

Sustainability Appraisal of the Wolverhampton Local Plan

Regulation 19 SA Report Volume 3 of 3: Appendices

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LEPUS CONSULTING
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Sustainability Appraisal of the Wolverhampton Local Plan 2024–2042

Including:
Strategic Environmental Assessment,
Health Impact Assessment and
Equality Impact Assessment

Volume 3 of 3: Appendices of the Regulation 19 SA

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A.1 Air

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
EC Air Quality Directive (1996) ¹	Aims to improve air quality throughout Europe by controlling the level of certain pollutants and monitoring their concentrations. In particular, the Directive aims to establish levels for different air pollutants; draw up common methods for assessing air quality; methods to improve air quality; and make sure that information on air quality is easily accessible to Member States and the public.
Clean Air Strategy (2019) ²	This Clean Air Strategy sets out how the Government will tackle all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. The strategy includes targets such as a commitment to reduce PM2.5 concentrations across the UK, so that the number of people living in locations above the World Health Organisation (WHO) guideline level of 10 µg/m ³ is reduced by 50% by 2025.
National Planning Policy Framework (2021) ³	The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution. Plans should consider the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas.
A Green Future: Our 25 Year Plan to Improve the Environment (2018) ⁴	<p>The document sets out Government action to help achieve natural world regain and retain good health.</p> <p>The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. <p>The Plan seeks to achieve clean air by:</p> <ul style="list-style-type: none"> • Meeting legally binding targets to reduce emissions of five damaging air pollutants. This should halve the effects of air pollution on health by 2030;

¹ EC Air Quality Directive (1996). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31996L0062&from=ES> [Date accessed: 21/08/24]

² DEFRA et al. (2019) Clean Air Strategy 2019. Available at: <https://www.gov.uk/government/publications/clean-air-strategy-2019> [Date accessed: 21/08/24]

³ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework-2> [Date accessed: 21/08/24]

⁴ DEFRA (2021) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
	<ul style="list-style-type: none"> • Ending the sale of new conventional petrol and diesel cars and vans by 2040; and • Maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework. <p>The 2021 Environment Act (9th November, 2021) embeds several of these aspects into the new legislation.</p>
Environmental Improvement Plan 2023 ⁵	<p>The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve clean air, the EIP sets out to:</p> <ul style="list-style-type: none"> • Cut overall air pollution by tackling the key sources of emissions, including reducing the maximum limits for domestic burning appliances in Smoke Control Areas • Tackle specific hotspots by challenging councils to improve air quality more quickly, while supporting them with clear guidance, funding, and tools • Reduce ammonia emissions (crucial for sensitive natural habitats) by using incentives in our new farming schemes, investing £13 million in slurry storage infrastructure in 2023 and considering expanding environmental permitting conditions to dairy and intensive beef farms.
Transport for West Midlands: Congestion Management Plan ⁶	<p>The Congestion Management Plan aims to:</p> <ol style="list-style-type: none"> 1. Tackle congestion hotspots through further investment in roads 2. Push for greater traffic management powers, including moving traffic offences 3. Invest in technology to help monitor performance and manage traffic 4. Deliver a regional transport coordination centre for all modes in partnership with local authorities, Highways England and West Midlands Police to manage incidents/major events 5. Invest in road safety and work with the Police and Crime Commissioner to manage road incidents more efficiently 6. Continue to build capacity into the public transport networks 7. Invest in communication and information tools and become a trusted source of travel advice 8. Coordinate the delivery of the transport investment programme and minimise impact through collaboration with the Resilience Partnership 9. Make better use of the M6 Toll 10. Deliver a travel demand action plan to encourage residents and businesses to re-mode, re-route, re-time or remove some journeys.

⁵ DEFRA (2023) Environmental Improvement Plan 2023. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 21/08/24]

⁶ Transport for West Midlands (no date) Congestion Management Plan. Available at: https://www.tfwm.org.uk/media/oxfyfpvz/tfwm_cm-plan-aw_v3_lr_spreads.pdf [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to air
<p>City of Wolverhampton Council Air Quality Annual Status Report (ASR) (2023)⁷</p>	<p>The ASR summarises actions to improve air quality that have been taken, and will be taken, in Wolverhampton AQMA. This includes:</p> <ul style="list-style-type: none"> • road improvements, • public transport improvements, • bus route improvements, • traffic management, • promoting travel alternatives, • promoting low emission vehicles, • air quality planning and guidance. <p>An overall increase in concentrations from 2021 to 2022 is reported; 36 passive monitoring sites reported an increase compared to 29 passive monitoring sites reporting a decrease.</p>
<p>Emerging Wolverhampton Air Quality Management Action Plan⁸</p>	<p>The Air Quality Action Plan, which is currently being updated, includes 23 proposed actions which aim to improve the air quality in Wolverhampton. These actions are listed under the following headings:</p> <ul style="list-style-type: none"> • reducing vehicle emissions • improving public transport • improving the road network • measures to reduce traffic volumes • reducing air pollution from industry, commerce and residential areas • changing levels of travel demand/ promotion of alternative modes of transport

⁷ Bureau Veritas (2023) 2023 Air Quality Annual Status Report (ASR): July 2023. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-05/Air-Quality-Report-2023.pdf> [Date accessed: 21/08/24]

⁸ City of Wolverhampton Council (2024) Emerging Wolverhampton Air Quality Management Action Plan. Available at: <https://www.wolverhampton.gov.uk/environment-and-climate/pollution/air-pollution> [Date accessed: 04/10/24]

A.2 Biodiversity, flora and fauna

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
UN Convention on Biological Diversity (1992) ⁹	The aims of the Convention include the conservation of biological diversity (including a commitment to significantly reduce the current rate of biodiversity loss), the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.
Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) ¹⁰	The Convention seeks to conserve wild flora and fauna and their natural habitats, and to monitor and control endangered and vulnerable species.
Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992 (the Habitats Directive) ¹¹	<p>The main aim of the Habitats Directive is to promote the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species listed on the Annexes to the Directive at a favourable conservation status, introducing robust protection for those habitats and species of European importance. In applying these measures Member States are required to take account of economic, social and cultural requirements, as well as regional and local characteristics.</p> <p>The provisions of the Directive require Member States to introduce a range of measures, including:</p> <ul style="list-style-type: none"> • Maintain or restore European protected habitats and species listed in the Annexes at a favourable conservation status as defined in Articles 1 and 2; • Contribute to a coherent European ecological network of protected sites by designating Special Areas of Conservation (SACs) for habitats listed on Annex I and for species listed on Annex II. These measures are also to be applied to Special Protection Areas (SPAs) classified under Article 4 of the Birds Directive. Together SACs and SPAs make up the Natura 2000 network (Article 3); • Ensure conservation measures are in place to appropriately manage SACs and ensure appropriate assessment of plans and projects likely to have a significant effect on the integrity of an SAC. Projects may still be permitted if there are no alternatives, and there are imperative reasons of overriding public interest. In such cases compensatory measures are necessary to ensure the overall coherence of the Natura 2000 network (Article 6); • Member States shall also endeavour to encourage the management of features of the landscape that support the Natura 2000 network (Articles 3 and 10);

⁹ UN Convention on Biological Diversity (1992) Available at: <https://www.cbd.int/doc/legal/cbd-en.pdf> [Date accessed: 21/08/24]

¹⁰ Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) Available at: <https://rm.coe.int/1680078aff> [Date accessed: 21/08/24]

¹¹ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
	<ul style="list-style-type: none"> • Undertake surveillance of habitats and species (Article 11); • Ensure strict protection of species listed on Annex IV (Article 12 for animals and Article 13 for plants). • Report on the implementation of the Directive every six years (Article 17), including assessment of the conservation status of species and habitats listed on the Annexes to the Directive.
<p>The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations)¹²</p>	<p>This transposes into national law the Habitats Directive and also consolidates all amendments that have been made to the previous 1994 Regulations. This means that competent authorities have a general duty in the exercise of any of their functions to have regard to the Directive.</p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment (2018)¹³</p>	<p>The document sets out government action to help achieve natural world regain and retain good health.</p> <p>The main goals of the Plan are to achieve:</p> <ul style="list-style-type: none"> • Clean air; • Clean and plentiful water; • Thriving plants and wildlife; • A reduced risk of harm from environmental hazards such as flooding and drought; • Using resources from nature more sustainably and efficiently; and • Enhanced beauty, heritage and engagement with the natural environment. <p>The Environment Act (2021) embeds several of these aspects into new legislation.</p>
<p>DEFRA: Environmental Improvement Plan 2023¹⁴</p>	<p>The document presents a review of the 25 Year Environmental Plan (25YEP) and looks to reinforce the vision set out. The document sets out the plan to achieve the 10 goals set out in the 25YEP and presents the progress made on all 10 of the goals.</p> <p>The apex goal of the EIP is to improve nature, achieving thriving plant life and wildlife, building on the Global Biodiversity Framework as agreed at the UN Nature Summit COP15 including a commitment to protect 30% of global land and 30% of global ocean by 2030. To achieve this, the EIP sets out to:</p> <ul style="list-style-type: none"> • Launch the Species Survival Fund to create, enhance and restore habitat; • Create, restore, and extend around 70 areas for wildlife through projects including new National Nature Reserves, and the next rounds of the Landscape Recovery Projects;

¹² The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations) Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents/made> [Date accessed: 21/08/24]

¹³ A Green Future: Our 25 Year Plan to Improve the Environment Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 21/08/24]

¹⁴ Department for Environment, Food & Rural Affairs (2023) Environmental Improvement Plan 2023. Available at: www.gov.uk/government/publications/environmental-improvement-plan [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
	<ul style="list-style-type: none"> • Protect 30% of our land and sea for nature through the Nature Recovery Network and enhanced protections for our marine protected areas. We intend to designate the first Highly Protected Marine Areas this year; and • Implement the Environment Act 2021, including rolling out Local Nature Recovery Strategies to identify areas to create and restore habitat, and Biodiversity Net Gain to enhance the built environment.
<p>DEFRA: Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)¹⁵</p>	<p>The England biodiversity strategy 2020 ties in with the EU biodiversity strategy in addition to drawing links to the concept of ecosystem services. The strategy's vision for England is: <i>"By 2050 our land and seas will be rich in wildlife, our biodiversity will be valued, conserved, restored, managed sustainably and be more resilient and able to adapt to change, providing essential services and delivering benefits for everyone"</i>.</p> <p>The Strategy's overall mission is: <i>"to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people"</i>.</p>
<p>National Planning Policy Framework (2023)¹⁶</p>	<p>The updated NPPF seeks to streamline the planning system and sets out the government's planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on promoting the conservation and enhancement of the natural environment. It requires the planning system to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> • protecting and enhancing valued landscapes, geological conservation interests and soils; • recognising the wider benefits of ecosystem services; • minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; • preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and • remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
<p>Making Space for Nature: a review of England's wildlife sites and ecological network (2010)¹⁷</p>	<p>The Making Space for Nature report, which investigated the resilience of England's ecological network to multiple pressures, concluded that England's wildlife sites do not comprise of a coherent and resilient ecological network. The report advocates the need for a step change in conservation of England's wildlife sites to ensure they are able to adapt and become part of a strong and resilient network. The report summarises what needs to be done to improve England's wildlife sites to enhance the resilience and coherence of England's</p>

¹⁵ DEFRA (2011). Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> [Date accessed: 21/08/24]

¹⁶ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

¹⁷ Making Space for Nature: a review of England's wildlife sites and ecological network (2010) Available at: <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
	<p>ecological network in four words; more, bigger, better, and joined. There are five key approaches which encompass these, which also take into account of the land around the ecological network:</p> <ul style="list-style-type: none"> • Improve the quality of current sites by better habitat management. • Increase the size of current wildlife sites. • Enhance connections between, or join up, sites, either through physical corridors, or through ‘stepping stones’. • Create new sites. • Reduce the pressures on wildlife by improving the wider environment, including through buffering wildlife sites.
Natural England Green Infrastructure Framework (2023) ¹⁸	The GI Framework supports the greening of towns and cities and looks to improve the surrounding landscapes as part of the Nature Recovery Network. The GI Framework will support planning authorities and developers to meet the requirements in the NPPF to consider GI in local plans and in new development. The GI Framework is underpinned by 15 principles based on the benefits of GI ‘why’ Principles, the descriptive or ‘what’ principles and the process or ‘how’ principles.
The England Trees Action Plan 2021-2024 (2021) ¹⁹	The Trees Action Plan sets out how the Government will tackle the challenges of biodiversity loss and climate change, in line with the goals of the 25 Year Environment Plan. The plan provides a strategic framework for implementing the Nature for Climate Fund and outlines over 80 policy actions the government is taking over this Parliament to help deliver this vision. Planting vastly more trees in England, and protecting and improving our existing woodlands, will be key to the government’s plan to achieve net zero and to create a Nature Recovery Network across the length of England.
The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011) ²⁰	<p>Published in June 2011, the Natural Environment White paper sets out the government’s plans to ensure the natural environment is protected and fully integrated into society and economic growth. The White Paper sets out four key aims:</p> <ul style="list-style-type: none"> • Protecting and improving our natural environment; • Growing a green economy; • Reconnecting people and nature; and • International and EU leadership.

¹⁸ Natural England (2023). Natural England Green Infrastructure Framework. Available at: <https://www.gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework> [Date accessed: 21/08/24]

¹⁹ DEFRA (2021) England Trees Action Plan 2021 to 2024. Available at: <https://www.gov.uk/government/publications/england-trees-action-plan-2021-to-2024> [Date accessed: 21/08/24]

²⁰ The Natural Choice: Securing the Value of Nature. The Natural Environment White Paper. (HM Government 2011) Available at: <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
Birmingham and the Black Country Biodiversity Action Plan (2010) ²¹	<p>The vision for the Birmingham and Black Country Biodiversity Action Plan is to create “A diverse and natural Birmingham and Black Country, where we are connected to our wildlife and landscape; healthy, sustainable communities and local livelihoods, working with nature and securing its future”. They key aims of this action plan are to:</p> <ul style="list-style-type: none"> • Maintain and increase the biodiversity of key sites and landscapes through appropriate protection and management. • Restore degraded habitats and key species populations by restoring key areas. • Link key areas with ecological corridors to reconnect wildlife populations and make them less vulnerable. • Promote and support the use of the natural environment to mitigate against, and adapt to, the effects of climate change. • Enable the sustainable use of the natural environment to benefit health and wellbeing of residents, workers and visitors as well as improving the local economy.
Black Country Local Nature Recovery map and strategy: an emerging approach (2022) ²²	<p>The Wildlife Trust for Birmingham and the Black Country and EcoRecord (the Local Environmental Record Centre for Birmingham and the Black Country) have been commissioned by the four Black Country local authorities (Dudley MBC, Sandwell MBC, Walsall MBC and Wolverhampton City Council, supported by the Black Country Consortium) to undertake an analysis of evidence to produce a draft Local Nature Recovery map and develop a Local Nature Recovery Strategy (LNRS) approach for the Black Country.</p> <ul style="list-style-type: none"> • Task 1: Development of a habitat baseline for the Black Country • Task 2: Produce a draft Nature Recovery Map for the Black Country • Task 3a: Produce a draft Black Country Local Nature Recovery Opportunity Map • Task 3b: Develop draft Priority Biodiversity Actions (Statement of Biodiversity Priorities)
An Ecological Evaluation of the Black Country Green Belt (2019) ²³	<p>The Ecological Evaluation of the Black Country Green Belt was prepared to inform the review of the former Black Country Plan. Although this is no longer being pursued, the study provides evidence base information relating to the geographic area including the Wolverhampton Local Plan.</p> <p>The primary output of the ecological evaluation is a GIS data set which assigns ecological value to individual landscape units through analysis and interpretation of a number of relevant data sets. The evaluation can be used in the following ways:</p> <ul style="list-style-type: none"> • Informs the prioritisation of ecological field survey and statutory and non-statutory site assessment.

²¹ The Birmingham and Black Country Biodiversity LBAP Review Group (2010) Birmingham and the Black Country Biodiversity Action Plan 2010. Available at: <https://www.bbcwildlife.org.uk/sites/default/files/2018-10/bbcbapfinal2010.pdf> [Date accessed: 21/08/24]

²² Birmingham & Black Country Wildlife Trust and EcoRecord (2022) Black Country Local Nature Recovery map and strategy: an emerging approach. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents/> [Date accessed: 21/08/24]

²³ EcoRecord (2019) An Ecological Evaluation of the Black Country Green Belt, October 2019. Available at: <https://blackcountryplan.dudley.gov.uk/media/13896/an-ecological-evaluation-of-the-black-country-green-belt-final-report-2019-redacted.pdf> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
	<ul style="list-style-type: none"> • Contributes to the defining of the ecological network of the Black Country Green Belt and beyond at a high resolution, and the identification of the component parts of a Black Country Nature Recovery Network. • Can be utilised to inform more effective nature conservation project targeting and delivery. • Can be utilised to inform the targeting of future agricultural environmental stewardship schemes. • Can be utilised to inform the targeting and delivery of Biodiversity Net Gain through the planning system. • Is a key data set to be analysed (in conjunction with others) as part of the proposed West Midlands Combined Authority Natural Capital Investment Strategy.
<p>Tree and Woodland Strategy for Wolverhampton (2020)²⁴</p>	<p>Wolverhampton’s Vision for Trees and Woodlands is of a City with an increasing stock of trees, hedges and woodlands which:</p> <ul style="list-style-type: none"> • Help to mitigate and to adapt to climate change in line with the Council’s declaration of a Climate Emergency • Help to improve air quality and public health • Are an integral part of the City’s identity and environment, earning it a reputation for high quality in its open spaces, highways and other public realm as well as across its centres, residential and business areas • Help to support regeneration and attract investment • Support health and wellbeing and social inclusion through their accessibility to all members of the community wherever they live, learn, work, play or shop • Are well-managed, healthy, widespread and diverse with trees of a range of species and of all ages and sizes • Promote biodiversity by providing habitat for a range of species and forming an important form of green infrastructure
<p>Tree Planting Strategy (2023)²⁵</p>	<p>This document recognises the importance of trees for their multifunctional benefits in the provision of green infrastructure across the urban area, as well as for their ecosystem service functions including air filtration. This sets out CWCs plans for tree planting and aftercare and integration into the plan area, in line with their overarching ‘Our City: Our Plan’ principles. The strategy sets out eight main aims:</p> <ul style="list-style-type: none"> • Increase tree canopy cover • Improve diversity and resilience in tree stock • Maximise tree benefits • Increasing the recording of tree planting • Better tree planting and aftercare • Biosecurity • Increasing planting on private land

²⁴ City of Wolverhampton Council (2020) Tree and Woodland Strategy for Wolverhampton 2019-2029. January 2020. Available at: <https://wolverhampton.moderngov.co.uk/documents/s135536/Appendix%20%20Tree%20and%20Woodland%20Strategy.pdf> [Date accessed: 21/08/24]

²⁵ City of Wolverhampton Council (2023) Tree Planting Strategy, August 2023.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to biodiversity, flora and fauna
	<ul style="list-style-type: none"><li data-bbox="622 236 931 264">• Including the community

A.3 Climatic factors

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
UN Framework Convention on Climate Change (1992) ²⁶	Sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change.
IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997) ²⁷	Commits member nations to reduce their emissions of carbon dioxide and other greenhouse gases, or engage in emissions trading if they maintain or increase emissions of these gases.
EC Sixth Environmental Action Programme Community 2002-2012 (2002) ²⁸	Climate change has been identified as one of four priority areas for Europe. The EAP's main objective is a reduction in emissions of greenhouse gases without a reduction in levels of growth and prosperity, as well as adaptation and preparation for the effects of climate change.
EU Sustainable Development Strategy (2006) ²⁹	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The Sustainable Development Strategy was reviewed in 2009 and " <i>underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified</i> ". Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.
UK Renewable Energy Strategy (2009) ³⁰	The UK has committed to sourcing 15% of its energy from renewable sources by 2020 – an increase in the share of renewables from about 2.25% in 2008. The Renewable Energy Strategy sets out how the Government will achieve this target through utilising a variety of mechanisms to encourage Renewable Energy provision in the UK. This includes streamlining the planning system, increasing investment in technologies as well as improving funding for advice and awareness raising.

²⁶ UN Framework Convention on Climate Change (1992) Available at: <https://unfccc.int/resource/docs/convkp/conveng.pdf> [Date accessed: 21/08/24]

²⁷ IPCC Kyoto Protocol to the United Nations Framework Convention on Climate Change (1997) Available at: <https://unfccc.int/resource/docs/convkp/kpeng.pdf> [Date accessed: 21/08/24]

²⁸ EC Sixth Environmental Action Programme Community 2002-2012 Available at: https://ec.europa.eu/environment/archives/action-programme/strategies_en.htm [Date accessed: 21/08/24]

²⁹ EU Sustainable Development Strategy (2006) Available at: <https://www.eea.europa.eu/policy-documents/renewed-eu-strategy-for-sustainable-development> [Date accessed: 21/08/24]

³⁰ UK Renewable Energy Strategy (2009) Available at: <https://www.gov.uk/government/publications/the-uk-renewable-energy-strategy> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
UK Renewable Energy Roadmap Update (2013) ³¹	This is the second Update to the 2011 Renewable Energy Roadmap. It sets out the progress that has been made and the changes that have occurred in the sector over the past year. It also describes the continuing high ambitions and actions along with the challenges going forward.
The UK Low Carbon Transition Plan (2009) ³²	<p>The UK Low Carbon Transition Plan sets out how the UK will meet the Climate Change Act's legally binding target of 34 per cent cut in emissions on 1990 levels by 2020. It also seeks to deliver emissions cuts of 18% on 2008 levels. The main aims of the Transition Plan include the following:</p> <ul style="list-style-type: none"> • Producing 30% of energy from renewables by 2020; • Improving the energy efficiency of existing housing; • Increasing the number of people in 'green jobs'; and • Supporting the use and development of clean technologies.
Powering Up Britain (2023) ³³	This document provides a blueprint of the Government's plans for the future of energy in the UK. It focusses on energy security and the drive to Net Zero. This document was the first to be published by the new Department for Energy Security and Net Zero.
National Planning Policy Framework (2023) ³⁴	<p>The NPPF includes guidance on climate change, flooding, and coastal change. Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.</p> <p>To support the move to a low carbon future, planning authorities should:</p> <ul style="list-style-type: none"> • plan for new development in locations and ways which reduce greenhouse gas emissions; • actively support energy efficiency improvements to existing buildings; and • when setting any local requirement for a building's sustainability, do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. <p>Local plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people</p>

³¹ Department of Energy and Climate Change (2013) UK Renewable Energy Roadmap Update. Available at: <https://www.gov.uk/government/publications/uk-renewable-energy-roadmap-second-update> [Date accessed: 21/08/24]

³² Department of Energy and Climate Change (2009) The UK Low Carbon Transition Plan. Available at: <https://www.gov.uk/government/publications/the-uk-low-carbon-transition-plan-national-strategy-for-climate-and-energy> [Date accessed: 21/08/24]

³³ HM Government (2023) Powering Up Britain. Available at: <https://assets.publishing.service.gov.uk/media/642468ff2fa8480013ec0f39/powering-up-britain-joint-overview.pdf> [Date accessed: 21/08/24]

³⁴ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
	<p>and property and manage any residual risk, taking account of the impacts of climate change, by:</p> <ul style="list-style-type: none"> • applying the Sequential Test; • if necessary, applying the Exception Test; • safeguarding land from development that is required for current and future flood management; • using opportunities offered by new development to reduce the causes and impacts of flooding.
<p>Environmental Improvement Plan 2023³⁵</p>	<p>The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country. To mitigate and adapt to climate change, the EIP sets out to:</p> <ul style="list-style-type: none"> • Update on our progress and plans to reach net zero • Publish a Land Use Framework in 2023, setting out how we will balance multiple demands on our land including climate mitigation and adaptation • Publish the third National Adaptation Programme (NAP3) in 2023 that will set out our five year strategy to build the UK's climate resilience • Continue our role as a global leader in tackling climate change, biodiversity loss and land degradation and push for an integrated approach to international action
<p>The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change (2021)³⁶</p>	<p>This guide is intended as an introduction to some of the key issues associated with the climate crisis, to ensure that Local Planning Authorities:</p> <ol style="list-style-type: none"> 1. Ensure that tackling the climate crisis is at the heart of the vision for the future of our communities; 2. Recognise how vital planning is to securing that vision – both directly, through facilitating the extension of renewable energy generation, and strategically, through practical nature-based solutions and design actions that can promote sustainable travel, urban cooling, or natural flood defence; and 3. Finally, recognise how many of the actions necessary to tackle the climate crisis are also key in creating healthy, ecologically rich, prosperous and beautiful places for us and for future generations. <p>The guide is intended as a starting point on the vital journey to put in place practical solutions which will halt the rise in temperatures and begin to reverse the climate crisis.</p>
<p>Carbon Trust: The Climate Change Challenge: Scientific</p>	<p>This report summarises the nature of the climate change issue. It explains the fundamental science and the accumulating evidence that climate change is real and needs to be addressed. It also explains the future potential impacts, including the outstanding uncertainties.</p>

³⁵ DEFRA (2023) Environmental Improvement Plan 2023. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 21/08/24]

³⁶ TCPA & RTPI (2021) The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change. Available at: https://tcpa.org.uk/wp-content/uploads/2021/11/tcpartpiclimateguide_oct2021_final.pdf [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
Evidence and Implications (2005) ³⁷	
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005) ³⁸	Provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.
HM Government: The Road to Zero (2018) ³⁹	This report outlines the transition to zero-emission road transport. This includes measures to reduce emissions from vehicles including specific targets for Heavy Goods Vehicles (HGVs), promoting low- and zero- emission cars and developing high quality electric vehicle infrastructure networks.
Department for Transport: Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World (2008) ⁴⁰	<p>Outlines five national goals for transport, focusing on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions. It outlines the key components of national infrastructure, discusses the difficulties of planning over the long term in the context of uncertain future demand and describes the substantial investments we are making to tackle congestion and crowding on transport networks. The National Goals for Transport are as follows:</p> <p>Goal 1: To reduce transport’s emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change.</p> <p>Goal 2: To support economic competitiveness and growth, by delivering reliable and efficient transport networks.</p> <p>Goal 3: To promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society.</p> <p>Goal 4: To contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health.</p> <p>Goal 5: To improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.</p>

³⁷ Carbon Trust: The Climate Change Challenge: Scientific Evidence and Implications. Available at: <https://www.carbontrust.com/resources/the-climate-change-challenge> [Date accessed: 21/08/24]

³⁸ Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments. Available at: https://www.buildingcentre.co.uk/media/file/pdf/22220_pdf30.pdf [Date accessed: 21/08/24]

³⁹ HM Government (2018) The Road to Zero: Next steps towards cleaner road transport and delivering out Industrial Strategy. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf [Date accessed: 21/08/24]

⁴⁰ Department for Transport: Towards a Sustainable Transport System: Supporting Economic Growth in a Low Carbon World Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228953/7226.pdf [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to climatic factors
Wolverhampton Renewable Energy and Climate Reduction Study (2011) ⁴¹	<p>The Renewable Energy and Climate Reduction Study was prepared by AMEC to assess opportunities for renewable and low carbon energy generation across Wolverhampton, to help inform the City Council's strategy. The study is also intended to inform local businesses, developers and communities about the roles they will play in delivery of renewable and low carbon energy.</p> <p>This Study is a starting point and a key priority for the City Council will be to disseminate the findings and promote the benefits associated with renewable and low carbon energy generation to local communities, businesses and developers.</p> <p>The Study presents a number of recommendations for the City Council and its partners, together with an action plan for delivery. The Study recommendations and supporting action plan identify the measures that the City Council and others will need to take to drive the take-up and realise the significant benefits associated with renewable and low carbon energy in Wolverhampton.</p>
Emerging Wolverhampton Net Zero City 2041 Strategy and Action Plan (2024) ⁴²	<p>The Net Zero City is a City of Wolverhampton Council strategy outlining an evidence-based, collaborative approach to cut the city's carbon footprint. The strategy will seek to enhance quality of life, encourage green businesses, develop active travel routes and public transport, and improve energy efficiency of homes. Six key outcomes are identified in the Draft Strategy:</p> <ol style="list-style-type: none"> 1. Residents and businesses are well informed and empowered to take climate action; 2. Wolverhampton runs on smart local low carbon heat and power; 3. Wulfrinians enjoy warm and energy efficient homes in Net Zero Neighbourhoods; 4. Sustainable businesses, jobs and skills to create a green and circular economy; 5. Equal access to sustainable transport across the City; and 6. Wulfrinians enjoy equal access to a nature friendly and climate resilient city.

