open Space and Recreation

### Open Space and Recreation

1. All development proposals should recognise the values and functions of open space as set out in national policy and guidance and address as appropriate the following functions of open space that are of particular importance in Wolverhampton:
  - a) improving the image, visual amenity and environmental quality of Wolverhampton, in accordance with Policy CSP2;
  - b) protecting and enhancing historic character and local distinctiveness, in accordance with Policy ENV5;
  - c) providing buffer zones between incompatible uses;
  - d) mitigating the effects of climate change, in accordance with Policy ENV10, through flood risk betterment, reducing potential urban heat island effects and providing opportunities for additional landscaping and tree planting, in accordance with Policy ENV4;
  - e) preserving and enhancing diversity in the natural environment and strengthening the Local Nature Recovery Network, in accordance with Policies ENV1 and ENV3;
  - f) strengthening (through extension, increased access and enhanced value) and providing components of a high quality, multifunctional green space and greenway network;
  - g) providing outdoor facilities for sport and physical activity, including footpath and cycle networks and areas for informal recreation and children’s play;
  - h) providing opportunities for people to grow their own food on allotments and encouraging urban horticulture;
  - i) enhancing people’s mental and physical health and wellbeing, in accordance with Policy HW1.
2. Development that would reduce the overall value of the open space and recreation network in Wolverhampton will be resisted. Development that would increase the overall value of the open space and recreation network will be supported, especially in areas of proven deficiency against adopted quantity, quality and accessibility standards.

## Open Space and Recreation

3. Other Development Plan Documents and the Policies Maps set out designations and proposals for specific open space and recreation facilities and detailed planning requirements for open space and recreation, in accordance with the following principles:
- a. move towards the most up-to-date local open space and recreation standards, in terms of quantity, quality and access. In order to balance the realisation of these standards, in some cases a loss in quantity of open space or facilities may be acceptable if compensatory gains in quality and / or accessibility of other open spaces / facilities can be secured that would be of a greater value in the local area;
  - b. address the priorities set out in the current Local Nature Recovery Strategy;
  - c. make more efficient use of urban land by:
    - i. creating more multifunctional open spaces;
    - ii. protecting the existing greenway network for recreation and biodiversity and taking opportunities to strengthen and expand the network;
    - iii. significantly expanding community use of open space and recreation facilities provided at places of education (see Policy HOU5);
    - iv. providing opportunities to increase accessible public open space and recreation use of the Green Belt, in accordance with Policy CSP1;
    - v. making creative use of land exchanges and disposing of surplus assets to generate resources for investment;
    - vi. increasing access to open space and recreation facilities for all, including people with disabilities and other target groups with limited access at present, to address health and other inequalities; and
    - vii. where there is a cross-boundary impact, identifying the most appropriate location to maximise community access and use of new facilities.

## Justification

- 10.88 The provision of high quality open space to serve new residential developments and the improvement of existing open spaces is critical to the overall aims of urban renaissance and environmental transformation across Wolverhampton. Policy ENV8 therefore identifies the functions of open space that are of particular importance to Wolverhampton, in addition to those set out in national guidance.
- 10.89 Greenways are defined as linear features of mostly open character, including paths through green spaces, canal corridors and disused railway lines, which act as wildlife corridors and provide attractive and safe off-road links for pedestrians and cyclists. They form an important network throughout Wolverhampton but in some cases are of poor quality or are severed by other infrastructure or barriers. The restoration of towpaths, bridges, public rights of way and the creation of cycle and pedestrian links to enhance the greenway network will be sought through planning conditions and obligations, transportation funding, and the support of other organisations such as the Canal & River Trust. Blue infrastructure features such as rivers and streams also provide opportunities for physical activity.
- 10.90 The Wolverhampton Open Space Strategy and Action Plan (2024) identifies key themes for open space, sport and recreation, and is informed by Natural England's Green Infrastructure Framework (2023), including recommended Green Infrastructure Standards. This document will be updated as appropriate during the Plan period and therefore new trends and priorities may emerge over time.
- 10.91 Data indicates that residents in Wolverhampton are less active than the England average. There is inequality in access to open space across the City and many residents, especially in high density and deprived areas, do not have access to a garden. The most deprived areas of the city have poorest access to quality open space and, where they do have sufficient quantity, it is of limited quality and function. It is therefore important that the open space network is strategically planned to help address inequalities in access and ensure that benefits are maximised for local communities. This is particularly the case in areas with an increasing population, such as in and around Wolverhampton City Centre.

## Policy ENV9 – Playing Fields and Sports Facilities

### Playing Fields and Sports Facilities

1. Existing playing fields and built sports facilities should be retained unless:
  - a) an assessment has been undertaken that has clearly shown the playing fields or built sports facilities to be surplus to requirements (for the existing or alternative sports provision) at the local and sub-regional level; or

## Playing Fields and Sports Facilities

- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - c) the development is for alternative sports provision, the benefits of which clearly outweigh the loss of the current or former use; or
  - d) the proposed development affects only land incapable of forming part of a playing pitch and would not prejudice the use of any playing pitch or remaining areas of playing field on the site.
- 2) New built sports facilities should be:
- a) demonstrated to accord with identified needs to ensure provision of appropriate facilities in a suitable location to meet that need;
  - b) well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities; and
  - c) well-linked to public transport infrastructure and footpath and cycleway networks and directed to a centre appropriate in role and scale to the proposed development and its intended catchment area. Proposals located outside centres must be justified in terms of relevant national policy.
- 3) Where an assessment demonstrates that a housing development of ten or more homes would increase the need for playing pitches or built sports facilities to a level where significant new or improved facilities are required to meet demand, proportionate planning obligations will be used to acquire sufficient provision, where it is financially viable and appropriate to do so, and long-term management arrangements can be secured and funded.
- 4) Where land is provided for a new built sports facility as part of a housing development, the financial contribution made by that development towards built sports facilities will be reduced accordingly.
- 5) The wider community use of school playing fields, other school facilities, such as sports halls, and private sports facilities, secured via a suitably worded community use agreement, will be encouraged, especially in areas where public provision is deficient (see also Policy HOU6).

## Justification

- 10.92 As sports participation rates in Wolverhampton are below the national average, needs assessments for sports facilities will consider the importance of increasing sports participation and improving health as well as meeting existing needs. Existing and potential cross-boundary effects will also be considered when developing proposals which would affect sports facility provision.
- 10.93 The Wolverhampton Playing Pitch Strategy and Outdoor Sport Strategy Assessment and Action Plan (2022) and emerging Wolverhampton Built Facilities Strategy have informed the WLP. These strategies will be updated as appropriate during the Plan period and therefore new priorities may emerge over time.
- 10.94 Although there are some shortfalls in provision of sports pitches for football, cricket and rugby union across the city, these are limited and can largely be met by improvements to existing facilities, including changing facilities, and by the provision of a small number of new third generation turf (3G) pitches. Increasing community access to school sports facilities would also help to address shortfalls in some areas.
- 10.95 Policy ENV9 recognises that, in some circumstances where there is a significant gap in provision of natural turf playing pitches or built sports facilities such as courts and swimming pools, it may be necessary for housing developments to contribute towards improvements to such facilities over and above general open space and recreation contributions. In such cases, the Sport England Playing Pitch and Sports Facilities Calculator tools will be used to determine an appropriate level of contributions. The high capital and revenue costs of such facilities and the challenges of securing appropriate, long-term management and maintenance for them are recognised. Contributions will be considered alongside requirements for other infrastructure in the context of scheme viability, in accordance with Policy DEL1.

## Evidence

- Wolverhampton Open Space Strategy and Action Plan (2024)
- Black Country Playing Pitch and Outdoor Sport Overarching Strategic Framework (2023)
- Wolverhampton Playing Pitch and Outdoor Sport Strategy Assessment and Action Plan (2022)
- Active Design Guidance (Sport England, 2023)

## Delivery

- Open Space and Playing Pitch Strategies and Action Plans, in partnership with Sport England
- Planning application process

## High Quality Design

10.96 High quality design is an essential element in placemaking, as promoted in Policy CSP2. Policy ENV10 will help deliver Spatial Priorities 1, 2, 3, 8, 12 and 13 by setting challenging but place appropriate design quality standards for Wolverhampton. The city is made up of a patchwork of areas of distinct and unique character (as set out in Policy ENV5) and successful place-making will depend on understanding and responding to the unique identity of each area through high quality and sensitive design proposals that complement local character and vernacular.

10.97 Ensuring good design is embedded across Wolverhampton will deliver economic, social and environmental benefits. Good placemaking will help support regeneration and the delivery of an inclusive and robust economy, attracting people and businesses to relocate to and remain in the area. High quality, innovative and modern design will also have a significant part to play in mitigating and adapting to climate change and achieving a carbon net zero city. This can be achieved by ensuring that buildings and landscaping are designed to offer comfortable and attractive living environments reflecting the traditional design qualities and features of Wolverhampton, while also incorporating green energy technologies and making efficient and effective use of water, planting and materials.

## Policy ENV10 – High Quality Design

### High Quality Design

1. All development proposals must demonstrate, through supporting information including Design and Access Statements as appropriate, that the following aspects of design have been addressed in a manner which reflects the Wolverhampton context:
  - a) implementation of the principles of the National Design Guide to ensure the provision of a high quality network of streets, buildings and spaces;
  - b) implementation of the principles of Manual for Streets to ensure urban streets and spaces are designed to provide a high quality public realm and an attractive, safe and permeable movement network;
  - c) consideration of Building for a Healthy Life criteria, to demonstrate a commitment to achieve the highest possible design standards, good place-making and sustainable development;
  - d) consideration of Active Design Guidance principles, to increase opportunities for physical activity;



## High Quality Design

- e) consideration of crime prevention measures and Secured by Design and Park Mark principles, in addition to the requirements of Part Q of the Building Regulations or any successor legislation;
  - f) accordance with the “agent of change” principle in relation to existing uses adjacent to proposed development;
  - g) consideration of suicide prevention when designing public buildings, multi-storey car parks, bridges and other infrastructure;
  - h) application of local design guidance, as appropriate.
2. Development must be designed to the highest possible standards, creating a strong sense of place. Development proposals must address as appropriate:
- a) the townscapes and landscapes of Wolverhampton;
  - b) the need to maintain strategic gaps and views;
  - c) the built and natural settings of development and the treatment of ‘gateways’;
  - d) Wolverhampton’s industrial and vernacular architecture and links with the wider rural hinterland;
  - e) the need to ensure development has no harmful impacts on key environmental and historic assets, in accordance with other national and local policies;
  - f) where necessary, the issue of land instability in relation to specific development proposals.
- 3) Development should be designed to mitigate climate change impacts and provide climate change adaptations that will reduce harmful impacts on human health, by:
- a) protecting, improving and creating green and blue infrastructure (such as landscaping, formal and informal open space, water features, wildlife habitats, trees, hedgerows, green roofs and walls, and natural SuDS) as a fundamental element of site and building design;
  - b) maximising the use of green and blue infrastructure for: urban cooling; shading of amenity areas, buildings and streets; air quality mitigation; flood risk management; and providing access to outdoor space;

## High Quality Design

- c) making maximum use of building orientation, reflective surfaces, fenestration, insulation, materials and landscaping to reduce the amount of heat entering each building, maximise opportunities for natural heating / cooling and natural ventilation, and minimise the exposure of occupants to wind, noise and pollutants;
  - d) delivering functional and sustainable buildings which provide healthy, comfortable and safe internal and external environments, including through minimising the potential for overheating and reliance on artificial cooling systems; and
  - e) minimising both internal heat gain and the impacts of urban heat islands (caused by extensive built-up areas absorbing and retaining heat) through the use of appropriate design, layout, orientation and materials.
- 4) Development must not cause a detrimental impact on the living environment of occupiers of existing residential properties, or unacceptable living conditions for future occupiers of new residential properties, in terms of:
- a) Immediate outlook;
  - b) privacy and overlooking;
  - c) access to sunlight and daylight;
  - d) artificial lighting;
  - e) vibration;
  - f) dust and fumes;
  - g) smell;
  - h) noise;
  - i) crime and safety; and
  - j) wind, where the proposals involve new development of more than eight storeys.

## Justification

### Design that reflects the Local Context

- 10.98 The National Design Guide (2021) sets out a series of aims and objectives for achieving well-designed places. The Guide identifies ten characteristics that drive good design: Context; Identity; Built form; Movement; Nature; Public spaces; Uses; Homes and buildings; Resources; Lifespan. These characteristics provide a framework against which good design should be measured, in order to create physical character, nurture and sustain a sense of community and positively address environmental issues affecting the climate.
- 10.99 Policy ENV10 seeks to integrate key design principles with an approach that interprets and reflects local character and distinctiveness within Wolverhampton. High quality design relates to buildings, architecture, the spaces within which buildings sit, the quality of the public realm reflected in its streets and spaces and the relationship between the development and the surrounding area.
- 10.100 To ensure that development proposals accord with policy requirements, the Design and Access Statements accompanying planning applications should follow current Commission for Architecture and the Built Environment guidance. The current Manual for Streets, produced by the Department for Transport, should be used to design movement networks through development. Building for a Healthy Life is a widely used design tool for creating places that are better for people and nature. More detailed local design guidance has been developed for Wolverhampton, including Supplementary Planning Documents, area guidance and guidance notes. This guidance, where it does not conflict with adopted national and local planning policies, is of great value in achieving consistently high levels of design across the City, and should be closely followed, with key requirements addressed in Design and Access Statements. Places should be designed using Sport England Active Design principles to increase opportunities for physical activity.
- 10.101 A key objective for new developments should be that they create safe and accessible environments where crime, or the fear of crime, and anti-social behaviour do not undermine the quality of life, health or community cohesion. Good design, layout and spatial relationships (including the use of sensitively designed and located landscaping that reduces opportunities for anti-social behaviours) can make a positive contribution towards improving community safety in an area. The Council and the police will continue to work closely together to reduce crime, fear of crime and anti-social behaviour across Wolverhampton, and this will be a material consideration for all planning application. Secured by Design and Park Mark provide useful principles to consider, alongside Building Regulations requirements, when “designing out crime” in developments.

- 10.102 Wolverhampton has a strong tradition of providing live music and entertainment; and this aspect of its character and economy should be protected by the application of the “agent of change” principle in relation to existing uses adjacent to proposed development sites, as set out in the NPPF (paragraph 193). This requires new development to be effectively integrated with existing businesses and community facilities (e.g. places of worship, pubs, music venues and sports clubs), to avoid unreasonable restrictions being placed on existing businesses because of development permitted after they were established.

### Design that Mitigates and Adapts to Climate Change

- 10.103 Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act to ensure that planning policy contributes to the mitigation of, and adaptation to, climate change.
- 10.104 The issues around adapting to and mitigating the effects of climate change form a major theme of the NPPF and its associated guidance. Sustainable development is required to mitigate and adapt to climate change and support the move to a low carbon economy, and strategic policies are expected to identify planning measures to address climate change mitigation and adaptation. As part of this, new development should be planned for in ways that can help to eliminate greenhouse gas emissions, such as through careful consideration of its location, orientation and design.
- 10.105 Addressing climate change using strategic policies and requiring development to meet and sometimes exceed current standards makes economic sense for local authorities and for homeowners and businesses potentially impacted by climate change in the following ways:
- a) ensuring projects, plans and processes are resilient to climate change strengthens the ability to achieve identified objectives over the long-term, helping local authorities and other organisations achieve their wider plans and ambitions;
  - b) screening public and strategic regeneration plans for climate risks can make them more attractive to inward investors by ensuring mitigation and adaptation aspects are considered at an early stage, while ensuring buildings provide adequate heating and cooling supports workforce health and productivity;
  - c) appropriate adaptation and mitigation allow assets and activities to continue performing during climate changes and will help to protect occupiers and users of buildings to continue to use them during times of environmental stress, such as flooding;
  - d) pre-emptive adaptation action is generally more cost effective over time than the costs incurred in responding to the outcomes of extreme weather events; and

- e) through careful planning, adaptation actions can deliver multiple benefits to projects / activities, such as improving health and wellbeing, increasing property values, skills, and employment, reducing emissions, and supporting biodiversity.
- 10.106 The NPPG section on climate change identifies examples of how planning can contribute towards mitigating climate change:
- a) reducing the need to travel and providing for sustainable transport;
  - b) requiring good design to enable the focus of travel to move away from the motor car to modes of “active travel” such as safe cycling and walking routes especially on new housing estates;
  - c) providing opportunities for renewable and low-carbon energy technologies;
  - d) providing opportunities for decentralised energy production and district heat networks;
  - e) promoting carbon net zero design approaches to reduce energy consumption in buildings, such as utilising passive solar design features.
- 10.107 The Government have stated that all buildings need to be carbon net zero by 2050. Section 19 of the Planning and Compulsory Purchase Act (2004), Section 182 of the Planning Act (2008), the Planning and Energy Act (2008), and the NPPF (2019) all empower local planning authorities to enforce policies that seek to reduce carbon emissions from new homes.
- 10.108 It is also crucial that Wolverhampton is able to adapt to the emerging impacts of climate change. This can be achieved by:
- a) considering future climate-related risks when allocating development sites, to ensure risks are understood and accounted for over the development’s lifetime;
  - b) considering flood risk in the design of developments;
  - c) considering the availability of water and water infrastructure, and design to promote water efficiency and protect water quality; and
  - d) promoting adaption in design policies, developments and public realm works.
- 10.109 WLP policies demonstrate that adaptation to and mitigation of climate change can be achieved across all forms of development, through measures such as planning for zero and low carbon development, requiring renewable and low carbon energy supply, mitigation of flood risk, and design solutions which address rising temperatures, the protection of the historic and natural environment and the need for more green infrastructure. It is particularly important that such design solutions respect the historic environment, in line with Policy ENV5 and guidance set out in Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England, 2024).

- 10.110 To help Wolverhampton become a more efficient and resilient place, policies in the WLP encourage development to:
- a) improve energy efficiency and move towards carbon net zero, in accordance with national, regional and local targets;
  - b) help decarbonise the transport system by locating developments sustainably to reduce new trips and encouraging less energy intensive and more sustainable modes of transport (as set out in the Transport section and Policy HOU2);
  - c) ensure buildings and infrastructure are designed, landscaped, and made suitably accessible to help adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect;
  - d) create a safe and secure environment that is resilient to the impacts of climate-related emergencies;
  - e) take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together; and
  - f) Avoid factors which may generate more greenhouse gases e.g. pollution, loss of biodiversity and protect the natural environment's resilience to change.
- 10.111 Policy ENV10 sets out how new development proposals will be required to demonstrate they are designed to maximise resistance and resilience to climate change through a range of design requirements.
- 10.112 Buildings, services, and infrastructure need to be able to cope with the impacts of climate change. Part of this will relate to ensuring that development is able to cope with more intense rainfall, the possibility of flooding, heat waves and droughts. The design of development therefore needs to address shading, insulation and ventilation, surface water runoff and storage and the use of appropriate tree planting and landscaping, to futureproof schemes against more extreme weather conditions.
- 10.113 Where possible and appropriate, the retrofitting of residential and other properties to achieve higher standards of energy and water efficiency will be encouraged and supported.
- 10.114 Green and blue infrastructure will be essential in helping to mitigate and adapt to climate change. The positive impacts of this infrastructure on air quality, heat reduction and ecological networks will be vital in helping to deliver sustainable and comfortable living and working environments across Wolverhampton over the Plan period. Policy ENV4 expects development to increase the tree canopy cover through habitat creation, landscaping, and biodiversity net gain.

10.115 Global temperatures are rising, and this has been paralleled by weather changes across the UK. In 2019, the Met Office outlined current trends and predictions for the UK, which included:

The average temperature over the most recent decade (2009-2018) has been on average 0.3°C warmer than the 1981-2010 average and 0.9°C warmer than the 1961-1990 average. All the top ten warmest years for the UK, in the series from 1884, have occurred since 2002. (paragraph 2.1)

10.116 The urban heat island effect is caused by extensive built-up areas absorbing and retaining heat during the day and night, leading to those areas being several degrees warmer than their surroundings. With higher temperatures across the country, the likelihood of heat being trapped in this way is very likely to increase.

10.117 Retained heat can become problematic, to the point where circumstances can lead to physical discomfort and disruption, but for those with certain health conditions, the very young or the elderly, the effects can be serious. The use of green roofs and / or walls can provide some mitigation by shading roof surfaces and through the mechanism of evapotranspiration.