⁴¹ AMEC (2011) Wolverhampton City Council Renewable Energy and Carbon Reduction Study: Final Report, December 2011. Available at: https://www.wolverhampton.gov.uk/sites/default/files/pdf/Wolverhampton_Renewable_Energy_and_Carbon_Reduction_Strategy.pdf [Date accessed: 21/08/24]

⁴² City of Wolverhampton Council (2024) Our Net Zero City: 2041. Available at: <https://consultation.wolverhampton.gov.uk/green-cities/our-net-zero-city/#:~:text=Working%20with%20other%20organisations%2C%20the,through%20increased%20planting%20and%20landscaping.> [Date accessed: 22/10/24]

A.4 Cultural heritage

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985) ⁴³	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992) ⁴⁴	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.
National Planning Policy Framework (2023) ⁴⁵	<p>The updated NPPF seeks to streamline the planning system and sets out the government’s planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.</p> <p>The NPPF includes guidance on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance.</p> <p>Planning authorities should take into account:</p> <ul style="list-style-type: none"> • The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; • The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and • The desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.
English Heritage and CABE: Buildings in Context: New	Aims to stimulate a high standard of design when development takes place in historically sensitive contexts by showing 15 case studies in which achievement is far above the ordinary and trying to draw some lessons both about design and about the development and planning process, particularly regarding building in sensitive locations.

⁴³ Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985). Available at: <https://www.coe.int/en/web/herein-system/council-of-europe> [Date accessed: 21/08/24]

⁴⁴ Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised). Available at: <https://www.coe.int/en/web/herein-system/council-of-europe> [Date accessed: 21/08/24]

⁴⁵ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Development in Historic Areas (2002) ⁴⁶	
Historic England: Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment (2008) ⁴⁷	<p>This Historic England document sets out the framework for the sustainable management of the historic environment. This is presented under the following six headline ‘principles’:</p> <p>Principle 1: The historic environment is a shared resource</p> <p>Principle 2: Everyone should be able to participate in sustaining the historic environment</p> <p>Principle 3: Understanding the significance of places is vital</p> <p>Principle 4: Significant places should be managed to sustain their values</p> <p>Principle 5: Decisions about change must be reasonable, transparent and consistent</p> <p>Principle 6: Documenting and learning from decisions is essential.</p>
Historic England: Tall Buildings: Historic England Advice Note 4 (2015) ⁴⁸	<p>This Historic England Advice Note updates previous guidance by Historic England and CABE, produced in 2007. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. The advice is for all relevant developers, designers, local authorities and other interested parties.</p>
Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1 ⁴⁹	<p>Practice Advice note is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).</p>
Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic	<p>The purpose of this Historic England Good Practice Advice note is to provide information in relation to assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.</p>

⁴⁶ English Heritage and CABE (2002) Buildings in Context: New Development in Historic Areas. Available at: <https://www.designcouncil.org.uk/sites/default/files/asset/document/building-in-context-new-development-in-historic-areas.pdf> [Date accessed: 21/08/24]

⁴⁷ Historic England (2008) Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment. Available at: <https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment/> [Date accessed: 21/08/24]

⁴⁸ Historic England: Tall Buildings: Historic England Advice Note 4. Available at: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/> [Date accessed: 21/08/24]

⁴⁹ Historic England (2015) The Historic Environment in Local Plans, Historic Environment Good Practice Advice in Planning: 1. Available at: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to cultural heritage
Environment Good Practice Advice in Planning: 2 ⁵⁰	
Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3 ⁵¹	This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.
The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015) ⁵²	The purpose of this Historic England advice note is to support all those involved in the Local Plan site allocation process in implementing historic environment legislation, the relevant policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG). In addition to these documents, this advice should be read in conjunction with the relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.
Black Country Historic Landscape Characterisation Study ⁵³	The HLC aimed to create a strategic landscape-level understanding of the historic character and environment of the Black Country. The study identified 103 Historic Environment Area Designations (HEADs) within the Black Country Green Belt and 354 HEADs in the urban area. The study also identified a number of Archaeological Priority Areas, which are considered to contain particularly rare or well-preserved remains of high archaeological and historic interest. Areas of High Historic Townscape Value (AHHTVs) and Designed Landscapes of High Historic Value (DLHHVs) have also been identified within the Historic Landscape Characterisation.

⁵⁰ Historic England (2015) Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning: 2. Available at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/> [Date accessed: 21/08/24]

⁵¹ Historic England (2015) The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3. Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 21/08/24]

⁵² The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015). Available at: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> [Date accessed: 21/08/24]

⁵³ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 21/08/24]

A.5 Human health

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
DCMS: Playing to win: a new era for sport (2008) ⁵⁴	The government’s vision for sport and physical activity for 2012 and beyond is to increase significantly levels of sport and physical activity for people of all ages and to achieve sustained levels of success in international competition. The ambition is for England to become –a truly world leading sporting nation. The vision is to give more people of all ages the opportunity to participate in high quality competitive sport.
DoH: Healthy Lives, Healthy People: Our strategy for public health in England White Paper (2011) ⁵⁵	Sets out the government’s approach to tackling threats to public health and dealing with health inequalities. It sets out an approach that will: <ul style="list-style-type: none"> • Protect the population from health threats – led by central government, with a strong system to the frontline; • Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing, and tackle the wider factors that influence it; • Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework; • Reflect the government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and • Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.
Public Health Strategy 2020-2025 (2019) ⁵⁶	The strategy sets out priorities within the public health system and areas of focus including addressing health inequalities and narrowing the ‘health gap’ between poor and wealthy communities, reducing rates of infectious diseases, addressing unhealthy behaviours and ensuring the potential of new technologies is realised.
DoH & Department for Work and Pensions. Improving health and work: changing	This sets out the government’s response to a review into the health of Britain’s working age population conducted by Dame Carol Black. The vision is to: “ <i>create a society where the positive links between work and health are recognised by all, where everyone aspires to a</i>

⁵⁴ DCMS (2008) Playing to win: a new era for sport Available at: http://www.lsersa.org/old/news/sse/sportstrategies/DCMS_PlayingtoWin_singles.pdf [Date accessed: 21/08/24]

⁵⁵ DoH (2011) Healthy Lives, Healthy People: Our strategy for public health in England White Paper Available at: <https://www.gov.uk/government/publications/healthy-lives-healthy-people-our-strategy-for-public-health-in-england> [Date accessed: 21/08/24]

⁵⁶ Public Health England (2019) PHE Strategy 2020 to 2025 <https://www.gov.uk/government/publications/phe-strategy-2020-to-2025> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
lives: The Government's Response to Dame Carol Black's Review of the health of Britain's working-age population (2008) ⁵⁷	<p><i>healthy and fulfilling working life and where health conditions and disabilities are not a bar to enjoying the benefits of work</i>'.</p> <p>To achieve the vision three key aspirations have been identified:</p> <ol style="list-style-type: none"> 1. creating new perspectives on health and work; 2. improving work and workplaces; and 3. supporting people to work. <p>Through these three aspirations Britain's working population will fulfil their full potential, create stronger communities and help relive the financial burden of health problems on the economy.</p>
DoH: Our health, our care, our say: a new direction for community services (2006) ⁵⁸	<p>Puts emphasis on moving healthcare into the community and will therefore have an impact on sustainable development considerations, including supporting local economies and how people travel to healthcare facilities.</p>
Forestry Commission: Trees and Woodlands – Nature's Health Service (2005) ⁵⁹	<p>Provides detailed examples of how the Woodland Sector (trees, woodlands and green spaces) can significantly contribute to people's health, well-being (physical, psychological and social) and quality of life. Increasing levels of physical activity is a particular priority.</p>
Natural England Green Infrastructure Framework (2023) ⁶⁰	<p>The Green Infrastructure Framework is a commitment in the Government's 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The Green Infrastructure Framework comprises:</p> <ul style="list-style-type: none"> • <u>Green Infrastructure Principles</u>: the why, what and how of good Green Infrastructure • <u>Green Infrastructure Standards</u>: guidance on national standards for Green Infrastructure quantity and quality • <u>Green Infrastructure Maps</u>: mapped environmental, socio-economic datasets to support the standards • <u>Green Infrastructure Planning and Design Guide</u>: practical, evidence-based advice on how to design good quality Green Infrastructure • <u>Green Infrastructure Process Journeys</u>: guides on how to apply all the products in the Green Infrastructure Framework <p>A key aspect of the GI Framework is to deliver active and healthy places, including green neighbourhoods, green / blue spaces and green routes support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life.</p>

⁵⁷ Improving health and work: changing lives. Available at: <https://www.gov.uk/government/publications/improving-health-and-work-changing-lives> [Date accessed: 21/08/24]

⁵⁸ DoH (2006) Our health, our care, our say: a new direction for community services. Available at: <https://www.gov.uk/government/publications/our-health-our-care-our-say-a-new-direction-for-community-services> [Date accessed: 21/08/24]

⁵⁹ Forestry Commission (2005) Trees and Woodlands - Nature's Health Service. Available at: <https://www.forestryresearch.gov.uk/publications/trees-and-woodlands-natures-health-service/> [Date accessed: 21/08/24]

⁶⁰ Natural England (2023) Green Infrastructure Framework. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
Cycling and walking plan for England (2020) ⁶¹	<p>The ‘Gear change: a bold vision for cycling and walking’ document sets out a vision for a travel revolution in England’s streets, towns and communities. The plan sets out the multiple benefits of increased cycling and walking including health, congestion, the economy and air quality, and the vision that “<i>cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030</i>”. The plan sets out four main themes to achieve this vision:</p> <ul style="list-style-type: none"> • Theme 1: Better streets for cycling and people; • Theme 2: Cycling at the heart of decision-making; • Theme 3: Empowering and encouraging Local Authorities; and • Theme 4: Enabling people to cycle and protecting them when they do.
Wolverhampton Playing Pitch and Outdoor Assessment (2022) ⁶² and Sport Strategy and Action Plan (2022) ⁶³	<p>The Playing Pitch and Outdoor Sport Strategy (PPOSS) Assessment Report for Wolverhampton presents a supply and demand assessment of playing pitch and outdoor sports facilities in accordance with Sport England’s Playing Pitch Strategy (PPS) Guidance (for playing pitch sports) and Sport England’s Assessing Needs and Opportunities Guide (ANOG) (for “non-pitch” sports).</p> <p>The Strategy and Action Plan report provides the Strategy for Wolverhampton. Building upon the preceding Assessment Report, it provides a clear, strategic framework for the maintenance and improvement of existing playing pitch and accompanying ancillary facilities up to 2039, in line with the previously proposed Black Country Plan.</p>
Wolverhampton Open Space Strategy and Action Plan Update (2018) ⁶⁴	<p>This Strategy and Action Plan sets out a strategic vision and a series of aims and objectives for open space in Wolverhampton of all types and ownerships. Based on these objectives and an assessment against quantity, quality and access standards a prioritised action plan is provided for different parts of the City for each type of open space. Over-arching actions for the whole City are also identified.</p> <p>The Strategy and Action Plan sets out a vision up to 2026, providing a strategic framework for the development and improvement of existing open space facilities. It aims to:</p> <ul style="list-style-type: none"> • Provide a clear prioritised action plan to protect and improve existing open spaces and to increase the provision of such facilities, where it is shown there are deficiencies against quantity, quality and access standards. This includes area-based action plans with implementation and funding sources. • Advise, as appropriate, on opportunities for rationalisation and change of use of current open space provision within the City. • Detail how CoWC can encourage greater community involvement and ownership in the management, maintenance and development of open spaces.

⁶¹ Department for Transport (2020) Cycling and walking plan for England. Available at: <https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england> [Date accessed: 21/08/24]

⁶² Knight, Kavanagh & Page (2022) City of Wolverhampton Council Playing Pitch & Outdoor Sports Strategy Assessment Report, October 2022. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-04/Wolverhampton-PPOSS-Assessment-Report-Oct-2022.pdf> [Date accessed: 21/08/24]

⁶³ Knight, Kavanagh & Page (2022) City of Wolverhampton Council Playing Pitch & Outdoor Sport Strategy & Action Plan, October 2022. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-04/Wolverhampton-PPOSS-Strategy-%28final%29-Oct-2022v2.pdf> [Date accessed: 21/08/24]

⁶⁴ Knight, Kavanagh & Page (2018) City of Wolverhampton Open Space Strategy and Action Plan Update, June 2018. Available at: https://www.wolverhampton.gov.uk/sites/default/files/pdf/Wolverhampton_OSSAP_Update_June_2018.pdf [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
	<ul style="list-style-type: none"> • Recommend how to maximise the effective use of physical and financial resources in improving the quantity, quality and accessibility of open space • Advise on best practise in terms of delivery including stakeholder and partnership working, marketing and communication improvements. • Establish a robust monitoring framework to assess the effectiveness of the Strategy and Action Plan. <p>The Open Space Strategy is currently being updated and will be complete in 2023.</p>
Emerging Wolverhampton Open Space Strategy and Action Plan 2024-2039 ⁶⁵	<p>This Open Space Strategy and Action Plan assessed existing open space across Wolverhampton and developed a strategy as a result which will meet to the current and future open space needs of residents up to 2039. The plan seeks to ensure that communities will have easy access to high quality, diverse and inclusive open spaces for recreation, contact with nature, physical activity and social interaction. To achieve this, five key aims have been identified:</p> <ul style="list-style-type: none"> • Provide a well-planned and maintained diverse open space network, underpinned by a strong evidence base, that informs allocation of open space contributions, investment decisions and funding applications. • Provide inclusive open spaces, with equal access to facilities for the whole community. • Provide healthy, safe and active open spaces. • Ensure open spaces are well recognized through local heritage and culture. • Develop a biodiverse, resilient and well-connected open space network.
Wolverhampton Joint Health and Wellbeing Strategy 2013-2018 ⁶⁶	<p>The Wolverhampton Joint Health and Wellbeing Strategy sets the framework for supporting Wolverhampton residents' health and wellbeing. Measures include increasing resident's level of physical activity and encouraging healthier eating. The strategy sets out three 'themes' as follows: Growing well, living well and ageing well. The strategy sets out seven key priorities for Wolverhampton:</p> <ul style="list-style-type: none"> • Early years • Children and young people's mental wellbeing and resilience • Workforce • City Centre • Embedding prevention across the system • Integrated care; frailty and end of life • Dementia friendly city
A step in the right direction: Wolverhampton transport plan	<p>The City Council has set out three main objectives to make way for safer streets for residents and visitors:</p> <ul style="list-style-type: none"> • Prioritising public safety and maintaining social distancing as part of COVID-19. • Redesigning public spaces to accommodate and encourage more walking and cycling

⁶⁵ LUC (2024) Wolverhampton Open Space Strategy and Action Plan 2024-2039. Draft, July 2024.

⁶⁶ City of Wolverhampton Council (no date) Wolverhampton Joint Health & Wellbeing Strategy 2018-2023. Available at: <https://wolverhampton.moderngov.co.uk/documents/s80182/DRAFT%20Joint%20Health%20and%20Wellbeing%20Strategy%202018-23.pdf> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to human health
<p>in response to COVID-19 (2020)⁶⁷</p>	<ul style="list-style-type: none"> • Reducing emissions as part of the Climate Emergency <p>To meet these objectives, the council has outlined a range of measures to be carried out as soon as possible, including:</p> <ul style="list-style-type: none"> • Widening footways • Relocating bus stops • Reducing speed limits • Creating more bike parking spaces and bike lanes • Trialing e-scooters
<p>Draft Active Travel Strategy for Wolverhampton (2009)⁶⁸</p>	<p>This document sets out how the Council will ensure that there is a co-ordinated approach to providing the physical infrastructure, information and support that will generate the necessary behaviour change required to increase the levels of walking and cycling in Wolverhampton, particularly for shorter journeys.</p> <p>This Active Travel Strategy provides a framework to put the steps in place to:</p> <ol style="list-style-type: none"> 1. To improve our health by encouraging more active lifestyle choices. 2. Create an inviting, safe and interconnected network of walking and cycling networks. 3. To support and encourage more sustainable travel choices, such as widely providing travel planning, bicycle training and route information.

⁶⁷ City of Wolverhampton Council (2020) A step in the right direction: Wolverhampton transport plan in response to COVID-19. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2020-08/2020-06-05%20Transport%20Plan%20-%20a%20step%20in%20the%20right%20direction%20FINAL.pdf> [Date accessed: 21/08/24]

⁶⁸ AECOM (2009) Wolverhampton City Council Draft Active Travel Strategy. Available at: <https://wolverhampton.moderngov.co.uk/documents/s14929/Draft%20Active%20Travel%20Strategy%20final.pdf> [Date accessed: 21/08/24]

A.6 Landscape

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
Council of Europe: European Landscape Convention (2006) ⁶⁹	Aims to promote the protection, management and planning (including active design and creation of Europe’s landscapes, both rural and urban, and to foster European co-operation on landscape issues.
English Heritage and CABE: Guidance on Tall Buildings (2007) ⁷⁰	Provides advice and guidance on good practice in relation to tall buildings in the planning process and to highlight other related issues, which need to be taken into account, i.e. where tall buildings would and would not be appropriate.
National Planning Policy Framework (2021) ⁷¹	The NPPF states that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and Areas of Outstanding Natural Beauty.
Environmental Improvement Plan 2023 ⁷²	<p>The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country.</p> <p>To enhance beauty, heritage, and engagement with the natural environment, the EIP sets out to:</p> <ul style="list-style-type: none"> • Work across government to fulfil a new and ambitious commitment that everyone should live within 15 minutes walk of a green or blue space; • Continue our delivery of the England Coast Path and the Coast to Coast National Trail; • Green the Green Belt as set out in the Levelling Up White Paper by identifying key areas for nature restoration; • Invest in a new national landscapes partnership for National Parks, Areas of Outstanding Natural Beauty, and National Trails; • Extend the delivery of our Farming in Protected Landscapes programme, using lessons learned to inform future farming schemes; and • Invest in active travel, with a vision for half of all journeys in towns and cities to be cycled or walked by 2030. £35 million funding has already been committed this financial year.

⁶⁹ Council of Europe: European Landscape Convention (2006) Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/236096/8413.pdf [Date accessed: 21/08/24]

⁷⁰ English Heritage and CABE: Guidance on Tall Buildings (2007) Available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/guidance-on-tall-buildings_0.pdf [Date accessed: 21/08/24]

⁷¹ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

⁷² DEFRA (2023) Environmental Improvement Plan 2023. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to landscape
MHCLG: National Design Guide: Planning practice guidance for beautiful, enduring and successful places (2021) ⁷³	This design guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the government’s collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.
Black Country Landscape Sensitivity Assessment (2019) ⁷⁴	<p>The Landscape Sensitivity Study was prepared to inform the review of the former Black Country Plan. Although this is no longer being pursued, the study provides evidence base information relating to the geographic area including the Wolverhampton Local Plan.</p> <p>The purpose of this study is to provide an assessment of the extent to which the character and quality of the landscape abutting the West Midlands conurbation within the Black Country and around settlements in South Staffordshire is, in principle, susceptible to change as a result of introducing built development.</p> <p>The study highlights likely landscape and visual sensitivities within each assessment area and provides a broad landscape character-based assessment rather than a site level assessment as might be required for a planning application.</p>
Black Country Green Belt Study (2019) ⁷⁵	<p>The Green Belt Study was prepared to inform the review of the former Black Country Plan. Although this is no longer being pursued, the study provides evidence base information relating to the geographic area including the Wolverhampton Local Plan.</p> <p>The overall aim of the Study was to undertake an independent, robust and transparent assessment of Green Belt within the Black Country. This includes a comprehensive assessment of the performance of Green Belt land in line with policy set out in the National Planning Policy Framework (NPPF) good practice guidance, local plan examination inspectors’ reports and case law. The Study draws out variations in the contribution of land to the five Green Belt purposes, identifying areas of land whose performance ranges from relatively weak to relatively strong in Green Belt terms.</p>

⁷³ MHCLG & DLUHC (2021) National design guide. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date accessed: 21/08/24]

⁷⁴ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 21/08/24]

⁷⁵ LUC (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 21/08/24]

A.7 Population and material assets

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
National Planning Policy Framework (2023) ⁷⁶	<p>The NPPF seeks to streamline the planning system and sets out the government’s planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development. The NPPF includes guidance on promoting healthy communities.</p> <p>The NPPF requires planning authorities to aim to achieve places which promote:</p> <ul style="list-style-type: none"> • Opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages which bring together those who work, live and play in the vicinity; • Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and • Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. <p>In order to deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</p> <ul style="list-style-type: none"> • Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs; • Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
Social Exclusion Unit: Preventing Social Exclusion (2001) ⁷⁷	<p>The primary aims are to prevent social exclusion, and reintegrate people who have become excluded. Improvement is required in the areas of truancy, rough sleeping, teenage pregnancy, youth at risk and deprived neighbourhoods.</p>
DCLG Homes for the future: more affordable, more	<p>The Housing Green Paper outlines plans for delivering homes; new ways of identifying and using land for development; more social housing- ensuring that a decent home at an affordable price is for the many; building homes more quickly; more affordable homes; and greener homes – with high environmental standards and flagship developments leading the way.</p>

⁷⁶ MHCLG (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

⁷⁷ Social Exclusion Unit (2001) Preventing Social Exclusion. Available at: <http://www.bris.ac.uk/poverty/downloads/keyofficialdocuments/Preventing%20Social%20Exclusion.pdf> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
sustainable (2007) ⁷⁸	
ODPM & Home Office: Safer Places: The Planning System and Crime Prevention (2004) ⁷⁹	Practical guide to designs and layouts that may help with crime prevention and community safety, including well-defined routes, places structured so that different uses do not cause conflict, places designed to include natural surveillance and places designed with management and maintenance in mind.
Cabinet Office: Reaching Out: An Action Plan on Social Exclusion (2006) ⁸⁰	Sets out an action plan to improve the life chances of those who suffer, or may suffer in the future, from disadvantage. Guiding principles for action include: better identification and earlier intervention; systematically identifying 'what works'; promoting multi-agency working; personalisation, rights and responsibilities; and supporting achievement and managing underperformance.
Homes England Strategic Plan 2023 to 2028 ⁸¹	<p>This 5-year plan spans financial year 2023 to 2024 to financial year 2027 to 2028. It outlines:</p> <ul style="list-style-type: none"> • Homes England's mission • Strategic objectives and aims • How performance will be measured <p>The plan seeks to drive regeneration and housing delivery to create high-quality homes and thriving places. This will support greater social justice, the levelling up of communities across England and the creation of places people are proud to call home, in line with the priorities of the government's Levelling Up White Paper.</p>
EC Waste Framework Directive (1975, updated 2006) ⁸²	Objective is the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste. Particular focus is placed on the re-use of recovered materials as raw materials; restricting the production of waste; promoting clean technologies; and the drawing up of waste management plans.
EC Landfill Directive (1999) ⁸³	Aims to prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, groundwater, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the landfilling of waste, during the whole lifecycle of the landfill.
Cabinet Office: Waste Not, Want Not, A Strategy for	A study into how England's current waste management practices could be improved to reduce the current, and growing, waste problem.

⁷⁸ DCLG (2007) Homes for the future: more affordable, more sustainable. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/243191/7191.pdf [Date accessed: 21/08/24]

⁷⁹ ODPM & Home Office (2004) Safer Places: The Planning System and Crime Prevention. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7784/147627.pdf [Date accessed: 21/08/24]

⁸⁰ Cabinet Office (2006) Reaching Out: An Action Plan on Social Exclusion. Available at: https://www.bristol.ac.uk/poverty/downloads/keyofficialdocuments/reaching_out_full.pdf [Date accessed: 21/08/24]

⁸¹ Homes England (2023) Strategic Plan 2023 to 2028. Available at: <https://www.gov.uk/government/publications/homes-england-strategic-plan-2023-to-2028> [Date accessed: 21/08/24]

⁸² EC Waste Framework Directive Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31975L0442> [Date accessed: 21/08/24]

⁸³ EC Landfill Directive (1999) Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31999L0031> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
tackling the waste problem (2002) ⁸⁴	
DEFRA Waste Strategy for England (2007) ⁸⁵	Aims are to reduce waste by making products with fewer natural resources; break the link between economic growth and waste growth; re-use products or recycle their materials; and recover energy from other wastes where possible. Notes that for a small amount of residual material, landfill will be necessary.
EU Sustainable Development Strategy (2006) ⁸⁶	This Strategy identifies key priorities for an enlarged Europe. This includes health, social inclusion and fighting global poverty. It aims to achieve better policy integration in addressing these challenges, and to ensure that Europe looks beyond its boundaries in making informed decisions about sustainability. The sustainable Development Strategy was reviewed in 2009 and “ <i>underlined that in recent years the EU has mainstreamed sustainable development into a broad range of its policies. In particular, the EU has taken the lead in the fight against climate change and the promotion of a low-carbon economy. At the same time, unsustainable trends persist in many areas and the efforts need to be intensified</i> ”. Sustainable development is a key focus of the EU and the strategy continues to be monitored and reviewed.
DEFRA, Noise Policy Statement for England (NPSE) (2010) ⁸⁷	This document seeks to clarify the underlying principles and aims in existing policy documents, legislation and guidance that relate to noise. The key aims of this document are as follows: <ul style="list-style-type: none"> • Avoid significant adverse impacts on health and quality of life; • Mitigate and minimise adverse impacts on health and quality of life; and • Where possible, contribute to the improvement of health and quality of life.
Strategy for Sustainable Construction (2008) ⁸⁸	‘Themes for Action’ include: re-use existing built assets; design for minimum waste; aim for lean construction; minimise energy in construction; minimise energy in building use; avoid polluting the environment; preserve and enhance bio-diversity; conserve water resources; respect people and their local environment; and set targets (benchmarks & performance indicators).
Planning for Town Centres: Practice guidance on need,	This practice guidance was intended to support the implementation of town centre policies set out in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4) (now replaced by PPG). It is aimed at helping those involved in preparing or reviewing need, impact and sequential site assessments.