10.118 Thermal inequity, where urban heating effects impact disproportionately on poorer and marginalised communities, will also be relevant in parts of Wolverhampton. This effect can be exacerbated by the concentration of development in urban areas, at higher densities and in taller forms, unless new development is sensitively designed.

10.119 Certain aspects of building design intended to increase energy efficiency and reduce heat demand, such as increased glazing and airtightness, can also exacerbate heat risk and cause uncomfortable living conditions. However, there are potential design solutions, as highlighted in Policy ENV10.

10.120 Means of minimising heat risk may include:

- a) solar shading, for instance through landscaping or brise-soleil (architectural features that reduce heat gain within a building by deflecting sunlight);
- b) using appropriate materials in areas exposed to direct sunlight;
- c) using landscaping and permeable surfaces to mitigate against flooding / run-off, counter poor air quality and allow for heat absorption.

10.121 Mechanical air conditioning will utilise more energy and generate significant amounts of additional greenhouse gases and thus should be avoided where possible.

10.122 As addressed in Policy ENV4, the use of trees in landscaping schemes can generate significant natural shading. The layout and orientation of new houses should also be considered carefully, to avoid existing or newly-planted trees creating excessive shading during cooler, darker times of the year.



## Evidence

- UK Climate Projections: Headline Findings (Met Office, 2019)
- National Design Guide (MHCLG, 2021)
- Manual for Streets (DfT, 2007 / 2011)
- Building for a Healthy Life (Homes England / NHS / Birkbeck et al, 2020)
- Wolverhampton Supplementary Planning Documents (SPDs) and other area and topic guidance (various dates)
- Suicide Prevention Strategy for England (DHSC, 2023)
- Active Design Guidance (Sport England, 2023)
- Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England, 2024)
- Research into Overheating in New Homes (MHCLG, 2019)
- Overheating in Dwellings Guidance Document (BRE, 2016)
- WM2041 Five Year Plan (WMCA, 2022)

## Delivery

- Through the planning application process, including Design and Access Statements, and through the Building Regulations process
- Updates to local design guidance, as appropriate

## Air Quality

10.123 Promoting healthy living is a key element of the Wolverhampton Local Plan. Reducing exposure to poor air quality will improve the health and quality of life of the population. The need to address climate change and its associated impacts will include the need to tackle pollution and poor air quality, especially where it has impacts on both human and environmental health.

10.124 A World Health Organisation report produced for the European High-Level Conference on Non-Communicable Diseases held in April 2019 concluded that over 500,000 deaths in the WHO European region were attributable to ambient air pollution in 2016.

10.125 The Clean Air Strategy (DEFRA, 2019) states that:

*Air pollution is the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. It makes us more susceptible to respiratory infections and other illnesses, and we estimate that the actions outlined in this document could cut the costs of air pollution to society by £1.7 billion every year by 2020, rising to £5.3 billion every year from 2030.*

- 10.126 The Strategy outlines the impacts of air quality on economic growth, identifying that particulate matter, nitrogen dioxide and ozone were estimated to be responsible for total productivity losses of up to £2.7 billion in 2012. Clean air also helps to create and sustain a pleasant and attractive living and working environment, which is more likely to encourage growth and investment in an area. The Air Quality Strategy for England (2023) sets out actions local authorities should take to address poor air quality, in order to deliver better public health, economic growth and national biodiversity and net zero goals.
- 10.127 A Black Country Air Quality Supplementary Planning Document (SPD) was adopted in 2016, building on work undertaken for the West Midlands Low Emissions Towns and Cities Programme, including the West Midlands Good Practice Air Quality Planning Guidance (2014). The SPD will need to be revisited during the Plan period to take into account changes in national legislation, regulations and targets and regional developments regarding air quality.

## Policy ENV11 – Air Quality

### Air Quality

#### Strategic Approach

1. The WLP promotes a comprehensive approach to addressing the issue of poor air quality across Wolverhampton, which aims to:
  - a) secure the sustainable location of new housing and employment development so as to minimise commute times and maximise sustainable transport access to residential services (as set out in Policy HOU2);
  - b) requiring development and other land use proposals to promote the integration of cycling, walking, public transport and electric charging points as part of their transport provision;
  - c) promoting and supporting (including through continued joint working with partners) a modal shift from private motorised vehicles to the use of clean, fast and accessible public transport alternatives such as rail, the Metro and bus transport networks, cycling and walking;
  - d) requiring the protection and provision of green open spaces and significant additional tree cover (as set out in Policy ENV4);
  - e) as part of an integrated zero-emission public transport system, promoting and requiring the use of sustainable technologies, zero-emission vehicles, design and materials and providing new or extended bus services to meet demand when development of a strategic nature is planned and constructed.

## Air Quality

### Air Quality and Development

2. All new developments must be at least air quality neutral following any required mitigation. Planning permission for new development or change of use will be refused where data assessment indicates that development will:
  - a) lead to deterioration of existing poor air quality;
  - b) lead to a deterioration of air quality or aerial deposition / emissions which could cause harm to sensitive habitats or species at designated sites;
  - c) create any new areas that exceed air quality objectives; or
  - d) delay compliance being achieved in areas that are currently in exceedance of legal limits unless sufficient mitigation can be achieved.
3. Residential or other sensitive development such as schools, hospitals / health care and care facilities should be sited in areas where air quality already meets national objectives, or where compliance with those objectives can be achieved with suitable mitigation proposed as part of the development proposal and verified as being achieved before occupation of the development.
4. Developments that will have a moderate air quality impact, and which can be dealt with through standard mitigation measures, will not require an Air Quality Assessment.
5. Whenever development is proposed in locations where air quality does not / will not meet national objectives, or where significant air quality impacts are likely to be generated on site or elsewhere by the development itself or its subsequent use / activities, an appropriate Air Quality Assessment will be required. The Air Quality Assessment must:
  - a) demonstrate that the proposed development will improve air quality in order that it will meet air quality objectives once the development is completed and occupied / operational;
  - b) take into consideration the potential cumulative impact on air quality of all extant planning permissions in the locality, for both large / strategic and small schemes;
  - c) consider the impact of point source emissions of pollutants to air on the scheme (pollution that originates from one place);
  - d) consider the types of pollutant emissions likely to be generated by the development and its future use / associated activities that will have an impact on human health.

## Air Quality

6. Where an Air Quality Assessment shows that a development is likely to result in exposure to pollutant concentrations that exceed national objectives, a mitigation plan will be required to demonstrate that the development will improve air quality sufficient to meet air quality objectives once it is complete and occupied / operational. The mitigation plan should be informed by damage cost calculations to determine the level of mitigation and / or compensation required to make the scheme acceptable. Adequate and satisfactory mitigation measures that are capable of implementation, including the planting of additional and replacement trees in appropriate locations, must be identified and submitted as part of the planning application and will be secured through appropriate planning conditions and legal agreements.
7. Developments should not include materials or be positioned or ventilated in a way that would result in poor indoor air quality.

## Justification

- 10.128 National planning guidance identifies the need for local planning authorities to address the problems created by pollution, in terms of poor air quality and its impacts on human and environmental health. Major air pollutants that impact on human health include particulate matter and nitrogen oxides. These gases may also combine to create ozone, a greenhouse gas that impacts on the atmosphere.
- 10.129 The main cause of poor air quality in Wolverhampton is road transport. Locations have been identified that do not comply with current national objectives and there are several air quality hotspots where on-going monitoring is required. The Council is working to reduce pollutant concentrations and to minimise exposure to air quality that does not meet with national objectives. An Air Quality Management Area for nitrogen dioxide and particulate matter which covers the whole of Wolverhampton was declared in 2005 to address the government's national air quality objectives, which have been set to provide protection for human health.
- 10.130 Aerial emissions can also impact on the natural environment, therefore it is important to minimise the potential harmful impacts of poor air quality on sensitive habitats and species within designated sites (as defined in Policy ENV1), including SINC, SLINC, LNR and ancient woodland in Wolverhampton, and SACs and SSSIs outside Wolverhampton. Commonly encountered air quality impacts on designated sites are associated with increased traffic resulting from new transport infrastructure, housing and commercial developments or energy generation, and agricultural developments likely to generate

ammonia emissions. All assessments of air quality impacts on biodiversity should be carried out in accordance with Natural England's guidance on assessing the implications of road traffic on European Sites.

- 10.131 It is important that development likely to have a negative impact on air quality is fully assessed and measures taken to make it acceptable, particularly in parts of Wolverhampton where air quality is, or is likely to become, a concern. The majority of developments will have a moderate air quality impact which can be dealt with through standard mitigation measures, without the need for an Air Quality Assessment (AQA), as detailed in the Black Country Air Quality SPD. These standard mitigation measures are designed to deal with the cumulative impact of many moderate impact developments over time and over a wide area.
- 10.132 AQAs should be proportionate to the type and scale of development proposed, in accordance with the guidance provided in the SPD and relevant national air quality standards. National planning policy and guidance provides examples of what might usefully be incorporated in such assessments, including baseline conditions, specific concerns, the assessment methods to be adopted, the basis for assessing impact and determining the significance of an impact and mitigation (NPPG para 007).
- 10.133 For some developments a basic screening assessment of air quality is all that will be required, whereas for other developments a full AQA will need to be carried out, using advanced dispersion modelling software. An appropriate methodology informed by the SPD should be agreed with the Local Planning Authority on a case by case basis.
- 10.134 Where a potential adverse impact on air quality is identified, mitigation measures may include:
- a) increasing the distance between the development and the pollution source;
  - b) using green infrastructure, particularly trees, to help absorb dust and other pollutants (in accordance with Policy ENV4 – care must be taken to ensure the type and location of such trees do not exacerbate air pollution by trapping it close to the street);
  - c) using ventilation systems to draw cleaner air into buildings;
  - d) improving public transport access to the development;
  - e) implementing travel plans to reduce the number of trips generated;
  - f) implementing low emission strategies;
  - g) controlling dust and emissions from construction, demolition and working projects (including through cleaner non-road mobile machinery as part of construction and environment management plans for development, as promoted in the Air Quality Strategy for England)

10.135 The impact of the development can be quantified in terms of damage costs by estimating the emissions of NO<sub>x</sub> and Particulate Matter. The road transport emission increase should be calculated in accordance with Defra guidance up to a maximum of 5 years. A trip length of 10km should be used which is derived from the Department of Transport National Travel Surveys estimation of average trip length. The emission total for the scheme can then be monetised by using the damage costs provided by the Inter-Governmental Department on Costs and Benefits (IGCB, DEFRA). Damage costs per tonne of air quality pollutants are periodically reviewed to reflect the latest evidence. Current damage cost figures per tonne should be used when carrying out air quality economic appraisals. Further details can be obtained from the Black Country Air Quality SPD.

## Evidence

- National Clean Air Strategy (DEFRA, 2019)
- The Air Quality Strategy for England (DEFRA, 2023)
- Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018)
- Wolverhampton Air Quality Annual Status Report (Bureau Veritas, 2023)
- Black Country Air Quality Supplementary Planning Document (BCAs, 2016)

## Delivery

- Planning application process, legal and funding mechanisms
- Black Country Air Quality SPD

## Flood Risk

10.136 In recent years floods, storms and droughts have shown how vulnerable the UK is to extremes of weather, resulting in significant economic, social and environmental cost. Climate change means that extreme weather events are becoming more frequent and have the potential to cause further damage to affected communities.

10.137 The most significant sources of flood risk in Wolverhampton are fluvial and surface water flooding. The primary fluvial flood risk lies along the Smestow Brook, Waterhead Brook and culverted tributaries of the River Tame. Surface water flooding is mostly caused by intense rainfall events. There are many areas at high risk of surface water flooding in Wolverhampton, due to the heavily urbanised nature of the area which impedes natural infiltration and drainage.

- 10.138 Climate change projections show an increased chance of warmer, wetter winters and hotter, drier summers, with a higher likelihood of more frequent and intense rainfall. This is likely to cause severe flooding more often. Effective flood risk management is one of the most important ways of adapting to intensive rainfall events. Ensuring that developments are planned to avoid vulnerability and manage flood risk with suitable adaptation measures where required will help to mitigate against related adverse impacts and disruptions.

## Policy ENV12 – Flood Risk and Water Quality

### Flood Risk and Water Quality

1. The Council will seek to minimise the probability and consequences of flooding from all sources by adopting a strong risk-based approach to site allocations and the granting of planning permission, in line with the National Planning Policy Framework (NPPF).
2. The Sequential Test, as set out in the NPPF, will:
  - a) be applied to all developments to ensure that development takes place in areas with the lowest flood risk;
  - b) take account of the most up-to-date information available on river (fluvial) flooding and all other sources of flooding, making use of the information provided in the most recent Strategic Flood Risk Assessment (SFRA);
  - c) consider the impact of climate change over the lifetime of that development.
3. Developers should apply the Sequential Test to all development sites, unless the development / site is:
  - a) an allocation in an adopted Wolverhampton Development Plan Document and the test has already been carried out by the Local Planning Authority;
  - b) a change of use (except to a more vulnerable use);
  - c) a minor development (householder development, small non-residential extensions with a footprint of less than 250m<sup>2</sup>); or
  - d) a development in Flood Zone 1, unless there are other flooding issues in the area of the development (i.e. surface water, ground water, sewer flooding). The SFRA can be used to identify where there are flooding issues from sources other than rivers.
4. Where 3. applies, developers must provide evidence that they have considered all reasonably available alternative sites that are at a lower risk of flooding from all sources, so that the suitability of the chosen site for the proposed development type can be determined.



## Flood Risk and Water Quality

5. For all developments, the vulnerability of the development type to flooding should be considered with regard to the most up-to-date flood zone information, in accordance with the NPPF, as set out below:
6. Flood Zone 3
  - a) Where the site is in Flood Zone 3b (Functional Floodplain), all development (including extensions and intensification of use and changes of use), other than essential infrastructure (subject to the Exception Test) and water compatible development, will be refused and opportunities to relocate development out of the floodplain should be sought;
  - b) Where the site is in Flood Zone 3a (High Probability), new homes can only be permitted subject to the Exception Test.
7. Flood Zone 2
  - a) Where the site is in Flood Zone 2 (Medium Probability), most development can be permitted, subject to a site-specific flood risk assessment;
  - b) Highly vulnerable developments, such as caravans, mobile homes and park homes with permanent residential use can be permitted, subject to the Exception Test;
  - c) Where the site is in Flood Zone 1 (Low Probability), information in the SFRA should be used to assess if a development is at risk from other sources of flooding and / or if there is an increased risk of flooding in the future due to climate change. If the site is shown to be at risk, a site-specific flood risk assessment should accompany any planning application.
8. To pass the Exception Test, developments will need to:
  - a) provide a demonstrable benefit to the wider sustainability of the area, taking into account matters such as biodiversity, green infrastructure, historic environment, climate change adaptation, low carbon energy, pollution, health and transport;
  - b) detail the sustainability issues the development will address and how doing so will outweigh the flood risk concerns for the site;
  - c) prove that the development will be safe from flooding for its lifetime, taking account of the vulnerability of its users;
  - d) prove that the development can be achieved without increasing flood risk elsewhere, and, where possible, will result in a reduced flood risk overall.

## Flood Risk and Water Quality

9. All development proposals in any of the following locations must be accompanied by a flood risk assessment and surface water drainage strategy that sets out how the development will provide a wider betterment in flood risk terms i.e. help to reduce flood risk both on and off site:
- a) where any part of the site is within Flood Zone 2 or Flood Zone 3;
  - b) for WLP site allocations, where this is a policy requirement as detailed in Section 13;
  - c. where the site is within Flood Zone 1 and is greater than one hectare;
  - d) where the site is a minerals or waste development;
  - e) where the site is within five metres of an ordinary watercourse;
  - f) where the site is within 20m of a known flooding hotspot;
  - g) where the site is within the 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map (dependant on the extent of flooding within the site, depths and velocities at the site and whether there are significant access and egress issues); or
10. All major development proposals must be accompanied by a surface water drainage strategy that considers all sources of flooding and which ensures that the development is resilient to flood risk, does not increase flood risk elsewhere and, where possible, provides wider betterment in flood risk terms.
11. Where flood risk assessments and surface water drainage strategies are required to provide wider betterment, they should demonstrate what measures can be put in place to contribute to a reduction in overall flood risk downstream. This may be by provision of additional storage on site e.g. through oversized SuDS, natural flood management techniques, green infrastructure and green-blue corridors and / or by providing a partnership funding contribution towards wider community schemes (both within Wolverhampton and in shared catchments).
12. Consultation on site-specific requirements should be undertaken with the Local Planning Authority, the Lead Local Flood Authority, the Environment Agency and Severn Trent Water (where this is a sewer flooding issue) at the earliest opportunity. Where necessary, discussions should also be held with other stakeholders such as the Canal & River Trust.

## Flood Risk and Water Quality

### Groundwater Source Protection Zones

13. No development will be permitted within a Groundwater Source Protection Zone that would physically disturb an aquifer, and no permission will be granted without a risk assessment demonstrating there would be no adverse effect on water resources.

### Watercourses and Flood Mitigation

14. Developments should, wherever possible, naturalise urban watercourses by reinstating a natural, sinuous river channel and restoring the functional floodplain, and open up underground culverts in a manner which improves biodiversity, amenity and natural drainage, in accordance with the current River Basin Management Plans for the area.

15. Developers should set out how their mitigation designs will ensure that there is no net increase to fluvial flood risk downstream and, where practical, how the development could help mitigate against downstream fluvial flood risk.

16. Development must not take place over culverted watercourses and a suitable easement of at least eight metres must be provided from the outside edge of the culvert.

17. There must be no built development within five metres of an ordinary watercourse and within eight metres of the top of the bank of a main river. This is to enable the preservation of the watercourse corridor, wildlife habitat, flood flow conveyance and future watercourse maintenance or improvement. A larger easement may be required to accommodate river restoration or mitigate for other potential impacts such as shading from tall buildings and providing climate change resilience.

18. Where there is a known or suspected culverted watercourse either on or immediately upstream or downstream of a site or where a FRA has been completed and this highlights there may be residual risk of flooding due to potential culvert blockages, developers should:

- a) confirm the location and presence of a watercourse (or otherwise) through ground-truthing strategic datasets and undertaking an assessment of the culvert extent and condition;
- b) confirm by survey, modelling and mapping, the flood extents of the watercourse(s), as many of the flood outlines associated with such watercourses have been carried out at a broad scale and may not take into account specific local features, such as culverts, bridges and detailed topographical survey;

## Flood Risk and Water Quality

- c) design the development to accommodate the floodplain of the watercourse and mitigate against flooding to properties on the site, including consideration of residual flood risk due to potential culvert blockage.

### Water Quality

19. All development should be designed to protect and enhance water quality, in particular to help deliver the relevant River Basin Management Plan measures and objectives for Water Framework Directive water bodies.
20. Proposals for development of the site allocations set out in Section 13 should comply with advice provided by Severn Trent Water and any relevant water cycle study evidence, in order to minimise impacts on wastewater infrastructure which could harm water quality. This will include maximising SuDS in accordance with Policy ENV13, arranging disposal of surface water to a watercourse rather than to the sewerage system, and ensuring necessary wastewater infrastructure upgrades are in place and aligned to development timescales.

## Justification

- 10.139 Wolverhampton is a densely populated and, in places, steeply sloping urban area. This makes it prone to rapid surface water flooding following heavy rainfall and flooding from smaller watercourses that are tributaries of the Rivers Tame, Stour and Penk. The industrial legacy has left complex urban drainage challenges, with many watercourses that have been heavily modified and culverted in places, providing little if any biodiversity benefit and being prone to blockages.
- 10.140 Wolverhampton is located across three river basin management catchments: Tame Anker and Mease; Severn Middle Worcestershire; and Trent Valley Staffordshire. The main rivers flowing through the area are:
- Smestow Brook
  - Darlaston Brook
  - Unnamed culverted tributary of the River Tame (between Bilston and Old Heath)

- 10.141 Climate change will increase the likelihood of surface water and localised flooding from smaller and culverted watercourses. Alongside this, the condition of many culverted watercourses is deteriorating as they age and where they lack maintenance, and therefore the likelihood of blockages or failure is increasing. Hence an approach is needed to new development that recognises local flood risk constraints and contributes wherever possible to wider environmental and flood risk improvements. Sustainable Drainage Systems (SuDS) provide an opportunity to replicate natural drainage systems through new development, which will help to reduce flood risk, improve water quality and provide wider environmental benefits (see also Policy ENV13). It is also important that development maximises opportunities to deculvert and naturalise watercourses. Applicants should positively explore and consider opportunities for deculverting and watercourse naturalisation and should fully justify where this is not considered to be practicable or viable.
- 10.142 The NPPF and Planning Practice Guidance requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, applying the Sequential Test and if necessary, applying the Exception Test. Where development is necessary, the NPPF and technical guidance recognises that there may be exceptions for certain at-risk sites where there are no suitable and reasonably available lower risk sites. In exceptional circumstances, where development is necessary in areas of risk and an alternative site at lower risk cannot be found, appropriate mitigation measures will be required to make it safe. These must not increase or displace flood risk elsewhere.
- 10.143 A Flood Risk Assessment and Surface Water Drainage Strategy will be required where development meets the criteria set out in Policy ENV12 (9), including for WLP site allocations, where this is highlighted in the Section 13 Site Allocations table. Detailed “Guidance for Developers” set out in the Wolverhampton Level 1 and Level 2 Strategic Flood Risk Assessment should be followed.
- 10.144 Water Framework Directive designated water bodies in Wolverhampton are currently classed as ‘moderate’ status due to diffuse and point source pollution, physical modifications and groundwater abstraction. The Plan can help deliver River Basin Management Plan measures and objectives for these water bodies by protecting and enhancing water quality, through measures in Policies ENV3, ENV7, ENV10, ENV12, ENV13, W4 and MIN3. For the site allocations made in this Plan which may have an impact on wastewater treatment works, early consultation should take place with Severn Trent Water and the Environment Agency, as set out in Section 13. Applicants should refer to the Wastewater Treatment Works Assessment undertaken by Severn Trent Water and any Water Cycle Study work produced to provide further detail.

## Evidence

- Wolverhampton Level 1 and Level 2 Strategic Flood Risk Assessment (JBA, 2024)
- Black Country Water Cycle Study: Phase 1 Scoping Study (JBA, 2020)
- Wolverhampton Wastewater Treatment Works Assessment (Severn Trent Water, 2024)
- Wolverhampton Water Cycle Study: Phase 2 (to be produced 2024/25, if required)
- River Basin Management Plans for Severn River Basin District (Severn Middle Worcestershire), Humber River Basin District (Tame Anker and Mease / Trent Valley Staffordshire) (Environment Agency, 2023)

## Delivery

- Through planning application and Lead Local Flood Authority processes.

## Sustainable Drainage Systems and Surface Water Management

### Policy ENV13 – Sustainable Drainage Systems and Surface Water Management

#### Sustainable Drainage Systems and Surface Water Management

1. All developments must incorporate Sustainable Drainage Systems (SuDS) and provide for their adequate adoption, ongoing maintenance and management over the lifetime of the development, in accordance with any surface water drainage strategy required for the development under Policy ENV12.
2. SuDS must be designed in accordance with Lead Local Flood Authority standards (currently the Staffordshire SuDS Handbook, 2017), as follows:
  - a) demonstrate application of the surface water discharge hierarchy: Re-Use (Water Harvesting); Infiltration; Discharge to a watercourse; Discharge to a surface water sewer; Discharge to a combined sewer;
  - b) manage surface run-off as close to the source as possible to reduce flood risk and improve water quality;
  - c) include mitigation within storage calculations for future climate change, designed to 100yr + Climate Change (currently 40%);
  - d) designed to accord with the Environment Agency's Guidance on Flood Risk and Coastal Change, Construction Industry Research and Information Association (CIRIA) guidance, and Department for Environment Food & Rural Affairs (DEFRA) non-statutory technical standards;

## Sustainable Drainage Systems and Surface Water Management

- e) designed to be daylight (open), natural and contribute to the conservation and enhancement of biodiversity and green infrastructure in the wider area, as far as is practical and viable.
- 3. For all major developments, surface water flows must be reduced back to equivalent greenfield rates. If greenfield runoff rates are not considered to be feasible for viability or other reasons, then the developer must submit evidence demonstrating what the constraints to achieving this are and how their development will accommodate runoff rates that are as close as reasonably possible to greenfield rates.
- 4. For all minor developments, a minimum reduction of 30% over pre-development run-off rates will be required. Under no circumstances will post-development runoff rates that are greater than pre-development run-off rates be permitted.
- 5. A hydrogeological risk assessment must be provided where infiltration SuDS is proposed for anything other than clean roof drainage in a Source Protection Zone 1.

## Justification

- 10.145 The incorporation of Sustainable Drainage Systems (SuDS) into new developments helps to manage and minimise surface water. SuDS are generally landscaped features such as wetlands, retention ponds, soakaways, swales and/or permeable surfaces. The primary function of SuDS is to reduce the volume and peak rates of water run-off from new development, however they should also fulfil their potential to provide new wildlife habitats and amenity spaces within developments. In a dense urban area such as Wolverhampton, with limited areas available for development, SuDS should be multifunctional wherever possible.
- 10.146 SuDS can also improve water quality by increasing the filtration of pollutants, and thereby help to support the objectives of the Water Framework Directive. They allow the management of diffuse pollution generated in urban areas by treating water and reducing the level of pollutants that enter rivers and other watercourses therefore resulting in less wastewater requiring treatment.
- 10.147 The NPPF states that “major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.” (para 175) and sets out requirements for such systems, including the importance of advice from the Lead Local Flood Authority (LLFA). The LLFA for Wolverhampton is the City of Wolverhampton Council.



- 10.148 The Flood Risk Management Team of Staffordshire County Council currently act on behalf of City of Wolverhampton Council to provide flood risk advice in the Wolverhampton area, including advice on the suitability and requirements for SuDS on a site by site basis (currently the Staffordshire SuDS Handbook, 2017). Local guidance, outlined in Policy ENV13, should be followed closely to ensure the most appropriate schemes are delivered.
- 10.149 Due to the legacy of contaminated land in Wolverhampton from historic mining and heavy industry there is a risk of causing contamination of groundwater and/or surface water if SuDS are not properly designed. The presence of contaminated land needs to be considered when designing SuDS features. National guidance, such as the CIRIA SuDS Manual C753, is available to help design SuDS on contaminated land.

### Canals and SuDS

- 10.150 The Canal & River Trust (CRT) manage water levels in the canal network by using control structures such as weirs and sluices in order to maintain a suitable depth for navigation by boats but also to avoid water levels becoming too high in periods of heavy rainfall where run-off from hard surfaces can lead to excess water passing into the canals. In some areas canals may therefore provide developers with opportunities to dispose of surface water drainage, on the grounds that drainage to surface water bodies, such as canals, lies higher on the drainage hierarchy than discharge to sewers and drains. As surface water discharge to canals can be a means of managing local surface water flood risk, canals could be considered as part of potential SuDS infrastructure, providing appropriate pollution control and mitigation measures are built into any potential development scheme. This approach would be a matter for discussion between the developer and the CRT and would need to be agreed between interested parties before a planning application is submitted.
- 10.151 SuDs adjacent to or connecting to canals will need to be maintained to ensure they function as they were designed to and do not cause pollution or excess flows. In the interests of local flood risk management and the protection of water quality, where a development proposes canal-related SuDS, the system should be designed in such a way that, if it were to fail, the canal would not be inundated with water.

## Evidence

- Wolverhampton Level 1 and Level 2 Strategic Flood Risk Assessment (JBA, 2024)
- Black Country Water Cycle Study: Phase 1 Scoping Study (JBA, 2020)
- Black Country Local Nature Recovery Map and Strategy: An Emerging Approach (Wildlife Trust for Birmingham and the Black Country, 2022)
- Staffordshire SuDS Handbook (Staffordshire County Council, 2017)

## Delivery

- Through planning application process and Lead Local Flood Authority processes.

## Energy and Sustainable Design

- 10.152 The NPPF expects plans to take a proactive approach to mitigating and adapting to climate change. Development should be planned for in ways that help eliminate greenhouse gas emissions, such as through consideration of location, orientation and design. To help increase the use and supply of renewable and low carbon energy and heat, plans should provide a positive strategy for energy from these sources. Policy ENV14 sets out how energy infrastructure will be considered, including how opportunities for decentralised energy networks will be identified and delivered.
- 10.153 It is essential for the successful delivery of the WLP that a high standard of sustainable design is secured on all new developments over the Plan period. This will reduce carbon emissions from new development, improve design quality and create a high quality environment which will maximise economic competitiveness and housing choice. Implementation of the Policy will be supported by an Energy and Sustainable Design Supplementary Planning Document (which will replace the existing Renewable and Low Carbon Energy Supplementary Planning Document), to be prepared in the context of anticipated changes to Building Regulations to meet Future Homes and Buildings Standards.

## Policy ENV14 – Energy and Sustainable Design

### Energy and Sustainable Design

#### Renewable and Low Carbon Energy Developments

1. Proposals involving the development of renewable or low carbon energy sources will be permitted where the proposal accords with local and national guidance, protects the significance of heritage assets including their setting and would not significantly harm the natural, historic or built environment or have a significant adverse effect on the amenity of those living or working nearby, in terms of visual, noise, odour, air pollution or other effects. The potential for inland waterways to promote low carbon technologies is recognised and supported.

#### Housing Developments – Solar Power and Water Efficiency Requirements

2. All development which will create new homes or houses in multiple occupation, through new build, building conversion or change of use, must:

## Energy and Sustainable Design

- a) demonstrate that the site layout is designed and buildings positioned so as to maximise optimal orientation and pitch of all available roof space for solar panel installation and operation;
- b) incorporate the maximum amount of solar photovoltaic or solar thermal panels on all available, suitably orientated and angled roof space, which covers a roof area equivalent to at least 40% of the ground floor area of the relevant buildings; and
- c) meet water efficiency standards of 110 litres per person per day, as set out in Part G2 of current Building Regulations 2010 or any successor legislation.

### Non-Residential Developments (including student housing and care homes) – Solar Power and BREEAM Requirements

3. All development which will create new non-residential floorspace, through new build, building conversion or change of use, must:
  - a) demonstrate that the site layout is designed and buildings positioned so as to maximise optimal orientation and pitch of all available roof space for solar panel installation and operation;
  - b) incorporate the maximum amount of solar photovoltaic or solar thermal energy generation on all available, suitably orientated and pitched roof space, which covers a roof area equivalent to at least 40% of the ground floor area of the relevant buildings.
4. All new build developments which create 1,000 sqm gross floorspace or more of non-residential floorspace must achieve BREEAM Excellent New Construction certification, including full credits for category Wat 01 (water efficiency).

### Major Developments – Energy Networks and Infrastructure

5. All development which will create either 10 or more new homes and / or non-residential floorspace of 1,000 sqm or more, must:
  - a) establish a site-wide local energy network within the site, using renewable or, if not viable, low carbon sources;
  - b) link into any district or local energy network which is operational close to the site; and
  - c) be designed to link into any energy network planned close to the site, providing suitable means of access and connection along roads or footpaths as a minimum.

## Energy and Sustainable Design

6. Where a development will create 100 new homes or more and / or non-residential floorspace of 10,000 sq m or more, early engagement should take place with relevant energy companies and bodies to establish the likely energy infrastructure requirements for the development. Proposals for addressing energy provision which achieve the lowest possible lifetime carbon emissions should then be developed and agreed with the Local Planning Authority. Information to support the preferred solutions should identify and address:
- a) current and future major sources of demand for heat (e.g. industrial / manufacturing sites, universities, large-scale sporting or leisure development, hospitals, social housing);
  - b) demands for heat from existing buildings that can be connected to future phases of a heat network;
  - c) major heat supply plant;
  - d) possible opportunities to utilise energy from waste or waste heat from industrial processes;
  - e) opportunities for heat networks;
  - f) opportunities for private wire electricity supply (where electricity generators are able to transfer supply directly to a consumer);
  - g) possible land for energy centres or energy storage;
  - h) possible heating and cooling network routes;
  - i) infrastructure and land requirements for electricity and gas supplies; and
  - j) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.

### Practicality and Viability

7. The requirements set out under 2(a) & (b), 3, 4, 5 and 6 above will only be reduced or varied if it can be demonstrated that this is not practical, not viable in accordance with Policy DEL1, or not in accordance with other national or local planning policies.

## Justification

### Energy Infrastructure

- 10.154 Many types of renewable and low carbon energy generation can be developed in Wolverhampton, including solar photovoltaics, solar thermal, air, water and ground source heat pumps and other technologies. The Wolverhampton Renewable and Carbon Reduction Energy Capacity Study (2011) concluded that there were opportunities for: development of a city centre-based district heating network; micro-generation on existing and new buildings; and on-site generation within employment land e.g. solar PV and waste to energy plants. The Black Country Utilities Infrastructure Capacity Study concluded that there are no parts of Wolverhampton that would be suitable for large-scale wind turbine development. However, there is no evidence to suggest that any other type of renewable or low carbon energy technology would not be appropriate in any part of Wolverhampton. Therefore, any renewable or low carbon energy proposal will be treated on its merits in accordance with Policies ENV14 and W4, national guidance, and other Development Plan Document policies.
- 10.155 It is crucial that the electricity infrastructure serving Wolverhampton over the Plan period is “fit for purpose” - able to support both the needs of new development and the necessary shift to more electric heating and electric vehicles across existing and new development. The Wolverhampton Infrastructure Delivery Plan provides evidence on the potential impact of development on electricity infrastructure over the Plan period, and how planned investment by suppliers has potential to mitigate these impacts. It is particularly important that the energy infrastructure provided to serve larger developments is carefully considered and designed to minimise carbon emissions, in consultation with energy providers and the Local Planning Authority. Further detail will be provided in an Energy and Sustainable Design Supplementary Planning Document.
- 10.156 New forms of energy infrastructure have been developed in response to the national transition to a carbon net zero energy system. There are a number of gas-powered peaking plants in operation in Wolverhampton, which provide electricity when demand exceeds supply. Proliferation of such plants will not be encouraged, as they encourage continued use of fossil fuels, rather than development of renewable and low carbon energy sources. There has also been interest in developing battery storage facilities within the city, which can help smooth the supply of electricity to the grid. The Council’s policy will be to encourage smaller scale battery storage to help develop micro grids.

### Sustainable Design

- 10.157 National legislation, planning policy and planning guidance requires local plans to include policies which ensure that development contributes towards the mitigation of, and adaptation to, climate change. Although there is currently limited renewable energy generation in Wolverhampton, evidence shows that there is considerable untapped capacity to produce and export renewable energy at a local level. In particular, the Wolverhampton Net Zero 2041 Strategy and Action Plan (2024) highlights the significant potential to increase

the amount of solar power generation, including on roofs. Solar energy generation is usually the most suitable renewable or low carbon energy technology which could be provided on most sites. Solar energy generation is limited by the orientation and extent of roofs within a development, such that, on average, roof space which is the equivalent of 40% of the ground floor area of buildings in a development can practically support solar panels.

- 10.158 Therefore, it is important that all new developments should reduce energy use from non-renewable sources and make the maximum contribution towards renewable and low carbon energy generation, where this is viable and practical. The main way of achieving this will typically be through provision of solar energy generation. The Council and partners will lead by example, seeking to maximise energy efficiency and incorporate renewable and low carbon energy generation through the refurbishment and redevelopment of land and buildings in their ownership.
- 10.159 Changes to Part L of Building Regulations in 2022 significantly improved energy efficiency and carbon emission standards for all types of development. Further improvements – referred to as the Future Homes and Buildings Standards - are anticipated early in the Plan period. However, given the urgency of the climate change crisis and the large amount of development planned in Wolverhampton across the whole Plan period, it is vital that use of energy from non-renewable sources by new developments is minimised as far as possible and as early as possible, until overtaken by any changes to Building Regulations. It is also important that new development contributes as far as possible to increasing renewable energy generation across the city, in line with Our Climate Commitment and the Wolverhampton Net Zero 2041 Strategy and Action Plan.

### **Sustainable Design Standards for Housing Development**

- 10.160 Option 1 of the Future Homes and Buildings Standards consultation (covering housing) assumes that solar panels are provided on the roofs of new build housing developments, covering the equivalent of 40% of the ground floor area of any buildings. This is the maximum amount of usable solar panels which could practically be installed on the roofs of an average housing development, taking into account the typical orientation and extent of roofs. The Viability Study assumes that Option 1 will be adopted into Building Regulations in 2025 and has demonstrated that this will not prejudice the delivery of most housing developments in Wolverhampton. Policy ENV14 ensures that the key element of the Future Homes Standard which can also be controlled through the planning system i.e. installation of solar panels, is implemented in Wolverhampton, regardless of any future changes to Building Regulations. The Policy also extends this approach to the conversion of existing buildings, which can be carried out to lower energy efficiency standards than new build under Buildings Regulations, where it is practical and viable to provide solar panels on available roof space and subject to any historic environment and design constraints – in line with Policies CSP2, ENV5 and ENV10 and guidance set out in Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England, 2024).

- 10.161 There are three optional national technical standards for housing which can be adopted through planning policy. Policy ENV14 adopts one of these standards for new housing in Wolverhampton, covering water efficiency standards, and Policies HOU2 and HOU3 adopt the remaining two standards. The Viability Study demonstrates that the introduction of these standards is unlikely to have a significant impact on development viability.
- 10.162 Introduction of the higher water efficiency standard for all new homes in Wolverhampton is justified by evidence provided in the Water Cycle Study (2020) and by the Environment Agency classification of Severn Trent Water as an area of serious water stress for the purposes of water resources planning. This change in water stress classification adds further weight to the tighter limit, which will be enforced through the Building Regulations system.
- 10.163 The use of other standards for housing developments (under Part L1), such as Passivhaus and the BRE Home Quality Mark, which use third party assessment and certification to robustly verify that the quality of approved development is not materially diminished between permission and completion, will also be supported.

#### **Sustainable Design Standards for Non-Residential Development**

- 10.164 Non-residential development (which includes student housing and care homes for the purposes of Building Regulations Part L) will also be covered by the Future Homes and Buildings Standards. It is important that this type of development also minimises energy use from non-renewable sources and contributes to renewable energy generation as far as possible. Therefore, it is considered pragmatic and practical to apply the same policy to non-residential development as to housing development, requiring solar panels to be provided on the roofs of new build and change of use developments, covering the equivalent of 40% of the ground floor area of any buildings.
- 10.165 The WLP includes a range of policy aspirations for high quality design and climate change mitigation and adaptation, particularly those set out in Policies CSP2, ENV10, ENV14 and W5. As set out in national design guidance, an effective way of ensuring these aspirations are delivered in a consistent manner is through the use of tools for assessing and improving design quality. The Building Research Establishment (BRE) administers a range of robust, national standards which can support this approach. BREEAM standards are well established and certify quality and sustainability in the built environment, including running costs, health and wellbeing and environmental impact. Minimum standards are first applied and then developers are able to choose from a menu of other measures to reach the total credits necessary to achieve certification to the required level.
- 10.166 Application of the BREEAM New Construction standards set out in Policy ENV14 will ensure that all major non-residential developments in Wolverhampton meet a minimum level of quality and sustainability that is independently certified throughout the planning and construction process and, in most cases, following completion. The Council is currently



committed to ensure BREEAM Excellent standard is attained on all Council-led schemes, therefore it is reasonable to apply this requirement to all major non-residential development. In order to deliver an improvement in standards over time, but also to allow for a transitional period, it is intended to increase the level of certification required to Outstanding after 2034 – subject to the anticipated review of this Plan by 2032.

### Energy Networks

- 10.167 The ways in which power and heating / cooling are generated, delivered to and used by developments will need to change to meet carbon net zero targets and eliminate greenhouse gas emissions. The use of fossil fuels and traditional forms of energy generation will need to be phased out and replaced by zero carbon, non-polluting and energy efficient sources.
- 10.168 The most efficient way of delivering this energy to homes and businesses is through the use of decentralised energy networks. These networks make use of energy that is generated off the main grid, including from micro-renewables, solar, geothermal, energy from waste plants or biomass. Networks can serve a single building or development (local networks), or a wider area (district networks). Local networks can also be connected to each other (in a cluster) and to district networks to form more efficient systems.
- 10.169 Repowering the Black Country was one of seven industrial cluster decarbonisation projects supporting Black Country businesses to take advantage of global clean growth opportunities and to make the transition to a net zero industrial future. The project successfully developed plans for six net-zero hubs across the Black Country.
- 10.170 A large proportion of the new homes to be delivered over the Plan period on sites identified in the SHLAA (2024) are likely to be flats, and the majority of these are located within Wolverhampton City Centre. There is more limited roof space for solar panel installation on flatted developments - although solar does have the potential to decarbonise energy demand from local heat networks serving such developments. However, flats are likely to be suitable in many cases for heat network development. Indeed, the Future Homes and Buildings Standard consultation response stated that: “New low carbon communal and district heat networks will likely be the preferred way of providing heating and hot water to blocks of flats under the Future Homes Standard.” There is real potential for such developments to be served by a local network on site, and to link to other networks off site. This potential is highest where there are clusters of high density blocks of residential and non-residential uses, and connections to renewable and low carbon energy sources and potential district network schemes are possible, as is the case for the city centre. The Renewable and Carbon Reduction Energy Capacity Study (2011) also concluded that there was potential to develop a city centre district heating network. There is Government funding available for private providers to develop district heat networks in locations such as the city centre, with metered supply to local networks and other consumers.