⁸⁴ Cabinet Office (2002) Waste Not, Want Not, A Strategy for tackling the waste problem. Available at: <https://statesassembly.gov.ie/scrutinyreviewresearches/2007/s-6482-38840-1972007.pdf> [Date accessed: 21/08/24]

⁸⁵ DEFRA (2007) Waste Strategy for England. Available at: <https://www.gov.uk/government/publications/waste-strategy-for-england-2007> [Date accessed: 21/08/24]

⁸⁶ EU Sustainable Development Strategy (2006) Available at: <https://www.eea.europa.eu/policy-documents/renewed-eu-strategy-for-sustainable-development> [Date accessed: 21/08/24]

⁸⁷ DEFRA (2010) Noise Policy Statement for England (NPSE) Available at: <https://www.gov.uk/government/publications/noise-policy-statement-for-england> [Date accessed: 21/08/24]

⁸⁸ Strategy for Sustainable Construction (2008) Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/+http://www.bis.gov.uk/files/file46535.pdf> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
impact and the sequential approach (2009) ⁸⁹	
Department for Transport: Connecting People: a Strategic Vision for Rail (2017) ⁹⁰	<p>The document describes the government’s strategic vision for the railways, and the actions that will be taken to make it a reality. The key priorities include:</p> <ol style="list-style-type: none"> 1. A more reliable railway 2. An expanded network 3. A better deal for passengers 4. A modern workforce 5. A productive and innovative sector
Movement for Growth: the West Midlands Strategic Transport Plan ⁹¹	<p>The Movement for Growth Strategy is based on the West Midlands Combined Authority’s Strategic Economic Plan (SEP) and seeks to create a modern, efficient and reliable transport system. The Movement for Growth document is accompanied by a 10-year delivery plan which outlines key supporting transport projects that will deliver many of the SEP’s outcomes over the coming decade.</p> <p>The vision for transport in the West Midlands Metropolitan Area is: <i>“We will make great progress for a Midlands economic ‘Engine for Growth’, clean air, improved health and quality of life for the people of the West Midlands. We will do this by creating a transport system befitting a sustainable, attractive and economically vibrant conurbation in the world’s sixth largest economy”.</i></p>
West Midlands Local Transport Plan Green Paper: Reimagining transport in the West Midlands: Local Transport Plan Draft Core Strategy (2021) ⁹²	<p>The proposed Core Strategy for the fifth LTP for the West Midlands sets out the overall aims, vision and approach to guide the development and delivery of transport policies until the end of 2041. It seeks to:</p> <ul style="list-style-type: none"> • Sustain economic success • Create a fairer society • Support local communities and places • Become more active • Tackle the climate emergency <p>The emerging fifth Local Transport Plan for the West Midlands will replace the Movement for Growth Strategy, when adopted.</p>

⁸⁹ Planning for Town Centres: Practice guidance on need, impact and the sequential approach (December 2009) Available at: <https://www.gov.uk/government/publications/planning-for-town-centres-practice-guidance-on-need-impact-and-the-sequential-approach> [Date accessed: 21/08/24]

⁹⁰ Department for Transport (2017) Connecting people: a strategic vision for rail. Available at: <https://www.gov.uk/government/publications/a-strategic-vision-for-rail> [Date accessed: 21/08/24]

⁹¹ West Midlands Combined Authority (no date) Movement for Growth: The West Midlands Strategic Transport Plan. Available at: <https://www.tfwm.org.uk/media/3uki3yw0/movement-for-growth.pdf> [Date accessed: 21/08/24]

⁹² Transport for West Midlands (2021) Reimagining transport in the West Midlands: Local Transport Plan Draft Core Strategy. Available at: <https://www.tfwm.org.uk/media/icvfrqhp/wm-ltp-core-strategy-v0-7.pdf> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
Greater Birmingham & Solihull Strategic Economic Plan 2016-2030 ⁹³	<p>The Strategic Economic Plan outlines three key strategic objectives for delivering economic growth across Greater Birmingham and Solihull:</p> <ul style="list-style-type: none"> • Becoming a world leader in innovation and creativity • Taking full advantage of our global connections • Creating stronger conditions for growth across our communities <p>The LEP works across these objectives, building on the scale and diversity of the assets of the GBSLEP area, to enable sustainable economic growth throughout our geography.</p>
Greater Birmingham Housing Market Area Strategic Growth Study (2018) ⁹⁴	<p>The NPPF and the Localism Act 2011 requires local authorities to work together through the ‘Duty to Cooperate’ across the relevant Housing Market Area (HMA) to identify and then meet housing need where it is sustainable to do so.</p> <p>The Birmingham Strategic Growth Study builds on work undertaken by Peter Brett Associates (PBA) who prepared a Strategic Housing Needs Study Stage 2 Report (November, 2014) and Strategic Housing Needs Study Stage 3 Report (August, 2015). These provide a framework and starting point for this Study, which the HMA authorities have jointly commissioned to further consider strategic development options to meet housing need across the HMA. It is intended to identify more specific options and broad locations for addressing the housing supply shortfall.</p>
Black Country Employment Area Review (BEAR) (2021) ⁹⁵	<p>The Black Country Employment Area Review (BEAR) Report forms part of the evidence base to support the preparation of the Black Country Plan (BCP). The overall purpose of this Study is to assess the suitability of existing employment land across the Black Country for continued business and industrial use. The Study reviews the stock of existing operational employment land which is already in use, identifies what is suitable to retain and what can be released to other uses, notably housing.</p>
Black Country Economic Development Needs Assessment (EDNA) Update (2023) ⁹⁶	<p>The aim of the EDNA is to provide an updated objective assessment of industrial land needs for Black Country, drawing upon an independent assessment of the area’s economic development needs. The EDNA Update 2023 provides an up-to-date assessment, building on the findings of the previous EDNA.</p>

⁹³ Greater Birmingham & Solihull Local Enterprise Partnership: Strategic Economic Plan 2016-2030. Available at: <https://www.businessboardnetwork.co.uk/media/1111/greater-birmingham-and-solihull-sep.pdf> [Date accessed: 21/08/24]

⁹⁴ Wood (2018) Greater Birmingham HMA Strategic Growth Study. Available at: https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study [Date accessed: 21/08/24]

⁹⁵ Black Country Employment Area Review (BEAR). July 2021. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents/> [Date accessed: 21/08/24]

⁹⁶ WECD (2023) Black Country Authorities Employment Land Needs Assessment 2020 to 2041. Updated Estimates, October 2023. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents/> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
Black Country Employment Land Supply Paper: 2023 Update ⁹⁷	This paper forms part of the evidence base to support the preparation of the individual Local Plans produced by the Black Country Local authorities (BCLAs). This is an update of a Report produced in 2021 to support the Regulation 18 Black Country Plan (BCP). The overall purpose of the Paper is to provide a definitive position statement on employment land supply to meet future needs.
Black Country Minerals Study (2019) ⁹⁸ and Update (2024) ⁹⁹	<p>The Study provides up-to-date information about the Black Country’s mineral resources and current and future demand for minerals and mineral products, which was originally prepared as part of the evidence base to inform the former Black Country Plan. Although this is no longer being pursued, the study provides evidence base information relating to the geographic area including the Wolverhampton Local Plan. The Minerals Study:</p> <ul style="list-style-type: none"> • Estimates the current demand for minerals and mineral products in the Black Country; • Predicts how demand for minerals and mineral products is likely to change over the plan period and beyond ; • Reviews the capacity and vulnerability of existing mineral production sites and processing facilities in the Black Country; • Analyses where our mineral supplies are coming from at the moment and whether this is having a significant effect on other areas; and • Reviews the extent of unworked mineral resources in the Black Country and resource areas that should be safeguarded.
Black Country Waste Study (2020) ¹⁰⁰ , Update (2022) ¹⁰¹ and Update (2024) ¹⁰²	<p>The Study provides up-to-date information about the Black Country’s current and future waste management needs, which was originally prepared as part of the evidence base to inform the former Black Country Plan. Although this is no longer being pursued, the study provides evidence base information relating to the geographic area including the Wolverhampton Local Plan. The Waste Study:</p> <ul style="list-style-type: none"> • Estimates how much waste we produce in the Black Country and how it is managed; • Predicts how the amount of waste we produce might change over the plan period and beyond; • Assesses whether the Black Country’s existing waste management sites have the capacity to meet our current and future needs; • Analyses where our waste goes and whether this is having a significant effect on other areas; and • Provides advice on how we should plan for our future waste management needs.

⁹⁷ Black Country Employment Land Supply Technical Paper. November 2023. Available at: <https://www.dudley.gov.uk/residents/planning/planning-policy/dudley-local-plan/draft-dudley-local-plan-consultation/dudleys-draft-local-plan-consultation-documents/> [Date accessed: 20/08/24]

⁹⁸ Wood (2019) Black Country Minerals Study. Available at: <https://blackcountryplan.dudley.gov.uk/media/15815/minerals-study-evidence-base-review-redacted.pdf> [Date accessed: 21/08/24]

⁹⁹ WSP (2024) Black Country Minerals Study Update: Updated evidence base for minerals to support the preparation of emerging local plans for each Black Country Authority- Wolverhampton. Draft, August 2024.

¹⁰⁰ Wood (2020) Black Country Waste Study. Available at: https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf [Date accessed: 21/08/24]

¹⁰¹ Wood (2022) Black Country Waste Study Update: Updated waste needs assessment to support preparation of the Black Country Plan. September 2022. Available at: <https://www.dudley.gov.uk/media/0zibtj2g/black-country-waste-study-2022-redacted.pdf> [Date accessed: 21/08/24]

¹⁰² WSP (2024) Black Country Waste Study Update: Updated waste needs assessment to support preparation of emerging Local Plans for each Black Country Authority- Wolverhampton. Draft, August 2024.

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) (2024) ¹⁰³	The Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) is a comprehensive study of sites within the City which have the potential to accommodate new housing development. The Council is required to produce a SHLAA by national planning policy set out in the National Planning Policy Framework (NPPF). The SHLAA forms part of the evidence base to inform the Wolverhampton Local Development Framework and will help to ensure the timely delivery of new housing to meet Government targets.
Wolverhampton Housing Market Assessment (SHMA) (update 2024) ¹⁰⁴	This SHMA details the amount of new housing required over the plan-period in Wolverhampton, including the size and tenure of housing which would be most suitable for the future population, housing requirements of specific groups of the local population and the level of affordable housing identified within Wolverhampton to meet the identified needs.
Wolverhampton Waste and Recycling Strategy 2017-2027 ¹⁰⁵	<p>The strategy sets out the Council's vision “<i>To deliver the best most environmentally appropriate and cost-effective service possible for the residents of Wolverhampton to support them to manage their waste in a sustainable way.</i>” And includes a target to increase the recycling rate to above 50% by March 2020.</p> <p>The strategy sets out the following key objectives:</p> <ul style="list-style-type: none"> • Lead, encourage and enable behaviour change of our residents through a combination of measures that increase the opportunity and motivation to not only reuse and recycle their waste but to also prevent and repair items to allow them to produce less waste. • Develop and implement a three-year waste and recycling collection service plan to deliver our waste services in a modern, quality and cost effective way to all residents of the city. • Review our household waste recycling centre provision in the city and deliver an improvement programme, accounting for: <ul style="list-style-type: none"> ○ population size, ○ accessibility, ○ how we can achieve maximum re-use from our centres, ○ how they can be funded more sustainably; • Support local businesses and other organisations both small and large within the city to understand their waste responsibilities and to reduce, reuse and recycle their waste appropriately. • Develop a future waste disposal model which builds in flexibility and ensures all future arrangements ensure the long-term stability of waste management for the residents of the city through to 2028 and beyond.
Wolverhampton Our City: Our Plan ¹⁰⁶	<p>Our City: Our Plan sets out how the Council will continue to work alongside its local, regional, and national partners to improve outcomes for local people. The plan sets out an ambition that ‘Wulfrunians will live longer, healthier lives.’ Delivery of this ambition will be supported by six overarching priorities:</p> <ol style="list-style-type: none"> 1. Strong families where children grow up well and achieve their full potential

¹⁰³ City of Wolverhampton Council (2024) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Update as of April 2024. Draft, August 2024.

¹⁰⁴ HDH Planning and Development (2024) Wolverhampton Housing Market Assessment Update. Draft, August 2024.

¹⁰⁵ City of Wolverhampton Council Waste Strategy 2018-2028. Available at: <https://wolverhampton.moderngov.co.uk/documents/s75571/Appendix%201%20for%20Waste%20Strategy%202018-2028.pdf> [Date accessed: 21/08/24]

¹⁰⁶ CWC (2024) Our City: Our Plan. 2024/2025. Available at: <https://www.wolverhampton.gov.uk/your-council-and-meetings/our-city-our-plan> [Date accessed: 27/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to population and material assets
	<ol style="list-style-type: none">2. Fulfilled lives for all with quality care for those that need it3. Healthy, inclusive communities4. Good homes in well-connected neighbourhoods5. More local people into good jobs and training6. Thriving economy in all parts of the city

A.8 Soil

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to soil
DEFRA: Safeguarding our Soils: A Strategy for England (2011) ¹⁰⁷	<p>The Soil Strategy for England outlines the government’s approach to safeguarding our soils for the long term. It provides a vision to guide future policy development across a range of areas and sets out the practical steps that are needed to take to prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve understanding of the threats to soil and best practice in responding to them. Key objectives of the strategy include:</p> <ul style="list-style-type: none"> • Better protection for agricultural soils; • Protecting and enhancing stores of soil carbon; • Building the resilience of soils to a changing climate; • Preventing soil pollution; • Effective soil protection during construction and development; and • Dealing with our legacy of contaminated land.
DEFRA: Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance (2012) ¹⁰⁸	<p>This document establishes a legal framework for dealing with contaminated land in England. This document provides guidelines for how local authorities should implement the regime, including how they should go about deciding whether land is contaminated land in the legal sense of the term.</p> <p>Key aims are as follows:</p> <ul style="list-style-type: none"> • To identify and remove unacceptable risks to human health and the environment. • To seek to ensure that contaminated land is made suitable for its current use. • To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.
National Planning Policy Framework (2023) ¹⁰⁹	<p>The NPPF states that plans should prevent development from contributing to, or being put at risk of, air or water pollution.</p> <p>The NPPF states that planning should protect and enhance soils, particularly those recognised as best and most versatile agricultural land (Grades 1, 2 and 3a).</p>

¹⁰⁷ DEFRA (2011) Safeguarding our Soils: A Strategy for England Available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [Date accessed: 21/08/24]

¹⁰⁸ DEFRA (2012) Environmental Protection Act 1990: Part 2A. Contaminated Land Statutory Guidance Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf [Date accessed: 21/08/24]

¹⁰⁹ MHCLG (2023) National Planning Policy Framework Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 21/08/24]

A.9 Water

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Water Framework Directive 2000/60/EC ¹¹⁰	This provides an overarching strategy, including a requirement for EU Member States to ensure that they achieve ‘good ecological status’ by 2015. River Basin Management Plans were defined as the key means of achieving this. They contain the main issues for the water environment and the actions we all need to take to deal with them.
HM Government Strategy for Sustainable Construction (2008) ¹¹¹	Encourages the construction industry to adopt a more sustainable approach towards development; identifies eleven themes for targeting Action, which includes conserving water resources.
DEFRA The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003) ¹¹²	<p>Requires all inland and coastal waters to reach ‘good’ status by 2015. It mandates that:</p> <ul style="list-style-type: none"> • Development must not cause a deterioration in status of a waterbody; and • Development must not prevent future attainment of ‘good status’, hence it is not acceptable to allow an impact to occur just because other impacts are causing the status of a water body to already be less than good. <p>This is being done by establishing a river basin district structure within which demanding environmental objectives are being set, including ecological targets for surface waters.</p>
Environment Agency: Building a Better Environment: Our role in development and how we can help (2013) ¹¹³	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Environment Agency), including managing flood risk, surface water management, use of water resources, preventing pollution.
A Green Future: Our 25 Year Plan to Improve the Environment (2018) ¹¹⁴	<p>The document sets out Government action to help achieve natural world regain and retain good health. The Plan seeks to achieve clean and plentiful water by:</p> <ul style="list-style-type: none"> • Reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies;

¹¹⁰Water Framework Directive 2000/60/EC Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060> [Date accessed: 21/08/24]

¹¹¹HM Government (2008) Strategy for Sustainable Construction. Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/+http://www.bis.gov.uk/files/file46535.pdf> [Date accessed: 21/08/24]

¹¹²The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003. Available at: <https://www.legislation.gov.uk/ukSI/2003/3242/contents/made> [Date accessed: 21/08/24]

¹¹³Environment Agency (2013) Building a Better Environment: Our role in development and how we can help Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf [Date accessed: 21/08/24]

¹¹⁴DEFRA (2021) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
	<ul style="list-style-type: none"> • Reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans; • Supporting OFWAT’s ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and • Minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters. We will make sure that potential bathers are warned of any short-term pollution risks. <p>The 2021 Environment Act (9th November, 2021) embeds several of these aspects into the new legislation.</p>
<p>Environmental Improvement Plan 2023¹¹⁵</p>	<p>The Environmental Improvement Plan (EIP) 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how the government will work with landowners, communities and businesses to deliver each of the goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help to restore nature, reduce environmental pollution, and increase the prosperity of our country.</p> <p>To achieve clean and plentiful water, the EIP sets out to:</p> <ul style="list-style-type: none"> • Tackle nutrient pollution, including by upgrading 160 wastewater treatment works by 2027 and providing increased advice and incentives to support a shift to sustainable agricultural techniques; • Restore 400 miles of river through the first round of Landscape Recovery projects and establish 3,000 hectares of new woodlands along England’s rivers; and • Roll out water efficiency labelling across appliances and ensure water companies deliver a 50% reduction in leakages by 2050.
<p>Environment Agency: Water for people and the environment: A Strategy for England and Wales (2009)¹¹⁶</p>	<p>Looks at the steps needed, in the face of climate change, to manage water resources to the 2040s and beyond, with the overall aim of improving the environment while allowing enough water for human uses.</p>
<p>Severn River Basin District: River Basin Management Plan (2022)¹¹⁷ and Humber River Basin District: River Basin Management Plan</p>	<p>RBMPs presents the ecological, chemical and quantitative status of the surface and groundwater bodies present in the river basin. In accordance with the RBMP, new development should not lead to deterioration of the water body. Objectives, according to the Water Framework Directive, are as follows:</p> <ul style="list-style-type: none"> • To prevent deterioration of the status of surface waters and groundwater; • To achieve objectives and standards for protected areas;

¹¹⁵ DEFRA (2023) Environmental Improvement Plan 2023. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan> [Date accessed: 21/08/24]

¹¹⁶ Environment Agency: Water for people and the environment: A Strategy for England and Wales Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/20140328091448/http://www.environment-agency.gov.uk/research/library/publications/40731.aspx> [Date accessed: 21/08/24]

¹¹⁷ Environment Agency (2022) Severn River basin district river basin management plan. Available at: <https://www.gov.uk/guidance/severn-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
(2022) ¹¹⁸	<ul style="list-style-type: none"> To aim to achieve good status for all water bodies or, for heavily modified water bodies and artificial water bodies, good ecological potential and good surface water chemical status; To reverse any significant and sustained upward trends in pollutant concentrations in groundwater; The cessation of discharges, emissions and losses of priority hazardous substances into surface waters; and Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants.
Severn Trent Water, Water Resource Management Plan (2019) ¹¹⁹ and emerging update (2024) ¹²⁰	The Plan sets out how Severn Trent Water maintains the balance between supply and demand for water. Their priorities for the future include keeping bills for customers at a minimum, taking a fair and balanced approach for all stakeholders and delivering long term environmental benefits.
Black Country Councils Water Cycle Study: Phase 1 Scoping Study (2020) ¹²¹	<p>This study assesses the potential issues relating to future development within the Black Country Councils and the impacts on water supply, wastewater collection and wastewater treatment. The Water Cycle Study is required to assess the constraints and requirements that will arise from potential growth on the water infrastructure.</p> <p>This study aims to assist the Local Planning Authorities (LPAs) to identify development locations where there is minimal impact on the environment, water quality, water resources, infrastructure, and flood risk. This will be achieved by identifying areas where there may be conflict between any proposed development, the requirements of the environment and by recommending potential solutions to these conflicts.</p>
The Black Country Authorities Level 1 Strategic Flood Risk Assessment: Final Report (2020) ¹²²	A Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out for the Black Country to inform the BCA of flood risk across the Plan area from all sources, in the present and in the future. The assessment has identified potential increases in flood risk due to climate change and produced modelled outputs.
The Black Country Local Strategy for Flood Risk	The Local Strategy for Flood Risk Management provides an overview and assessment of local flood risk in the Black Country, setting out objectives and measures for how the LLFAs will manage and reduce local flood risk. It is the document that sets out how flood risk

¹¹⁸ Environment Agency (2022) Humber River basin district river basin management plan. Available at: <https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022> [Date accessed: 21/08/24]

¹¹⁹ Severn Trent Water (2019) Water Resources Management Plan 2019. Available at: <https://www.stwater.co.uk/content/dam/stw-plc/our-plans/severn-trent-water-resource-management-plan.pdf> [Date accessed: 21/08/24]

¹²⁰ Severn Trent Water (2024) Draft Water Resources Management Plan 2024. Available at: <https://www.severntrent.com/about-us/our-plans/water-resources-management-plan/> [Date accessed: 21/08/24]

¹²¹ JBA Consulting (2020) Black Country Councils Water Cycle Study: Phase 1 Scoping Study. Available at: https://blackcountryplan.dudley.gov.uk/media/17929/watercyclestudy_phs1_scopingstudy.pdf [Date accessed: 21/08/24]

¹²² JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment: Final Report, 25th June 2020. Available at: https://blackcountryplan.dudley.gov.uk/media/15818/2018s1436-black-country-councils-level-1-sfra-final-50_redacted.pdf [Date accessed: 21/08/24]

Title of PPP	Main objectives of relevant plans, policies and programmes in relation to water
Management (2016) ¹²³	associated with surface water, groundwater and ordinary watercourses in an area will be managed by the relevant Councils and their partners. It is a statutory duty of the local authorities within the Black Country to produce and maintain a Local Strategy for Flood Risk Management.
Wolverhampton Level 1 Strategic Flood Risk Assessment (2024) ¹²⁴	A Level 1 SFRA has been prepared to support the preparation of the WLP, updating and replacing the 2020 Black Country Level 1 SFRA. The SFRA provides an understanding of the risk from all types of flooding across Wolverhampton and provides information to inform future Infrastructure Planning and Neighbourhood Plans.
Wolverhampton Level 2 Strategic Flood Risk Assessment (2024) ¹²⁵	A Level 2 SFRA has been prepared to support the preparation of the WLP. The SFRA provides a detailed understanding of the risks from all types of flooding across Wolverhampton and provides information to inform future Infrastructure Planning and Neighbourhood Plans.

¹²³ Black Country Authorities (2016) Local Strategy for Flood Risk Management. Available at: https://www.wolverhampton.gov.uk/sites/default/files/pdf/Local_Flood_Risk_Management_Strategy_-_The_Black_Country_final_version.pdf [Date accessed: 21/08/24]

¹²⁴ JBA Consulting (2024) City of Wolverhampton Council Level 1 Strategic Flood Risk Assessment. Draft, August 2024.

¹²⁵ JBA Consulting (2024) City of Wolverhampton Council Level 2 Strategic Flood Risk Assessment. Draft, October 2024.

Appendix B: SA Framework

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	a) Preserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) Preserve or enhance archaeological sites/remains? c) Preserve or enhance the setting of cultural heritage assets? d) Improve the energy efficiency of historic buildings?	<ul style="list-style-type: none"> Number and type of features and areas of historic designations in the WLP area. Statutory and non-statutory sites in the Historic Environment Record (HER). Number of historic assets on the Heritage at Risk register.
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.	a) Safeguard and enhance the character of the landscape and local distinctiveness and identity? b) Protect and enhance visual amenity, including light and noise pollution? c) Reuse degraded landscapes/townscapes? d) Compromise the purpose of the Green Belt e.g. lead to coalescence of settlements and/or urban sprawl?	<ul style="list-style-type: none"> National Character Area. Tranquillity rating of area. Re-use of derelict buildings or re-use of buildings in a prominent location. Landscape sensitivity.
3	Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity.	a) Maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) Support positive management of local sites (SLINCs and SINCs) designated for nature conservation and geodiversity value? c) Link up areas of fragmented habitat contribute to habitat connectivity? d) Increase awareness of biodiversity assets?	<ul style="list-style-type: none"> Number and diversity of European Protected Species, and NERC Act Section 41 species in the area. Area and condition of priority habitats. Area and condition of sites designated for biological and geological interest.
4	Climate change mitigation: Minimise Wolverhampton's contribution to climate change.	a) Help reduce the per capita carbon footprint of Wolverhampton? b) Encourage renewable energy generation or use of energy from renewable sources?	<ul style="list-style-type: none"> Proximity to public transport links. Frequency of nearby public transport services. Distance to local services and amenities. Energy efficiency of buildings and transport. Percentage of energy in the area generated from renewable sources.
5	Climate change adaptation: Plan for the anticipated levels of climate change.	a) Avoid development in areas at high risk of flooding? b) Increase the area and connectivity of green infrastructure (GI)? c) Promote use of technologies and techniques to adapt to the impacts of climate change?	<ul style="list-style-type: none"> Number of properties at risk of flooding. Area of new greenspace created per capita. Connectivity of GI. Implementation of adaptive techniques, such as SuDS and passive heating/cooling.

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
6	Natural resources: Protect and conserve natural resources.	a) Utilise previously developed, degraded and under-used land? b) Lead to the loss of the best and most versatile agricultural land? c) Lead to the loss or sterilisation of mineral resources, or affect mineral working?	<ul style="list-style-type: none"> • Re-use of previously developed land. • Area of best and most versatile agricultural land lost to development. • Groundwater Source Protection Zone. • Proposed Mineral Safeguarding Area(s).
7	Pollution: Reduce air, soil, water and noise pollution.	a) Maintain and improve air quality? b) Maintain soil quality or help to remediate land affected by ground contamination? c) Maintain and improve water quality? d) Help to reduce noise pollution and protect sensitive receptors from existing ambient noise?	<ul style="list-style-type: none"> • Provision of GI. • Remediation of contaminated land. • Proximity to watercourses with poor quality status. • Percentage change in pollution incidents. • Development with potential to generate a significant increase in road traffic emissions or other air pollutants.
8	Waste: Reduce waste generation and disposal and achieve the sustainable management of waste.	a) Encourage recycling/re-use/composting of waste? b) Minimise and where possible eliminate generation of waste?	<ul style="list-style-type: none"> • Number and capacity of waste management facilities. • Re-use of recycled and recyclable materials. • Management of local authority collected waste.
9	Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	a) Reduce the need to travel and/or reduce travel time? b) Provide adequate means of access by a range of sustainable transport modes (i.e. walking/cycling/public transport)?	<ul style="list-style-type: none"> • Distance to place of work. • Distance to local amenities and key services. • Distance to existing or proposed bus routes. • Frequency of bus services. • Proximity and connectivity of walking and cycling links. • Distance to train or metro station.
10	Housing: Provide affordable, environmentally sound and good quality housing for all.	a) Provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) Provide housing suitable for the growing elderly population? c) Provide decent, affordable and accessible homes?	<ul style="list-style-type: none"> • Varied housing mix. • Percentage of dwellings delivered as affordable housing. • Number of extra care homes.
11	Equality: Reduce poverty, crime and social deprivation and secure economic inclusion.	a) Help achieve life-long learning and increase learning participation and adult education? b) Enable communities to influence the decisions that affect their neighbourhoods and quality of life? c) Reduce crime and the fear of crime? d) Advance equality of opportunity? e) Foster good community relations? f) Eliminate unlawful discrimination, victimisation and harassment on individuals or groups in the community including consideration of age, disability, gender, race, religion, gender re-assignment, maternity, sexual orientation, marriage and civil partnership, and human rights?	<ul style="list-style-type: none"> • No. of people with NVQ2 qualifications. • Percentage of adults surveyed who feel they can influence decisions affecting their own local area. • % respondents very or fairly satisfied with their neighbourhood. • Crime Deprivation Index. • Education, Skills & Training Deprivation Index. • Availability of libraries. • Index of Multiple Deprivation

#	SA Objective	Decision making criteria: Will the option/proposal...	Indicators (this list is not exhaustive)
12	Health: Safeguard and improve community health, safety and wellbeing.	a) Improve access for all to health, leisure and recreational facilities? b) Improve and enhance Wolverhampton's GI network? c) Improve road safety? d) Reduce obesity? e) Consider the needs of Wolverhampton's growing elderly population?	<ul style="list-style-type: none"> • Travel time by public transport to nearest health centre and sports facilities. • Provision and accessibility of open greenspace and GI. • Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres.
13	Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities.	a) Increase accessibility of suitable employment within Wolverhampton? b) Encourage business start-ups in the area? c) Support the health of established centres? d) Protect and create jobs?	<ul style="list-style-type: none"> • Number of residents working within Wolverhampton. • Number of employment opportunities in professional occupations. • Number of new business start-ups as a result of the development. • Total amount of employment land. • Number of vacant units in strategic centres. • Amount of additional retail, office and leisure floorspace completed in established centres.
14	Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness.	a) Improve access for all to education and training opportunities? b) Encourage a diversity of education and training opportunities?	<ul style="list-style-type: none"> • Distance to education and training, particularly primary schools and secondary schools. • Provision of new education and training facilities and opportunities. • Accessibility of education and training facilities by public transport. • Capacity of local schools to meet demand from new development.