- 10.171 Given the extensive network of canals throughout the Growth Network and the location of many regeneration sites in canalside locations, there is potential to make use of canal water as a renewable energy source for heating / cooling of buildings, where this will not have a negative impact on the historic significance or ecological value of the waterway. Heat or cold can be extracted from water pumped from an adjoining canal using a heat exchanger and the water discharged back into the canal. Schemes on sites within 100m of a canal with no intervening roads, railway lines, etc. and with a likely 500kW of heat to be dissipated to the canal can usually be considered viable. Large residential schemes which are overseen by one management company with a designated energy centre / CHP plant may also have potential. Businesses located adjoining canals can use canal water for industrial processes (consumptive) and for cooling purposes (take and return). The Canal and River Trust should be consulted on any proposal to make use of canal water for heating or cooling.
- 10.172 Therefore, given these local opportunities, Policy ENV14 expects all major developments to seriously consider the feasibility of incorporating decentralised energy networks on site, and to ensure that sufficient infrastructure is provided to link into networks off site as and when they become available.
- 10.173 Heat networks are not limited to a particular energy source and can incorporate flexibility to respond to local circumstances and be future-proofed for transition to other fuels. New regulations on heat networks are anticipated to come into force mandating a maximum emissions limit for new heat networks and introducing minimum technical standards. Government funding is available to support the transition to heat networks and their use of low carbon heat sources. There are plans to introduce Heat Network Zoning in England by 2025 and the connection of certain buildings to heat networks within these zones will become mandatory on adoption of the legislation. This zoning will provide the market with a level of certainty that the demand for heat networks will be there to support investment decisions.
- 10.174 Within Heat Network Zones, it is anticipated that large public sector buildings, large non-domestic buildings, all new buildings and residential buildings that are already heated by communal systems would be required to connect to the heat network within a given timeframe and that certain works would not require permissions, as is the case for other statutory undertakers. To facilitate the development of heat networks, when there is a reasonable prospect that a district heat network will be developed in Wolverhampton, the Council will consider the introduction of a Local Development Order (such as that adopted in Leeds) to allow the operator(s) to carry out certain works without the normal permissions.

## Evidence

- Black Country Utilities Infrastructure Capacity Study (Stantec, 2019)
- Black Country Water Cycle Study: Phase 1 Scoping Study (JBA, 2020)
- Wolverhampton Renewable and Low Carbon Energy SPD (WCC, 2011)
- Wolverhampton Viability Study (Aspinall Verdi, 2024)
- Wolverhampton Infrastructure Delivery Plan (WCC, 2024)
- Our Climate Commitment (WCC, 2024)
- Wolverhampton Council 2028 Net Zero Action Plan (WCC, 2021)
- Wolverhampton Net Zero 2041 Strategy and Action Plan (2024)
- Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England, 2024)
- Housing: Optional Technical Standards (MHCLG, 2015)
- The Future Homes and Buildings Standards: 2023 Consultation (DLUCH, 2024)
- Powering Growth: Black Country Energy Strategy (AECOM, 2018)
- Repowering the Black Country (Black Country LEP, 2022)
- West Midlands Regional Energy Strategy (WMCA, 2022)
- Heat and Buildings Strategy (Business, Energy and Industrial Strategy, 2021)

## Delivery

- Preparation of Energy and Sustainable Design Supplementary Planning Document
- Through the planning application process
- BREEAM certification process

## Monitoring

Policy	Indictaor	Target
ENV1	Area of designated nature conservation sites	No net reduction through development
ENV2	Proportion of eligible developments providing financial contributions to meet the requirements of the Cannock Chase SAC Partnership MOU.	100%
ENV3	Proportion of eligible developments providing minimum 10% biodiversity net gain	100%
ENV4	Tree canopy cover across Wolverhampton	20% by 2042
ENV4	Area of ancient woodland / number of veteran trees	No reduction
ENV14	Proportion of eligible developments meeting sustainable design standards	100%

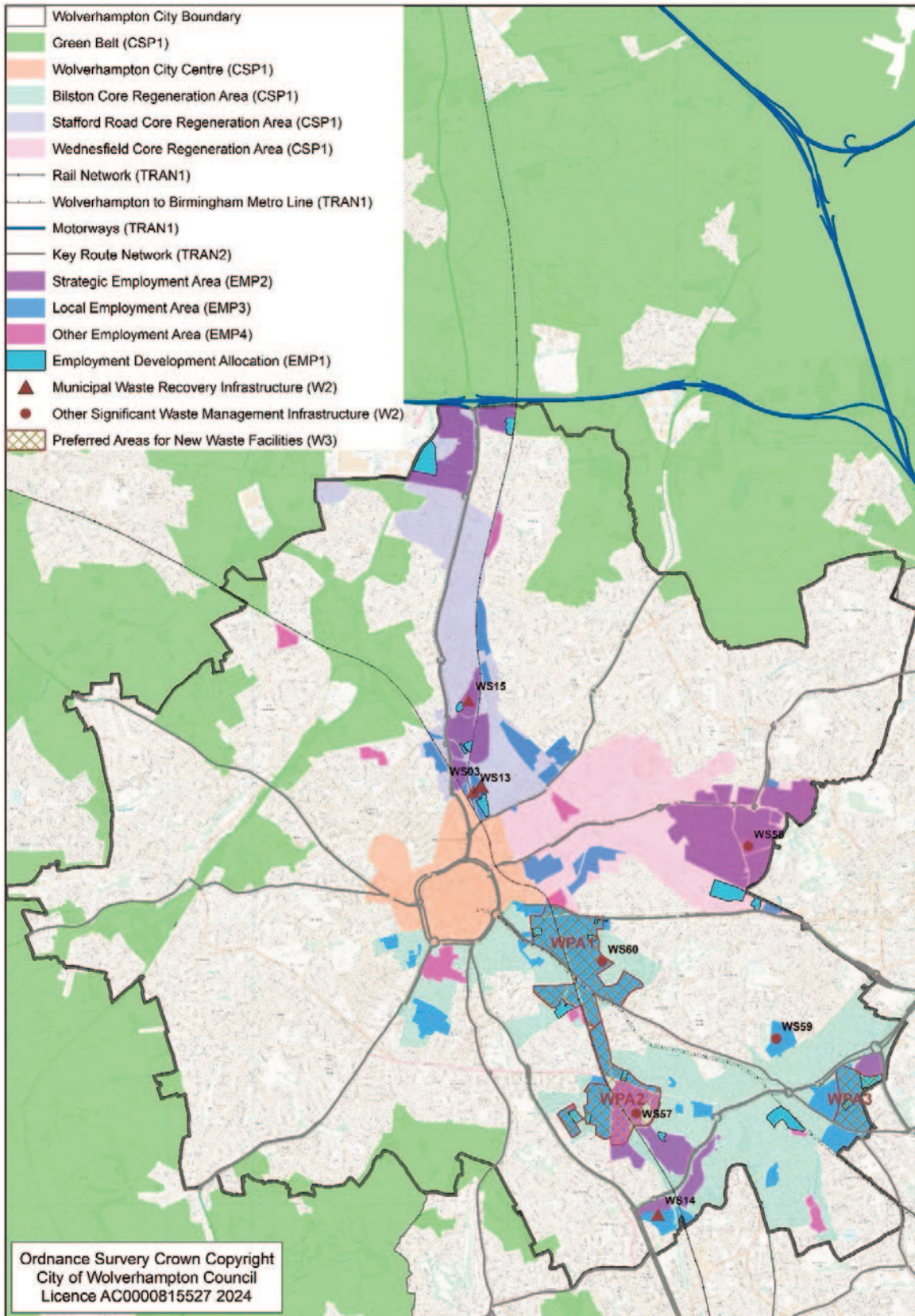
# 11. Waste

## Introduction

- 11.1 The City of Wolverhampton Council is the Waste Collection, Waste Disposal and Waste Planning Authority for Wolverhampton. A key aim of the Council is to minimise the amount of waste generated across all sectors and increase the re-use, recycling and recovery rates of waste material.
- 11.2 The policies in this section are focused on the city's waste requirements and infrastructure. However, given the nature of waste management - where waste arising in one local authority area is often managed in another and facilities have catchment areas that extend beyond local authority boundaries - the wider context of the Black Country area, and beyond, is also recognised.



Figure 12: Waste Key Diagram



## Waste Infrastructure – Future Requirements

11.3 Policy W1 sets out the overall strategy and principles for waste management in Wolverhampton and the types of waste development that will support this. It also identifies how much new waste management capacity Wolverhampton is likely to need to support planned levels of housing and growth over the Plan period and to help meet Wolverhampton’s resource and infrastructure needs.

### Policy W1 – Waste Infrastructure – Future Requirements

#### Waste Infrastructure – Future Requirements

1. Development proposals shall consider how they will minimise waste production and facilitate the re-use and recovery of waste materials, including through recycling, composting and energy from waste.
2. Waste operators will be expected to demonstrate that the greenhouse gas emissions from the operations involved and associated transport of waste from source to processing facility have been minimised, in line with national and local targets for the transition to a carbon net zero economy.
3. Proposals for waste management facilities will be supported based upon the following principles:
  - a) managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy;
  - b) promoting the opportunities for on-site management of waste where it arises and encouraging the co-location of waste developments that can use each other’s waste materials;
  - c) ensuring that sufficient capacity is located within Wolverhampton to accommodate the waste capacity requirements during the Plan period and reducing the reliance on other authority areas;
  - d) enabling the development of recycling facilities across Wolverhampton, including civic amenity sites, and ensuring that there is enough capacity and access for the deposit of municipal waste for re-reuse, recycling and disposal;
  - e) waste must be disposed of, or be recovered in, one of the nearest appropriate facilities, by means of the most appropriate methods and technologies, to ensure a high level of protection for the environment and public health;

## Waste Infrastructure – Future Requirements

- f) ensuring new waste management facilities are located and designed to avoid unacceptable adverse impacts on the townscape and landscape, human health and wellbeing, nature conservation and heritage assets and amenity;
- g) working collaboratively with neighbouring authorities with responsibilities for waste who import waste into, or export waste out of, Wolverhampton, to ensure a co-operative cross boundary approach to waste management is maintained.

## Justification

- 11.4 In line with national waste planning guidance, the Plan aims to make provision for the suitable management of waste, including: non-hazardous waste; Local Authority Collected Waste (LACW) and Commercial and Industrial Waste (C & I); construction, demolition and excavation waste (CD&E); hazardous waste such as asbestos or batteries; low-level radioactive waste; agricultural waste; and waste water produced from water treatment.
- 11.5 The WLP aims to deliver significant housing and employment land growth over the Plan period, however this will need to be balanced against requirements for new waste infrastructure over the Plan period. Priority will therefore be given to the safeguarding of existing waste sites for their continued use, and the protection of the Local Employment Areas (Policy EMP3) within which they are located.
- 11.6 The Black Country Waste Study Update - Wolverhampton (the Wolverhampton Waste Study), concludes that waste reduction and resource efficiency improvements will have a significant influence on future waste growth in Wolverhampton. Annual waste generation per Wolverhampton household decreased by 15% between 2006/07 and 2021/22, from 1,153 kg to 974 kg. This reduction has been driven by a range of factors, including household income, increased resource efficiency and changes in consumer habits and behaviours. Similar factors are also thought to be driving reductions in C&I waste.
- 11.7 The transition towards a circular economy - the approach to economic development designed to benefit businesses, society and the environment - is expected to significantly change the way waste is managed in future. This transition will involve a significant reduction in the amount of waste produced by households and businesses, because avoidable waste will be 'designed out' of products at the manufacturing stage. It will also mean a shift away from methods of managing unavoidable waste at the bottom of the 'waste



hierarchy' (landfill, waste disposal and energy recovery) and towards those at the top of the hierarchy, which can 'close the loop' (re-use and recycling). In particular, the quantities of waste reused, recycled, and composted are expected to increase.

- 11.8 As waste facilities are an essential part of the infrastructure of an area, it is not only important that they are appropriately located, but also that policy protection is applied to areas suitable for waste uses, to help achieve the objectives of moving waste up the hierarchy.

#### The updated baseline for Wolverhampton

- 11.9 The Wolverhampton Waste Study (2023) provides an updated baseline of predicted waste arisings, imports and exports, and future capacity requirements as of 2021. It is estimated that Wolverhampton generated 626,000 tonnes of waste in 2021. Excluding exempt sites, the largest waste stream was construction, demolition and excavation (CD&E) waste, at 437,000 tonnes. 102,000 tonnes was collected by the Council from household sources. Commercial and industrial (C&I) waste arisings (including LACW non-household sources) were 80,000 tonnes and hazardous waste arisings were 25,000 tonnes. Other waste stream arisings generated 200 tonnes, composed primarily of agricultural waste and batteries.
- 11.10 With the exception of exempt sites, 179,000 tonnes (28.6%) of waste was re-used, recycled or composted, 139,000 tonnes (22.1%) was subject to recovery or treatment, 269,000 tonnes (42.9%) was disposed to landfill outside Wolverhampton (mainly construction and demolition waste), and 40,000 tonnes (6.4%) was transferred for management elsewhere.
- 11.11 Waste facilities within Wolverhampton (including permitted sites and incinerators) managed 484,000 tonnes of waste in 2021. Of this total, the greatest percentage by tonnage (43%) was received at Transfer sites, followed by Treatment sites (24%), incinerators (23%) and metal recycling sites (MRS) (11%).
- 11.12 It is estimated that Wolverhampton exported 362,000 tonnes more waste than it imported in 2021, being a net exporter of 401,000 tonnes of non-hazardous waste and a net importer of 39,000 tonnes of hazardous waste. The vast majority of waste imported (79%) arose from within the West Midlands region (as defined by the Environment Agency Waste Data Interrogator).
- 11.13 Wolverhampton exported 730,000 tonnes of waste in 2021. Of the 614,000 tonnes received at permitted sites in England and Wales and incinerators in England (outside of Wolverhampton), 42.5% was received at landfill sites, followed by treatment sites (31.5%), on/in land sites (15.5%), MRS (7%), transfer sites (2.5%) and incinerators (1%).

### Projected Future Waste Management Capacity

- 11.14 The Wolverhampton Waste Study updated waste capacity requirements assuming delivery of the housing and employment growth targets set out in the WLP. Under current projections, the quantity of waste Wolverhampton is projected to manage (including imported waste) increases from approximately 1 million tonnes (mt) in 2021/22 to over 1.4 mt in 2041/42 - an increase of 50% or 2% per annum. An ongoing emphasis on waste reduction (see para 11.7) could have a significant influence on future waste growth. However, there are emerging changes in the need for different types of waste management capacity. Exports already reflect a shortage of landfill space, household waste Material Recycling Facilities (MRFs) and composting facilities. The way waste is managed is also expected to change significantly in future with the transition towards a circular economy (see para 11.8).

### Waste Management Scenarios & Capacity Gaps

- 11.15 The Wolverhampton Waste Study presents two key waste management scenarios, according to the extent to which circular economy targets for re-use and recycling of C&I and municipal waste are met over the period 2021/22 to 2041/42. Based on the assumption that the circular economy targets will either be met (WMS2) or partially met (WMS3), the Study (at Table 3.9) predicts the additional waste management capacity will need to be delivered by 2041/42 to maintain net self-sufficiency, as set out in Table 8.

**Table 8: Waste Management Capacity Requirements 2041/42**

	WMS2 (tonnes per annum)	WMS3 (tonnes per annum)
Re-use/Recycling	701,000	674,000
Energy Recovery	305,000	287,000
Disposal	95,000	139,000

- 11.16 Taking account of known future developments and closures, total waste management capacity is projected to decrease from 441,000 tonnes in 2021 to 371,000 tonnes in 2042. This is driven by decreasing recovery capacity, with recycling and transfer capacity not anticipated to change significantly.

- 11.17 WMS2 assumes that the targets for reuse and recycling of municipal waste will be achieved for household and C&I waste over the Plan period (i.e. 65% of waste from these streams will be recycled by 2035). A different set of assumptions has been applied to the CD&E waste stream, based on the targets set under the Waste Framework Directive, existing CD&E waste management rates in the Black Country and potential future recycling targets suggested in the 'Circular Economy Package' proposals.
- 11.18 Wolverhampton has no disposal capacity (landfill). Therefore, depending on the extent to which diversion from landfill can be achieved, there may be a need for additional disposal capacity in other authorities and the contractual arrangements for these exports will be an important focus going forward.
- 11.19 To achieve net self-sufficiency Wolverhampton would need to provide extra waste capacity. If self-sufficiency is to be maintained then an additional 300-700,000 tonnes of recycling capacity will be required by 2042 to support planned housing and employment growth and compensate for the types of waste capacity that cannot be accommodated due to a lack of suitable space within the urban area (e.g. composting, anaerobic digestion, landfill). The capacity requirements for recycling are expressed as a range, because this depends on the extent to which the Circular Economy recycling targets are met – the greater the recycling rates achieved, the more recycling capacity will be needed. Additional recovery capacity is also required by 2042, although to a lesser extent than recycling capacity.
- 11.20 Most of the identified capacity requirements are expected to be delivered by the waste industry rather than by the Council. Delivery will therefore depend on whether new projects are financially viable and attractive to investors. This will in turn depend on demand from waste producers, the effectiveness of government initiatives to incentivise re-use and recycling of waste in preference to energy recovery and disposal to landfill, and the availability of suitable sites for new facilities (see Policy W3).
- 11.21 The Wolverhampton Waste Study identifies that around 80% of waste imported and exported from Wolverhampton stays within the West Midlands region, and there is a high interdependence in terms of waste flows between authorities in this region. The only other regions that receive significant tonnages of Wolverhampton waste are the East Midlands and the North West. It is recognised that ongoing collaboration with relevant local authorities under the Duty to Cooperate will be required to ensure waste capacity requirements that cannot be delivered within the city are met in other areas, particularly where there are existing import / export relationships established and ongoing (e.g. disposal at landfills).

## Evidence

- Black Country Plan Waste Study (Wood, 2020 / 2022)
- Black Country Plan Waste Study Update – Wolverhampton (Wood, 2023)

## Delivery

- Through the planning application process.
- Waste industry and investors – develop new waste management infrastructure in locations that are well placed to meet demand from waste producers, supported by investors
- City of Wolverhampton Council as waste authority – deliver new or upgraded waste transfer sites / household waste recycling centres / material recycling facilities to support separate collection of waste glass, metal, paper, card and food from households and increased recycling of these wastes

## Waste Sites

- 11.22 Policy W2 seeks to safeguard and retain the capacity of existing waste facilities in order to maintain overall waste management capacity within Wolverhampton.

## Policy W2 – Safeguarding Waste Sites

### Safeguarding Waste Sites

#### Protection of Waste Sites

1. All strategic waste management sites and other waste management facilities (including all new waste management sites that are developed within the lifetime of the Plan) will be safeguarded from inappropriate development, in order to maintain existing levels of waste management capacity in Wolverhampton, unless it can be demonstrated that:
  - a) there is no longer a need for the facility and capacity can be met elsewhere in Wolverhampton; or
  - b) appropriate compensatory provision is made in appropriate locations elsewhere in Wolverhampton.

#### Sensitive Development Near a Waste Site

2. Housing or other potentially sensitive uses will not be permitted adjacent or near to a waste management site where this could create conflict between the uses, unless it can be demonstrated that:
  - a) a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent waste use; or

## Safeguarding Waste Sites

- b) redevelopment of the waste site or loss of waste infrastructure would form part of a strategy or scheme that has wider environmental, social and / or economic benefits that outweigh the retention of the site or infrastructure for the waste use and alternative provision is made for the displaced waste use; or
  - c) a suitable replacement site or infrastructure has otherwise been identified and permitted.
3. Such applications should also identify any 'legacy' issues arising from existing or former waste uses, and how these will be addressed through the design of the development and the construction process.