Appendix C: Consultation Responses to the SA

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C.1 Overview

C.1.1 Purpose of this document

- C.1.1.1 This appendix provides a summary of the consultation responses received during the Wolverhampton Local Plan (WLP) Sustainability Appraisal (SA) process to date, and how the comments received have been considered.
- C.1.1.2 The SA Scoping Report for the WLP was prepared by Lepus Consulting and issued to the statutory bodies (the Environment Agency, Historic England and Natural England) for consultation between 7th November and 12th December 2022. **Table C.2.1** provides a summary of the consultation responses received from the statutory bodies in relation to the SA Scoping Report, and indicates how the comments received have influenced the SA.
- C.1.1.3 The Regulation 18 SA Report (2024)¹ was prepared by Lepus Consulting and was published for consultation alongside the Regulation 18 WLP 'Issues and Preferred Options' document² between 26th February and 10th April 2024. **Table C.3.1** provides a summary of the consultation responses received from the statutory consultees and other interested parties relating to the Regulation 18 SA, and also indicates how the comments received have influenced the SA.

¹ Lepus Consulting (2024) Sustainability Appraisal of Wolverhampton Local Plan. Regulation 18: Issues and Preferred Options, January 2024. Available at: https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Sustainability%20Appraisal%20WLP%20IPO%202024_0.pdf [Date accessed: 24/07/24]

² City of Wolverhampton Council (2024) Wolverhampton Local Plan: Issues and Preferred Options Consultation (Regulation 18) February 2024. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Main%20Document%20WLP%20IPO.pdf> [Date accessed: 24/07/24]

C.2 Scoping

Table C.2.1: Consultation comments received from statutory consultees in response to the SA Scoping Report for the WLP (2022)

Consultee	Summary of consultation responses to SA Scoping Report	Incorporation into the SA
Environment Agency	No comments received at this stage.	N/A
Historic England	<p>“Chapter 6: Cultural Heritage Baseline Data – <i>We are pleased to see that this baseline presents a comprehensive background into the designated and non-designated heritage assets of the Plan area, and also refers to heritage at risk, although not in any detail.</i></p> <p>Key Issues – <i>We consider that although some relevant key sustainability issues in relation to the historic environment have been identified, we suggest that heritage at risk may also be an issue which should be included, as this has been identified elsewhere within the document.</i></p> <p><i>Historic England also considers that other sustainability issues should be included here, such as improving the energy efficiency of historic buildings and taking into account their embodied carbon value when considering the retention and re-use, versus their replacement.</i></p> <p>Chapter 12: SA Framework <i>Historic England welcomes SA Objective 1: “Cultural Heritage” and also objectives 2: Landscape, and 4 & 5 on Climate Change. However, we note that the report does not set out any appraisal questions or decision-making criteria under these objectives. In relation to the historic environment/cultural heritage we suggest that these decision-making criteria should reflect all of the Key Issues identified under this theme, as well as wider sustainability issues regarding the historic environment, such as:</i></p> <ul style="list-style-type: none"> • <i>“Will it tackle heritage at risk?”</i> • <i>“Will it improve the energy efficiency of historic buildings?”</i> • <i>“Will it re-use/retain historic buildings or fabric?”</i> <p><i>In addition to the above comments, Historic England is concerned that it is not clear from the document as to how impacts will be evaluated, as there is no framework, or mechanism, for assessment included. The document does not therefore set out how policies or site allocations will be assessed or provide detailed information about how potential significant effects will be identified (both positive and negative); for example, using professional judgement and reference to evidence base documents. We strongly recommend that this is included within a revised SA Scoping document.”</i></p>	<ul style="list-style-type: none"> • The key sustainability issues referred to within the cultural heritage section of the SA Scoping Report were updated in the Regulation 18 SA to reflect the suggestions made. These key issues are discussed and updated further where relevant within each SEA topic chapter of the Regulation 19 SA Report (see Boxes 7.1, 8.1, 9.1, 10.1, 11.1, 12.1, 13.1, 14.1 and 15.1). • The full SA Framework was set out in Appendix B of the SA Scoping Report, and updated within Appendix A of the Regulation 18 SA Report. The updated SA Framework is presented within Appendix B of this Regulation 19 SA Report. • Chapter 3 of the Regulation 18 SA set out the methodology used to appraise the options and proposals included within the Issues and Preferred Options (Regulation 18) Consultation. Chapter 4 of this Regulation 19 SA Report sets out the most up-to-date iteration of the methodology.
Natural England	No comments received at this stage.	N/A

C.3 Regulation 18

Table C.3.1: Consultation comments received in response to the Regulation 18 WLP Issues and Preferred Options SA (2024)

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
<p>Environment Agency</p>	<p><i>“The Black Country Water Cycle Study Phase One (2020) has made some clear recommendations for further assessment of the potential impact of increased wastewater discharges on water quality of receiving watercourses and sites with environmental designations, as part of a Phase Two Outline Study (pages 52, 83 and 95 and 109). This is also noted in your Sustainability Appraisal report, Table 10.1, page 132. We strongly recommend this is taken forward, and we have advised the same for Sandwell and Dudley local plan consultations...”</i></p> <p><i>Please note that your evidence base on flood risk should also feature the Sequential Test ... The Planning Practice Guidance advises to either present this evidence as part of your Sustainability Appraisal or a standalone document. It needs to be explicit and clear how the flood risk Sequential Test has been applied to the Wolverhampton Local Plan and a genuine attempt has been made to ‘steer new development to areas with the lowest risk of flooding from any source’ in accordance with NPPF paragraph 168.”</i></p> <p>“5) Do you agree with the Preferred Housing Growth Option (H3) for the Wolverhampton Local Plan and the proposed apportionment approach to housing contributions from neighbouring authorities?”</p> <p><i>The commentary provided within the Sustainability Appraisal for SA Objective 7 ‘Pollution’ seems logical that development under option H3 could potentially result in largest impact on pollution due to the greater worsening of air, soil and water quality. Mitigation measures would need to be identified to help minimise/avoid these impacts should the council pursue this to publication, with support from the evidence base studies such as the Phase One and Phase Two Water Cycle Studies.</i></p> <p><i>The appraisal of the housing growth options against SA Objective 5 ‘Climate change adaptation has described where the fluvial Flood Zones are located within the district. However, it hasn’t commented as to how the housing options perform against the flood risk sequential test (NPPF paragraphs 167-171). We understand that a proportion of housing growth would need to be exported under the Duty to Co-operate and therefore those spatial locations are unknown, however, the location of the sites that can be delivered within the Wolverhampton district are known (SHLAA, new site 61 dwellings and density uplift 524 dwellings). The SA should explain to what extent the aims of the Sequential Test have been addressed by the options and preferred option. This should describe the proportion of housing developments proposed in Flood Zone 1, Flood Zone 2 and Flood Zone 3. It should also provide the outcome of the Sequential Test (and any Exceptions Test associated with a Level 2 SFRA). We, the Planning Inspectorate and yourselves should be reassured that the option chosen passes the Sequential</i></p>	<ul style="list-style-type: none"> • The Regulation 19 SA will refer to the latest available evidence documents to inform the evaluation of the WLP, including any updated information relating to the water environment. Appendix A presents the latest version of the Policies, Plans and Programmes (PPP) Review including a selection of relevant evidence documents which have been considered during the SA process. • The housing growth options evaluated in the Regulation 18 SA represent high-level options for overall quantum of housing, and broad directions for where this growth would be distributed. They lack specific detail regarding the nature and location of development; as such, the evaluation is necessarily high level with restricted diagnostic conclusions. This applies especially to issues like flood risk (covered under SA Objective 5: Climate change adaptation) where positive and negative effects are possible depending on the specific location and site context. • In the evaluation of reasonable alternative sites against SA Objective 5, each site has been assessed against flood risk data

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
	<p><i>Test i.e. there are no other reasonably alternative sites at a lower risk of flooding that could have been selected.</i></p> <p><i>To a certain extent this commentary has been provided in relation to the other categories i.e. the two Gypsy and Traveller growth options and the employment growth options, so we are unsure why this is not within the housing growth commentary (given residential dwellings are classed as 'more vulnerable').</i></p> <p><i>We've only identified 2 sites (a housing site (H19) and an employment site (E2) at partial risk of fluvial flooding, and thus this seems a positive outcome for the aims of the Sequential Test. However, the source of flood risk and level of risk should be verified through the Strategic Flood Risk Assessment and Council are reminded that all forms of flooding should be considered."</i></p>	<p>including fluvial flood zones, extent of surface water flood risk, and 'Indicative Flood Zone 3b' as set out in the methodology within Chapter 3 of the Regulation 18 SA (and updated within Appendix E of the Regulation 19 SA).</p>
<p>Historic England</p>	<p><i>"Paragraph 2.6.8 in order to justify the inclusion of site allocations within the Local Plan, appropriate assessment needs to be undertaken during the preparation of the Local Plan, to assess whether the principle of development is acceptable.</i></p> <p><i>Under paragraph 2.6.10 are there any opportunities through the Local Plan for the Council to address the identified heritage at risk.</i></p> <p><i>Section 2.8 should include consideration of the historic environment under this section too as the historic environment is a component of landscape. We would welcome sight of this during the next iteration of the Sustainability Appraisal.</i></p> <p><i>Table 3.1 we welcome a specific sustainability objective for cultural heritage.</i></p> <p><i>Page 44, there could still be a red score where a proposed allocation affects the setting of a heritage asset. We are unclear on what methodology has been used to assess the impacts to heritage in terms of distance from proposed allocations, but we want to ensure that it has fully considered impacts beyond the site itself and its immediate boundary.</i></p> <p><i>Section 4.2 we accept that currently there is limited detail to assess the impacts for cultural heritage. We do consider, however, that when making a decision about which growth option to progress that the Council does assess what the implications are for cultural heritage and ensure that if higher growth levels are sought this does not compromise the historic environment.</i></p> <p><i>Section 5.2 it is unclear what assessment has been undertaken at this stage. The paragraph sets out that there could be harm to the historic environment, yet there is no detail of what assessment or what avoidance/mitigation measures could be utilised to reduce any harm. We disagree with the conclusion in section 5.16 as there are assets that could be harmed and minimal assessment information.</i></p> <p><i>Paragraph 6.2.2 sets out that there could be harm to the historic environment but concludes that because the area is already developed then the new development will be in keeping with this and as such no harm. We consider that the Council needs to assess what the harm to these heritage assets is as a result of the proposed allocations and consider whether there are avoidance/ mitigation or enhancement opportunities available. We consider heritage impact assessment would be a useful tool to achieve this. Section 6.16 it is important that the SA considers the implications for each section and does not rule that the effects are unknown or uncertain for cultural heritage.</i></p>	<ul style="list-style-type: none"> • Although correct that there is some overlap between cultural heritage and landscape topics, potential effects on townscapes and the historic environment has been considered within SA Objective 1: Cultural Heritage. This includes evaluation of reasonable alternatives against Areas of High Historic Townscape / Landscape Value (AHHTV/AHHLV) and Designed Landscapes of High Historic Value (DLHHV) which have been identified within the Historic Landscape Characterisation (HLC) Study. • The SA methodology, as presented within Chapter 3 of the Regulation 18 SA, has been updated to ensure clarity in the approach within Chapter 4 of the Regulation 19 SA Report, with the site assessment topic-specific methodology and assumptions presented in Appendix E. • The SA is a high-level strategic tool for the evaluation of options and relies upon secondary information to inform the assessments. Historic England data, and local data

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
	<p><i>Section 7.2 how have these assessments been factored into the overall direction of growth? Once heritage impact assessments have been completed for the proposed allocations it will provide additional evidence to assess whether those growth directions are appropriate.</i></p> <p><i>Table 8.1 it is disappointing to note that all the policies within the Plan that could lead to development have been scored as a ‘-/+'. We consider that the SA needs to assess what the impacts may be for cultural heritage as a result of development and then seek to address whether there are any amendments required to ensure that the Plan is appropriate/ justified/ effective/ in line with national policy.</i></p> <p><i>Table 9.1 there are a large number of proposed allocations which score poorly for the historic environment and these needs to be assessed, in order to understand if the principle of development is acceptable and whether there are mitigation/ avoidance and enhancement measures that can be incorporated into the Plan.</i></p> <p><i>Table 10.1 in respect of cultural heritage the assessment should consider all levels of harm and not just relate to substantial harm.</i></p> <p><i>We are concerned about the lack of assessment for cultural heritage at this time and the tendency to refer to ‘-/+' throughout the assessment. We welcome the next iteration of the SA and hope for this to be overcome.”</i></p>	<p>provided by CWC, has been used to inform the evaluation of options and reasonable alternatives with regard to cultural heritage. Potential risks to heritage assets and the historic environment are flagged for the attention of the plan makers using the SA scoring system, including the use of ‘uncertain’ overall effects where the level of information available did not provide enough detail to determine an overall positive or adverse effect at the time of assessment.</p> <ul style="list-style-type: none"> • This Regulation 19 SA includes evaluation of the updated policies and site allocations within the emerging WLP, consideration of mitigation, and recommendations for the Council to mitigate/minimise any identified residual effects including for cultural heritage. • Should any further information become available, such as Heritage Impact Assessment information, this can be factored into the SA process and evaluation.
<p>Natural England</p>	<p>Sustainability Appraisal incorporating Strategic Environmental Assessment: it should be clear how this has informed and provided justification for the sites selected for allocation assessed against reasonable alternatives. Recommendations and findings from the assessments should also be used to inform mitigation measures and design principles for the allocated sites.</p>	<ul style="list-style-type: none"> • The Regulation 18 SA included information from CWC regarding the selection/rejection of each reasonable alternative or option evaluated in the SA. This included CWC’s preliminary outline reasons for selection/rejection of reasonable alternative sites in Table 9.2 of the Regulation 18 SA Report. • CWC’s updated reasons for selection/rejection of reasonable alternative sites, drawing on the

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
		<p>latest available evidence information and including new/amended reasonable alternative sites assessed at this stage, are presented in Appendix I of this Regulation 19 SA Report.</p>
<p>CarneySweeney on behalf of Peveril Securities</p>	<p><i>“The housing growth options assessed in the 2024 Sustainability Appraisal ... are not realistic options for assessment in the SA as they would fail to deliver between 11,993 and 11,413 within the authority area over the plan period. These figures represent less than half the authority’s objectively assessed needs and there are no firm offers through the DtC to deliver to the remainder of this need in other authority areas. Further, paragraph 4.1.2 of the SA references NPPF Paragraph 11.b) which states that “any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. However, there is no evidence that the SA has accounted for any need from neighbouring areas.</i></p> <p><i>...As Table 4.2 of the SA shows, the assessment identifies positive transport impacts for the authority in adopting Preferred Housing Growth Option H3 and very positive impacts associated with housing.</i></p> <p><i>The SA fails to consider the impacts on transport associated with more than half of its housing need being exported to other authorities, including ones which do not neighbour the Wolverhampton authority area, such as Shropshire. The transport impacts associated with car users commuting to Wolverhampton from outside the authority area versus those residents living adjacent to the Wolverhampton Urban Area with the benefit of established local public transport networks should be considered. Further, the SA identifies very positive impacts for housing despite meeting less than half the authority’s housing need. The SA’s assessment of the housing growth options against the ‘Economy’ objective do not reflect the significant loss of investment and consumer expenditure associated with more than half Wolverhampton’s housing needs being met outside the authority area.</i></p> <p><i>Options to accommodate a greater, more realistic proportion of the authority’s housing need within Wolverhampton through the release of Green Belt sites adjacent to the Wolverhampton Urban Area should be assessed in the SA. Whilst it is acknowledged that some negative environmental impacts would arise through this approach (as they do for all the options assessed in the SA for the WLP), the BCP identified suitable mitigation measures which accord with the requirements of NPPF Paragraph 32. For example, Policy CSA1 required accessibility, biodiversity and environmental quality improvements to Northcote Farm Country Park and the Northcote Farm Country Park Extension Area, including opening up the area for public access and maintaining it in perpetuity.”</i></p> <p><i>“... Our client controls land to the east of Northcote Lane, Bushbury – forming part of a Green Belt site previously proposed for release and allocation within the Draft Back Country Plan 2039 (Regulation 18) consultation (Policy CSA1 – Bushbury Strategic Allocation) to deliver 532 homes, together with space to provide a two-form entry primary school...”</i></p>	<ul style="list-style-type: none"> • All reasonable alternatives and options have been identified by CWC as the Plan makers and evaluated in the SA, with findings fed back to the Council to aid their decision making and selection/rejection of options. • CWC have determined that Green Belt release is not a reasonable alternative for Wolverhampton, in line with the updated NPPF position (e.g. paragraph 145) that there is no need to review the Green Belt. • Any growth which is exported to neighbouring LPAs will be evaluated through the SA of the LPAs’ local plans; this cannot be fully evaluated in the SA of the WLP given the location of such development will be determined by the LPA in question. The specific location and nature of development outside of CWC’s administrative area is unknown at this stage, and this is reflected in the uncertainties identified in the SA. • Should any further reasonable alternatives to the spatial strategy, housing number, development sites or other aspect of the WLP be identified by CWC, these can be evaluated in the SA.

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
	<p><i>We have demonstrated the obvious opportunity offered by our client’s site at Bushbury to deliver a strategic scale of development in a highly sustainable location, supported by the draft Illustrative Masterplan enclosed with these representations.</i></p> <p><i>The plan in its current form is unsound and to be made sound it would be necessary to revert to the previous (sound and evidentially justified) spatial strategy comprising the previous draft allocations for Wolverhampton in the Draft Black Country Plan, including the Bushbury site.”</i></p>	
<p>Marrons on behalf of Bloor Homes</p>	<p><i>“The Council appears to have conflated the meaning of the word ‘review’ in Green Belt terms as simply meaning to consider. ‘Review’ when reading the whole of the Green Belt chapter of the current NPPF, and its appropriate application previously, means to amend the boundaries through the production of a Local Plan. The result of this conflation is that the Council considers no Green Belt options at all. This interpretation is fundamentally at odds with the Presumption in Favour of Sustainable Development; Paragraph 62 of the NPPF, and the assessment of alternatives through sustainability appraisal or environmental outcomes reports.</i></p> <p><i>...Bloor Homes Limited consider the substantial housing need and significant shortfall identified in housing supply represent cogent exceptional circumstances for Green Belt boundary amendments. The Council should therefore consider development options within its Green Belt before the Council can reasonably and robustly seek contributions towards unmet needs from its neighbouring authorities, which may similarly need to consider development options within the Green Belt.”</i></p>	<ul style="list-style-type: none"> • All reasonable alternatives and options have been identified by CWC as the Plan makers and evaluated in the SA process. • CWC have determined that Green Belt release is not a reasonable alternative for Wolverhampton, in line with the updated NPPF position (e.g. paragraph 145) that there is no need to review the Green Belt. • Should any further reasonable alternatives to the spatial strategy, housing number or other aspect of the WLP be identified by CWC, these can be evaluated in the SA.
<p>Walsall Council</p>	<p><i>“The sustainability appraisal refers to housing option H3 as the preferred option. This option assumes that the majority of housing need will be met outside the City. This cannot be considered a reasonable alternative as the plan will not cover areas outside the City. It also assumes that sites outside the City will be in areas with a "strong relationship with CWC." There is no evidence of where these areas might be. Indeed, based on plans for neighbouring areas published to date, there is likely to remain a considerable shortfall in housing supply. For example, South Staffordshire are proposing to reduce their 'offer' to Birmingham and the Black Country from 4,000 to just 640 homes.</i></p> <p><i>...the sustainability appraisal should examine the impact of failing to meet over half the authority's housing need. Statements of common ground should also be agreed with the other local planning authorities within the Black Country.”</i></p>	<ul style="list-style-type: none"> • All reasonable alternatives and options have been identified by CWC as the Plan makers and evaluated in the SA process. • Should any further reasonable alternatives to the spatial strategy, housing number or other aspect of the WLP be identified by CWC these can be evaluated in the SA. • Whilst there is uncertainty in the evaluation of options relating to a proportion of growth being exported through Duty to Co-operate, this remains a valid reasonable alternative source of growth to be considered.

Consultee	Extracts of consultation responses relating to the Regulation 18 SA	Incorporation into the SA
		<ul style="list-style-type: none">Reasonable alternatives are discussed further in Chapter 5 of this Regulation 19 SA Report.

Appendix D: Assessment of Updated Housing and Employment Growth Options

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D.1 Introduction

D.1.1 The purpose of this appendix

- D.1.1.1 This appendix provides additional context to **Chapter 5** of the main Regulation 19 SA Report regarding the assessment of reasonable alternatives considered during the preparation of the emerging Wolverhampton Local Plan (WLP).
- D.1.1.2 This appendix contains assessments of the reasonable alternative housing and employment growth options that have been updated since the Regulation 18 stage of the SA process. The City of Wolverhampton Council (CWC) has used information from the Black Country Economic Development Needs Assessment (EDNA) update (2024)¹ and the Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) update (2024)² to inform the new housing and employment figures.
- D.1.1.3 The evaluation of additional options has been carried out in a consistent manner drawing on the assessment of options from previous SA stages.
- D.1.1.4 Limitations of the assessments are declared where relevant.

¹ Warwick Economics and Development (2024) Black Country Economic Development Needs Assessment

² City of Wolverhampton Council (2024) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Update as of April 2024. Draft, August 2024.

D.2 Housing growth options

D.2.1 Preface

- D.2.1.1 Paragraph 61 of the National Planning Policy Framework (NPPF) (2023)³ states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in planning practice guidance (PPG)⁴, unless the local authority feel that circumstances warrant an alternative approach.
- D.2.1.2 The NPPF also states that “*any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for*”.

Appraisal of housing growth options identified by CWC at Regulation 18 (2023)

- D.2.1.3 Three housing growth options were assessed within the Regulation 18 Issues and Preferred Options SA Report⁵. These three options related to variations on the standard method at the time of their evaluation, and relevant evidence documents. Options H1 and H2 failed to meet the identified housing need at the time of their evaluation, whilst Option H3 met the identified need.
- D.2.1.4 The options assessed at the Regulation 18 stage were based on housing need figures calculated in April 2022, which demonstrated a need for 1,086 homes per year, equating to a total of 21,720 homes during the period 2022–2042.

Appraisal of housing growth options identified by CWC at Regulation 19 (2024)

- D.2.1.5 As of April 2024, the housing need figure for Wolverhampton is 1,096 homes per year, according to the national standard method including a 35% uplift which applies to the 20 largest towns and cities. This means that the housing need which the WLP must seek to meet for the updated Plan period (2024-2042) is 19,728 homes.
- D.2.1.6 The latest Wolverhampton SHLAA (2024)⁶ estimates the current supply of housing land in the Wolverhampton urban area up to 2042. This supply takes into account all identified sites which are currently suitable and deliverable for housing, and also reasonable windfall allowances. The total identified urban housing supply is 8,850 homes, leaving a significant unmet housing need for the Plan period of 10,878 homes.

³ DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 10/09/24]

⁴ DLUHC and MHCLG (2020) Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments> [Date accessed: 10/09/24]

⁵ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan: Regulation 18 Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan/evidence-plan-preparation-documents> [Date accessed: 03/09/24]

⁶ City of Wolverhampton Council (2024) Wolverhampton Strategic Housing Land Availability Assessment (SHLAA) Update as of April 2024. Draft, August 2024.

D.2.1.7 The three options for housing growth as identified by CWC at the Regulation 18 stage have been updated to take account of the latest housing evidence available at the Regulation 19 stage, and to cover the updated period for the WLP which will now cover from 2024 to 2042. The updated housing growth options are presented in **Table D.2.1**.

D.2.1.8 The broad distribution of growth under the three options is unchanged from Regulation 18. These options include overall housing quanta, and broad direction of growth i.e. the proportion of the housing to be met within Wolverhampton’s urban area and met through exporting through the Duty to Cooperate (DtC). In light of the current NPPF position⁷, CWC have taken the decision to not review the Green Belt and as such distribution of growth within the Green Belt is not considered to be a reasonable alternative.

Table D.2.1: Wolverhampton housing growth options identified by CWC at the Regulation 19 stage

Option	Description of housing growth option	CWC assessment of option
Option H1	Carry forward existing housing allocations which focus housing growth in urban area: <ul style="list-style-type: none"> • Around 8,850 homes on existing supply in urban area 	<ul style="list-style-type: none"> • Shortfall of 10,878*homes against housing need 2024-42 • Sustainable pattern of development
Option H2	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres: <ul style="list-style-type: none"> • Around 8,850 homes on existing supply in urban area • 61 homes on one new allocation (following discount) • Around 419 homes from density uplift and structural change in Centres 	<ul style="list-style-type: none"> • Shortfall of 10,398 homes against housing need 2024-42 • Highly sustainable pattern of development
Option H3	Carry forward existing housing allocations and make new allocations which focus housing growth in urban area, with increased density in accessible locations and structural change in Centres, and export remaining housing need to neighbouring authorities: <ul style="list-style-type: none"> • Around 8,850 homes on existing supply in urban area • 61 homes on one new allocation (following discount) • Around 419 homes from density uplift and structural change in Centres • Around 10,398 homes exported through Duty to Cooperate 	<ul style="list-style-type: none"> • All of housing need 2024-42 met • Highly sustainable pattern of development • 35% cities and urban centres uplift of 5,115 homes met within Wolverhampton • Existing and potential contribution offers from neighbouring authorities which have a strong relationship with Wolverhampton • Birmingham and Black Country HMA Statement of Common Ground to address remaining unmet need

D.2.1.9 **Table D.2.2** summarises the likely impacts of each housing growth option in relation to the 14 SA Objectives. The text within **sections D.2.2 – D.2.15** sets out the accompanying assessment narrative which explains how each overall impact was identified.

⁷ Paragraph 145 of the NPPF (December 2023) states that “Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated”

D.2.1.10 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by the CWC, as well as expert judgement.

D.2.2 SA Objective 1 – Cultural heritage

D.2.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. Many of Wolverhampton's remaining open spaces are also of historic importance, such as conservation areas and areas noted within the Historic Landscape Characterisation (HLC) as Areas of High Historic Landscape or Townscape Value (AHHLV/AHHTV), including historic field systems and parklands.

D.2.2.2 All three housing growth options propose to deliver around 8,850 homes in the urban area, and as such, it is likely that a large proportion of housing growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of assets and their settings. Options H2 and H3 seek to increase density within Centres, which could potentially place pressure on the historic environment to a greater extent than Option H1. On the other hand, by encouraging growth within these areas, development could also help to promote regeneration, and enhance the cultural heritage value and appreciation of historic features.

D.2.2.3 Overall, as the location, site context and proximity to receptors of the proposed housing growth is unknown, the potential impacts of all the housing growth options on cultural heritage features is uncertain.

D.2.3 SA Objective 2 – Landscape

D.2.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. According to the Landscape Sensitivity Assessment, the northern and southern Green Belt parcels, and a small section to the south west, are the most sensitive in Wolverhampton, identified as 'moderate-high' sensitivity. According to the Green Belt Study, development in these areas would also lead to 'very high' harm to the purposes of the Green Belt. Although Green Belt is not necessarily an indicator of higher quality landscapes, within Wolverhampton this is generally the case. All three options would protect Green Belt land from development and would focus the majority of growth within the existing urban area.

D.2.3.2 Similarly to the assessment under SA Objective 1, development within urban areas could lead to positive or negative effects on landscape character. All options include at least 8,850 homes within the urban area, with Options H2 and H3 also delivering approximately 419 homes through density uplift in Centres. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local landscape character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.

D.2.3.3 Overall, as the location, site context and proximity to receptors of the proposed housing provision is unknown, the potential impacts of all the housing growth options on landscape is uncertain.

D.2.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

- D.2.4.1 Wolverhampton's biodiversity assets include Local Nature Reserves (LNRs), Sites of Importance for Nature Conservation (SINCs) and Sites of Local Importance for Nature Conservation (SLINCs) which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of Wolverhampton's green infrastructure (GI) network are also likely to serve as important corridors between habitats, facilitating movement of species and linking to the wider countryside including the Green Belt, which supports various elements of the GI network, including habitats and ecological networks such as hedgerows, remnant woodland, trees and green/blue corridors.
- D.2.4.2 The proposed development under any of the housing options may have the potential to lead to adverse impacts on European sites, due to increased development related threats and pressures, is explored in more detail within the Habitats Regulations Assessment (HRA).
- D.2.4.3 All three options seek to focus housing growth in the existing urban area, with no Green Belt release. The options may therefore direct development away from the most sensitive biodiversity features, although it should be noted that urban areas can also support distinctive habitats, species and ecological linkages.
- D.2.4.4 It is likely that development under any option would place pressure on biodiversity resources, with adverse impacts at the landscape scale despite any biodiversity net gain (BNG) provisions at the site level, owing to the large quanta of housing proposed. A minor negative impact is therefore identified for Options H1 and H2 and a major negative impact is identified for H3 that proposes significantly larger housing growth and therefore increased pressure on biodiversity.

D.2.5 SA Objective 4 – Climate change mitigation

- D.2.5.1 The majority of Wolverhampton's carbon dioxide (CO₂) emissions are attributed to domestic and transport sources⁸. The lowest number of dwellings is proposed under Option H1, and as such, this option would be likely to lead to the lowest impact with regard to greenhouse gas (GHG) emissions. This option would also focus all development within Wolverhampton's existing urban areas, in proximity to a range of existing jobs, services, facilities and sustainable transport infrastructure. As such, Option H1 would be likely to perform best with regard to climate change mitigation.
- D.2.5.2 In contrast, Option H3 proposes the highest number of dwellings (19,728 homes). Option H3 would lead to greater increase CO₂ and other GHG emissions, as a consequence of the construction and occupation of dwellings. However, Options H2 and H3 would also provide development at a higher density within Centres, which are likely to be highly sustainable locations for growth in terms of accessibility to services and public transport infrastructure.

⁸ Department for Energy Security & Net Zero (2024). UK local authority greenhouse gas emissions estimates 2022. Available at: <https://assets.publishing.service.gov.uk/media/64a67cc37a4c230013bba230/2005-21-local-authority-ghg-emissions-statistical-release-update-060723.pdf> [Date accessed: 10/09/24]

D.2.5.3 Overall, all housing growth options propose a large quantum of growth, which would be likely to increase CO₂ and other GHG emissions, to some extent, as a consequence of the construction and occupation of dwellings. A minor negative impact is identified for Options H1 and H2 which provide 8,850 and 9,330 homes respectively, and a major negative impact for Option H3 which would provide 19,728 homes in total.

D.2.5.4 The potential of new development under any growth option to draw on renewable or low-carbon energy supplies is not known for these high-level options.

D.2.6 SA Objective 5 – Climate change adaptation

D.2.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time.

D.2.6.2 The focus of development under the three options within the existing urban area may help to reduce the proportion of previously undeveloped land required to deliver the housing, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers⁹, and helping to alleviate the ‘urban heat island’ effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.

D.2.6.3 Overall, as the location and site context of the proposed housing provision is unknown, the potential impacts of all housing growth options on climate change adaptation is uncertain.

D.2.7 SA Objective 6 – Natural resources

D.2.7.1 The majority of Wolverhampton’s land is classified as ‘Urban’ within the Agricultural Land Classification (ALC). There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC.

D.2.7.2 It can be assumed that development focused in the existing urban area would not result in the loss of any ‘best and most versatile’ (BMV) land. Development focused within the urban area is also likely to provide opportunities for re-use of previously developed land, helping to promote an efficient use of natural resources. Although the exact location of new housing growth under the three options is unknown, it is likely that any development on previously undeveloped land would be small-scale. Therefore, Options H1 and H2 would likely result in a minor positive impact on natural resources, by promoting an efficient use of land. Whereas Option H3 in addition to the development focused in the existing urban area would export growth through DtC, and the exact location of the growth is uncertain and could potentially result in the loss of undeveloped land.

⁹ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 10/09/24]

D.2.8 SA Objective 7 – Pollution

- D.2.8.1 The entirety of the WLP area falls within Wolverhampton Air Quality Management Area (AQMA), meaning that development under any of the housing options would be likely to expose new residents to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air pollution.
- D.2.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. Development under Option H3 would deliver the most housing growth of the three options; therefore, this option could potentially result in the largest impact on pollution due to the greater potential of the worsening of air, soil and water quality.
- D.2.8.3 Overall, all housing options would be expected to expose new residents to pollution to some degree, and generate further pollution owing to the large scale of development proposed. A minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

D.2.9 SA Objective 8 – Waste

- D.2.9.1 All options for housing growth would be likely to increase household waste production. It is assumed that new residents in the WLP area will have an annual waste production of approximately 377kg per person, in line with the average for England¹⁰.
- D.2.9.2 Option H1 proposes the lowest total housing number (8,850) and so this option could be considered the best performing, followed by H2 (9,330). Option H3 proposes the highest total housing number (19,728) although approximately 10,398 of these homes would be exported through DtC. It can be assumed that the higher the proposed housing number, the higher the number of new residents introduced through each option.
- D.2.9.3 Overall, all options would be likely to significantly increase household waste and result in a negative impact on SA Objective 8. When considering the total housing quanta proposed under each option alongside the general national trend of decreased waste over time, a minor negative impact is recorded for Options H1 and H2, and a major negative impact is recorded for Option H3.

D.2.10 SA Objective 9 – Transport and accessibility

- D.2.10.1 All options aim to focus housing growth within Wolverhampton's existing urban areas, where there is the greatest provision of sustainable transport infrastructure, including active travel links and public transport options such as buses, metro and rail. It is anticipated that new residents in the centres would be more likely to choose sustainable travel options rather than private car use, compared to more dispersed housing.

¹⁰ DEFRA (2024) Statistics on waste managed by local authorities in England in 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223> [Date accessed: 10/09/24]

D.2.10.2 It should be noted that there is some uncertainty in this assessment in terms of the effect that high density development within centres proposed under all options could potentially have with regard to capacity issues at transport facilities and traffic congestion; the larger amount of development proposed under Option H3 would be likely to have the greatest potential for adverse effects in this regard. Additionally, there is uncertainty in the assessment of Option H3 as the location of the exported proportion of the housing under the option is unknown. Overall, taking into consideration the potential positive and negative impacts of the proposed growth, Options H1 and H2 would provide a major positive impact on transport and accessibility and Option H3 on balance would provide a minor positive impact.

D.2.11 SA Objective 10 – Housing

D.2.11.1 Option H3 would be expected to meet the identified housing requirement of 19,728 homes, and therefore, have a major positive impact on housing provision. Whereas, Options H1 and H2 would not deliver enough housing to meet the identified need, with a shortfall of approximately 10,878 and 10,398 homes predicted under Options H1 and H2, respectively. A minor positive impact on housing provision is identified for Options H1 and H2.

D.2.11.2 The capacity of Wolverhampton's urban area has been informed through the SHLAA (2024) and emerging Urban Capacity Review. These aspects need to be closely considered as, without careful planning, development solely focused in urban areas could have adverse impacts on loss of employment opportunities, access to greenspaces for health and wellbeing and the capacity of social infrastructure such as education and health facilities to accommodate growth.

D.2.11.3 At this scale of assessment, the likely contribution of each housing growth option to meeting the different needs of the population is uncertain, such as housing mix, and provision of extra care housing, accessible housing and affordable homes. However, options which would deliver a larger quantum of growth may be more likely to provide a range of homes.

D.2.12 SA Objective 11 – Equality

D.2.12.1 According to the Index of Multiple Deprivation (IMD), the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area.

D.2.12.2 Growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to key services and employment opportunities; however, this could also lead to exacerbation of existing inequalities by increasing housing density in deprived areas. Increased housing in the urban areas may also lead to greater pressure on existing open spaces and potential conversion of non-residential land uses into residential properties.

- D.2.12.3 Option H3 meets the identified housing need for Wolverhampton of 19,728 homes. Option H3 may therefore be more likely to ensure provision of a suitable mix of housing types / tenures and allow greater scope to meet the varying needs of the population, such as provision of affordable homes, compared to Options H1 and H2 which would result in a housing shortfall. By not meeting housing needs, Options H1 and H2 could also put pressure on housing and rental costs, which would be likely to lead to poorer quality accommodation and overcrowding, with adverse implications for health and wellbeing.
- D.2.12.4 As the location, site context and proximity to receptors of the proposed housing provision is unknown, there is some uncertainty regarding the potential impacts of all housing growth options on equality. Overall, Options H1 and H2 would be more likely to lead to a minor negative impact on equality, whereas there is greater uncertainty for Option H3 which could lead to positive or adverse effects.
- D.2.12.5 At present, there is no evidence to suggest that any of the housing growth options would disproportionately affect any of the protected characteristics¹¹ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

D.2.13 SA Objective 12 – Health

- D.2.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation, although new development may put pressure on open spaces under any of the proposed housing growth options.
- D.2.13.2 All three options direct growth towards the existing urban area where the majority of existing healthcare facilities are concentrated. The three options may therefore result in a large proportion of new residents being located in areas with good sustainable access to these facilities. Although, it should be noted that the high density development in centres proposed within Options H2 and H3 could potentially lead to capacity issues at healthcare facilities. This could also put pressure on urban greenspaces if land is required for development, with potential negative effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation.
- D.2.13.3 Overall, Options H1 and H2 could potentially result in a major positive impact on SA Objective 12 as it would situate the development in sustainable locations. Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at healthcare facilities within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to healthcare. Overall, on balance Option H3 is identified as having a minor positive impact on health.

¹¹ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

D.2.14 SA Objective 13 – Economy

- D.2.14.1 The options considered in this assessment focus on housing growth only. It is assumed that future housing development would not result in the loss of existing active employment floorspace.
- D.2.14.2 In terms of accessibility of proposed new housing growth to employment opportunities, the majority of the WLP area is likely to provide relatively good connections, according to accessibility modelling data. A range of employment opportunities including retail, commercial and office floorspace can be found in the WLP area, particularly the main centres. The WLP area is also well served by public transport to nearby centres such as Birmingham and the wider Black Country.
- D.2.14.3 In general, it is expected that development focused within the existing urban area would provide good access to a range of local employment opportunities as well as sustainable transport options to reach employment further afield.
- D.2.14.4 Overall, Options H1 and H2 would be likely to result in a major positive impact as all development would be concentrated in the urban area under this option. Whereas there is uncertainty regarding where the development exported to neighbouring authorities under Option H3 would be and if this development would solely be located in urban areas. Overall, considering similar development in the urban area to Options H1 and H2, Option H3 would be likely to have a minor positive impact on the economy.

D.2.15 SA Objective 14 – Education, skills and training

- D.2.15.1 There are many primary and secondary schools located across Wolverhampton, as well as higher education opportunities at the University of Wolverhampton. The majority of the WLP area has good pedestrian and public transport access to schools according to accessibility modelling data.
- D.2.15.2 All three housing options seek to focus growth in the existing urban area, with Options H2 and H3 also proposing increased housing density in accessible locations (i.e. the main centres). This approach would be likely to ensure that the majority of new development is situated in areas with good sustainable access to education; however, it is uncertain whether the associated increase in population density would lead to adverse effects in terms of capacity issues at primary and secondary schools.
- D.2.15.3 Overall, Option H1 and H2 could potentially result in a major positive impact on SA Objective 14 as they would be likely to situate development in sustainable locations. Option H3 would also situate development in sustainable locations within Wolverhampton itself, however, Option H3 includes an element of housing export to neighbouring authorities. This approach may help to alleviate capacity issues at schools within Wolverhampton, but it is uncertain where the development would be located in other authorities with respect to schools and training opportunities. On balance, a minor positive impact is identified for Option H3.

D.2.16 Conclusions

Table D.2.2: Impact matrix of the three housing growth options

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Housing Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H2	+/-	+/-	-	-	+/-	+	-	-	++	+	-	++	++	++
H3	+/-	+/-	--	--	+/-	+/-	--	--	+	++	+/-	+	+	+

D.2.16.1 Environmental assessment needs to have details of size, nature and location of the proposals in order for impacts to be understood in relation to the environmental baseline. The housing options have only ‘nature’, in this case housing. The size and location details are not present, beyond the broad direction towards the existing urban area, which means that any attempt to evaluate impacts is necessarily high level with restricted diagnostic conclusions.

D.2.16.2 A larger quantum of housing growth would generally have more potential to lead to adverse effects, particularly on environmentally focused SA Objectives. Options H1 and H2 propose significantly smaller housing numbers at 8,850 and 9,330 respectively, compared to Option H3 which proposes 19,728 homes. Development proposed under Options H1 and H2 would be located wholly within Wolverhampton’s urban area. Based on the high-level scoring system, Options H1 and H2 have been identified to score the same overall (as shown within **Table D.2.2**), however, as Option H1 provides a lower housing supply than Option H2, it has potential to perform slightly better against environmental SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste). Despite this, Options H1 and H2 would both lead to a significant shortfall against the identified housing need; therefore, minor negative impacts have been identified against SA Objective 11 (equality) and minor positive impacts against SA Objective 10 (housing) due to the likely reduced scope for delivering varied and high-quality homes to meet the needs of the population.

D.2.16.3 On the contrary, Option H3 recorded a major positive impact against SA Objective 10, where the proposed development would meet the identified housing need of 19,728. However, major negative impacts were identified for Option H3 for SA Objectives 3 (biodiversity), 4 (climate change mitigation), 7 (pollution) and 8 (waste) due to the larger quantum of growth proposed under this option having potential to lead to more adverse effects than Options H1 or H2. Just under half of the growth proposed under Option H3 (10,398 homes) will be exported to neighboring authorities, which has resulted in uncertainty in the expected impacts for the proposed housing growth since the location would be determined through other authorities’ local plans.

D.2.16.4 Overall, whilst Option H1 can be identified as the best performing within several SA Objectives, the three options would deliver a similar level of growth within Wolverhampton itself and as such there is very little separating the options in terms of effects within the Plan area. Options H2 and H3 both seek to deliver the same amount of increased growth in accessible locations and maximise opportunities for sustainable urban growth within Wolverhampton. In order to meet the identified housing needs, it will be necessary to export a proportion of growth to neighbouring authorities as set out in Option H3; however, this is likely to increase potential for adverse effects when compared to pursuing a lower quantum of growth.

D.2.17 Selection and rejection

D.2.17.1 CWC's assessment of the housing growth options is set out in **Table D.2.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹².

D.2.17.2 Considering the housing evidence and the SA findings, CWC consider that “*The Preferred Option H3 is the only one of the three growth options which has the potential to meet housing need for Wolverhampton and meet national guidance on sustainable development*”.

¹² City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Main%20Document%20WLP%20IPO.pdf> [Date accessed: 17/09/24]

D.3 Employment growth options

D.3.1 Preface

Appraisal of employment growth options identified by CWC at Regulation 18 (2023)

- D.3.1.1 Three employment growth options were assessed within the Regulation 18 Issues and Preferred Options SA Report¹³. These three options included distributions of employment land across existing allocations taking into account the 47.4ha baseline supply figure that was identified at the time and within the identified Plan period. Options E1 and E2 failed to meet the identified employment land need at the time of their evaluation, whilst Option H3 met the identified need.
- D.3.1.2 Wolverhampton is located within the Black Country Functional Economic Market Area (FEMA) which also covers the local authorities of Dudley, Sandwell and Walsall. The options assessed at the Regulation 18 stage were based on employment land need figures derived from the Black Country Economic Development Needs Assessment (EDNA) (2023), which demonstrated a need for 116ha of employment land within Wolverhampton up to 2041, against an employment land supply of 47.4ha.

Appraisal of employment growth options identified by CWC at Regulation 19 (2024)

- D.3.1.3 The Black Country EDNA update (2024)¹⁴ identifies a residual need for an additional 149ha of land for employment development over the Plan period up to 2042 for Wolverhampton.
- D.3.1.4 As of April 2024, existing Local Plan allocations proposed to be carried forward into the WLP and other sites with planning permission for employment development total 33.65ha. (30.25ha on existing allocations and 3.4ha on other sites with planning permission). There have been 22.6ha of completions during 2020-24, reducing residual need to 126.4ha.
- D.3.1.5 The three options for employment growth as identified by CWC at the Regulation 18 stage have been updated to take into account the latest evidence available at the Regulation 19 stage and are based on the updated Plan period of 2024-2042. The updated employment growth options are presented within **Table D.3.1**.
- D.3.1.6 The broad distribution of growth under the three options is unchanged from Regulation 18. These options include distributions of employment land across existing allocations taking into account the latest baseline supply figure, proposed new sites, and potential to export growth through DtC.

¹³ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan: Regulation 18 Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/planning/planning-policies/wolverhampton-local-plan/evidence-plan-preparation-documents> [Date accessed: 03/09/24]

¹⁴ Warwick Economics and Development (2024) Black Country Economic Development Needs Assessment

Table D.3.1: Wolverhampton employment growth options identified by CWC at the Regulation 19 stage

Option	Description of employment option	CWC assessment of option
Option E1	<p>Carry forward existing employment allocations:</p> <ul style="list-style-type: none"> 33.65 ha on existing employment land supply in urban area. 	<ul style="list-style-type: none"> Shortfall of 92.75 ha against employment land need for Wolverhampton up to 2042 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E2	<p>Carry forward existing employment allocations and make new employment allocations in locations suitable for employment use and with good transport access:</p> <ul style="list-style-type: none"> 33.65 ha on existing employment land supply in urban area 9.25 ha on new allocations 	<ul style="list-style-type: none"> Shortfall of 83.5 ha against employment land need for Wolverhampton up to 2042 Shortfall of employment land across the Black Country FEMA as a whole. Sustainable pattern of development
Option E3	<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"> 33.65 ha on existing employment land supply in urban area 9.25 ha on new allocations 83.5 ha exported through Duty to Cooperate 	<ul style="list-style-type: none"> All of employment land need for Wolverhampton up to 2042 met. Sustainable pattern of development Existing and potential contribution offers available from neighbouring authorities which have a strong relationship with Wolverhampton Existing and potential contribution offers available from neighbouring areas to address employment land need across the Black Country FEMA as a whole.

D.3.2 SA Objective 1 – Cultural heritage

D.3.2.1 The majority of cultural heritage assets within the WLP area are concentrated in the city centre, particularly listed buildings and conservation areas. All three employment options would focus growth within the existing urban areas, amongst existing employment areas. These are generally clustered in the centre, east and north of the WLP area. It is therefore likely that a large proportion of employment growth would be located in proximity to designated heritage assets, with potential to adversely affect the historic significance of these assets and their settings. Employment floorspace could include large buildings and potentially high-rise development, which may also have potential to affect views of or from heritage assets in the city.

D.3.2.2 Under Options E2 and E3 the “new allocations” have been assessed as reasonable alternative sites within the SA, presented in **Appendix F**. Of the two allocations, one site was identified to have potential to negatively affect conservation areas (pre-mitigation). However, as a whole, due to the focus of new growth within areas that area already characterised by employment land uses, the new development under the options is likely to be in keeping with the existing built form and may also help to promote regeneration with benefits to areas with historic interest or architecture. All three options could therefore give rise to positive or negative effects, depending on the specific proposal and location. Furthermore, under Option E3 more uncertainty is present where a large proportion of growth would be exported to neighbouring authorities, the specific location of which is unknown.

D.3.2.3 Overall, as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three employment growth options on cultural heritage features are uncertain.

D.3.3 SA Objective 2 – Landscape

D.3.3.1 The majority of Wolverhampton is urbanised, although areas of Green Belt remain to the north, south and western edges of the city. None of the employment growth options seek to release Green Belt land for development, and so it is likely that development would avoid sensitive areas as identified in the Landscape Sensitivity Assessment.

D.3.3.2 Development within the existing urban areas could lead to positive or negative effects on the landscape / townscape character. Adverse effects could arise on existing townscapes through increased density, loss of open space and changes to local character, distinctiveness and views. Conversely, development could also potentially provide opportunities to enhance the character and appearance of the local area and promote regeneration and investment.

D.3.3.3 Options E1 and E2 propose to incorporate all employment growth within Wolverhampton rather than exporting a proportion to neighbouring authorities as under Option E3. Impacts under Option E3 would be more uncertain than options E1 and E2 due to the exported growth. However, as all options propose the same scale of development within Wolverhampton, and as the specific site context and proximity to receptors of the proposed employment provision are unknown, the potential impacts of all three options on landscape are uncertain.

D.3.4 SA Objective 3 – Biodiversity, flora, fauna and geodiversity

D.3.4.1 Wolverhampton's biodiversity assets include LNRs, SINC and SLINC which primarily follow the canal and watercourse networks, as well as some areas of grassland and remnant woodlands, for example. Undesignated aspects of the WLP area's GI network are also likely to serve as important corridors between habitats, facilitating movement of species.

D.3.4.2 None of the employment growth options seek to release Green Belt land for development, and so it is likely that the majority of development would be directed away from areas of previously undeveloped land where habitats and ecological networks are most prevalent. Although, urban areas can also support distinctive habitats, species and ecological linkages and there may be some loss of previously undeveloped land or brownfield land with ecological value within the city. Several of Wolverhampton's employment sites are situated along the canal network which includes locally designated biodiversity assets, including the 'Birmingham Canal, Wolverhampton Level' SINC which is noted as supporting a wide range of habitat types and associated species, including in parts a diverse and abundant aquatic flora. Increasing or intensifying employment uses in proximity to the canal network may therefore increase the risk of water pollution and other development related threats and pressures to local biodiversity features.

D.3.4.3 Under Options E2 and E3 “*new allocations*” will provide employment land, and have been assessed in the SA as reasonable alternative sites (presented in **Appendix F**). Of the two sites, one site is adjacent to the ‘Birmingham Canal, Wolverhampton Level’ SINIC and one site wholly coincides with the ‘Neachells Lane Open Space’ SLINC. Development proposed under the options as a whole could potentially lead to minor negative impacts on these local designations, depending on site-specific requirements including potential for BNG which may mitigate these effects to some extent. Based on the information available for the high level options, a minor negative impact on biodiversity, flora, fauna and geodiversity cannot be ruled out for all three employment growth options. There is greater uncertainty regarding the effect of Option E3 than the other two, given the unknown location of exported growth.

D.3.4.4 The proposed development under these three employment options may have the potential to lead to adverse impacts on European sites, due to increased development related threats and pressures, which will be explored in the HRA.

D.3.5 SA Objective 4 – Climate change mitigation

D.3.5.1 Owing to the focus of employment development under all three options towards the urbanised areas of Wolverhampton and where existing employment provisions are concentrated, it is likely that these areas will be accessible via sustainable transport methods and close to strategic transport routes. This may help to reduce the number of car journeys required for employees travelling to work, and reduce journey times.

D.3.5.2 However, all three options propose to deliver a large amount of new employment land, including 33.65ha under Option E1, 42.9ha under Option E2, and 126.4ha under Option E3. All options have potential to result in increased GHG emissions during construction and occupation, potentially including more heavy goods vehicle (HGV) journeys; although, the emissions likely to be generated as a result of the development would be dependent on the nature and scale of the employment land proposed, and the potential for low- or zero-carbon and renewable energy schemes to be incorporated, which is unknown at present. Option E3 would also export 83.5ha of the total 126.4ha need to neighbouring authorities, resulting in greater uncertainty surrounding the potential for associated adverse impacts of the proposed development. The overall impact of Options E1, E2 and E3 on climate change mitigation is therefore uncertain.

D.3.6 SA Objective 5 – Climate change adaptation

D.3.6.1 Flood risk within Wolverhampton is generally low, although there are some areas within Flood Zones 2 and 3 associated with the Smestow Brook in the south west, the Staffordshire and Worcestershire Canal in the north, and the River Tame in the east. The north and the south east of the city are also within Indicative Flood Zone 3b, where flood risk could potentially worsen over time. The majority of the proposed employment growth is expected to be situated away from these areas; however, a proportion of growth is likely to be situated in the employment areas to the south east and northern extents of Wolverhampton where there are some areas within Flood Zones 2 and 3. Depending on the site-specific proposals and land use, employment development may be classed as ‘less vulnerable’ to fluvial flooding according to the NPPF. However, increasing development or density within areas at risk of flooding can have implications downstream, making it more difficult to adapt to the effects of climate change.

- D.3.6.2 The focus of the majority of employment growth within the existing urban area and in some cases on brownfield land would be likely to reduce the proportion of previously undeveloped land required to deliver the development, which would be less likely to exacerbate local surface water flood risk. However, there may still be an increase in the area or density of built form and thereby the extent of impermeable surfaces, especially if existing open spaces within the city are developed. Open spaces and GI can help urban areas adapt to climate change, for example through providing protection from extreme weather such as hotter summers¹⁵, and helping to alleviate the ‘urban heat island’ effect. Loss of GI within the urban area and greater urban density could therefore compromise these functions.
- D.3.6.3 Overall, the precise impacts of development cannot be determined without input from flood risk assessments and knowledge regarding the proposed uses and layout of each employment site. Greater uncertainty arises under Option E3, which would export a proportion of growth to neighbouring authorities, the location of which is unknown. Nevertheless, based on the available information for the high-level options, a minor negative impact on climate change adaptation cannot be ruled out for all three options.

D.3.7 SA Objective 6 – Natural resources

- D.3.7.1 The majority of Wolverhampton’s land is classified as ‘Urban’ ALC. There are some extents of Grade 3 ALC to the south and north (within the Green Belt), a small section of Grade 4 ALC to the north, and very small areas of Grade 2 ALC. It can therefore be assumed that development focused in the existing urban area would not result in the loss of any BMV land.
- D.3.7.2 All three options would focus growth within Wolverhampton’s urban areas, amongst existing employment land uses. This is likely to include use of previously developed or under-utilised land, and as such, the majority of the proposed development is likely to represent an efficient use of land, with positive effects in terms of the conservation of natural resources. Although, the two “*new allocations*” proposed for development under the options contain areas of potential environmental value (see **Appendix F**).
- D.3.7.3 Under Option E3, 83.5ha of employment land will be exported to neighbouring areas. Whilst the precise location of this growth is unknown, it is likely that the employment land would be located in urban areas, amongst existing employment land uses to promote sustainable development.
- D.3.7.4 There may be some loss of previously undeveloped land, or brownfield land with environmental value, within the city as a result of the proposed employment growth under all three options, although this is likely to be relatively small-scale. Overall, all three options would be likely to result in a negligible impact on natural resources.

¹⁵ Environment Agency (2018) Climate change impacts and adaptation. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758983/Climate_change_impacts_and_adaptation.pdf [Date accessed: 10/09/24]

D.3.8 SA Objective 7 – Pollution

- D.3.8.1 The entirety of the WLP area falls within Wolverhampton AQMA, meaning that development under any of the employment growth options would be likely to expose site end users to poor air quality, and would introduce new development into the AQMA. The proposed development could also potentially exacerbate existing congestion issues with implications for air quality.
- D.3.8.2 Soil and water pollution impacts will depend on the nature, scale and location of development. None of the employment growth options seek to release Green Belt land for development. As the employment growth would be focused within the existing urban areas, there is likely to be potential for redevelopment of brownfield sites and more efficient use of land compared to development directed outside of the city. This may also help to ensure existing ground contamination issues are addressed, prior to the development. The employment options may lead to benefits in the sense that new development would be directed away from areas of greenfield land and natural features where there is generally higher potential for worsening of air, soil and water quality.
- D.3.8.3 Despite the above considerations, there is still potential for the generation of air, soil and water pollution to some extent, depending on the proposed end uses of the new employment land, as well as potential to exacerbate existing poor air quality within the AQMA. Option E3 proposes significantly larger employment growth, proposing 126.4ha of employment land in comparison to 33.65ha under E1 and 42.9ha under E2; therefore, Option E3 has potential to cause greater pollution related impacts as a result of proposing a larger quantity of development. Overall, a minor negative impact is identified for Options E1 and E2 and a major negative impact is identified for Option E3. Although, there is some uncertainty in this assessment owing to the unknown specific site context and proximity to receptors, and the unknown location of exported growth under Option E3.