## Justification

### Waste Infrastructure

- 11.23 The existing pattern of waste management infrastructure in Wolverhampton is provided in the Wolverhampton Waste Study, which identifies all known waste management facilities. Strategic waste management sites have been identified through a detailed analysis of all known licenced and exempt facilities and include waste treatment, waste transfer and waste to energy facilities. These sites are listed in Table 9 and are shown on the Waste Key Diagram and the Policies Map.
- 11.24 The definition of a strategic waste management site is:
- a) all facilities that form a vital part of Wolverhampton's municipal waste management infrastructure, e.g. energy from waste plants, waste transfer facilities and household waste recycling centres, depots;
  - b) all commercial waste management facilities that fulfil more than one local role, e.g. they are part of a nationwide or regional operation linked to other facilities elsewhere and take in waste from all over the Black Country and / or beyond;
  - c) all commercial facilities specialising in a particular waste stream or waste management technology, of which there are no or very few other of the same type operating elsewhere in the Black Country;
  - d) all facilities likely to make a significant contribution towards existing waste management capacity in Wolverhampton;

- e) a site with sufficient capacity to recover, treat or dispose of at least 20,000 tonnes of waste per annum;
- f) a facility forming part of the UK's network of installations for waste disposal, such as landfill sites;
- g) a hazardous waste recovery facility of sufficient size to qualify as a Nationally Significant Infrastructure Project (NSIP).

**Table 9: Strategic Waste Management Sites**

WLP Site Ref / Location	Previous Local Plan Ref (replaced unless stated)	Site Name and Address	Operational Capacity (tonnes per annum)
<b>Municipal Waste Recovery - Installations</b>			
WS03 SRCRA	SRCAAP – SW1	Wolverhampton Energy from Waste (EfW), Crown Street	115,000
<b>Municipal Waste Recovery - Supporting Infrastructure</b>			
WS13 SRCRA	SRCAAP – SW2	Crown Street Recycling Transfer Station	20,000
WS14 BCRA	BCAAP – BC2 (1)	Anchor Lane Household Waste Recycling Centre (HWRC)	10,000
WS15 SRCRA	SRCAAP – SW3	Shaw Road Household Waste Recycling Centre (HWRC)	10,000
<b>Other Significant Waste Management Infrastructure</b>			
WS57 BCRA	Not Allocated	Ettingshall Inert Waste Recycling Facility, Millfields Road	100,000
WS58 BCRA	Not Allocated	Neachells Lane WTS (SUEZ Recycling and Recovery UK Ltd)	25,000
WS59 BCRA	Not Allocated	JMP Wilcox & Company, Beldray Road, Bilston	45,000
WS60 BCRA	BCAAP – BC2 (6)	Purbrook WTS (S.B. Waste Management & Recycling Ltd), Purbrook Road	25,000

- 11.25 The WLP is a strategic Plan and therefore focuses on the safeguarding of strategic waste sites. Certain forms of waste infrastructure make a particularly important contribution to the overall network because they are relatively specialised or of a strategic scale. However, waste facilities are an essential part of the infrastructure of the area and, in combination, all facilities can contribute to delivering these objectives. Therefore, Policy W2 also gives appropriate protection to other waste sites.

### Safeguarding Waste Sites

- 11.26 The WLP aims to deliver significant housing and employment land growth by 2042, however this aim must be balanced against the need to retain the waste infrastructure necessary to support local households, businesses and the construction industry. This will include infrastructure to manage the additional waste that this growth will generate. Waste Planning Authorities must ensure that the impact of non-waste development on existing and planned waste facilities is acceptable, and “does not prejudice the implementation of the waste hierarchy and/ or the efficient operation of such facilities” (NPPW, para. 8).
- 11.27 Policy W2 therefore safeguards existing strategic and other waste sites, including those that may be developed over the Plan period. Given their importance to the city’s waste management capacity, there will be a stronger presumption against the loss of strategic waste sites and developments which would prejudice their continued operation. However, the Policy also recognises that the redevelopment of existing or former waste management sites for housing, employment or other land uses may sometimes be justified. For example, redevelopment is likely to be acceptable where the waste facility has already closed, or the operator is proposing to close it or relocate the operations to another site.
- 11.28 Another important material consideration will be whether or not the waste operations are lawful, i.e. whether they have planning permission or a lawful development certificate. If the waste operations are unauthorised and unsuitable for the location, the Council will normally consider taking enforcement action to stop them.
- 11.29 The NPPF states that existing business should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing facility could have a significant adverse effect on new development (including classes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before development has been completed.
- 11.30 When determining applications for non-waste development within a short distance of an existing waste management facility, regard will be had to any potential adverse impacts the proposed development might have on the existing or future use of the site for waste management activities. If a proposed development is likely to have an unacceptable impact on such activities, it will be refused.



- 11.31 In order to determine such impacts, Policy W2 requires applications for non-waste development which could be sensitive to the operation of a waste management site to be supported by a Waste Site Impact Assessment. This should:
- a) identify the waste site potentially affected;
  - b) explain the spatial relationship between the application site and the waste site;
  - c) provide a brief description of the waste site, including:
    - i. its operational status and any proposed changes;
    - ii. the facility type;
    - iii. whether the site is a strategic waste site;
    - iv. the types of waste managed;
    - v. the waste operations permitted on the site.
  - d) summarise the main effects of the waste operations;
  - e) identify any effects that could be harmful to the health, wellbeing, and amenity of the occupiers of the new development;
  - f) consider how the occupiers of the new development could be affected;
  - g) consider how the waste site could be affected by the development; and
  - h) demonstrate how the development complies with Policy W2 including any measures proposed to ensure that the waste site and the proposed development can co-exist without compromising each other.

## Evidence

- Black Country Plan Waste Study (Wood, 2020 / 2022)
- Black Country Plan Waste Study Update – Wolverhampton (Wood, 2023)

## Delivery

- Through the planning application process
- Waste industry – engage positively with developers and the Local Planning Authority on proposals to change the use of existing or planned waste sites and proposals for non-waste development near to existing or planned waste sites

## Locational Requirements for New Waste Management Facilities

- 11.32 The delivery of new waste management facilities in the most suitable locations, where they are likely to generate maximum benefits in terms of co-location, provide supporting infrastructure for other uses and minimise potential harmful effects on the environment and local communities, will make a significant contribution towards meeting new capacity requirements set out in Policy W1.

## Policy W3 – Locational Requirements for New Waste Management Facilities

### Locational Requirements for New Waste Management Facilities

- 1. The preferred areas for new waste management facilities are listed in Table 10 and shown on the Policies map. Where a new waste management facility cannot be located within a preferred area, it should be located within a Local Employment Area as defined in Policy EMP3.**

## Justification

- 11.33 National Planning Policy for Waste (NPPW) requires Waste Management Authorities to identify suitable sites and areas for waste management in Local Plans. The NPPW recommends looking at a broad range of locations for the development of new waste infrastructure, including previously developed land and industrial sites, particularly where there are opportunities to co-locate waste management facilities together. When deciding which sites should be allocated, their suitability should be assessed against a range of criteria, including physical and environmental constraints, cumulative impacts, and transport effects. The NPPW also advises that opportunities for on-site management of waste where it arises should be considered. This has been addressed in Policy W1 part 3(b).
- 11.34 The move towards more sustainable waste management set out in Policy W1 will involve broadening the range of waste management facilities available in Wolverhampton. Therefore, it is necessary to identify a range of opportunities that can accommodate different types of operation and technology. Many waste operations are similar to industrial processes and can be accommodated in Local Employment Areas, as set out in Policy EMP3.
- 11.35 Within Strategic Employment Areas as defined in Policy EMP2, only limited types of waste development are likely to be acceptable. These will normally be restricted to fully enclosed operations that fall within Use Classes B1 (c) or B2 and are already classified as employment uses, or sui generis operations that would be compatible with a Strategic Employment Area location and would not compromise existing or potential future employment uses falling within Use Classes E(g)(ii), E(g)(iii), B2 or B8 (see Policies EMP2 and EMP3).

- 11.36 Within Other Employment Sites as defined in Policy EMP4, certain waste operations may be acceptable. However, given the status of these areas and the possibility that they will be developed for a non-employment use, in most cases only a temporary permission for waste development will be granted.

#### Identification of Preferred Areas

- 11.37 Specific sites for waste are not allocated in the WLP because no new sites likely to be deliverable within the Plan period have been identified. To have sufficient confidence to allocate a site, it would need to be actively promoted for waste management use by the Waste Planning Authority, a landowner or a commercial waste operator.
- 11.38 The Wolverhampton Waste Study identifies three preferred areas which are most suited to the development of new waste recovery, treatment, and transfer infrastructure, as listed in Table 10 and shown on the Policies Map. Waste development in these areas is considered least likely to give rise to land use conflicts, in accordance with Policy W4. In several cases there is already co-location of existing waste facilities to which new sites could contribute.

**Table 10: Preferred Areas for New Waste Management Facilities**

WLP Ref / WWS Ref	Address	Potentially Suitable Waste Uses	Area (ha)
WPA1 / M.19	<p>Wolverhampton / Ettingshall Corridor (North)</p> <p>The area west of the railway line is under pressure from non-employment uses / proximity to housing, however, proposals will be dealt with on a case by case basis.</p> <p>The area to the east of the railway line is less under pressure and should therefore be the focus for additional waste uses.</p>	Energy from Waste, Treatment, In-vessel composting, Anaerobic digestion, Transfer, Recycling	88.5
WPA2 / M.20	<p>Wolverhampton / Ettingshall Corridor (South)</p> <p>The area is under pressure from housing proposals with significant areas of interest to the north eastern and western boundaries.</p> <p>The area to the east of the railway line is less under pressure and should therefore be the focus for additional waste uses.</p>	Energy from Waste, Treatment, In-vessel composting, Anaerobic digestion, Transfer, Recycling	74.5
WPA3 / M.23	Dale Street, Loxdale, Bilston	Treatment, In-vessel composting, Anaerobic digestion, Transfer, Recycling	20.6

## Evidence

- Black Country Plan Waste Study (Wood, 2020 / 2022)
- Black Country Plan Waste Study Update – Wolverhampton (Wood, 2023)

## Delivery

- Through the planning application process
- Waste industry – engage positively with developers and the Local Planning Authority on waste development proposals

## Key Considerations for Waste Developments

11.39 Policy W4 will ensure waste developments are guided towards the most suitable locations and designed to minimise environmental impacts.

## Policy W4 – Key Considerations for Waste Developments

### Key Considerations for Waste Developments

1. Waste development proposals will be required to meet all of the following criteria:
  - a) all waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained in buildings;
  - b) proposals must comply with planning policies on protection of the environment (both natural and historic) and public amenity and avoid potential adverse environmental impacts, including:
    - i. visual impacts;
    - ii. effects on the environment and public health;
    - iii. generation of odours, litter, light, dust, and other infestation;
    - iv. noise, excessive traffic and vibration;
    - v. risk of serious fires through combustion of accumulated wastes;
    - vi. harm to water quality and resources and flood risk management;
    - vii. land instability
  - c) proposals should demonstrate compatibility with the uses already present within / adjacent to the area; and

## Key Considerations for Waste Developments

- d) where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.

### Supporting Information

#### 3. Waste development proposals must be supported by the following information:

- a) The key characteristics of the development:
- i. the type of waste facility or facilities proposed;
  - ii. the waste streams and types of waste to be managed;
  - iii. the types of operation to be carried out on the site;
  - iv. whether waste would be sourced locally, regionally or nationally;
  - v. the maximum operational throughput in tonnes per annum;
  - vi. for waste disposal to landfill, the total void space to be infilled in cubic metres;
  - vii. the outputs from the operations, including waste residues;
  - viii. the expected fate and destination of the outputs;
  - ix. the number of associated vehicular movements; and
  - x. the number of jobs to be created.
- b) A supporting statement that clearly explains the need for the development and how it will contribute to the strategic objectives of Policy W1. This should include a consideration of the contribution the development would make towards:
- i) driving waste up the waste hierarchy (e.g. by diverting waste from landfill);
  - ii) supporting the development of a more circular economy;
  - iii) delivering additional waste capacity to help meet Wolverhampton's waste capacity requirements;
  - iv) broadening the range of waste facilities currently available in Wolverhampton;
  - v) providing opportunities for co-location of related uses; and
  - vi) providing other benefits e.g. production of a range of waste types or streams, production of high quality aggregates or other useful raw materials, supply of heat or power to adjacent uses.

## Justification

- 11.40 For the purposes of Policy W4, waste development covers the use of any land or buildings for the storage, treatment, processing, transfer, bulking-up, recycling, recovery, or final deposit of any substance classified as 'waste'. Such developments will include new build, changes of use, new operations and other material changes to existing waste sites, and 's73' applications to vary a condition attached to an existing waste permission.
- 11.41 There are a number of planning issues common to all waste development proposals that should be addressed in all cases. The relationship of a proposal to the strategy for waste, as set out in Policy W1, is of paramount importance and all proposals should demonstrate how they will contribute towards this. They should also address other locational issues such as proximity to the source of waste, relationships to adjoining / neighbouring uses, visual impacts and other potential effects on the surrounding area. Potentially harmful environmental and amenity impacts will be minimised where operations are contained within a building or enclosure, therefore facilities should always be enclosed where feasible.
- 11.42 There are certain types of waste management facilities that require an open site and will therefore be difficult to accommodate within the urban area of Wolverhampton due to the lack of suitable sites (e.g. open window composting facilities, disposal of inert waste onto or into land). These types of facility are subject to strict regulation by the Environment Agency and must be located at least 250m away from sensitive receptors.

## Evidence

- Black Country Plan Waste Study (Wood, 2020 / 2022)
- Black Country Plan Waste Study Update – Wolverhampton (Wood, 2023)

## Delivery

- Through the planning application process

## Resource Management and New Development

- 11.43 Managing material resources – including waste - in a responsible way is an important element of sustainable development.

## Policy W5 – Resource Management and New Development

### Resource Management and New Development

1. All new developments should;
  - a) address waste as a resource;
  - b) minimise waste as far as possible;
  - c) be designed with resource and waste management in mind;
  - d) manage unavoidable waste in a sustainable and responsible manner; and
  - e) maximise use of materials with low environmental impacts.
2. Where a development proposal includes uses likely to generate significant amounts of waste, this waste should be managed either on site or as close as possible to the source of the waste.
3. Resource and waste management requirements should be reflected in the design and layout of new development schemes. Wherever possible, building, engineering and landscaping projects should use alternatives to primary aggregates, such as secondary and recycled materials, renewable and locally sourced products and materials with low environmental impacts. Consideration should also be given to how waste will be managed within the development once it is in use.
4. Where redevelopment of existing buildings or structures and / or remediation of derelict land is proposed:
  - a) It must be demonstrated why the proposed use is not suitable for any existing buildings on site; and
  - b) construction, demolition and excavation wastes (CD&EW) should be managed on-site where feasible and as much material as possible should be recovered and re-used for engineering or building either on-site or elsewhere.



## Justification

- 11.44 The management of material resources including ‘waste’ in a responsible way is an important element of sustainable development. Policy W5 sets out general principles on waste management and resource efficiency to be addressed by new developments, including requirements to manage large amounts of waste on site or nearby, recycle and re-use products as far as possible.
- 11.45 The “waste hierarchy” ranks waste management options according to what is best for the environment. It gives top priority to preventing waste arising in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill).
- 11.46 Achieving zero waste growth and driving waste up the “waste hierarchy” are important objectives of national policy guidance and the strategy for waste management in Wolverhampton. Delivering on site-waste management of waste and making better use of waste generated through development are critical to the delivery of these objectives.
- 11.47 The scale of development over the Plan period presents a major opportunity to influence decisions over how resources are managed and to develop a more integrated and holistic approach towards this at a local level. Policy W5 sets out the minimum requirements for all developments to demonstrate how they have addressed waste and resource issues. Major development schemes should provide evidence of how they are addressing these issues within supporting information.
- 11.48 Residential developments should include adequate storage for recyclable and non-recyclable waste pending collection, including storage for recyclable wastes and access for waste collection vehicles. The resources and waste management requirements of businesses will be an important consideration in development projects to improve employment areas and centres. Where feasible, regeneration schemes should include provision for on-site waste management.
- 11.49 Where organisations are generating significant amounts of a particular type of waste, which is not currently managed in Wolverhampton, consideration should be given towards waste being disposed of or being recovered at the nearest appropriate facilities. Opportunities for symbiosis – matching waste producers with organisations who might have a use for the waste produced - should also be explored.

## Evidence

- Black Country Plan Waste Study (Wood, 2020 / 2022)
- Black Country Plan Waste Study Update – Wolverhampton (Wood, 2023)
- Making Space for Waste: Designing Waste Management in New Developments (June 2010), Association of Directors of Environment, Planning and Transport (ADEPT)

## Delivery

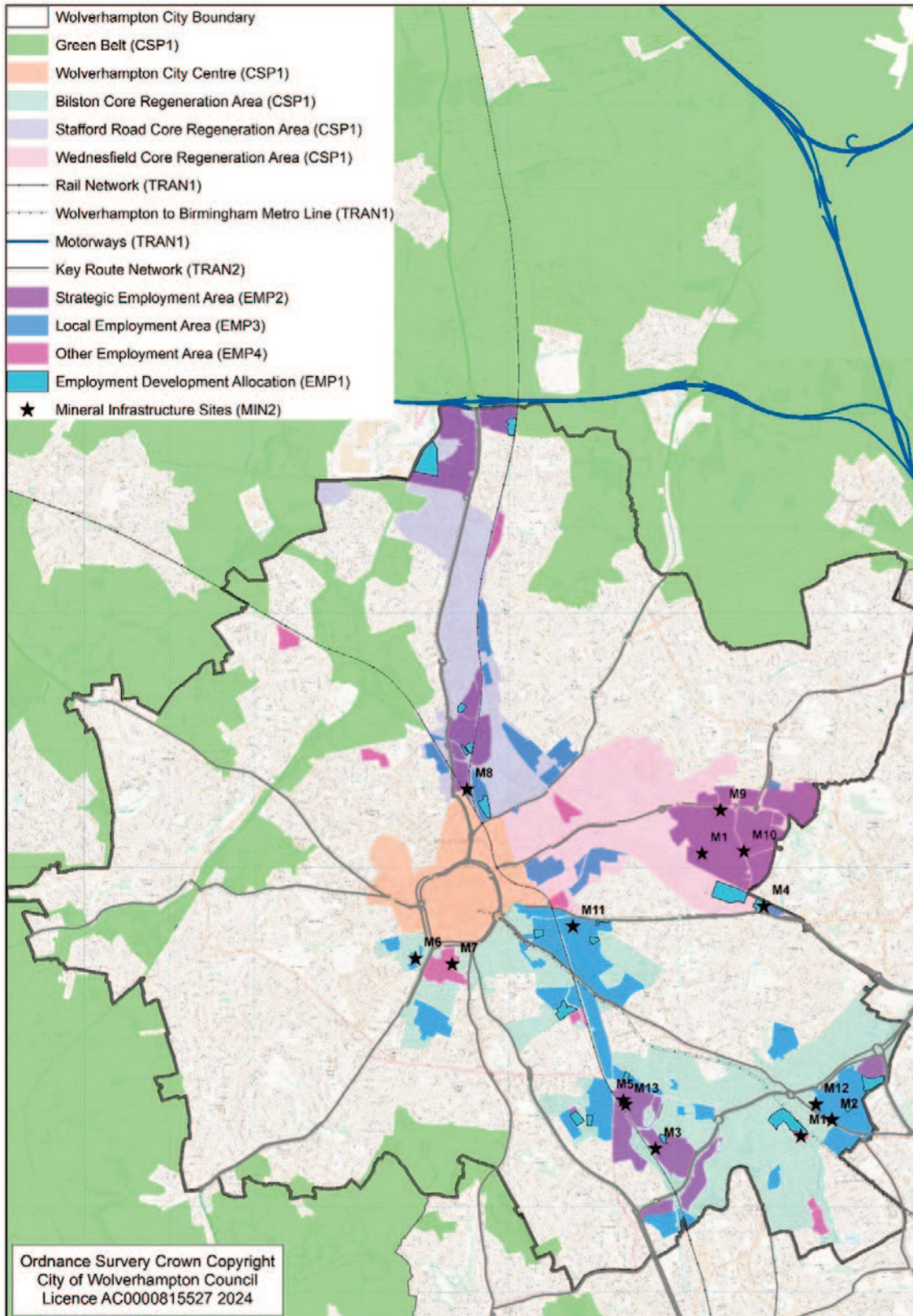
- Through the planning application process

## Monitoring

Policy	Indicator	Target
W2	Strategic and other waste management facilities protected from inappropriate development unless Policy W2 exceptions are met.	100%
W3	New waste management facilities located within a preferred area or Local Employment Area, as set out in Policy W3.	100%

# 12. Minerals

Figure 13: Minerals Key Diagram



## Mineral Production

12.1 Policy MIN1 will help to ensure a sustainable supply of minerals over the Plan period.

### Policy MIN1 – Mineral Production

#### Mineral Production

1. To enable Wolverhampton to make an appropriate contribution towards identified local and regional requirements, the following provision is identified for minerals over the Plan period:

#### Construction Aggregates - Secondary and Recycled Aggregates

- a) The Wolverhampton Minerals Study estimates the quantity of secondary and recycled aggregates per annum being produced at permitted production sites within Wolverhampton. The Council will aim to maintain this level of production, as a minimum, throughout the Plan period. In support of this, permitted secondary and recycled aggregate sites currently expected to continue in production up to 2042 will be safeguarded, as set out in Policy MIN2.