D.3.9 SA Objective 8 – Waste

- D.3.9.1 As the proposed employment growth under all options would be focused within the existing urban areas, it is likely that the development will be situated in closer proximity to existing waste management infrastructure. This could potentially help to minimise adverse effects in terms of simplifying the management of waste and reducing travel times; however, employment growth may also result in a greater quantity or range of waste associated with more employment floorspace. Under Option E3, employment land would be exported to neighbouring authorities, therefore, the location of the growth and other authorities' waste infrastructure is unknown. The specific site context and nature of the proposed development associated with these high-level options is unknown, and therefore, the volumes and types of waste likely to be generated is uncertain under all three options.

D.3.10 SA Objective 9 – Transport and accessibility

- D.3.10.1 Options E1 and E2 would focus growth within the existing urban areas, amongst existing employment areas which are generally clustered in the centre, east and north of the WLP area. The majority of Wolverhampton's urban areas are well served by sustainable transport infrastructure including public transport options such as buses, metro and rail. Although, some employment areas such as the eastern and northern extents of the WLP area are situated further from rail or metro links. Option E3 in addition to focusing growth within the existing urban areas within Wolverhampton as per Options E1 and E2, will also export a proportion of growth to neighbouring areas; it is uncertain as to how well the exported growth will be served by sustainable transport infrastructure.
- D.3.10.2 Active travel links are also relatively good across the WLP area, although the coverage varies depending on the specific location and may be less well connected in more industrialised areas, compared to residential neighbourhoods. There is also potential for large amounts of employment growth in the urban areas to exacerbate congestion.
- D.3.10.3 On balance, the broad location of new employment growth within the city would be likely to provide sustainable travel options for employees travelling to work, with a minor positive impact on transport and accessibility identified for all three options.

D.3.11 SA Objective 10 – Housing

- D.3.11.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not result in the loss of existing housing, or compromise housing delivery. The three options would be expected to result in a negligible impact on housing provision in Wolverhampton.

D.3.12 SA Objective 11 – Equality

- D.3.12.1 According to the IMD, the most deprived areas of Wolverhampton are generally found in the central areas, and the south east of the city, although there are pockets of deprivation found throughout the WLP area. Employment growth directed towards the existing urban areas could potentially help to facilitate social inclusion by increasing accessibility to employment opportunities; however, this could also lead to exacerbation of existing inequalities in some instances, for example by leading to densification and greater pressure on existing open spaces to be converted into employment land.
- D.3.12.2 Option E3 would meet all of the Black Country FEMA employment land need arising in Wolverhampton up to 2042; however, not all growth would be provided within the WLP area and CWC would instead export 83.5ha of employment land via the DtC, potentially resulting in an increased need to commute to other local authority areas and missing an opportunity to address local unemployment issues. However, under Options E1 and E2 the identified employment need for Wolverhampton would not be met and a shortfall of 92.75ha is expected under Option E1 and a shortfall of 83.5ha is expected under Option E2.
- D.3.12.3 As the specific site context and proximity to receptors of the proposed employment land is unknown for the high-level options, there is some uncertainty regarding the potential impacts of the three options on equality. Overall, Options E1 and E2 would be more likely to lead to a minor negative impact on equality overall, whereas there is greater uncertainty and potential for positive effects under Option E3.

D.3.12.4 At present, there is no evidence to suggest that either of the employment growth options would disproportionately affect any of the protected characteristics¹⁶ under the Equality Act. Planning policies would provide opportunities to bring out more positive effects regarding equality.

D.3.13 SA Objective 12 – Health

D.3.13.1 The majority of Wolverhampton is well served by healthcare facilities, with New Cross Hospital in the north east of the city, and various GP surgeries distributed across the urban area. The majority of the built-up area has good pedestrian and public transport access to healthcare. Various open spaces, parks and sports facilities can be found throughout the WLP area, providing areas for exercise and recreation.

D.3.13.2 Under all three options, development is directed towards the existing urban areas, although under Option E3 83.5ha of development would be exported via the DtC. It is expected that exported development would remain in existing urban areas; however, the specific details of the proposed exported growth is uncertain and will be determined through the relevant authorities' local plans. Development directed towards existing areas under all three options could put pressure on urban greenspaces if land is required for development, with potential adverse effects on health associated with loss of, or reduced access to, outdoor space for exercise and recreation. However, this is likely to be small-scale occurrence, if at all.

D.3.13.3 The three employment options are not expected to increase the provision of healthcare facilities across the Plan area. It is also assumed that future employment development would not result in the loss of healthcare facilities. As a result, overall, the three options would be likely to have a negligible impact in regard to human health.

D.3.13.4 It should be noted that there is potential for adverse effects on human health associated with poor air quality; these impacts are addressed within SA Objective 7 – Pollution.

D.3.14 SA Objective 13 – Economy

D.3.14.1 Options E1 and E2 would not meet the employment land need for Wolverhampton up to 2042, and additionally would result in a shortfall of employment land across the Black Country FEMA as a whole. Option E1 would result in a 92.75ha shortfall and Option E2 would result in a 83.5ha shortfall. Both options could therefore result in a lack of local employment opportunities and exacerbate unemployment issues.

D.3.14.2 Option E3 is the only option that meets all of the employment land need for Wolverhampton up to 2042. Option E3 provides 126.4ha of employment land, with 83.5ha served through the DtC. The contributions from neighbouring areas would address Wolverhampton's employment land need across the Black Country FEMA as a whole. Although there may be need to commute to neighbouring authorities to reach new employment sites, on the whole, under Option E3 residents of Wolverhampton would be likely to have access to a wider range of employment opportunities than Options E1 and E2.

¹⁶ It is against the law to discriminate against someone because of: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

D.3.14.3 Overall, under the provisions of Options E1 and E2 a minor positive impact would be expected on the economy, and under Option E3 a major positive impact is identified.

D.3.15 SA Objective 14 – Education, skills and training

D.3.15.1 The options considered in this assessment focus on employment growth only. It is assumed that future employment development would not affect access to schools. However, as all options seek to provide employment land, this could potentially also include opportunities for skill development and training, for example the provision of apprenticeships. All three options may therefore lead to an indirect minor positive impact on SA Objective 14.

D.3.16 Conclusions

Table D.3.2: Impact matrix of the three employment growth options

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Employment Growth Option	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
E1	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E2	+/-	+/-	-	+/-	-	0	-	+/-	+	0	-	0	+	+
E3	+/-	+/-	-	+/-	-	0	--	+/-	+	0	+/-	0	++	+

D.3.16.1 As Options E1 and E2 have a similar urban focus and both fail to meet the employment land need for Wolverhampton, resulting in 33.65ha and 42.9ha of employment land respectively, the overall identified impacts against the SA Objectives are similar, as shown in **Table D.3.2**.

D.3.16.2 All three options would locate new development in central areas of Wolverhampton where there is generally good access via existing transport infrastructure, however Option E3 is the only option that would satisfy Wolverhampton's identified employment need (although reliant on DtC to achieve this). As a result, a major positive impact has been identified for Option E3 under SA Objective 14 (economy), and there may be greater potential than the other options to achieve positive impacts on equality (SA Objective 11) due to the employment need being met, although the overall effect is uncertain.

D.3.16.3 On the other hand, Options E1 and E2 could potentially lead to minor negative impacts on pollution (SA Objective 7), in comparison to a major negative impact identified for Option E3, given that less development would take place in total under Options E1 and E2. However, all options would also give rise to potential adverse effects in terms of increasing threats and pressures to local biodiversity assets (SA Objective 3), including the canal network, as well as potentially locating some employment sites in proximity to areas of flood risk (SA Objective 5).

- D.3.16.4 The options are unlikely to significantly affect natural resources (SA Objective 6), owing to a large proportion of development being located within existing urban areas with potential for efficient use of land including brownfield development, although there is some uncertainty in the location of exported growth under Option E3. There is unlikely to be a significant effect from any employment option on housing provision (SA Objective 10).
- D.3.16.5 The effects of the proposed development under any option on climate change mitigation (SA Objective 4) and waste (SA Objective 8) are uncertain, owing to the unknown scale and nature of employment development involved. Furthermore, without knowledge of the specific site proposals and the nature of the employment land to be delivered, it is difficult to determine overall effects on landscape and townscape character (SA Objective 2) and cultural heritage (SA Objective 1) as the growth could give rise to positive or negative effects depending on these factors.
- D.3.16.6 Overall, whilst Option E1 would deliver the smallest quantum of employment growth and could therefore give rise to the least adverse effects against several SA Objectives, there is very little separating any of the three options in terms of growth within Wolverhampton itself. Given that Option E3 would meet Wolverhampton’s employment needs within the FEMA, and is likely to provide a greater range of local employment opportunities, this option could be identified as the best performing of the three; however, CWC would have little control as to the location of exported growth and there may be increased potential for adverse effects on some receptors.

D.3.17 Selection and rejection

- D.3.17.1 CWC’s assessment of the employment growth options is set out in **Table D.3.1**, derived from the information presented in the WLP Issues and Preferred Options Consultation document¹⁷.
- D.3.17.2 Considering the employment evidence and the SA findings, CWC consider that “*The Preferred Option E3 is the only one of the three growth options which has the potential to meet employment land needs for Wolverhampton, allow Duty to Cooperate requirements to be met for the Black Country FEMA, and meet national guidance on sustainable development*”.

¹⁷ City of Wolverhampton Council (2024) Wolverhampton Local Plan Issues and Preferred Options Consultation (Regulation 18) February 2024. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Main%20Document%20WLP%20IPO.pdf> [Date accessed: 17/09/24]

Appendix E: Site Assessment Methodology and Assumptions

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E.1 Overview

E.1.1 The purpose of this appendix

- E.1.1.1 This appendix provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the methodology used to assess reasonable alternative sites within the emerging Wolverhampton Local Plan (WLP).
- E.1.1.2 Topic-specific methodologies have been established which reflect the differences between the SA Objectives and how different receptors should be considered in the appraisal process for reasonable alternative sites. There are also a number of assumptions and limitations noted within each of the following sections, which should be borne in mind when considering the assessment findings.
- E.1.1.3 The topic-specific methodologies set out in **Boxes E.2.1** to **E.15.1** explain how the likely impact per receptor has been identified in line with the local context and the impact symbols presented in **Table 4.4** within the main Regulation 19 SA Report.
- E.1.1.4 All distances stated in site assessments are measured ‘as the crow flies’ from the closest point of the site/receptor in question, unless otherwise stated.
- E.1.1.5 **Appendix F** sets out the detailed appraisal of each reasonable alternative site proposed, pre-mitigation. The appraisal evaluates the likely significant effects of each reasonable alternative against the 14 SA Objectives, using the methodology as set out in this appendix.
- E.1.1.6 The level of detail that can be expressed through the SA assessments depends on the level of detail provided associated with the part of the plan in question.

E.2 SA Objective 1: Cultural heritage

- E.2.1.1** **Box E.2.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 1: Cultural heritage.
- E.2.1.2** Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. As such, the level of the impact when considered at the pre-mitigation stage has been assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question.
- E.2.1.3** It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development. Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets¹ that are important components of the local area. Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.
- E.2.1.4** No specific mapped information regarding the setting of heritage assets has been available to inform the assessments; it is recommended that site-specific evaluations are carried out by qualified professionals to determine this and inform any development proposals.

Box E.2.1: SA Objective 1: Cultural heritage strategic assessment methodology

Score	Likely impact – Grade I Listed Building
--	Development proposal is coincident with or adjacent to, or has the potential for direct adverse impacts on, the character/significance of a Grade I Listed Building or its setting.
-	Development proposal located within the wider setting of a Grade I Listed Building with potential to lead to adverse effects on character or significance.
0	Development proposal is not considered likely to affect the setting or character of a Grade I Listed Building.
+	Development proposal which could potentially enhance a Grade I Listed Building or its setting.

Notes
Grade I Listed Buildings are considered to be those of exceptional interest. Data for heritage assets ² , including the Heritage at Risk Register ³ , available from Historic England.

¹ Setting is taken to mean the surroundings in which a heritage asset may be experienced, which does not relate solely to distance from proposed developments to heritage assets. Historic England (2017) The Setting of Heritage Assets. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition). Available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [Date accessed: 09/08/24]

² Historic England (2024) Download Listing Data. Available at: <https://historicengland.org.uk/listing/the-list/data-downloads/> [Date accessed: 09/08/24]

³ Historic England (2024) Search the Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [Date accessed: 09/08/24]

Score	Likely impact – Grade II* Listed Building
--	Development proposal coincides with, or has the potential for direct adverse impacts on, the character/significance of a Grade II* Listed Building.
-	Development proposal located within the wider setting of a Grade II* Listed Building with the potential to lead to adverse effects on its character/significance.
0	Development proposal not considered likely to impact a Grade II* Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II* Listed Building or its setting.

Notes

Grade II* Listed Buildings are considered to be those of more than special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Grade II Listed Building
--	Development proposal coincides with, or has the potential for adverse direct impacts on, the character/significance of a Grade II Listed Building.
-	Development proposal located within the wider setting of a Grade II Listed Building with the potential to lead to adverse effects on its character/significance.
0	Development proposal not considered likely to impact a Grade II Listed Building or its setting.
+	Development proposal which could potentially enhance a Grade II Listed Building or its setting.

Notes

Grade II Listed Buildings are considered to those of special interest.
 Data sourced from Historic England as above.

Score	Likely impact – Scheduled Monument
--	Development proposal coincides with, or has the potential for direct adverse impacts on, the character/significance of an SM.
-	Development proposal located within the wider setting of an SM with the potential to lead to adverse effects on its character/significance.
0	Development proposal not considered to impact an SM or its setting.
+	Development proposal which could potentially enhance an SM or its setting.

Notes

Scheduling is the selection of a sample of nationally important archaeological sites.
 Data sourced from Historic England as above.

Score	Likely impact – Registered Parks and Gardens
--	Development proposal coincides with, or has the potential for adverse direct impacts on, the character/significance of an RPG.
-	Development proposal located within the wider setting of an RPG with the potential to lead to adverse effects on its character/significance.
0	Development proposal not considered likely to impact an RPG or its setting.
+	Development proposal which could potentially enhance an RPG or its setting.

Notes	
The main purpose of the Register is to celebrate designed landscapes of note and encourage appropriate protection.	
Data sourced from Historic England as above.	

Score	Likely impact – Conservation Areas
-	Development proposal located within a Conservation Area or considered to be located within the setting of a Conservation Area with the potential to lead to adverse effects on its character/significance.
0	Development proposal not considered likely to impact a Conservation Area or its setting.
+	Development proposals which could potentially enhance the character or setting of a Conservation Area.

Notes	
Conservation Area data provided by CWC.	
Information available for Wolverhampton ⁴ authority.	

Score	Likely impact - Archaeological Priority Area
-	Development proposal coincides with an APA with potential to lead to adverse effects on their character/significance.
0	Development proposal does not coincide with an APA.
+	Development proposal which could potentially enhance an APA.

Notes	
Archaeology data provided by CWC and detailed within the HLC report ⁵ .	

⁴ City of Wolverhampton Council (2022) Conservation. Available at: <https://www.wolverhampton.gov.uk/planning/conservation> [Date accessed: 09/08/24]

⁵ Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 09/08/24]

Score	Likely impact - Historic Landscape Characterisation
-	Development proposal located within an area of high historic landscape or townscape value and/or designed landscape of high historic value with potential to lead to adverse effects on their character/significance.
0	Development proposal located outside of areas of high historic landscape or townscape value and designed landscapes.
+	Development proposal which could potentially enhance historic character.

Notes

HLC data provided by CWC and detailed within the HLC report⁶.

⁶ Ibid

E.3 SA Objective 2: Landscape

- E.3.1.1 **Box E.3.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 2: Landscape.
- E.3.1.2 Impacts on landscape are often determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed designs for each development proposal are uncertain at this stage of the assessment. This assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. There is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a development proposal is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.
- E.3.1.3 Adverse effects on Cannock Chase AONB / National Landscape are unlikely given the distance from the Plan area, and as such this has not been considered as a receptor within the site assessments. Additionally, there is no landscape / townscape sensitivity or character evidence available to inform the assessment of sites within Wolverhampton's urban area, beyond the HLC information as discussed under SA Objective 1: Cultural Heritage (see **Chapter E.2**).

Box E.3.1: SA Objective 2: Landscape strategic assessment methodology

Score	Likely impact – Landscape Sensitivity
--	Development proposals located within areas of 'moderate-high' or 'high' landscape sensitivity.
-	Development proposals located within areas of 'low-moderate' or 'moderate' sensitivity.
+/-	Development proposal located outside of the Landscape Sensitivity Assessment study area.
0	Development proposals located within areas of 'low' sensitivity.
+	Development proposals which would protect or enhance features of the landscape as identified within the study.
Notes	
Appraisal of sites informed by the Black Country Landscape Sensitivity Assessment ⁷ .	

⁷ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 09/08/24]

Score	Likely impact – views for local residents
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by local residents.
0	Development proposals are not considered to significantly alter views experienced by local residents.
+	Development proposals which could potentially improve the views experience by some local residents.

Notes

Views and proximity to existing residential development have been identified through the use of aerial photography and Google Maps⁸.
 Potential positive impacts would be dependent upon the current views, and level of detail of the proposed development.

Score	Likely impact - Views from the PRow network
-	Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the PRow network.
0	Development proposals are not considered to significantly alter views experienced by users of the PRow network.
+	Development proposals which could potentially improve the views experienced from the nearby PRow network.

Notes

PRow data provided by CWC.
 Views have been identified through the use of aerial photography and Google Maps⁹.

⁸ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

⁹ Ibid

E.4 SA Objective 3: Biodiversity, flora, fauna and geodiversity

E.4.1.1 **Box E.4.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 3: Biodiversity, flora, fauna and geodiversity.

E.4.1.2 Where a site is coincident with, adjacent to or located in close proximity to an ecological receptor, it is assumed that there is potential for negative effects associated with development to arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

Box E.4.1: SA Objective 3: Biodiversity, flora, fauna and geodiversity strategic assessment methodology

Score	Likely impact - European site e.g. SAC, SPA or Ramsar site
--	Development proposal coincides with, or is located in close proximity to, a European site. Likelihood of direct impacts.
-	Development proposal is located within a recognised ZOI or similar spatial catchment relative to the European site. Likelihood of direct or indirect impacts.
+/-	Development located outside of a recognised ZOI where, in absence of HRA conclusions, the effect of development is uncertain.
0	Development not anticipated to result in adverse impacts on European sites.
+	Development proposals which would be expected to enhance features within a European site.

Notes

Data for SACs from Natural England¹⁰.

It should be noted that the Habitats Regulations Assessment (HRA) will provide further detail relating to potential impacts on European sites within and surrounding the Plan area.

¹⁰ Natural England (2024) Special Areas of Conservation (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/e4142658906c498fa37f0a20d3fdcff_0 [Date accessed: 09/08/24]

Score	Likely impact - SSSI
--	Development coincides with, or is located adjacent to, an SSSI.
-	Within an IRZ which indicates proposed development should be consulted on with Natural England. Likelihood of direct or indirect impacts.
0	Development within an IRZ which does not indicate the proposed development need to consult with Natural England.
+	Development proposals which would enhance features of an SSSI.

Notes

Data for SSSIs and IRZs from Natural England¹¹.

Score	Likely impact - NNR
--	Development coincides with an NNR. Likelihood of direct impacts.
-	Development could potentially result in adverse impacts on an NNR. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on NNRs.
+	Development proposals which would enhance or create an NNR.

Notes

Data for NNRs from Natural England¹².

Score	Likely impact – ancient woodland
--	Development proposal coincides with a stand of ancient woodland. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a stand of ancient woodland. Likelihood of direct or indirect impacts.
0	Development proposal would not be anticipated to impact ancient woodland.
+	Development proposals which would enhance ancient woodland.

Notes

Data for ancient woodlands from Natural England¹³.

¹¹ Natural England (2024) Natural England's Impact Risk Zones for Sites of Special Scientific Interest, 25 July 2024. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date accessed: 09/08/24]

¹² Natural England (2024) National Nature Reserves (England). Available at: <https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england> [Date accessed: 09/08/24]

¹³ Natural England (2024) Ancient Woodland (England). Available at: <https://data.gov.uk/dataset/9461f463-c363-4309-ae77-fdcd7e9df7d3/ancient-woodland-england> [Date accessed: 09/08/24]

Score	Likely impact - SINC
--	Development proposal coincides with a SINC. Likelihood of direct impacts.
-	Development proposal anticipated to result in adverse impacts on a SINC. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SINC.
+	Development proposals which would enhance or create a SINC.

Notes
 Data for SINC's provided by CWC. Including the recently adopted 'Alexander Metals' SINC.

Score	Likely impact - LNR
-	Development proposal could potentially result in adverse impacts on an LNR, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on an LNR.
+	Development proposals which would enhance or create an LNR.

Notes
 Data for LNRs from Natural England¹⁴.
 Adopted Wyrley and Essington Canal LNR data from CWC.

Score	Likely impact - SLINC
-	Development proposal anticipated to result in adverse impacts on a SLINC, such as those which coincide or are located in close proximity. Likelihood of direct or indirect impacts.
0	Development not anticipated to result in adverse impacts on a SLINC.
+	Development proposals which would enhance or create a SLINC.

Notes
 Data for SLINC's provided by CWC.

Score	Likely impact – geological conservation
-	Development proposal anticipated to result in adverse impacts on a geological site, due to location or proximity. Likelihood of direct or indirect impacts.
0	Development proposal not anticipated to result in adverse impacts on a Geological Site.
+	Development proposal anticipated to enhance a geological site.

Notes
 Data for geological sites provided by CWC and data for underlying geological context provided by British Geological Survey.

¹⁴ Natural England (2024) Local Nature Reserves (England). Available at: <https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england> [Date accessed: 09/08/24]

Score	Likely impact – priority habitat
-	Development proposal coincides with a priority habitat.
0	Development proposal does not coincide with a priority habitat.
+	Development proposals which enhance or create a priority habitat.

Notes

Data for priority habitats from Natural England¹⁵.

¹⁵ Natural England (2024) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddab7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date accessed: 09/08/24]

E.5 SA Objective 4: Climate change mitigation

- E.5.1.1 **Box E.5.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 4: Climate change mitigation.
- E.5.1.2 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment of carbon emissions. The 1% principle as set out in **Box E.5.1** is only a coarse precautionary indicator, and greater detail of carbon data would help to better quantify effects.

Box E.5.1: SA Objective 4: Climate change mitigation strategic assessment methodology

Score	Likely impact – carbon emissions
--	Residential-led development which could potentially result in an increase in CO ₂ emissions by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in CO ₂ emissions by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in CO ₂ emissions.
+/-	Non-residential or Gypsy and Traveller development where the carbon emissions produced as a result of the proposed development is uncertain
+	Development proposals which include energy saving or renewable energy technologies. Development proposals which would reduce reliance on private car use, encourage active travel or the use of public transport.

Notes

Figures calculated using UK local authority CO₂ emissions data¹⁶ and the number of people per dwelling¹⁷, such that proposals for 1,162 homes or more are expected to increase carbon emissions by 1% or more in comparison to the current estimates for Wolverhampton.

Proposals for 116 homes or more are expected to increase carbon emissions by 0.1% or more in comparison to current estimates for Wolverhampton.

¹⁶ Department for Energy Security and Net Zero (2024) UK local authority and regional carbon dioxide emissions national statistics: 2005-2022. Available at: <https://www.gov.uk/government/collections/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics> [Date accessed: 09/08/24]

¹⁷ People per Dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock (Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>)

E.6 SA Objective 5: Climate change adaptation

E.6.1.1 **Box E.6.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 5: Climate change adaptation.

E.6.1.2 It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial or surface water flooding.

Box E.6.1: SA Objective 5: Climate change adaptation strategic assessment methodology

Score	Likely impact – Flood Zones
--	Development proposals which coincide with Flood Zone 3.
-	Development proposals which coincide with Flood Zone 2.
+	Development proposals which are located wholly within Flood Zone 1.

Notes	
Data for fluvial flooding has been derived from the latest available Environment Agency Flood Map for Planning (Rivers and Sea) ¹⁸ , such that:	
<ul style="list-style-type: none"> Flood Zone 3: Greater or equal to 1% chance of river flooding in any given year or greater than 0.5% chance of sea flooding in any given year; Flood Zone 2: Between 1% and 0.1% chance of river flooding in any given year or 0.5% and 0.1% chance of sea flooding in any given year; and Flood Zone 1: Less than 0.1% chance of river and sea flooding in any given year. 	

Score	Likely impact – surface water flooding
--	Development proposals which coincide with areas at high risk of surface water flooding.
-	Development proposals which coincide with areas at low and/or medium risk of surface water flooding.
0	Development proposals which are not located in areas determined to be at risk of surface water flooding.
+	Development proposals which include the integration of GI, open space, SUDS or other surface water flood risk alleviating measures

Notes	
Based on the Environment Agency surface water flood risk data ¹⁹ , such that:	
<ul style="list-style-type: none"> High risk: 3.3+% chance of flooding each year; 	

¹⁸ Environment Agency (2024) Flood Map for Planning (Rivers and Sea) – Flood Zone 2 and Flood Zone 3. Available at: <https://www.data.gov.uk/dataset/cf494c44-05cd-4060-a029-35937970c9c6/flood-map-for-planning-rivers-and-sea-flood-zone-2> and <https://www.data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3> [Date accessed: 09/08/24]

¹⁹ Environment Agency (2013) Risk of flooding from surface water. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/297429/LIT_8986_eff63d.pdf [Date accessed: 09/08/24]

Notes

- Medium risk: between 1% - 3.3% chance of flooding each year; and
- Low risk: between 0.1% - 1% chance of flooding each year.

Score Likely impact – Indicative Flood Zone 3b

-- Development proposals which coincide with Indicative Flood Zone 3b.

0 Development proposals which do not coincide with Indicative Flood Zone 3b.

Notes

Data for Indicative Flood Zones produced by JBA Consulting as part of the Level 1 Strategic Flood Risk Assessment (SFRA)²⁰

²⁰ JBA Consulting (2020) The Black Country Authorities Level 1 Strategic Flood Risk Assessment Final Report 25th June 2020. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4h/> [Date accessed: 09/08/24]

E.7 SA Objective 6: Natural resources

- E.7.1.1 **Box E.7.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 6: Natural resources.
- E.7.1.2 In accordance with the core planning principles of the NPPF, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.
- E.7.1.3 The natural resources objective also considers potential effects on mineral resources. Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. There are no Mineral Safeguarding Areas or Areas of Search identified within Wolverhampton in the Black Country Minerals Study²¹; as such all proposed development sites would be expected to have a negligible impact on mineral resources based on the current evidence available.

Box E.7.1: SA Objective 6: Natural resources strategic assessment methodology

Score	Likley impact - previously developed (brownfield) land / land with environmental value
-	Development proposal located on previously undeveloped land and/or land with potential environmental value.
+	Development proposal located on previously developed land with no environmental value.

Notes

Assessment of sites comprising previously developed land is in accordance with the definitions in the NPPF²². Assessment of current land use and potential environmental value has been made through reference to aerial photography using Google Maps. It should be noted that this may not reflect the current status of the site, and the nature / layout of proposed development within the site boundary is unknown, so a degree of uncertainty remains.

Score	Likely impact - ALC
--	Development proposals which are situated on Grade 1, 2, or 3 ALC land comprising 20ha or more.
-	Development proposals which are situated on Grade 1, 2 or 3a ALC land comprising less than 20ha.
0	Development proposals located on previously undeveloped land with no environmental value.
+	Development proposals which are situated on Grade 4 and 5 ALC land, or land classified as 'urban' or 'non-agricultural'.

²¹ wood (2020) Review of the Evidence Base for Minerals to support preparation of the Black Country Plan. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4f/> [Date accessed: 09/08/24]

²² DLUHC (2023) National Planning Policy Framework. December 2023. Available at: https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf [Date accessed: 09/08/24]

Notes

ALC data available from Natural England²³. Where Grade 3 data is not sub-divided into 3a or 3b, it is assumed that 3a is present.

A 20ha threshold has been used based on Natural England guidance²⁴.

²³ Natural England (2019) Agricultural Land Classification (ALC) (England). Available at: https://naturalengland-defra.opendata.arcgis.com/datasets/5d2477d8d04b41d4bbc9a8742f858f4d_0?geometry=-3.131%2C52.513%2C-0.667%2C53.094 [Date accessed: 09/08/24]

²⁴ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date accessed: 09/08/24]

E.8 SA Objective 7: Pollution

E.8.1.1 **Box E.8.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 7: Pollution.

E.8.1.2 The assessment under this objective considers the potential for reasonable alternative sites to generate pollution associated with the construction and occupation of new development, as well as the potential to expose site end users to existing sources of pollution.

Box E.8.1: SA Objective 7: Pollution strategic assessment methodology

Score	Likely impact - AQMA
-	All development proposals in Wolverhampton are located within an AQMA.
Notes	
UK AQMA data available from Defra ²⁵ .	

Score	Likely impact – main road
-	Development proposals located within 200m of a main road.
0	Development proposals located over 200m from a main road.
+	Development proposals which would help to reduce the number of cars used, promote the use of public transport and active travel and reduce congestion on nearby roads.

Notes	
Road data available from the Ordnance Survey ²⁶ .	
A 200m buffer distance from main roads (motorways and A-roads) has been used, in line with the Department for Transport guidance ²⁷ .	

Score	Likely impact – Water quality
-	Development proposals located within 10m of a watercourse.
+/-	Development proposals located over 10m from a watercourse.
+	Development proposal includes integration of GI or the naturalisation of watercourses.

Notes	
Watercourse mapping data available from the Ordnance Survey ²⁸ .	

²⁵ Department for Environment Food and Rural Affairs (2024) UK Air Information Resource. Available at: <https://uk-air.defra.gov.uk/aqma/maps/> [Date accessed: 09/08/24]

²⁶ Ordnance Survey (2024) OS Open Roads. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-roads> [Date accessed: 09/08/24]

²⁷ Department for Transport (2024) TAG unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 09/08/24]

²⁸ Ordnance Survey (2024) OS Open Rivers. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-rivers> [Date accessed: 09/08/24]

Notes

A 10m buffer zone from a watercourse in which no works, clearance, storage or run-off should be permitted has been used as per available guidance²⁹³⁰.

Score	Likely impact – groundwater SPZ
-	Development proposal coincides with a groundwater SPZ.
0	Development proposal does not coincide with a groundwater SPZ.

Notes

SPZ data available from the Environment Agency³¹. Groundwater source catchments are divided into three zones:

- Inner Zone (Zone I) – 50-day travel time from any point below the water table to the source;
- Outer Zone (Zone II) – 400-day travel time; and
- Total Catchment (Zone III) – within which all groundwater recharge is presumed to be discharged at the source.

Score	Likley impact – increase in air pollution
--	Development proposals which could potentially result in a significant increase in air pollution.
-	Development proposals which could potentially result in a minor increase in air pollution.
0	Development would be expected to result in a negligible increase in air pollution.
+/-	The air pollution likely to be generated as a result of development proposals is uncertain. Including development proposals for Gypsy and Traveller use.

Notes

It is assumed that development would result in an increase in traffic and thus traffic generated air pollution. Residential sites proposed for the development of between ten and 99 dwellings would therefore be expected to have a minor negative impact on local air pollution³². Residential sites proposed for the development of 100 dwellings or more would be expected to have a major negative impact. Employment sites which propose the development of between 1ha and 9.9ha of employment space would be expected to have a minor negative impact and sites which propose 10ha or more would be expected to have a major negative impact.

Where a site is proposed for the development of nine dwellings or less, or for 0.99ha of employment floorspace or less, a negligible impact on local air quality would be anticipated.

²⁹ DAERA (2019) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date accessed: 09/08/24]

³⁰ Wild Trout Trust. Buffer Zones. Available at: <https://www.wildtrout.org/content/buffer-zones> [Date accessed: 09/08/24]

³¹ Environment Agency (2024) Source Protection Zones. Available at: <https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged> [Date accessed: 09/08/24]

³² Institute of Air Quality Management (2017) Land-Use Planning & Development Control: Planning for Air Quality. Paragraph 5.8. Available at: <https://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf> [Date accessed: 09/08/24]

E.9 SA Objective 8: Waste

E.9.1.1 **Box E.9.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 8: Waste.

E.9.1.2 It should be noted that the appraisal of the reasonable alternatives is limited in its assessment against waste. The 1% principle as set out in **Box E.9.1** is only a coarse precautionary indicator, and greater detail of waste data would help to better quantify effects. The amount and type of waste produced will vary depending upon the specific site circumstances and end use and may have differing implications for the management of waste; such detail is not available to inform the assessment of reasonable alternative sites.

Box E.9.1: SA Objective 8: Waste strategic assessment methodology

Score	Likley impact - waste
--	Residential-led development which could potentially result in an increase in household waste generation by 1% or more in comparison to current levels.
-	Residential-led development which could potentially result in an increase in household waste generation by 0.1% or more in comparison to current levels.
0	Development would be expected to result in a negligible increase in household waste generation.
+/-	The waste generated as a result of development proposals for non-residential or Gypsy and Traveller use is uncertain.
+	Development proposals which include provision of waste and recycling storage.
++	Development proposals for waste or recycling facilities.

Notes

Figures calculated using UK local authority household waste data³³ and the number of people per dwelling³⁴, such that proposals for 1,328 homes or more are expected to increase household waste generation by 1% or more in comparison to the current estimates for Wolverhampton.

Proposals for 133 homes or more are expected to increase household waste generation by 0.1% or more in comparison to current estimates for Wolverhampton.

³³ DEFRA (2024) Statistics on waste managed by local authorities in England in 2022/23. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results> [Date accessed: 09/08/24]

³⁴ People per dwelling has been calculated using the 2021 Census population estimates (Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021>) and dwelling stock Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date accessed: 09/08/24]

E.10 SA Objective 9: Transport and accessibility

E.10.1.1 **Box E.10.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 9: Transport and accessibility.

Box E.10.1: SA Objective 9: Transport and accessibility strategic assessment methodology

Score	Likely impact – access to bus stop
-	Development proposals where the majority of the site is located over 400m from a bus stop
+	Development proposals where the majority of the site is located within 400m of a bus stop
Notes	
Bus stop data available from Transport for West Midlands ³⁵ . Target distance of 400m to a bus stop in line with Barton <i>et al.</i> sustainable distances ³⁶ .	

Score	Likley impact – access to railway or metro station
-	Development proposals where the majority of the site is located over 2km from a railway or metro station.
+	Development proposals where the majority of the site is located within 2km of a railway or metro station.
Notes	
Railway station data available from Transport for West Midlands. Target distance of 2km to a railway station in line with Barton <i>et al.</i> sustainable distances.	

Score	Likely impact – pedestrian access
-	Development proposals located in areas which currently have poor access to the surrounding footpath network.
+	Development proposals which are well connected to the existing footpath network and would be expected to provide safe access for pedestrians.
Notes	
Assessment of proximity to existing footpaths has been made through reference to aerial photography and the use of Google Maps ³⁷ .	

³⁵ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 09/08/24]

³⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

³⁷ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

Score	Likely impact – road access
-	Development proposals located in areas which currently have poor access to the surrounding road network.
+	Development proposals which are adjacent to an existing road.
Notes	
Assessment of proximity to existing roads has been made through reference to aerial photography and the use of Google Maps ³⁸ .	

Score	Likely impact – pedestrian access to local services
-	Development proposals where the majority of the site is located over a 15-minute walk to local services.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to local services.
++	Development proposals where the majority of the site is located within a 10-minute walk to local services.

Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food and centres) provided by CWC.	

Score	Likely impact – public transport access to local services
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to local services.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to local services.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to local services.

Notes	
Data on fresh food centre locations and accessibility modelling (travel time to fresh food centres) provided by CWC.	

³⁸ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

E.11 SA Objective 10: Housing

E.11.1.1 **Box E.11.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 10: Housing.

Box E.11.1: SA Objective 10: Housing strategic assessment methodology

Score	Likely impact – provision of housing
--	Development proposals which result in a significant net decrease in housing (of 100 dwellings or more).
-	Development proposals which result in a minor net decrease in housing (of between one and 99 dwellings).
0	Development proposals would not impact housing provision.
+	Development proposals resulting in a minor net gain in housing (of between one and 99 dwellings).
++	Development proposals resulting in a significant net gain in housing (of 100 dwellings or more).

Notes
Estimated housing capacity provided by CWC. At this stage of the assessment process, information is not available relating to the specific housing mix / type that would be delivered through each reasonable alternative site, including potential for development of affordable homes. It is assumed that development options will provide a good mix of housing type and tenure opportunities.

E.12 SA Objective 11: Equality

E.12.1.1 **Box E.12.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 11: Equality.

Box E.12.1: SA Objective 11: Equality strategic assessment methodology

Score	Likely impact- Index of Multiple Deprivation
-	Development proposals within most deprived 10 percent LSOAs in England. Development proposals would result in the loss of affordable housing, community services or could potentially increase crime/the fear of crime in the area.
0	Development proposals outside most deprived 10 percent LSOAs in England. Development proposals would be expected to have no significant impact on equality.
+	Development proposals would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area.
Notes	
UK Indices of Multiple Deprivation (IMD) available from MHCLG ³⁹ . It should be noted that there is a degree of uncertainty in regard to the impacts of each site on deprivation and equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.	

³⁹ MHCLG (2019) Indices of Multiple Deprivation (IMD). Available at: <http://data-communities.opendata.arcgis.com/datasets/indices-of-multiple-deprivation-imd-2019-1?geometry=-2.688%2C52.422%2C-1.456%2C52.714> [Date accessed: 09/08/24]

E.13 SA Objective 12: Health

E.13.1.1 **Box E.13.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 12: Health.

E.13.1.2 In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the Local Plan should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure facilities and a diverse range of accessible natural habitats and the surrounding PRoW network.

E.13.1.3 It should be noted that healthcare capacity information has not been available; the assessment is based on accessibility alone.

Box E.13.1: SA Objective 12: Health strategic assessment methodology

Score	Likely impact – NHS hospital
-	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.
+	Development proposals where the majority of the site is located over 5km from an NHS hospital providing an A&E service.

Notes

NHS hospital department data available from the NHS website⁴⁰, and local hospital data provided by CWC. The target distance of 5km to an NHS hospital with and A&E service has been used in line with Barton et al. sustainable distances⁴¹.

Score	Likely impact – pedestrian access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute walk to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute walk to a healthcare location.

Notes

Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.

⁴⁰ NHS (2024) NHS hospitals overview. Available at: <https://www.nhs.uk/service-search/other-services/Accident-and-emergency-services/LocationSearch/428> [Date accessed: 09/08/24]

⁴¹ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Score	Likely impact – public transport access to GP surgery
-	Development proposals where the majority of the site is located over a 15-minute travel time via public transport to a healthcare location.
+	Development proposals where the majority of the site is located over a 10-minute travel time but within a 15-minute travel time via public transport to a healthcare location.
++	Development proposals where the majority of the site is located within a 10-minute travel time via public transport to a healthcare location.
Notes	
Data on healthcare locations and accessibility modelling (travel time to healthcare) provided by CWC.	

Score	Likely impact – access to / net loss of greenspace
-	Development proposals which coincide with greenspace. Development proposals where the majority of the site is located over 600m from greenspace.
0	Development proposals do not coincide with greenspace.
+	Development proposals where the majority of the site is located within 600m of a greenspace.
Notes	
Assessment of proximity to/net loss of greenspaces based on Ordnance Survey Open Greenspaces ⁴² . It is assumed that these greenspaces are publicly accessible. The target distance of 600m to a public greenspace has been used in line with Barton et al. sustainable distances ⁴³ .	

Score	Likely impact – access to PRow / cycle routes
-	Development proposals where the majority of the site is located over 600m from a PRow and cycle route.
+	Development proposals where the majority of the site is located within 600m from a PRow and/or cycle route.
Notes	
PRow data provided by CWC. Strategic cycle route data available from Transport for West Midlands ⁴⁴ . The target distance of 600m to a footpath or cycle path has been used in line with Barton <i>et al.</i> sustainable distances.	

⁴² Ordnance Survey (2024) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 09/08/24]

⁴³ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁴⁴ Transport for West Midlands (2021) Transport for West Midlands Data Portal. Available at: <https://data-tfwm.opendata.arcgis.com/> [Date accessed: 09/08/24]

E.14 SA Objective 13: Economy

E.14.1.1 **Box E.14.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 13: Economy.

Box E.14.1: SA Objective 13: Economy strategic assessment methodology

Score	Likely impact – pedestrian access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute walk to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute walk but within a 30-minute walk to a key employment location.
++	Residential development proposals where the majority of the site is located within a 25-minute walk to a key employment location

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – public transport access to employment opportunities
-	Residential development proposals where the majority of the site is located over a 30-minute travel time via public transport to a key employment location.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 25-minute travel time but within a 30-minute travel time via public transport to a key employment location.

Notes

Data on key employment locations and accessibility modelling (travel time to employment) provided by CWC.

Score	Likely impact – employment floorspace
--	Development proposals which result in a significant net decrease in employment floorspace.
-	Development proposals which result in a minor net decrease in employment floorspace.
0	Development proposals would not impact employment floorspace.
+/-	It is uncertain whether the proposed development would result in a net change in employment floorspace.
+	Development proposals which result in a minor net increase in employment floorspace.
++	Development proposals which result in a significant net increase in employment floorspace.

Notes

Assessment of current land use has been made through reference to aerial photography and Google Maps⁴⁵.

⁴⁵ Google Maps (2024) Available at: <https://www.google.co.uk/maps>

E.15 SA Objective 14: Education, skills and training

E.15.1.1 **Box E.15.1** sets out the specific methodology used to appraise the reasonable alternative sites against SA Objective 14: Education, skills and training.

Box E.15.1: SA Objective 14: Education, skills and training strategic assessment methodology

Score	Likely impact – pedestrian access to primary school
-	Residential development proposals where the majority of the site is located over a 15-minute walk to a primary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 10-minute walk but within a 15-minute walk to a primary school.
++	Residential development proposals where the majority of the site is located within a 10-minute walk to a primary school.
Notes	
Data on primary school locations and accessibility modelling (travel time to primary schools) provided by CWC.	

Score	Likely impact – pedestrian access to secondary school
-	Residential development proposals where the majority of the site is located over a 25-minute walk to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute walk but within a 25-minute walk to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute walk to a secondary school.
Notes	
Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.	

Likely impact – public transport access to secondary school	
-	Residential development proposals where the majority of the site is located over a 25-minute travel time via public transport to a secondary school.
0	Development proposals for non-residential use.
+	Residential development proposals where the majority of the site is located over a 20-minute travel time via public transport but within a 25-minute travel time via public transport to a secondary school.
++	Residential development proposals where the majority of the site is located within a 20-minute travel time via public transport to a secondary school.
Notes	
Data on secondary school locations and accessibility modelling (travel time to secondary schools) provided by CWC.	

Appendix F: Reasonable Alternative Site Assessments (Pre-Mitigation)

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F.1 Introduction

F.1.1 Overview

F.1.1.1 The purpose of this appendix is to provide an up-to-date assessment of the reasonable alternative sites considered in the Sustainability Appraisal (SA) process for the Wolverhampton Local Plan (WLP). It provides an update to, and supersedes, Appendix C of the Regulation 18 SA Report¹.

F.1.2 Regulation 18 SA of the WLP: Issues and Preferred Options (Jan 2024)

F.1.2.1 At the previous stage of plan making, a total of 48 reasonable alternative sites were identified by the City of Wolverhampton Council (CWC) and assessed within the accompanying SA Report, which included:

- 22 sites proposed for residential use;
- 25 sites proposed for employment use; and
- One site proposed for Gypsy and Traveller use.

F.1.3 Regulation 19 SA Report (this report)

F.1.3.1 At the Regulation 19 stage of plan making, there are now a total of 40 reasonable alternative sites, following the removal of 14 sites and addition of six new sites since the Regulation 18 stage. These sites are shown on **Figures F.1.1, F.1.2 and F.1.3** with details provided in **Table F.1.1**.

F.1.3.2 Following the Regulation 18 consultation in early 2024, CWC have identified a further six reasonable alternative sites (Sites H7, H18, H24a, H24b, H24c and H24d all for residential use) and provided updated information to five reasonable alternative sites assessed at Regulation 18 (Sites H1, H3, H4, E17 and E7).

F.1.3.3 CWC have identified that 14 of the sites assessed and presented within the Regulation 18 SA are no longer considered to be reasonable alternative sites. This affects the following sites, listed by their former references from the Regulation 18 stage:

- Site E01 'Wolverhampton Business Park' – site now has planning permission.
- Site E02 'Rear of IMI Marstons, Wobaston Road' – site now has planning permission.
- Site E03 'Shaw Road' – site is now built out.
- Site E04 'Former Strykers, Bushbury Lane' – site now has planning permission.
- Site E05 'Gas Holder Site, Wolverhampton Science Park' – site is now built out.
- Site E08 'Cross Street North / Crown Street' – site now has planning permission.
- Site E09 'Bentley Bridge Business Park, Well Lane, Wednesfield' – site is now built out.

¹ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan. Regulation 18: Issues and Preferred Options, January 2024. Available at: https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Sustainability%20Appraisal%20WLP%20IPO%202024_0.pdf [Date accessed: 06/08/24]

- Site E10 'Tata Steel, Wednesfield' – site is now built out.
- Site E11 'Phoenix Road, Wednesfield' – site is now built out.
- Site E19 'Rolls Royce Playing Fields, Spring Road' – site is now built out.
- Site H7 'Dudley Road / Bell Place, Blakenhall – site now has planning permission.
- Site H8 'Former Royal Hospital, All Saints' – site now has planning permission.
- Site H16 'Former Northcote Secondary School, Northwood Park Road' – site is now under construction.
- Site H17 'Beckminster House, Beckminster Road – site now has planning permission and is too small to allocate.

F.1.3.4 Each of the sites appraised within this report have been assessed for likely impacts on each of the 14 SA Objectives, as outlined in the SA Framework (see **Appendix B**). Likely sustainability impacts have been set out in **Tables F.2.1 – F.14.1** within each SA Objective chapter, in accordance with the topic-specific methodology set out in **Appendix E**.

F.1.3.5 All reasonable alternative sites have been considered in the same way during the SA process using the SA Framework, irrespective of their size or location. The assessments have been carried out using the red line boundary and site proposal information provided by CWC, as set out in **Table F.1.1**. The receptor-only impacts help to identify the potential impacts on site if there were no policy or mitigation. Mitigation information, drawing on the provisions of the WLP policies, is presented in **Appendix H**.

F.1.3.6 It should be noted that whilst every effort has been made to predict effects accurately, the sustainability impacts have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by CWC, as well as expert judgement.

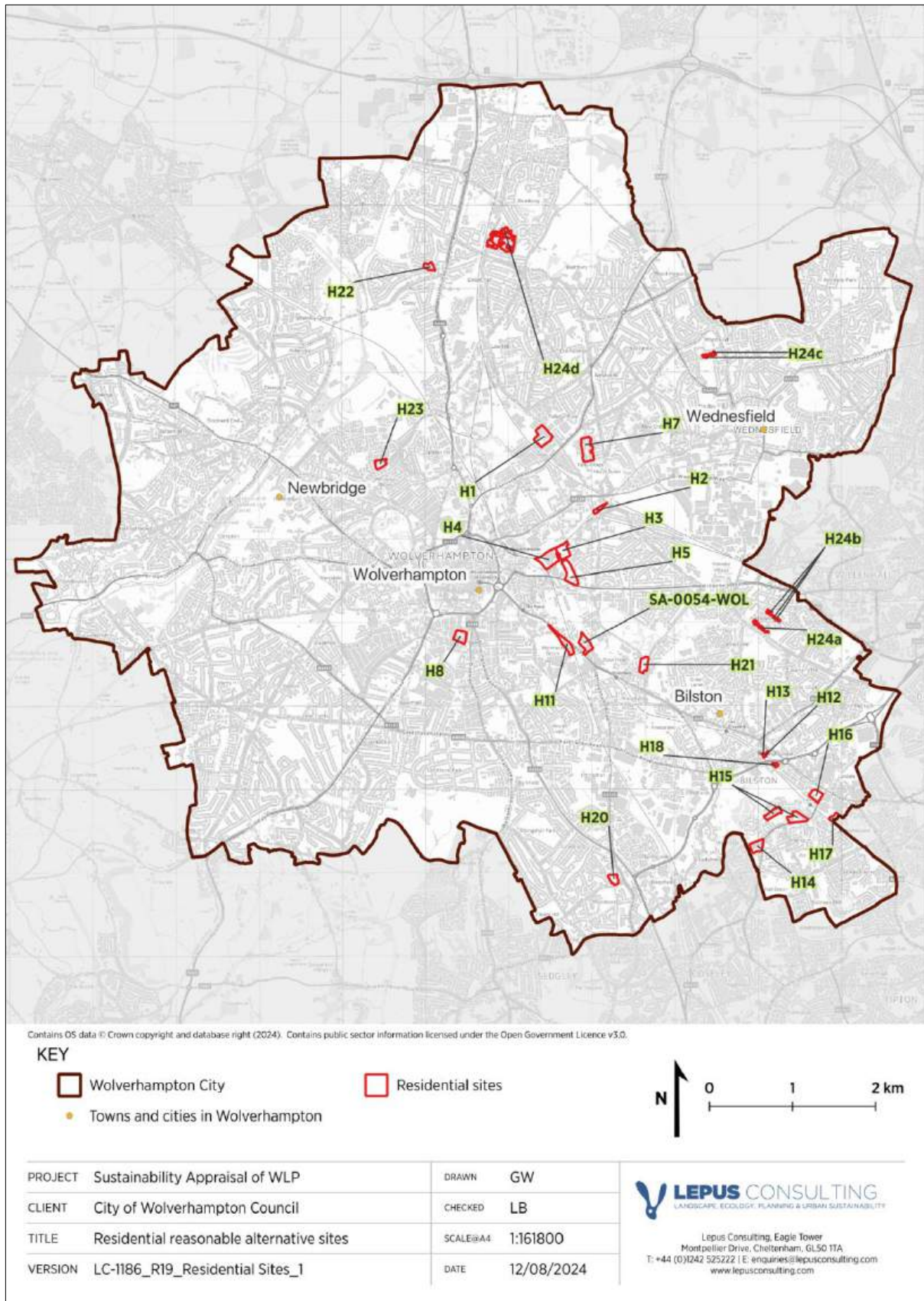


Figure F.1.1: Reasonable alternative sites proposed for residential use in Wolverhampton

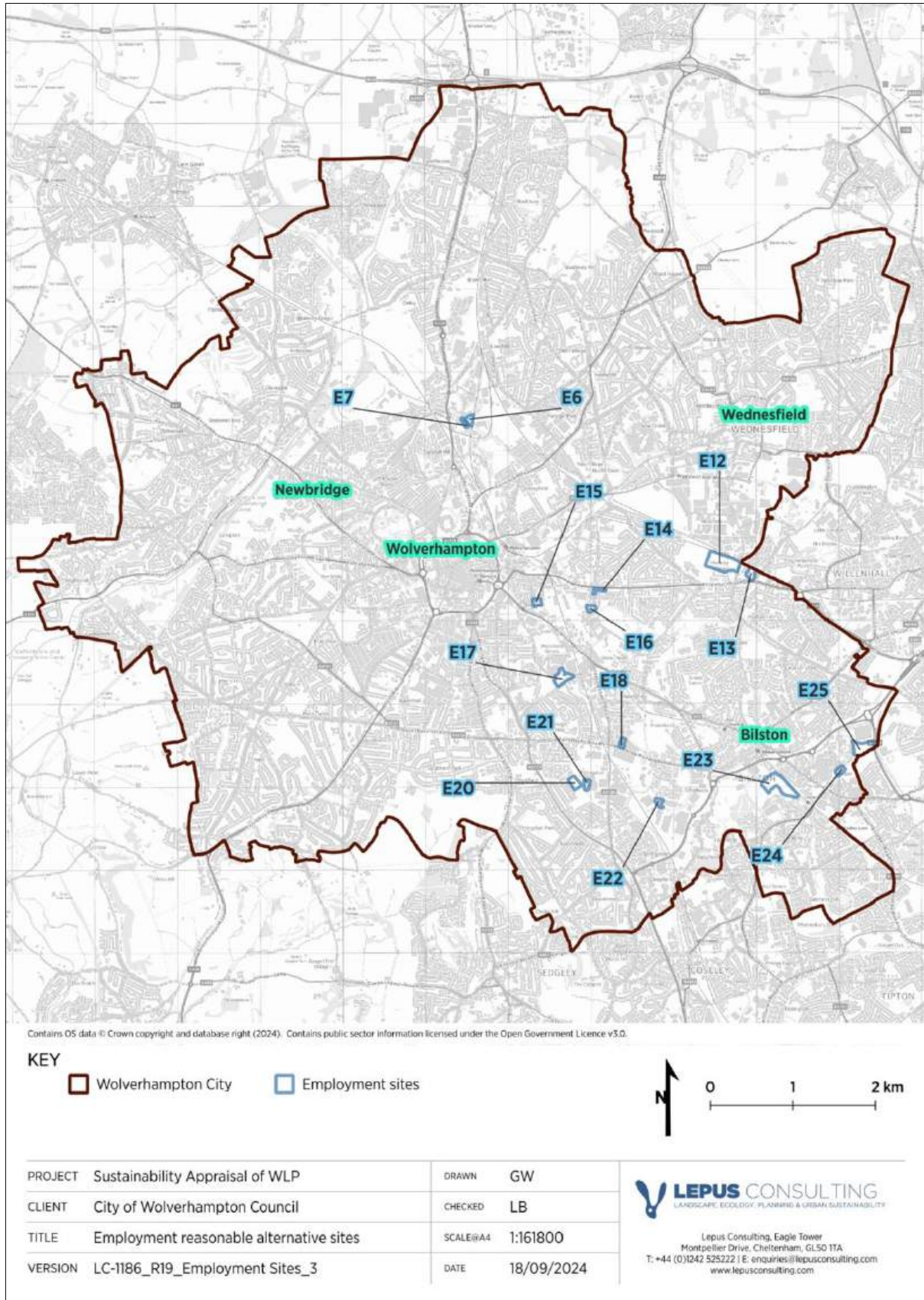


Figure F.1.2: Reasonable alternative sites proposed for employment use in Wolverhampton