#### Efficient Use of Mineral Resources

- b) All new developments should make maximum possible use of recycled mineral products in construction, to be resource efficient and to reduce reliance on quarried products and help maintain existing supplies for longer.

## Justification

12.2 The City of Wolverhampton Council is the Minerals Planning Authority for Wolverhampton. Local plans are required to make sufficient provision for minerals development. The NPPF recognises that mineral resources can only be worked where they are found, as determined by the underlying geology. As detailed in the Black Country Minerals Study – Wolverhampton (2024) (the Wolverhampton Minerals Study), there are no workable primary minerals or aggregates sites remaining in the city. Therefore, the focus of Policy MIN1 is on maintaining the supply of secondary and recycled aggregates from sites in the city, which helps to preserve the regional primary aggregates supply. Secondary and recycled aggregate sites expected to continue in production up to 2042 will be safeguarded as set out in Policy MIN2 and Table 11. Some of these sites are also protected as strategic waste management sites (see Policy W2).

- 12.3 For minerals planning purposes, past trends and future provision is planned at the West Midlands Metropolitan Area (WMMA) level via the Local Aggregates Assessment, which is updated on a regular basis. The WMMA comprises the seven unitary authorities of Birmingham, Coventry, Dudley, Sandwell, Solihull, Walsall, and Wolverhampton. The Council will continue to work with these Mineral Planning Authorities to identify, monitor and manage the wider WMMA minerals requirements over the Plan period. The Council will also continue to work with Mineral Planning Authorities in the wider region, via the West Midlands Aggregate Working Group.

### Evidence

- Black Country Minerals Study and Update – Wolverhampton (Wood, 2020 / 2024)

### Delivery

- Through the planning application process
- Through continued liaison with Minerals Planning Authorities via the Local Aggregates Assessment and the Aggregates Working Party under the Duty to Cooperate

### Safeguarding Minerals

- 12.4 Policy MIN2 sets out how the most important mineral resources in Wolverhampton, and sites that are expected to be producing, processing or transporting minerals and mineral products, will be protected from other types of development that could compromise their continued operation over the Plan period.

## Policy MIN2 – Safeguarding Minerals

### Safeguarding Minerals

1. Mineral deposits that are identified as being, or may become of, economic importance will be safeguarded from unnecessary sterilisation. Where non-mineral development is proposed, consideration should be given to the extraction of the mineral resource prior to or in conjunction with development, where this would not have unacceptable impacts on neighbouring uses. New build developments of over five hectares (i.e. excluding changes of use and building conversions) should be accompanied by supporting information demonstrating that mineral resources will not be needlessly sterilised.



## Safeguarding Minerals

- 2. All permitted mineral infrastructure sites in Wolverhampton are listed in Table 11 and identified on the Policies Map. Development proposals within a 150m buffer zone of these sites must demonstrate that they will not have any unacceptable impacts on these sites that would prevent them from continuing to operate.**

### Justification

- 12.5 All of Wolverhampton's mineral resources are now either exhausted or sterilised by other development and therefore not capable of being worked on a commercial scale. Therefore, the Plan does not identify any Minerals Safeguarding Areas. However, to prevent the unnecessary sterilisation of mineral resources more widely, the prior extraction of these resources is encouraged where large scale non-mineral development is proposed on sites of over five hectares, in accordance with the NPPF. Such developments should be accompanied by supporting information demonstrating that mineral resources will not be needlessly sterilised. The supporting information should include details of a prior extraction scheme or, where this is not considered feasible, evidence that:
- a) mineral resources are either not present, are of no economic value or have already been extracted as a result of a previous site reclamation scheme or other development; or
  - a) extraction of minerals is not feasible, for example due to significant overburden or because mineral extraction would lead to or exacerbate ground instability; or
  - a) prior extraction of minerals would result in abnormal costs and / or delays which would jeopardise the viability of the development; or
  - a) there is an overriding need for the development which outweighs the need to safeguard the mineral resources present; or
  - a) extraction of minerals would have unacceptable impacts on neighbouring uses, the amenity of local communities or other important environmental assets.
- 12.6 Where prior extraction is proposed, conditions will be imposed requiring applicants to provide details of the types and tonnages of minerals to be extracted once the scheme has been completed.

#### Mineral Infrastructure Sites

- 12.7 Mineral facilities are an essential part of the city's infrastructure, therefore it is important that they are appropriately located and protected to help maintain an adequate and steady supply of minerals.

12.8 Wolverhampton has several fixed secondary and recycled aggregates sites which provide around 105,000 tonnes per annum of recycled and secondary processing capacity. Other mineral infrastructure sites in Wolverhampton include a coating plant, a number of ready-mix concrete plants, a Dry Silo Mortar plant, and an aggregates depot. These sites are protected by Policy MIN2 and are listed in Table 11 and shown on the Minerals Key Diagram and the Policies Map.

**Table 11: Key Mineral Infrastructure Sites**

WLP Site Ref	Site	Location	Type
M1	Aggregate Industries (Wolverhampton)	Manfield Road, Wolverhampton	Ready-Mix Concrete Plant
M2	Britannia Onsite Concrete	Oxford Street/Vulcan Road, Bilston	Ready-Mix Concrete Plant
M3	CPI Mortars (Wolverhampton)	Springvale Industrial Estate, Springvale Avenue, Bilston	Dry Silo Mortar Plant
M4	Dismantling & Engineering Services	Noose Lane, Willenhall	Aggregates Recycling
M5	Ettingshall Asphalt Plant	Spring Road, Wolverhampton	Coating Plant
M6	Gills Mix Concrete	Mander Street, Wolverhampton	Ready-Mix Concrete Plant
M7	G L Ready Mix Concrete	Unit 1a Thomas Street, Blakenhall	Ready-Mix Concrete Plant
M8	Heidelberg Materials Ready Mix Concrete (Wolverhampton)	Fox's Lane, Wolverhampton	Ready-Mix Concrete Plant
M9	Landywood Concrete Products Ltd	Neachells Lane, Wednesbury	Ready-Mix Concrete Plant



WLP Site Ref	Site	Location	Type
M10	Neachells Lane Transfer Station	Consolidation House, Neachells Lane, Willenhall	Operational waste transfer station (WTS) with specialist facility for recovery of street sweepings for use in manufacture concrete
M11	Premier Mortars (Wolverhampton)	Chillington Works Industrial Estate, Cross Street, Eastfield	Dry Silo Mortar Plant
M12	S S Concrete	Price Street, Bilston	Ready-Mix Concrete Plant
M13	Tarmac Concrete Ettingshall	Millfields Road, Ettingshall,	Ready-Mix Concrete Plant
M14	McAuliffe Recycling Facility and Depot	McAuliffe House, Northcott Road, Bilston	Recycled / secondary aggregates - Operational recycling facility and depot operated by demolition contractor carrying on-site and off-site recycling for developer clients

12.9 The Wolverhampton Minerals Study recommends that a 150m buffer zone is applied around existing mineral infrastructure sites and that any non-mineral development within this zone should demonstrate that it will not have any unacceptable impacts on these sites that would prevent them from continuing to operate. Given the proximity of permitted mineral sites to other urban uses in Wolverhampton, it was considered that application of the Mineral Products Association's recommended 250m buffer zone was unrealistic.

## Evidence

- Black Country Minerals Study and Update – Wolverhampton (Wood, 2020 / 2024)

## Delivery

- Through the planning application process

## Key Considerations for Mineral Developments

12.10 Policy MIN3 sets out the requirements that planning applications for minerals infrastructure will be expected to address.

### Policy MIN3 – Key Considerations for Mineral Developments

#### Key Considerations for Mineral Developments

1. Proposals for mineral working or mineral-related infrastructure at both new and existing sites must accord with planning policies relating to the protection of the environment, public amenity and health, and surrounding land uses, and avoid potential adverse environmental impacts, including:
  - a) visual impacts;
  - b) effects on natural, built, and historic (including archaeological) environments and on public health;
  - c) generation of noise, dust, vibration, lighting, and excessive vehicle movements;
  - d) harm to water quality and resources and flood risk management, and impacts upon the drainage network;
  - e) ground conditions and land stability;
  - f) impacts on the highway and transport network.
2. Proposals should demonstrate compatibility with neighbouring uses, taking into account the nature of the operations, hours of working, the timing and duration of operations and any cumulative effects.
3. Where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.

## Justification

12.11 The NPPF places several requirements on minerals planning authorities when setting policies for assessing minerals developments and for assessing individual proposals – including adverse impacts on the natural and historic environment and on human health, cumulative effects of multiple mineral facilities, control and mitigation of noise, dust and vibration, and restoration and aftercare at the earliest opportunity and to a high environmental standard. Policy MIN3 sets out the general requirements that will apply to all proposals involving the development of mineral infrastructure and mineral working. Mineral infrastructure proposals are defined as storage, handling, and processing facilities (such as depots and recycling facilities) and transportation facilities (such as rail sidings, rail heads and canal wharves). In Wolverhampton, mineral working proposals are only likely to include any prior extraction in advance of a large-scale development scheme.

## Evidence

- Black Country Minerals Study and Update – Wolverhampton (Wood, 2020 / 2024)

## Delivery

- Through the planning application process

## Monitoring

Policy	Indicator	Target
MIN1	Maintenance of 2021 levels of aggregates produced from secondary and recycled sources.	N/A
MIN2	Applications for non-mineral development within the MSAs and within the 'buffer zones' around mineral extraction sites and mineral infrastructure that comply with the safeguarding policy.	100%
MIN3	Percentage of applications for mineral related development satisfying the requirements set out in the policy.	100%

## 13. Site Allocations

- 13.1 Table 12 provides details of all housing and employment site allocations made through the Wolverhampton Local Plan (WLP) and specific policy requirements which apply to them. These allocations are shown on Figures 4 and 6. A number of the allocations replace existing allocations made in adopted Development Plan Documents, which formed part of the Wolverhampton Policies Map. Where this is the case, the Development Plan Document concerned and the previous allocation reference are provided. Appendix 1 provides details of all other Development Plan Document designations in Wolverhampton which have been replaced or amended through this Plan. All detailed allocation and designation boundaries can be viewed on the online Wolverhampton Policies Map.

**Table 12: Housing and Employment Allocations**

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
<b>Stafford Road Core Regeneration Area</b>						
H1	Bluebird Industrial Estate and site to rear, Park Lane	<p>Replaces Stafford Road Corridor Area Action Plan allocation HP7. Occupied employment land.</p> <p><b>Heritage Impact:</b> Site falls within an Area of High Historic Townscape Value which contains the remains of the early 20th century Fallings Park Motor Works and a small factory used for the production of railway carriage parts. Low archaeological potential. Within 500m of the site there are Wolverhampton Locks CA and LBs (to west) and LLBs and other HEADs further away. HIS required.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFFRA Site Report requirements.</p>	Housing	130	3.20 (B)	2037-42: 130
GT1	Former Bushbury Reservoir, Showell Road	<p>Replaces Stafford Road Corridor Area Action Plan allocation HP5. Site of Local Importance for Nature Conservation (reservoir since landfilled). Subject to satisfactory mitigation for loss of nature conservation value / biodiversity net gain.</p> <p><b>Heritage Impact:</b> Land between two railway lines, used in 20th century as reservoir. No archaeological potential. Wolverhampton Locks CA and LBs are 390m to southwest. No HIS necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFFRA Site Report requirements.</p>	Gypsy and traveller pitches	12 pitches	0.30 (G)	2024-32: 12 (2029-30: 4; 2030-31: 4; 2031-32: 4)

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E1	Wolverhampton Business Park	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO4. Site has Local Development Order and secured outline planning permission. site also suitable for office development consistent with extant planning permission.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Leescroft Farm (18th C mapping) partially within north of site. Snapes Green settlement (with a single building) partially within south of site. Archaeological potential low, but DBA to be submitted with any application. Within 500m of site there are Springfield Cottage LLB (350m to southwest) and two HEADS and CA further away. No HIS necessary.</p>	Employment	-	1.77 (G)	By 2032
E2	Rear of IMI Marstons, Wobaston Road	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO2. Site has outline planning permission. High quality design required which respects adjoining canal.</p> <p><b>Heritage Impact:</b> Adjoins Staffordshire / Worcestershire and Shropshire Union Canal CA and Waterhead Brook APA. Archaeological work completed (potential for peat deposits under made ground and alluvium - deposit model and coring / analysis undertaken), no further work required. No other heritage assets within 500m. HIS required.</p>	Employment	-	7.24 (B)	By 2032
E4	Former Strykers, Bushbury Lane	<p>Site has outline planning permission.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site of former late 19th century methodist church, converted to warehouse mid 20th century. Within 500m of site are Oxley House LB (210m to southwest) and Wolverhampton Locks CA and LBs (to the southwest). No HIS necessary.</p>	Employment	-	0.77 (B)	By 2032

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E6	Mammoth Drive, Wolverhampton Science Park	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO12. Designated a core development site within the West Midlands Investment Zone. High quality design required which respects adjoining canal. Subject to biodiversity net gain.</p> <p><b>Heritage impact:</b> Site of former 19th century gas works with potential for related archaeology. Site adjoins Wolverhampton Locks CA and Grade II Listed Stour Valley Line Viaduct. Within 500m of site is Locally Listed railway turntable 400m to south. HIS required, including assessment of archaeological significance and potential.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Employment	-	0.83 (G)	By 2042
E7	Stratosphere Site, Wolverhampton Science Park	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO11. Designated a core development site within the West Midlands Investment Zone. Subject to biodiversity net gain. High quality design required which respects adjoining Birmingham Canal (CA and SINC) and Land at Wolverhampton Science Park SLINC by incorporating natural landscaping on site.</p> <p><b>Heritage impact:</b> Site of former 19th century gas works with potential for related archaeology. Site adjoins Wolverhampton Locks CA and Grade II Listed Stour Valley Line Viaduct. Within 500m of site is Locally Listed railway turntable 400m to south. HIS required, including assessment of archaeological significance and potential.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Employment	-	0.42 (G)	By 2042



Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E8	Cross Street North / Crown Street	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO14. Site has outline planning permission. High quality design required which respects adjoining canal.</p> <p><b>Heritage impact:</b> Site of former industrial works but archaeological assessment showed north area has been 'sealed', middle area remediated and only base of canal basin likely to survive. Potential for preservation in situ through sensitive design of new build piles. Site adjoins Wolverhampton Locks CA, Grade II Listed Stour Valley Line Viaduct and Local List railway platform across canal. Within 500m of site are Springfield Brewery CA with LBs and LLBs (to the southeast) and Park Village Estate AHHTV (100m to east). HIS required.</p>	Employment	-	2.14 (B)	By 2032
<b>Wednesfield Core Regeneration Area</b>						
H2	Former G & P Batteries, Grove Street, Heath Town	<p>Existing allocation in Heathfield Park Neighbourhood Plan. Outline permission lapsed in 2024, 100% flats. High quality design required which respects adjoining Wyrley &amp; Essington Canal (LNR and SINC). Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage within site. Site adjoins Wyrley and Essington canal AHHTV. A DBA submitted for prior application recorded 19th century industrial buildings at southwestern end of the site, but confirmed archaeological potential is low. Within 500m of the site are the Bilston Canal Corridor CA (120m to the southwest) and a number of HEADs (250-300m to the north), including Heath Town AHHTV (with the Grade II Holy Trinity Church), and Heath Town Park. HIS required.</p>	Housing	56	0.62 (B)	2024-32: 56 (2029-30: 18; 2030-31: 19; 2031-32: 19)

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H3	East of Qualcast Road, Canal-side South	<p>Together with H4 and H5, replaces Bilston Corridor Area Action Plan allocation H1. Includes Inkerman Street Open Space. Subject to biodiversity net gain and provision of an equivalent quantity of high quality recreational open space as part of the development. High quality design required which respects adjoining Wyrley &amp; Essington Canal (LNR and SINC).</p> <p><b>Heritage Impact:</b> No built heritage within site. Site adjoins Bilston Canal Corridor and Union Mill Conservation Areas. Archaeological DBAs completed for previous applications. Remains of canal basin potentially survives, but overall archaeological potential low. Within 500m of site are CAs, LBs and LLBs within the wider area. HIS required.</p>	Housing	152	2.00 (G)	2024-32: 152  (2026-27: 76; 2027-28: 76)
H4	West of Qualcast Road, Canal-side South	<p>Together with H3 and H5, replaces part of Bilston Corridor Area Action Plan allocation H1. Occupied employment land. High quality design required which respects adjoining Wyrley &amp; Essington Canal (LNR and SINC).</p> <p><b>Heritage Impact:</b> Later industrial works may contain historic buildings / fabric. Site of former Horseley Fields Iron Works. Likely truncation from later phases of works here, but potential for earlier archaeology – DBA underway. Site adjoins Bilston Canal Corridor and Union Mill Conservation Areas. Within 500m of site are CAs, LBs and LLBs within the wider area. HIS required.</p> <p><b>Wastewater:</b> Early consultation is required with STW to ascertain if any sewer infrastructure upgrades / network connections are required, and can be delivered, before commencement or occupation of development.</p>	Housing	228	3.00 (B)	2024-32: 228  (2028-29: 114; 2029-30: 38; 2030-31: 38; 2031-32: 38)

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H5	West of Colliery Road, Horseley Fields	<p>Together with H3 and H4, replaces Bilston Corridor Area Action Plan allocations H1 and MU1. Occupied employment land. Additional 1 ha suitable for other commercial uses as part of mixed use scheme. 100% flats. High quality design required which respects adjoining Wyrley &amp; Essington Canal (LNR and SINC).</p> <p><b>Heritage Impact:</b> Site of former Swan Garden Iron Works and terraced housing along Swan Street and to the south. Site adjoins Bilston Canal Corridor and Union Mill CAs. Within 500m of site are LLBs and other LBs within the CAs (100m to east and west). HIS required, including dating of current industrial buildings and assessment of archaeological significance and potential.</p>	Housing	90	2.00 (B)	2037-42: 90
H6	Heath Town Estate Masterplan – Chervil Rise	<p>Council housing renewal site forming part of Heath Town Masterplan scheme. Cleared site with full planning permission. 70% flats.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. No archaeological potential. Within 500m of the site are St Barnabas Church (50m to west) recommended for local listing, Culwell Trading Estate AHHTV, and St Stephen's CofE School LLB (230m to north). No HIS necessary.</p>	Housing	54	0.49 (B)	2024-32: 54 (2026-27: 27; 2027-28: 27)
H7	New Park Village Housing Renewal (Elerton Walk)	<p>Council housing renewal scheme. Estimated 205 demolitions planned.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. No archaeological potential. Within 500m of the site are a number of HEADS, including Heath Town AHHTV (with LBs) to the south, Park Village Estate AHHTV and Fallings Park Garden Suburb AHHTV. No HIS necessary.</p>	Housing	188 (-17 net)	3.26 (B)	2024-32: 188 (2026-27: 93; 2028-29: 95) (-17 net)

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E12	Land at Neachells Lane	<p>Part of Neachells Lane Open Space and Site of Local Importance for Nature Conservation. Subject to satisfactory highways access being demonstrated and mitigation for loss of open space and nature conservation value. Appropriate buffers are required around the development to mitigate harm to nature conservation and open space value, and to the amenity of existing residential development: (1) continuous wildlife corridor alongside the railway line; (2) minimum 30m to the west to retain openness, allow for diversion/ retention of existing public right of way and avoid pinch point in public open space corridor; (3) minimum 35m to the south between existing residential boundaries and proposed buildings to include diversion/ retention of existing public right of way. Further assessment work should be carried out on transportation, nature conservation and open space implications of the proposed development to support any planning application. Planning application under consideration as of 2024.</p> <p><b>Heritage Impact:</b> No built heritage within or adjacent to site. No archaeological potential. Former colliery land/ landfill site. Within 500m of site is locally listed Old Heath War Memorial (280m to southwest). No HIS necessary.</p> <p><b>Wastewater:</b> Early consultation is required with STW to ascertain if any sewer infrastructure upgrades / network connections are required, and can be delivered, before commencement or occupation of development.</p>	Employment	-	6.73 (G)	By 2032
E13	Land rear of Keyline Builders, Neachells Lane / Moose Lane	<p>Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage within or adjacent to site. No archaeological potential. Former large pits/colliery. Within 500m of site is Fibbersley Nature Reserve AHHLV (450m to east). No HIS necessary.</p>	Employment	-	1.22 (G)	By 2042

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
<b>Bilston Core Regeneration Area</b>						
H8	Dobbs Street, Blakenhall	<p>100% flats.</p> <p><b>Heritage Impact:</b> Site is immediately south of Grade II Listed Building Moxley Foundry (Formerly Star Motors). Part of the site falls within the Industrial Area south of Wolverhampton AHHTV and includes the Former Adelphi Works. The archaeological remains of the former Lion Iron Works may survive in the southwestern corner of the site. Within 500m of the site are the Sunbeamland Works LLB and Crown Works LLB, St John's CA with numerous LBs (220m to north), and other LLBs including Graiseley Primary and Music School (230m southwest) and Dudley Road School (140m southeast). HIS required, including assessment of archaeological potential. Design required to respect historic context of the area.</p>	Housing	266	1.35 (B)	2032-37: 266
H9	Dudley Road / Bell Place, Blakenhall	<p>Replaces Wolverhampton City Centre Area Action Plan allocation 10d. Site has full planning permission. 100% flats.</p> <p><b>Heritage Impact:</b> No built heritage within site. No archaeological potential. Site adjoins the Industrial Area south of Wolverhampton AHHTV. Within 500m of site is St John's CA with LBs (220m to north) and Dudley Road School LLB (140m to south). No HIS necessary.</p>	Housing	100	0.36 (B)	2024-32: 100 (2026-27: 50; 2027-28: 50)

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H10	Royal Hospital Development Area, All Saints	Replaces Wolverhampton City Centre Area Action Plan allocation 11a. Fmr Bus Depot part was completed in 2022. Royal Hospital part is partly complete. Cleveland Street part has full planning permission for 93 homes. 50% flats (of remaining). Total capacity: 295 homes. Any subsequent planning applications would require high quality design which respects Cleveland Road Conservation Area (within which the site is located) and associated listed and locally listed buildings.  <b>Heritage Impact:</b> Site is within Cleveland Road CA and contains Grade II listed building and LLBs. Archaeological DBA identified specific areas of potential that are being mitigated as individual areas are developed. Former Baker's Shoe Factory (Grade II listed) immediately west of the site. Within 500m are many heritage assets, including St George's (Grade II listed converted church, and graveyard APA), Old Hall Street CA, LBs and APA, and Bilston Canal Corridor CA. HIS Required.	Housing	143 (remaining)	4.76 (B)	2024-32: 143  (2024-25: 40; 2025-26: 10 ; 2026-27: 93)
H11	Delta Trading Estate, Bilston Road	Replaces Bilston Corridor Area Action Plan allocation H2. Occupied employment land. High quality design required which respects adjoining Birmingham Canal (CA and SINC).  <b>Heritage Impact:</b> Formerly late 19th century terrace housing in northern part and mid-19th century tube works in southern part. Historic Monmore Green settlement also recorded on the HER. Site adjoins Bilston Canal Corridor CA. Within 500m of site are Grade II listed Chillington Wharf (close to the north) and a number of locally listed industrial buildings, pubs and bridges. HIS required, including dating of current industrial buildings and assessment of archaeological significance and potential.	Housing	80	2.00 (B)	2037-42: 80

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H12	Land at Hall Street / The Orchard, Bilston Town Centre	<p>Replaces Bilston Corridor Area Action Plan allocation B3. 100% flats. Subject to retention and appropriate conversion of Grade II Listed Buildings at 20-22 Lichfield Street. High quality design required which respects Bilston Town Centre Conservation Area (within which the site is located) and Grade II Listed Buildings which fall within the site.</p> <p><b>Heritage Impact:</b> Site is within Bilston Town Centre CA and includes Grade II LBs. Site is within Bilston medieval settlement APA. Within 500m of site are many LBs and LLBs. HIS required, including assessment of archaeological significance and potential.</p>	Housing	21	0.12 (B)	2037-42: 21
H13	Former Pipe Hall, The Orchard, Bilston Town Centre	<p>Subject to retention and appropriate conversion of Grade II Listed Building. 100% flats. High quality design required which respects Bilston Town Centre Conservation Area (within which the site is located) and Grade II Listed Building.</p> <p><b>Heritage Impact:</b> Site is within Bilston Town Centre CA and includes Grade II LB. Site is within Bilston medieval settlement APA. Within 500m of site are many LBs and LLBs. HIS required, including assessment of archaeological significance and potential for any new build north of the LB.</p>	Housing	38	0.13 (B)	2024-32: 38 (2029-30: 12; 2030-31: 13; 2031-32: 13)



Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H14	Lane Street / Highfields Road, Bradley	<p>Occupied employment land. Subject to a design which: protects the operation of employment land to the east; achieves retention and appropriate conversion of the locally listed Highfield Works building; respects the historic value and setting of Highfield Works and the Bilston Canal Corridor Conservation Area within which it falls; respects the Area of High Historic Townscape Value designation covering the whole site; protects the adjoining SLINC; and provides off-site improvements to local open space to meet recreational open space needs of new residents.</p> <p><b>Heritage Impact:</b> Site includes locally listed building, falls within Highfield Works AHHTV and adjoins Bilston Canal Corridor CA. Earlier building shown on tithe map. Within 500m of site are Coronation Park DLHV and LLB (250m to southeast), former Queens Picture Housing LLB (270m to northeast). HIS required, to include archaeological assessment of significance and potential for remains.</p>	Housing	72	1.79 (B)	2037-42: 72
H15	Greenway Road, Bradley	<p>Replaces Bilston Corridor Area Action Plan allocation H6. Occupied employment land. Suitable for a density of 45 dph subject to access improvements (Policy HOU3). High quality design required which respects the adjoining Birmingham Canal (CA and SINC).</p> <p><b>Heritage Impact:</b> Site adjoins Bilston Canal Corridor CA. Eastern part former 19th century terraced housing with low archaeological potential. Western part former 19th century works on canal with canal basin through site. HIS required, including assessment of archaeological significance and potential.</p>	Housing	180	3.52 (B)	2037-42: 180

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H16	Former Loxdale Primary School, Chapel Street, Bradley	<p>100% flats. Conversion of building preferred. Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> The school has been recommended for local listing and so is considered a non-designated heritage asset. Site of former Bradley Lodge (18th/19th century), with likely truncation due to Bradley Lodge Colliery or significant amounts of made ground. Within 500m of site are Bilston Canal Corridor CA (160m to southwest), Locally Listed Congregational Church (80m to northwest), Grade II Listed Church of St Mary (also an APA, with a memorial and walls, railings and gates separately listed) and adjoining Locally Listed Holy Trinity RC church (350m to northwest). HIS required, including assessment of archaeological significance and potential.</p>	Housing	100	1.30 (B)	2024-32: 100 (2029-30: 33; 2030-31: 33; 2031-32: 34)
H17	South of Oxford Street, Bilston	<p>Replaces Bilston Corridor Area Action Plan allocation MU2. Occupied employment land. Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is within former Bradley Lodge Colliery. No archaeological potential. Within 500m of site is Bilston Canal Corridor CA (170m to west). HIS not necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Housing	20	0.45 (G)	2037-42: 20
H18	Land at Railway Drive, Bilston	<p>Outline permission lapsed in 2023. 100% flats. Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> Site of former 19th century terraced housing with low archaeological potential. Within 500m are Bilston Town Centre CA with many LBs and LLBs (60m to north), Grade II Listed Church of St Mary (also an APA, with a memorial and walls, railings and gates separately listed) and adjoining Locally Listed Holy Trinity RC church (220m to east). HIS required.</p>	Housing	47	0.28 (G)	2024-32: 47 (2029-30: 15; 2030-31: 16; 2031-32: 16)

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H19	Former Bilston College, 40 and adjoining land, Mount Pleasant, Bilston Town Centre	<p>Site has full planning permission. Subject to retention and appropriate conversion of Locally Listed Building. 100% flats. High quality design required which respects Bilston Town Centre Conservation Area (within which the site is located) and Listed and Locally Listed Buildings.</p> <p><b>Heritage Impact:</b> Site includes significant Bilston College LLB and adjoins Bilston Library, Museum and Art Gallery LLB and Prospect House Grade II LB. Site is within Bilston Town Centre CA. No archaeological potential. Within 500m are Bilston Town Centre CA with many LBs and LLBs (to southwest) and Nut and Bolt Works LLB (100m to northeast). HIS required.</p>	Housing	64	0.38 (B)	2024-32: 64  (2029-30: 21; 2030-31: 21; 2031-32: 22)
E14	Chillington Fields	<p>Replaces Bilston Corridor Area Action Plan allocation EDO2. Site includes Willenhall Road Open Space. Subject to biodiversity net gain, compensation for loss of recreational open space, and protecting and improving the environment along Willenhall Road in line with BCAAP Policy BC2.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Settlement shown in this area on tithe map - likely much truncation from later development fronting the road. Low archaeological potential. Within 500m of site are Chillington Moat APA (60m to south), East Park DLHHV and LLB (160m to south), Grade II listed Chillington Wharf (460m to west) and Bilston Canal Corridor CA (500m to west). HIS not necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Employment	-	0.57 (G)	By 2042

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E15	Powerhouse, Commercial Road	<p>Replaces Bilston Corridor Area Action Plan allocation EDO6. High quality design required which respects Bilston Canal Corridor Conservation Area (within which the site is located) and Locally Listed Building within site, and the Birmingham Canal SINC. Subject to retention and appropriate conversion of Locally Listed Building.</p> <p><b>Heritage Impact:</b> Site includes Wolverhampton's first Power Station LLB and falls within Bilston Canal Corridor CA. Within 500m are Bilston Canal Corridor CA Grade II listed Chillington Wharf (160m to southeast) and other LLBs including Crown Nail Works, Wulfrun Coal Company Office, the Harp PH and historic bridges (to north), Cleveland Street CA with associated LLBs and LLBs (230m to west), and other LLBs in wider area. HIS required, including assessment of potential for archaeological remains of parts of the original complex now demolished.</p>	Employment	-	0.85 (B)	By 2042
E16	Hickman Avenue	<p>Replaces Bilston Corridor Area Action Plan allocation EDO4. Subject to protecting and improving the environment along Hickman Avenue in line with BCAAP Policy BC2.</p> <p><b>Heritage Impact:</b> No built heritage assets within site. Site adjoins East Park (DLHHV and Locally Listed). Site is former Chillington Ironworks (APA) which was built over a medieval moat - possibly the site of Stow Heath Manor. Within 500m of site are Bilston Canal Corridor CA (450m to west), including Grade II listed Chillington Wharf. HIS required, including assessment of archaeological significance and potential</p>	Employment	-	0.69 (B)	By 2042

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E17	Former MEB Site, Major Street / Dixon Street	<p>High quality design required which respects the adjoining Birmingham Canal (CA and SINC). Subject to appropriate land remediation and biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage assets within site. Site of former 19th century chemical works. Site adjoins Bilston Canal Corridor CA and LLBs, including engineering sheds and entrance buildings that were part of the Victoria Iron Works, are within CA to the north. Within 500m of site are locally listed New Inn public house (260m to east) and Kings Hall school recommended for local listing (300m to northeast). HIS required, including assessment of archaeological significance and potential.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress and flood depths within site, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Employment	-	2.50 (G)	By 2042
E18	Millfields Road, Ettingshall	<p>High quality design required which respects the adjoining Birmingham Canal (CA and SINC).</p> <p><b>Heritage Impact:</b> Few small buildings shown on title map and site partially contains 19th century Britannia Tube Works, with likely significant truncation from later works. Site adjoins Bilston Canal Corridor CA and Crown House LLB. Within 500m of site are Ward Street bridge LLB (290m to east) and Rough Hills Methodist Church LLB (490m to west). HIS required, including assessment of archaeological significance and potential.</p>	Employment	-	0.70 (B)	By 2042

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E20	South of Inverclyde Drive	Replaces Bilston Corridor Area Action Plan allocation EDO1. Subject to a design which protects the adjoining SLINC.  <b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is within area of former Ettingshall Colliery. No archaeological potential. Within 500m of site is GKN Research Laboratories LLB (260m to northwest). No HIS necessary.	Employment	-	1.44 (B)	By 2042
E21	Rear of Spring Road	Replaces Bilston Corridor Area Action Plan allocation EDO9. Subject to biodiversity net gain and a design which protects the adjoining SLINC.  <b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is within area of former Ettingshall Colliery. No archaeological potential. Within 500m of site are GKN Research Laboratories LLB (450m to northwest) and Bilston Canal Corridor CA (490m to southeast). No HIS necessary.	Employment	-	0.72 (B)	By 2042
E22	Springvale Avenue	Replaces Bilston Corridor Area Action Plan allocation EDO11. Subject to biodiversity net gain.  <b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is within area of former Springvale Colliery and on edge of Spring Vale furnaces. Likely significant truncation from later works. Archaeological potential is low. Within 500m of site is Bilston Canal Corridor CA (150m to west). No HIS necessary.  <b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress and flood depths within site, which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.	Employment	-	0.71 (G)	By 2042

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E23	Bilston Urban Village, Bath Street	<p>Replaces Bilston Corridor Area Action Plan allocation MU3. Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site already assessed and has low archaeological potential. Within 500m of site are Bilston Canal Corridor CA (50m to south), Bilston Town Centre CA and LBs / LLBs (200m to north), Grade II Listed Church of St Mary (also an APA, with a memorial and walls, railings and gates separately listed) and adjoining Locally Listed Holy Trinity RC church (250m to east) and Bilston High School LLB (370m to west). No HIS necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change, and residual risk from the culverted Bilston Brook. Any development must comply with Level 2 SFRA Site Report requirements.</p> <p><b>Wastewater:</b> Early consultation is required with STW to ascertain if any sewer infrastructure upgrades / network connections are required, and can be delivered, before commencement or occupation of development.</p>	Employment	-	6.02 (G)	By 2042
E24	Dale St, Bilston	<p>Subject to biodiversity net gain</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is former colliery land. No archaeological potential. Within 500m of site are Grade II Listed Church of St Mary (also an APA, with a memorial and walls, railings and gates separately listed) and adjoining Locally Listed Holy Trinity RC church (390m to west), Former Congregational Church Mission Hall LLB (400m to southwest) and Walsall Canal AHHTV (420m to east). No HIS necessary.</p>	Employment	-	0.91 (B)	By 2042



Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
E25	South of Citadel Junction, Murdoch Road, Bilston	<p>Replaces Bilston Corridor Area Action Plan allocation EDO13. Includes Land South of Citadel Junction Site of Local Importance for Nature Conservation. Subject to appropriate land remediation and biodiversity net gain / mitigation for loss of nature conservation value.</p> <p><b>Heritage Impact:</b> No built heritage assets within site. Site adjoins Walsall Canal AHTV. Site is former colliery land / sludge bed. No archaeological potential except possibly disused canal branch on southern border. No other recorded heritage assets within 500m of site. HIS required.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of fluvial flooding and surface water flooding affecting access / egress, which is likely to increase over the Plan period due to climate change, and residual risk from the culverted Darlaston Brook. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Employment	-	3.25 (G)	By 2042
<b>Neighbourhoods Area</b>						
H20	Former Rookery Lodge, Woodcross Lane	<p>Subject to biodiversity net gain. Located in medium value zone (Policy HOU3).</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site is south of Rookery Colliery and OS 1st ed map shows old shafts. Fields on tithe map. 20th c building would have caused additional truncation. No archaeological potential. No other recorded heritage assets within 500m of site. No HIS necessary.</p>	Housing	16	0.25 (G)	2032-37: 16

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H21	Former Stowheath Centres, Stowheath Lane	<p>Subject to biodiversity net gain.</p> <p><b>Heritage Impact:</b> No built heritage assets within site. Site adjoins East Park DLHHV and LLB. Old shafts and colliery land on OS 1st ed. No archaeological potential. Within 500m of site is Stowlawn Wood AHLV (400m to northeast). No HIS necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of fluvial flooding, and surface water flooding affecting access / egress which is likely to increase over the Plan period due to climate change. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Housing	53	1.00 (B)	2024-32: 53
H22	Former Probert Court / Health Centre, Probert Road	<p>Subject to relocation of existing GP surgery. Located in medium value zone (Policy HOU3). Located within Cannock Chase SAC 15km zone (Policy ENV2)</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site of former Rake Gate Farm, depicted on tithe map and OS 1st ed. Significant truncation due to modern buildings, possible survival of remains outside built footprint. DBA required to assess archaeological significance and potential. No other recorded heritage assets within 500m of site. No HIS necessary.</p>	Housing	35	0.88 (B)	2024-32: 35
H23	Former Gym, Craddock Street	<p>Replaces Wolverhampton Unitary Development Plan allocation H4.</p> <p><b>Heritage Impact:</b> No built heritage assets within or adjoining site. Site developed in 20th century - low archaeological potential. Within 500m of site are St Andrew Church LLB (220m to southwest), Rosedale LLB (200m northeast) and West Park CA, LBs and LLBs (420m to south). No HIS necessary.</p> <p><b>Flood Risk:</b> Parts of the site are at risk of surface water flooding affecting access / egress. Any development must comply with Level 2 SFRA Site Report requirements.</p>	Housing	48	1.20 (B)	2024-32: 48

Site Reference	Site Name	Detailed Information and Policy Requirements (including Heritage Impact / Flood Risk / Wastewater)	Allocated Use	Indicative no. of homes (gross without discount)	Area to be developed in hectares (predominantly Brownfield / Greenfield)	Anticipated Delivery Timescale (by year for housing sites to be delivered by 2032)
H24	Tarrans Housing Renewal (Portobello, Wood End, Lincoln Green)	<p>Council housing renewal scheme to replace outdated, concrete construction "Tarran" properties. Estimated 126 demolitions planned.</p> <p><b>Heritage Impact:</b></p> <p><b>a) Arnhem Road</b> Site adjoins The Grapes PH LLB. Site is formerly old shafts, no archaeological potential. Within 500m of site are Moseley Road Open Space AHHLV (50m to south), Stowlawn Wood AHHLV (350m to west) and Royal Oak PH LLB (500m to northeast). No HIS necessary.</p> <p><b>b) Alamein Road</b> No built heritage assets within or adjoining site. Site is colliery land with old shafts on OS 1st ed. No archaeological potential. Within 500m of site are Royal Oak Pub LLB (250m to east), The Grapes Pub LLB and Moseley Road Open Space AHHLV (260m to southwest). No HIS necessary.</p> <p><b>c) Orchard Road</b> Located within Cannock Chase SAC 15km zone (Policy ENV2). No built heritage within or adjoining site. Current buildings built on fields. No archaeological potential. Within 500m of site are The Pheasant Pub LLB (260m to northeast), The Red Lion Pub LLB and Cedar Way CA (250m to west), and Wednesfield Park DLHHV (350m to south). No HIS necessary.</p> <p><b>d) Lincoln Green</b> Located within Cannock Chase SAC 15km zone (Policy ENV2). Site within AHHLV. Pre-fab single story houses. Estate retains its original character almost completely. Distinctive sense of place which contributes to post-war character of the area. Estate built on fields, no archaeological potential. Within 500m of site are Elston Primary School LLB (350m to west), Bushbury Hill CA, LBs and LLBs (250m to east). HIS required.</p>	Housing	138 (12 net)	5.46 (B)	2024-32: 138 (12 net)

# 14. Monitoring and Review

- 14.1 City of Wolverhampton Council is committed to ensuring robust monitoring of the implementation of the WLP. The aim is to ensure that the Plan is delivered successfully, efficiently and working in partnership with stakeholders.
- 14.2 Monitoring indicators have been included within each section of the WLP to measure the implementation of policies. The indicators will identify trigger points at which it may be appropriate to address any emerging issues.
- 14.3 The purpose of the monitoring indicators are to:
- Assess the performance of the Plan in delivering the Vision, Strategic Priorities and Spatial Strategy;
  - Demonstrate that the Plan continue to be deliverable over the Plan period;
  - Identify the need to amend policies.
- 14.4 The WLP has been prepared to be flexible over the Plan period and adjust to changes where they arise. These changes may include changes to national policy and guidance, demographic changes and variable economic conditions. There also may be circumstances or unexpected external factors that mean certain policies become less effective or out of date. Monitoring the Plan is essential to identify such issues and devise appropriate actions. Such actions might include adjusting the implementation of the policies or undertaking a partial or early review of the WLP.
- 14.5 The Council, in line with national policy, will review the policies in the Plan to assess whether they need updating at least once every five years.

## Appendix 1: The Impact of the Wolverhampton Local Plan on existing Development Plan Documents and Neighbourhood Plans

A1.1 The following Development Plan Documents and Neighbourhood Plans were in force in Wolverhampton upon adoption of the WLP:

BCCS	Black Country Core Strategy (2011)
WUDP	Saved parts of the Wolverhampton Unitary Development Plan (2006)
BCAAP	Bilston Corridor Area Action Plan (2014)
SRCAAP	Stafford Road Corridor Area Action Plan (2014)
CCAAP	Wolverhampton City Centre Area Action Plan (2016)
HNP	Heathfield Park Neighbourhood Plan (2014)
TNP	Tettenhall Neighbourhood Plan (2014)

A1.2 The policies and designations contained in these documents are still saved or in force following adoption of the WLP, unless specifically replaced by policies and designations in the WLP as listed in Table 9, Section 13 and this Appendix 1.

A1.3 Within the Wolverhampton administrative area, the policies and designations of the Black Country Core Strategy have been wholly replaced by the Wolverhampton Local Plan (WLP). Some of the policies, supporting paragraphs and Policies Map designations of the BCAAP, SRCAAP, CCAAP and saved parts of the WUDP have also been replaced through adoption of the WLP. Table 12 – Housing and Employment Allocations of Section 13, Table 9 – Strategic Waste Management Sites and Tables A1.1-A1.3 below list the resulting amendments to the Wolverhampton Policies Map. Table A1.2 lists policies and supporting paragraphs of existing Plans which were replaced upon adoption of the WLP.

A1.4 The CCAAP covers the Wolverhampton Strategic Centre (as defined in the BCP) and the Blakenhall & Graiseley and All Saints Quarters located to the south of the city centre. As the WLP does not allocate sites within Wolverhampton City Centre (as defined in Figure 2), only certain policies, supporting paragraphs and designations within the CCAAP are affected by adoption of the WLP.

A1.5 Neighbourhood Plan policies and proposals cannot be replaced by a Development Plan Document. However, for clarity, Table A1.3 lists allocations in the Heathfield Park Neighbourhood Plan, which have not been carried forward into the WLP. As the Neighbourhood Plan Forums for the HNP and TNP have now lapsed, the WLP is not required to set separate housing targets for the areas covered by these Neighbourhood Plans.

**Table A1.1: Wolverhampton Policies Map amendments made upon adoption of the WLP**

Development Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
BCCS	Minerals Safeguarding Areas	Various	Removed	Policy MIN1 no longer applies
BCCS	Strategic Waste Allocation WP7	SITA Transfer Station, Neachells Lane, Willenhall	Removed	Policy WM3 no longer applies
BCCS	Retained for Employment	Wednesfield Employment Area	Removed	Appendix 2 no longer applies
BCCS	Area of Search for Housing & Employment	Racecourse Road	Removed	Appendix 2 no longer applies
WUDP	Housing allocation / H9	Goldthorn Hill Pumping Station and Allotments	Removed	Site no longer developable for housing
WUDP	Housing allocation / H12	Land Rear of 18-32 Turner Avenue, Woodcross	Removed	Site built out
WUDP	Housing allocation / H8	Former Farndale Junior School	Removed	Site built out
WUDP	Housing allocation / H5	Fmr Bilston Girls School, Windsor St	Removed	Site built out
WUDP	Housing Renewal site / HR1	The Mayfield, Willenhall Road, Old Heath	Removed	Site built out
WUDP	Housing Renewal site / HR3	Portobello Flats, New Street & South Street	Removed	Site built out
WUDP	Housing-led Mixed Use Site / MU2	Factory rear of Fifth Avenue / Humphries Road, Low Hill	Removed	Site built out
WUDP	Housing-led Mixed Use Site / MU1	Former Chubb Site, Wednesfield Road	Removed	Site built out
SRCAAP	Housing allocation / HP3	Showell Road / Bushbury Lane	Removed	Site no longer developable for housing
SRCAAP	Housing allocation / HP6	Bus Depot, Park Lane	Removed	Site no longer developable for housing
SRCAAP	Housing allocation / HP8	Assa Abloy building and former petrol station, Cannock Road	Removed	Site no longer developable for housing

**Table A1.1: Wolverhampton Policies Map amendments made upon adoption of the WLP**

Development Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
SRCAAP	Housing allocation / HP4	Armitage Shanks	Removed	Site built out
SRCAAP	Housing allocation / HP2	Promise House	Removed	Site built out
SRCAAP	Housing allocation / MU1	Goodyear	Removed	Site built out
BCAAP	Housing part of Mixed Use allocation / MU3	Bilston Urban Village	Removed	Housing part of site built out
BCAAP	Housing allocation / H3	Dixon Street	Removed	Site no longer developable for housing
BCAAP	Housing allocation / H4	Reliance Trading Estate	Removed	Site no longer developable for housing
BCAAP	Housing allocation / H5	Wolverhampton Street / Shale Street	Removed	Site no longer developable for housing
BCAAP	Housing allocation / HC1	Cable Street / Steelhouse Lane	Removed	Site built out
BCAAP	Housing allocation / HC3	Ward Street / Polypipe	Removed	Site built out
BCAAP	Housing allocation / HC5	Bankfield Road	Removed	Site built out
BCAAP	Housing allocation / HC6	Highfields Road	Removed	Site built out
BCAAP	Housing allocation / HC2	Taylor Road	Removed	Site no longer developable for housing
BCAAP	Housing allocation / HC7	Thompson Avenue Open Space	Removed	Site built out
BCAAP	Housing allocation / HC4	Greenock Crescent	Removed	Site built out
BCAAP	Housing allocation / HOS1	Alexander Metals Open Space	Removed	Site no longer developable for housing



**Table A1.1: Wolverhampton Policies Map amendments made upon adoption of the WLP**

Development Plan Document	Designation / Site Reference	Site Name	Description of Change	Reason for Change
CCAAP	Housing allocation / 10a	Tower and Fort Works, Blakenhall & Graiseley Character Area	Removed	Site built out
CCAAP	Housing allocation / 10b	Former Sunbeam Factory, Blakenhall & Graiseley Character Area	Removed	Site no longer available for development
CCAAP	Housing allocation / 10c	Ablow Street, Blakenhall Character Area	Removed	Site no longer available for development
CCAAP	Housing allocation / 10e	Land north of Graiseley Hill, Blakenhall & Graiseley Character Area	Removed	Site no longer available for development
CCAAP	Housing allocation / 10f	Former Metal Castings Site, Blakenhall & Graiseley Character Area	Removed	Site no longer available for development
CCAAP	Housing allocation / 10g	Former St Lukes School, Blakenhall & Graiseley Character Area	Removed	Site no longer developable for housing
CCAAP	Housing allocation / 10h	Moorfield Road, Blakenhall & Graiseley Character Area	Removed	Site no longer developable for housing
SRCAAP / BCAAP / CCAAP	High Quality Employment Areas (HQEA) / Local Quality Employment Areas (LQEA) / Employment Development Opportunities (EDO) / Employment Investment Areas (EIA)	Various	Removed	Replaced by Policy EMP1- EMP4 employment designations in WLP

**Table A1.2: Development Plan Document Policy changes made upon adoption of the WLP**

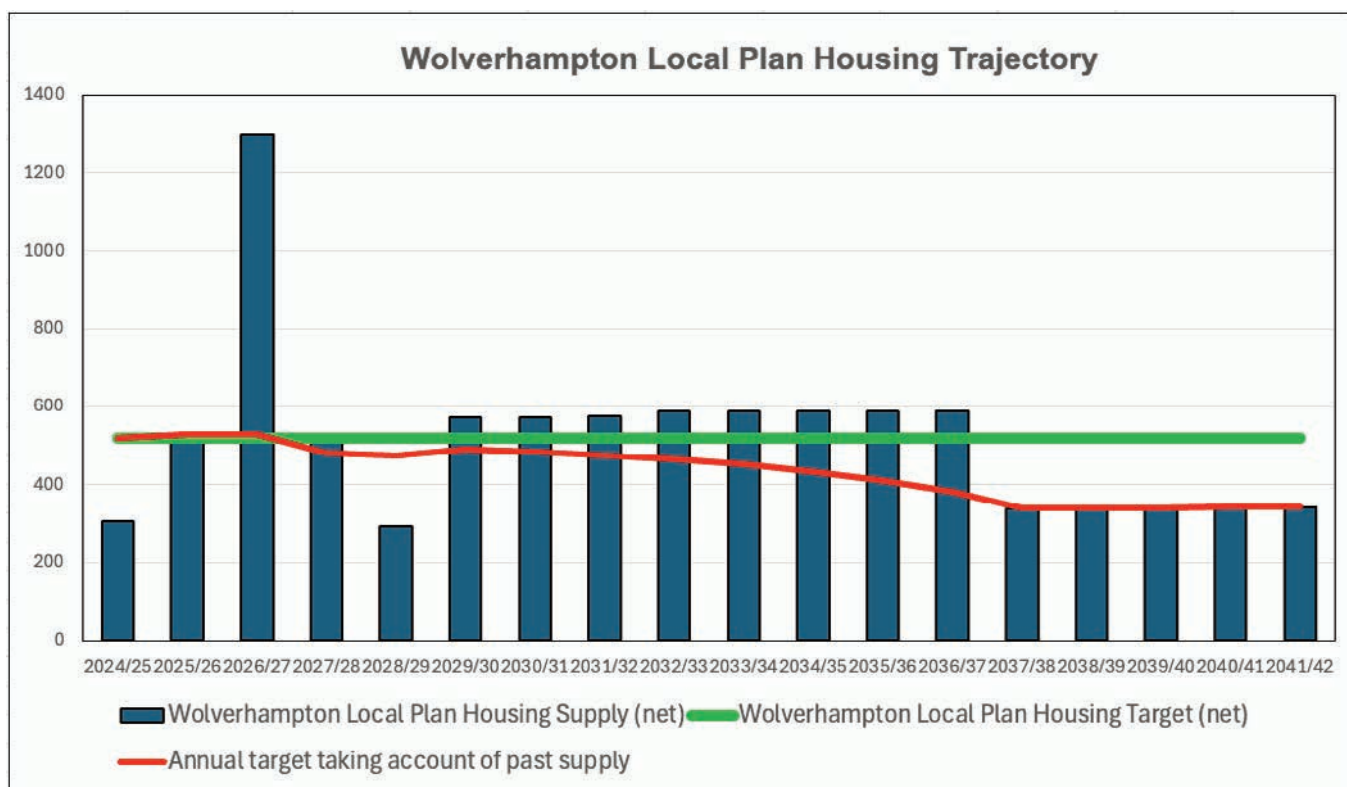
Development Plan Document	Policy / Paragraphs	Replacement WLP Policy
SRCAAP	Policy SRC1 – Delivering High Quality and Local Employment Opportunities. Paragraphs 2.3 – 2.10	EMP1 - EMP4
SRCAAP	Policy SRC4 – Delivering Sustainable Levels of Housing. Paragraphs 2.20 – 2.26	HOU1
SRCAAP	Policy SRC10 – Providing Local Renewable and Low Carbon Energy Infrastructure	ENV14
BCAAP	Policy BC1 – Delivering Sustainable Levels of Housing. Paragraphs 2.3 – 2.13	HOU1
BCAAP	Policy BC2 – Delivering High Quality and Local Employment Opportunities (excluding final two paragraphs relating to Hickman Avenue and Willenhall Road). Paragraphs 2.14 – 2.21	EMP1 – EMP4
BCAAP	Policy BC9 – Providing Local Renewable and Low Carbon Energy Infrastructure	
CCAAP	Policy CC4 – Providing Sufficient Employment Land. Paragraphs 3.1.14 – 3.1.17	EMP1 – EMP4
CCAAP	Policy CC7 – Delivering a Sustainable Mix of Housing (part (a) housing targets only)	HOU1
CCAAP	Policy CC11 – City Centre Renewable and Low Carbon Energy Infrastructure	ENV14
CCAAP	Policy CA10: Blakenhall & Graiseley Character Area	CSP1
CCAAP	Policy CA11: Royal Hospital Character Area	CSP1

**Table A1.3: Wolverhampton Neighbourhood Plan allocations not carried forward into the WLP**

Neighbourhood Plan	Designation / Site Reference	Site Name	Reason for allocation not being carried forward into WLP
HNP	Housing allocation / H3	Culwell Industrial Estate	Site no longer developable for housing.
HNP	Mixed employment / housing allocation E4 / H4	RDP Electronics Ltd, Grove Street	Site no longer developable for housing.
HNP	Housing allocation / H7	New Cross Hospital, Wolverhampton Road	Site no longer developable for housing.

## Appendix 2: Wolverhampton Local Plan Housing Trajectory

Year	Wolverhampton Local Plan Housing Supply (net)	Wolverhampton Local Plan Housing Target (net)	Annual target taking account of past supply	Year	Cumulative Target	Cumulative Housing Supply	Variation from Cumulative Target
2024/25	305	518	518	2024/25	518	305	213
2025/26	532	518	531	2025/26	1037	837	199
2026/27	1298	518	531	2026/27	1555	2135	-580
2027/28	532	518	480	2027/28	2073	2667	-593
2028/29	293	518	476	2028/29	2592	2959	-368
2029/30	574	518	490	2029/30	3110	3534	-424
2030/31	574	518	483	2030/31	3628	4108	-480
2031/32	576	518	475	2031/32	4146	4684	-537
2032/33	588	518	465	2032/33	4665	5272	-607
2033/34	588	518	451	2033/34	5183	5860	-677
2034/35	588	518	434	2034/35	5701	6449	-747
2035/36	588	518	412	2035/36	6220	7037	-817
2036/37	588	518	382	2036/37	6738	7625	-887
2037/38	340	518	341	2037/38	7256	7965	-709
2038/39	341	518	341	2038/39	7775	8305	-531
2039/40	341	518	341	2039/40	8293	8646	-353
2040/41	341	518	342	2040/41	8811	8987	-176
2041/42	343	518	343	2041/42	9330	9330	0



### Appendix 3: Glossary

Acronym	Word / Phrase	Meaning
AAP	Area Action Plan	A type of Development Plan Document focused on an area where development will be focused over the Plan period.
BNG	Biodiversity Net Gain	A national policy approach that aims to leave biodiversity in a measurably better state than it was before development, with at least a 10% uplift in biodiversity value (either on or off site).
BCA	Black Country Authorities	The four local authorities of Dudley Council, Sandwell Council, Walsall Council and City of Wolverhampton Council.
BCCS	Black Country Core Strategy	Joint Development Plan Document adopted in 2011, covering the Black Country Authorities.
BEAR	Black Country Employment Area Review	Study produced by the BCA to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The study: <ul style="list-style-type: none"> <li>• reviews the stock of existing operational employment land that is already in use;</li> <li>• identifies the best quality Strategic Employment Areas that should be safeguarded primarily for manufacturing and logistics activity;</li> <li>• identifies those employment areas that have a key role in meeting more local needs, where a wider range of uses can be supported;</li> <li>• identifies those employment areas that have a more limited economic role and could be suitable for release for alternative uses such as housing.</li> </ul>
BCP	Black Country Plan	Joint Development Plan Document prepared during 2016-22 to replace the BCCS. Work ceased in 2022, to be replaced by individual Local Plans for each BCA.
-	Brownfield land or site (see also “previously developed land”)	National definition of land that is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure.
-	Council	Where the term “the Council” is used, this refers to the wider local authority function of City of Wolverhampton Council, as distinct from the Local Planning Authority.
DPD	Development Plan Documents	Development Plan Documents are prepared by local planning authorities and set out the key development goals, policies and site allocations of the local development framework. All DPDs must be subject to rigorous procedures of consultation and independent examination. Once adopted, planning decisions must be made in accordance with DPDs unless material considerations indicate otherwise.

Acronym	Word / Phrase	Meaning
DtC	Duty to Co-operate	The duty to co-operate was created by the Localism Act 2011. It places a legal duty on local planning authorities, county councils and public bodies in England to engage constructively, actively and on an ongoing basis with each other to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters.
EDNA	Black Country Economic Development Needs Assessment	Document providing key evidence on demand and supply of employment land to 2042.
FEMA	Functional Economic Market Area	The spatial level at which local economies and markets actually operate. In most cases, these will extend beyond existing administrative boundaries.
-	Green belt	(not to be confused with the term 'greenfield') A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purposes of the green belt are to: <ul style="list-style-type: none"> <li>• check the unrestricted sprawl of large built up areas</li> <li>• prevent neighbouring towns from merging</li> <li>• safeguard the countryside from encroachment</li> <li>• preserve the setting and special character of historic towns</li> <li>• assist urban regeneration by encouraging the recycling of derelict and other urban land</li> </ul> Green Belts are defined in a Local Planning Authority's development plan.
-	Greenfield land or site	Land (or a defined site) that is not defined as previously developed.
HIA	Health Impact Assessment	
HIS	Heritage Impact Statement	
HMA	Housing Market Area	A geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. HMAs do not necessarily coincide with local authority administrative boundaries.
ICB	Integrated Care Board	

Acronym	Word / Phrase	Meaning
LEP	Local Enterprise Partnership	A body, designated by the Secretary of State for Department for Levelling Up, Housing and Communities, established for the purpose of creating or improving the conditions for economic growth in an area.
LNR	Local Nature Reserve	
LPA	Local Planning Authority	Where the term “the Local Planning Authority” is used, this refers to the planning function of City of Wolverhampton Council, as distinct from the wider local authority role.
MoU	Memorandum of understanding	A memorandum of understanding outlines the main points of agreement that the parties involved in a negotiation have reached. The MOU is a mutually agreed summary of the areas of agreement and expectations of all signatories (those involved in the negotiations). It is not legally binding.
MHCLG	Ministry for Housing, Communities and Local Government	Government department (name changed from Department for Levelling Up and Communities in 2024)
NPPF	National Planning Policy Framework	
NPPG	National Planning Policy Guidance	
PDL	Previously Developed Land (see also “brownfield land”)	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: <ul style="list-style-type: none"> <li>• land that is or has been occupied by agricultural or forestry buildings;</li> <li>• land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures;</li> <li>• land in built-up areas such as private residential gardens, parks, recreation grounds and allotments;</li> <li>• and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time</li> </ul>
SSSI	Site of Special Scientific Interest	A site designated by Natural England under the Wildlife and Countryside Act 1981 as an area of special interest by reason of any of its flora, fauna, geological or physiographical features (plants, animals and natural features relating to the Earth’s structure).



Acronym	Word / Phrase	Meaning
SINC	Site of Importance for Nature Conservation	
SLINC	Site of Local Importance for Nature Conservation	
SAC	Special Area of Conservation	Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.
SEP	Strategic Economic Plan	
SFRA	Strategic Economic Plan Strategic Flood Risk Assessment	An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
SHLAA	Strategic Housing Land Availability Assessment	
-	sui generis	A term given to the uses of land or buildings not falling into any of the use classes identified by the Use Classes Order, for example theatres, launderettes, car showrooms and filling stations.
SPD	Supplementary Planning Document	SPDs (previously called Supplementary Planning Guidance or SPGs) add further detail to the policies in adopted DPDs. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are a material consideration when making planning decisions.
SA	Sustainability Appraisal	An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process, to allow decisions to be made that accord with sustainable development.
UDP	Unitary Development Plan	
WMCA	West Midlands Combined Authority	
WMSRFI	West Midlands (Strategic Rail Freight) Interchange	
-	Windfall sites	Sites for housing or other forms of development not specifically identified in the development plan when it was adopted.

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