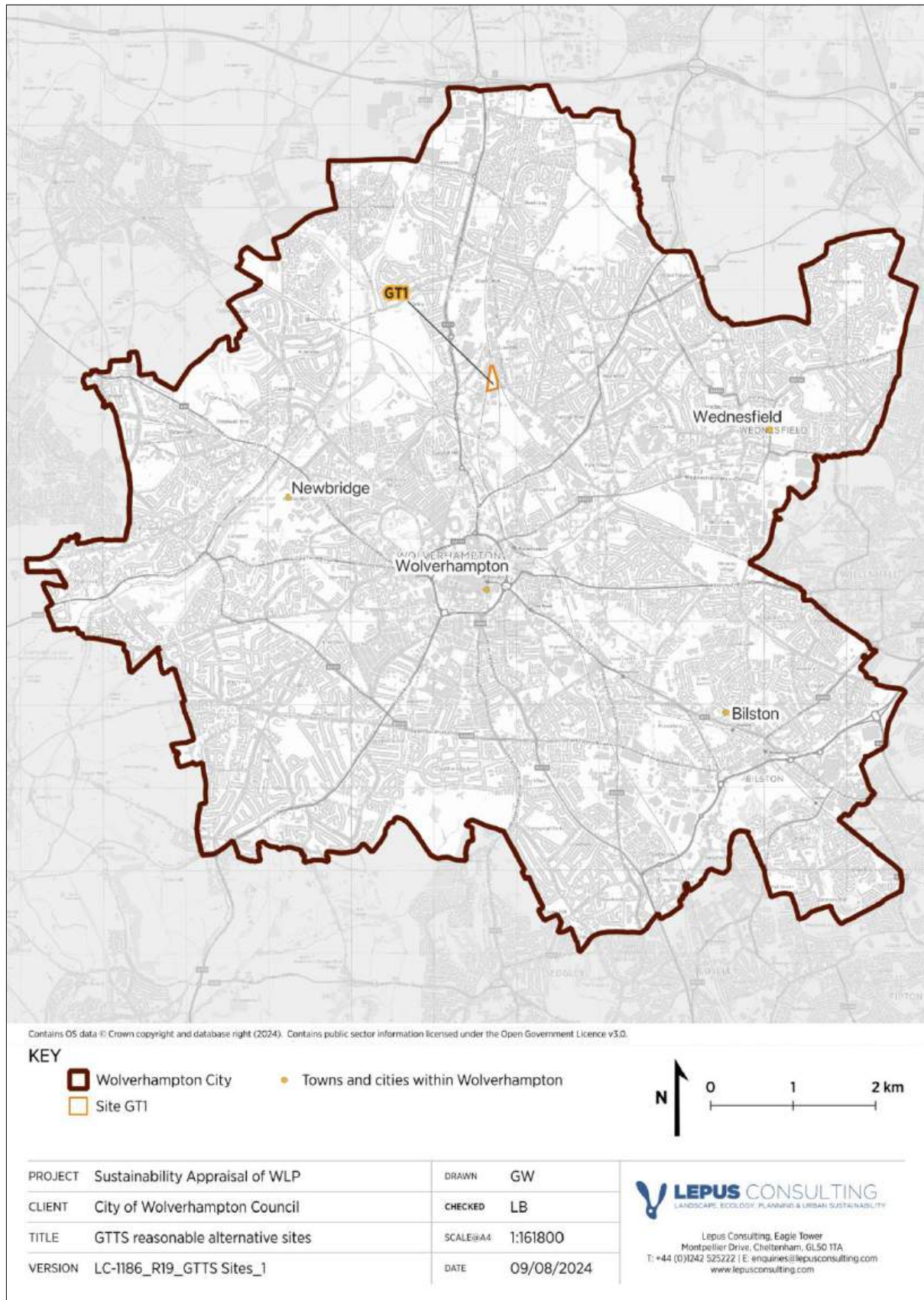


Figure F.1.3: Reasonable alternative sites proposed for Gypsy and Traveller use in Wolverhampton

Table F.1.1: Reasonable alternative sites in Wolverhampton (orange sites = amended from R18 and blue sites = new R19 sites)

Site reference	Site ref at R18 (if different)	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
H1		Blue Bird Industrial Estate and site to rear, Park Lane	3.10	Residential	130
H2		Former G & P Batteries Site, Grove Street, Heath Town	0.79	Residential	56
H3		East of Qualcast Road	2.00	Residential	101
H4		West of Qualcast Road	3.25	Residential	119
H5		West of Colliery Road	2.00	Residential	90
H7		New Park Village Housing Renewal (Elerton Walk)	3.26	3.26	-10 net (181 gross)
H8	H6	Dobbs Street, Blakenhall	1.35	Residential	266
H11	H9	Delta Trading Estate, Bilston Road	2.00	Residential	80
H12	H10	Land at Hall Street / The Orchard, Bilston Town Centre	0.12	Residential	21
H13	H11	Former Pipe Hall, The Orchard, Bilston Town Centre	0.13	Residential	38
H14	H12	Lane Street / Highfields Road, Bradley	1.79	Residential	72
H15	H13	Greenway Road, Bradley	4.00	Residential	180
H16	H14	Former Loxdale Primary School, Chapel Street, Bradley	1.30	Residential	100
H17	H15	South of Oxford Street, Bilston	0.45	Residential	20
H18		Land at Railway Drive, Bilston	0.28	Residential	47
H20	H18	Former Rookery Lodge, Woodcross Lane	0.25	Residential	16
H21	H19	Former Stowheath centres. Stowheath Lane	1.00	Residential	53
H22	H20	Former Probert Court / Health Centre, Probert Road	0.88	Residential	35
H23	H21	Former Gym, Craddock Street	1.20	Residential	48
H24a		Tarrans Housing Renewal (Portobello – Arnhem Road)	0.48	Residential	9 net (15 gross)
H24b		Tarrans Housing Renewal (Portobello – Alamein Road)	0.42	Residential	1 net (12 gross)
H24c		Tarrans Housing Renewal (Wood End – Orchard Road)	0.32	Residential	1 net (12 gross)
H24d		Tarrans Housing Renewal (Lincoln Green)	4.24	Residential	1 net (99 gross)
SA-0054-WOL		Sites at Sutherland Avenue / Cooper Street	1.50	Residential	100-150
E6		Mammoth Drive, Wolverhampton Science Park	0.80	Employment	N/A
E7		Stratosphere Site, Wolverhampton Science Park	0.42	Employment	N/A
E12		Land at Neachells Lane	6.70	Employment	N/A
E13		Land rear of Key Line Builders, Neachells Lane / Noose Lane	1.20	Employment	N/A

Site reference	Site ref at R18 (if different)	Site address	Gross area (ha)	Site use	Housing capacity (if applicable)
E14		Chillington Fields	0.60	Employment	N/A
E15		Powerhouse, Commercial Road	0.90	Employment	N/A
E16		Hickman Avenue	0.70	Employment	N/A
E17		Former MEB Site, Major Street / Dixon Street	2.50	Employment	N/A
E18		Millfields Road, Ettingshall	0.70	Employment	N/A
E20		South of Inverclyde Drive	1.40	Employment	N/A
E21		Rear of Spring Road	0.70	Employment	N/A
E22		Springvale Avenue	0.70	Employment	N/A
E23		Bilston Urban Village, Bath Street	6.00	Employment	N/A
E24		Dale Street, Bilston	0.90	Employment	N/A
E25		South of Citadel Junction, Murdoch Road, Bilston	3.20	Employment	N/A
GT1		Former Bushbury Reservoir, Showell Road	0.30	Gypsy and Traveller	12 pitches

F.2 SA Objective 1: Cultural Heritage

F.2.1 Grade I Listed Buildings

F.2.1.1 There are two Grade I Listed Buildings in Wolverhampton, 'Wightwick Manor' and 'Church of St Peter'. All of the reasonable alternative sites are over 800m in distance from the Grade I Listed Buildings and would be unlikely to significantly impact either of the buildings or their settings. Therefore, a negligible impact has been identified for these sites.

F.2.2 Grade II* Listed Buildings

F.2.2.1 There are 22 Grade II* Listed Buildings within Wolverhampton, including 10 within Wolverhampton city centre, with the rest located within the wider city boundary. All reasonable alternative sites are more than 200m from these listed buildings and are separated from them by existing built form. The proposed development at all reasonable alternative sites is therefore unlikely to significantly impact any Grade II* Listed Buildings and a negligible impact has been identified.

F.2.3 Grade II Listed Buildings

F.2.3.1 There are over 350 Grade II Listed Buildings throughout Wolverhampton, with particular concentrations within the city centre and Tettenhall, and along the canal network. Site H13 coincides with the Grade II Listed Building 'Pipe Hall' (listed as 'Top Cats Night Spot'). Despite the likely retention (and opportunities for sensitive redevelopment) of the Grade II Listed Building, in line with the precautionary principle it is considered that the proposed development at the site could potentially have a direct major negative impact on the Grade II Listed Building. A further four reasonable alternative sites (Sites E6, E7, H8 and H12) are either adjacent to or in close proximity (within 20m) to various Grade II Listed Buildings. The proposed development at these four sites could potentially have a minor negative impact on the settings of these Grade II Listed Buildings. Although some further reasonable alternative sites lie in relatively close proximity to listed buildings (e.g., Sites H4, H11 and H13 within 100m), the remaining reasonable alternative sites are likely to have a negligible impact on the setting of Grade II Listed Buildings, primarily due to being separated by existing built form.

F.2.4 Conservation Area

F.2.4.1 Wolverhampton contains 31 Conservation Areas (CAs), the majority of which cover sections of the urban area, as well as portions of the canal network and historic open spaces. The proposed development at the majority of the reasonable alternative sites is unlikely to significantly impact any of these CAs, as the sites are separated from nearby CAs by existing built form. However, four sites are located wholly or partially within one of these CAs, including three residential sites (H12, H13 and H14) and one employment site (E15). Sites H12 and H13 are located wholly within 'Bilston Town Centre' CA, Site H14 is partially located within 'Bilston Canal Corridor' CA and Site E15 is located wholly within the 'Bilston Canal Corridor' CA. A further 10 sites are located adjacent or in close proximity to a CA. Therefore, the proposed development at these 14 sites could potentially result in a minor negative impact on the character or setting of CAs in Wolverhampton.

F.2.5 Scheduled Monument

F.2.5.1 There are four Scheduled Monuments (SMs) within Wolverhampton, all of which cover small historical features. All reasonable alternative sites are over 800m from the nearest SMs, separated by existing built form, and therefore, the proposed development at these sites will be expected to result in a negligible impact on the setting of SMs.

F.2.6 Registered Park and Garden

F.2.6.1 Two Registered Parks and Gardens (RPGs) can be found within Wolverhampton: 'West Park' and 'Wightwick Manor' RPGs. All reasonable alternative sites are over 200m from nearby RPGs and separated by existing built form, and therefore, the proposed development at these sites will be expected to result in a negligible impact on the setting of RPGs.

F.2.7 Archaeological Priority Area

F.2.7.1 Archaeological Priority Areas (APAs) have been identified throughout Wolverhampton, mainly found in the urban areas, where the potential for archaeological remains to be present is considered medium to high. Three reasonable alternative sites coincide wholly or partially with APAs (H12, H13 and E16). The proposed development at these three sites could potentially impact on any archaeological remains, should they be present, and as a result have a minor negative impact on the historic environment.

F.2.7.2 The remaining sites are not located in close proximity to APAs, and whilst a negligible impact is identified in the scoring matrix, it is acknowledged some sites may also have potential for locally significant archaeology to be present that should be explored prior to development.

F.2.8 Historic Landscape Characterisation

F.2.8.1 The Black Country Historic Landscape Characterisation (HLC) Study² has identified a range of Historic Environment Area Designations within the Black Country. In Wolverhampton, these designations are mainly restricted to the small parcels of Green Belt as well as a number of locations within the urban areas with high historic value.

F.2.8.2 Four reasonable alternative sites are located wholly or partially within an Area of High Historic Landscape Value (AHHLV) or High Historic Townscape Value (AHHTV): Sites H1, H8, H14 and H24d. The proposed development at these four sites could potentially result in a minor negative impact on the surrounding historic environment. The remaining sites do not coincide with any identified areas of high historic value, and therefore, will be expected to have a negligible impact on the local historic environment.

² Oxford Archaeology (2019) Black Country Historic Landscape Characterisation Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13895/comp_black-country-hlc-final-report-30-10-2019-lr_redacted.pdf [Date accessed: 07/08/24]

Table F.2.1: Sites impact matrix for SA Objective 1 – Cultural heritage

Site use	Site ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Residential	H1	0	0	0	0	0	0	0	-
Residential	H2	0	0	0	0	0	0	0	0
Residential	H3	0	0	0	-	0	0	0	0
Residential	H4	0	0	0	-	0	0	0	0
Residential	H5	0	0	0	-	0	0	0	0
Residential	H7	0	0	0	0	0	0	0	0
Residential	H8	0	0	-	0	0	0	0	-
Residential	H11	0	0	0	-	0	0	0	0
Residential	H12	0	0	-	-	0	0	-	0
Residential	H13	0	0	--	-	0	0	-	0
Residential	H14	0	0	0	-	0	0	0	-
Residential	H15	0	0	0	-	0	0	0	0
Residential	H16	0	0	0	0	0	0	0	0
Residential	H17	0	0	0	0	0	0	0	0
Residential	H18	0	0	0	0	0	0	0	0
Residential	H20	0	0	0	0	0	0	0	0
Residential	H21	0	0	0	0	0	0	0	0
Residential	H22	0	0	0	0	0	0	0	0
Residential	H23	0	0	0	0	0	0	0	0
Residential	H24a	0	0	0	0	0	0	0	0
Residential	H24b	0	0	0	0	0	0	0	0
Residential	H24c	0	0	0	0	0	0	0	0
Residential	H24d	0	0	0	0	0	0	0	-
Residential	SA-0054-WOL	0	0	0	0	0	0	0	0
Employment	E6	0	0	-	-	0	0	0	0
Employment	E7	0	0	-	-	0	0	0	0
Employment	E12	0	0	0	0	0	0	0	0
Employment	E13	0	0	0	0	0	0	0	0
Employment	E14	0	0	0	0	0	0	0	0
Employment	E15	0	0	0	-	0	0	0	0
Employment	E16	0	0	0	0	0	0	-	0
Employment	E17	0	0	0	-	0	0	0	0
Employment	E18	0	0	0	-	0	0	0	0
Employment	E20	0	0	0	0	0	0	0	0
Employment	E21	0	0	0	0	0	0	0	0
Employment	E22	0	0	0	0	0	0	0	0
Employment	E23	0	0	0	-	0	0	0	0
Employment	E24	0	0	0	0	0	0	0	0
Employment	E25	0	0	0	0	0	0	0	0
G&T	GT1	0	0	0	0	0	0	0	0

F.3 SA Objective 2: Landscape

F.3.1 Landscape sensitivity

- F.3.1.1 The Black Country Landscape Sensitivity Assessment³ identified the extent to which the character and quality of Black Country Green Belt land is susceptible to change as a result of future development. In Wolverhampton, Green Belt is restricted mainly to the north and west, and alongside the Smestow Brook and the Staffordshire and Worcestershire Canal. All 40 reasonable alternative sites identified for the WLP lie outside of the Green Belt, and as such outside of the Landscape Sensitivity Assessment study area. Therefore, the potential effects of each site on sensitive landscapes are scored as uncertain.
- F.3.1.2 Information relating to the historic environment which has strong links with landscapes/townscapes in Wolverhampton, including the Historic Landscape Characterisation and associated designations, has been assessed under SA Objective 1 (Cultural Heritage) (see **Chapter F.2**).

F.3.2 Views from the PRoW network

- F.3.2.1 Wolverhampton's PRoW network is fragmented, with the majority of remaining footpaths found in the Green Belt parcels. The proposed development at four reasonable alternative sites (H2, E12, E25 and GT1), could potentially alter the views of open space currently experienced by users of the PRoW network, and result in a minor negative impact on the landscape. Sites which contain existing development, or are separated from PRoWs by existing built form, would be unlikely to significantly alter views and are assessed as negligible.

F.3.3 Views from local residents

- F.3.3.1 The development proposed at a large proportion of reasonable alternative sites are considered to have the potential to alter the views currently experienced by local residents primarily due to their location with respect to existing residential zones. Therefore, a minor negative impact on the local landscape could be expected at these 15 sites. The remaining sites comprise previously developed land and/or are located away from existing residential zones; therefore, the proposed development at these sites would be unlikely to result in a significant change to views.

³ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at:
https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 07/08/24]

Table F.3.1: Sites impact matrix for SA Objective 2 – Landscape

Site use	Site reference	Landscape sensitivity	Views from the PProW network	Views from local residents
Residential	H1	+/-	0	0
Residential	H2	+/-	-	-
Residential	H3	+/-	0	-
Residential	H4	+/-	0	0
Residential	H5	+/-	0	0
Residential	H7	+/-	0	0
Residential	H8	+/-	0	0
Residential	H11	+/-	0	0
Residential	H12	+/-	0	0
Residential	H13	+/-	0	0
Residential	H14	+/-	0	0
Residential	H15	+/-	0	0
Residential	H16	+/-	0	-
Residential	H17	+/-	0	0
Residential	H18	+/-	0	0
Residential	H20	+/-	0	-
Residential	H21	+/-	0	-
Residential	H22	+/-	0	-
Residential	H23	+/-	0	-
Residential	H24a	+/-	0	0
Residential	H24b	+/-	0	0
Residential	H24c	+/-	0	0
Residential	H24d	+/-	0	0
Residential	SA-0054-WOL	+/-	0	0
Employment	E6	+/-	0	0
Employment	E7	+/-	0	0
Employment	E12	+/-	-	-
Employment	E13	+/-	0	-
Employment	E14	+/-	0	-
Employment	E15	+/-	0	0
Employment	E16	+/-	0	0
Employment	E17	+/-	0	-
Employment	E18	+/-	0	0
Employment	E20	+/-	0	0
Employment	E21	+/-	0	0
Employment	E22	+/-	0	-
Employment	E23	+/-	0	-
Employment	E24	+/-	0	0
Employment	E25	+/-	-	-
G&T	GT1	+/-	-	-

F.4 SA Objective 3: Biodiversity, Flora, Fauna and Geodiversity

F.4.1 European sites

F.4.1.1 European sites are a network of nature protection areas which include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There are no European sites located within Wolverhampton, with the nearest being 'Fens Pools' SAC located approximately 5km to the south of the city, and 'Cannock Chase' SAC located approximately 12km to the north east. A small proportion in the north of the city lies within the identified 15km Zone of Influence (ZoI) where recreational impacts to Cannock Chase SAC may arise as a result of new development. No ZoI has currently been identified for Fens Pools SAC or other surrounding European sites.

F.4.1.2 Within Wolverhampton, three reasonable alternative sites proposed for residential use (Sites H22, H24c and H24d) are located within the 15km ZoI for recreational impacts at Cannock Chase SAC, and therefore, the proposed development at these sites could potentially have a minor negative impact on the designated features of this European site. At the time of writing, the likely impact of development at the remaining sites on other European sites, including Fens Pools SAC, is uncertain. The emerging HRA will provide more detailed analysis of likely impacts and identification of impact pathways beyond those considered in the SA.

F.4.2 Sites of Special Scientific Interest

F.4.2.1 There are no Sites of Special Scientific Interest (SSSI) within Wolverhampton, with the nearest being 'Wren's Nest' SSSI located approximately 1.4km south of the city, in Dudley. The majority of reasonable alternative sites are located within IRZs which do not indicate the proposed use as a threat to nearby SSSIs, and as such, would be likely to have a negligible impact. However, three sites (H22, H24c and H24d) lie within an IRZ which recognises that "*strategic solutions for recreational impacts are in place*", reflecting the potential for adverse effects associated with residential growth in proximity to the SSSIs underpinning Cannock Chase SAC. As such, a minor negative impact has been identified for these three sites.

F.4.3 National Nature Reserves

F.4.3.1 There are no National Nature Reserves (NNR) within Wolverhampton City, with the nearest being 'Wren's Nest' NNR located approximately 1.4km south of the city in Dudley. There are no reasonable alternative sites located in close proximity to this NNR, and therefore the proposed development at all sites will be expected to have a negligible impact.

F.4.4 Ancient woodland

F.4.4.1 There are four areas of ancient woodland within Wolverhampton: 'Tettenhall Wood', 'Ashen Coppice', 'Park Coppice' and one unnamed stand of woodland, all of which are

found in the south west of the city. All reasonable alternative sites are not in close proximity to any areas of ancient woodland, and therefore a negligible impact is identified.

F.4.5 Local Nature Reserves

F.4.5.1 Within Wolverhampton, there are two Local Nature Reserves (LNRs): ‘Smestow Valley’ and the more recently adopted ‘Wyrley and Essington Canal’ LNR. Other nearby LNRs include ‘Waddens Brook, Noose Lane’ LNR which is located adjacent to the north eastern city boundary, in Walsall. Sites H2, H3, H4 and H5 are all located adjacent to the ‘Wyrley and Essington Canal’ LNR. Development at these four sites could potentially have a minor negative impact on the LNR due to increased risk of development related threats and pressures, including recreational disturbance and water quality impacts. All of the remaining reasonable alternative sites are deemed unlikely to significantly impact these LNRs, primarily due to being separated by existing built form.

F.4.6 Sites of Importance for Nature Conservation

F.4.6.1 There are 43 Sites of Importance for Nature Conservation (SINCs) found throughout Wolverhampton, including ‘Birmingham Canal, Wolverhampton Level’ SINC which runs throughout the central city area. A small proportion of Site SA-0054-WOL coincides with ‘Monmore Green Disused Railway’ SINC. The proposed development at the site could potentially have direct major negative impact on the SINC.

F.4.6.2 Additionally, 10 sites are located adjacent to SINCs. Sites E7, E15, E17 E18, H11 and H15 are located adjacent to the ‘Birmingham Canal, Wolverhampton Level’ SINC which runs through the centre of Wolverhampton. Sites H2, H3, H4 and H5 are located adjacent to the ‘Wyrley and Essington Canal’ SINC. The proposed development at these 10 sites could potentially have a minor negative impact on the SINCs, due to an increased risk of development related threats and pressures.

F.4.7 Sites of Local Importance for Nature Conservation

F.4.7.1 A total of 58 Sites of Local Importance for Nature Conservation (SLINCs) can be found throughout Wolverhampton, many of which comprise semi-natural open spaces within the highly urbanised area.

F.4.7.2 Two sites coincide with SLINCs, including Site E12 with ‘Neachells Lane Open Space’ SLINC, and Site E25 with ‘Land East of Dale Street’ SLINC. Additionally, four sites are located adjacent to SLINCs: Site H14 is located adjacent to ‘Dudley to Priestfield Disused Railway’ SLINC, Site E7 adjacent to ‘Wolverhampton Science Park’ SLINC and Sites E20 and E21 are located adjacent to ‘Taylor Road’ SLINC. The proposed development at these six sites could potentially result in a minor negative impact on SLINCs, due to an increased risk of development related threats and pressures.

F.4.7.3 Site GT1 coincides with ‘Bushbury Junction Reservoir’ SLINC; however, it is understood that this reservoir has since been landfilled. It is unknown whether this site is still of any importance for biodiversity; therefore, the impact of the proposed development at this site is uncertain.

F.4.7.4 The remaining sites are located further away from SLINCs, and as such, the proposed development at these sites would be less likely to significantly impact any SLINC.

F.4.8 Geological sites

F.4.8.1 Geological sites have been identified throughout the city, which form part of the Black Country Global Geopark⁴. These sites include a range of notable geological features and formations. In Wolverhampton, these include ‘Stafford Road Cutting SINC’, ‘Wightwick Manor and Smestow Valley’ and ‘Northycote Farm’. None of the reasonable alternative sites are located in close proximity to any identified areas of geological importance, and therefore, a negligible impact is identified as a result of the proposed development at all sites.

F.4.9 Priority habitats

F.4.9.1 Despite being largely urbanised, there are some sections of priority habitats present within Wolverhampton, with deciduous woodland in particular found along the canals, as well as coastal and floodplain grazing marsh alongside the Smestow Brook, with a smaller proportion of good quality semi-improved grassland in the north east.

F.4.9.2 Site E23 coincides with a small area of deciduous woodland priority habitat. The proposed development at this site could potentially result in the loss or degradation of this habitat, and therefore result in a minor negative impact on the overall presence of priority habitats across the Plan area. The sites which do not coincide with any identified priority habitat are likely to have a negligible impact.

⁴ Black Country Geopark (2021) Black Country Geopark. Available at: <https://blackcountrygeopark.dudley.gov.uk/bcg/> [Date accessed: 07/08/24]

Table F.4.1: Sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Site use	Site ref	European Sites	SSSIs and IRZs	NNRs	Ancient woodland	LNRs	SINCs	SLINCs	Geological sites	Priority habitats
Residential	H1	+/-	0	0	0	0	0	0	0	0
Residential	H2	+/-	0	0	0	-	-	0	0	0
Residential	H3	+/-	0	0	0	-	-	0	0	0
Residential	H4	+/-	0	0	0	-	-	0	0	0
Residential	H5	+/-	0	0	0	-	-	0	0	0
Residential	H7	+/-	0	0	0	0	0	0	0	0
Residential	H8	+/-	0	0	0	0	0	0	0	0
Residential	H11	+/-	0	0	0	0	-	0	0	0
Residential	H12	+/-	0	0	0	0	0	0	0	0
Residential	H13	+/-	0	0	0	0	0	0	0	0
Residential	H14	+/-	0	0	0	0	0	-	0	0
Residential	H15	+/-	0	0	0	0	-	0	0	0
Residential	H16	+/-	0	0	0	0	0	0	0	0
Residential	H17	+/-	0	0	0	0	0	0	0	0
Residential	H18	+/-	0	0	0	0	0	0	0	0
Residential	H20	+/-	0	0	0	0	0	0	0	0
Residential	H21	+/-	0	0	0	0	0	0	0	0
Residential	H22	-	-	0	0	0	0	0	0	0
Residential	H23	+/-	0	0	0	0	0	0	0	0
Residential	H24a	+/-	0	0	0	0	0	0	0	0
Residential	H24b	+/-	0	0	0	0	0	0	0	0
Residential	H24c	-	-	0	0	0	0	0	0	0
Residential	H24d	-	-	0	0	0	0	0	0	0
Residential	SA-0054-WOL	+/-	0	0	0	0	--	0	0	0
Employment	E6	+/-	0	0	0	0	0	0	0	0
Employment	E7	+/-	0	0	0	0	-	-	0	0
Employment	E12	+/-	0	0	0	0	0	-	0	0
Employment	E13	+/-	0	0	0	0	0	0	0	0
Employment	E14	+/-	0	0	0	0	0	0	0	0
Employment	E15	+/-	0	0	0	0	-	0	0	0
Employment	E16	+/-	0	0	0	0	0	0	0	0
Employment	E17	+/-	0	0	0	0	-	0	0	0
Employment	E18	+/-	0	0	0	0	-	0	0	0
Employment	E20	+/-	0	0	0	0	0	-	0	0
Employment	E21	+/-	0	0	0	0	0	-	0	0
Employment	E22	+/-	0	0	0	0	0	0	0	0
Employment	E23	+/-	0	0	0	0	0	0	0	-
Employment	E24	+/-	0	0	0	0	0	0	0	0
Employment	E25	+/-	0	0	0	0	0	-	0	0
G&T	GT1	+/-	0	0	0	0	0	+/-	0	0

F.5 SA Objective 4: Climate Change Mitigation

F.5.1 Potential increase in carbon footprint

- F.5.1.1 Residential-led development is likely to result in an increase in carbon emissions, to some extent. Some 13 sites are proposed for the development of less than 116 dwellings. The proposed development at these sites would be likely to result in a negligible contribution towards Wolverhampton's total carbon emissions.
- F.5.1.2 Five sites are proposed for the development of 116 dwellings or more. The proposed development at these sites could potentially increase local carbon emissions, as a proportion of Wolverhampton's total, by more than 0.1%. A minor negative impact on Wolverhampton's carbon emissions is identified at these six sites.
- F.5.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain as the likely extent of carbon emissions is unknown.
- F.5.1.4 The carbon emissions likely to be generated as a result of employment-led development is uncertain. This would be entirely dependent on the nature and scale of the employment land proposed, which is unknown at present.
- F.5.1.5 The nature and design of Gypsy and Traveller pitches which could be developed is unknown at present. Therefore, potential increases in carbon emissions as a result of the construction and occupation of dwellings at Site GT1 is uncertain.
- F.5.1.6 Five residential sites (H7, H24a, H24b, H24c and H24d) include development that will involve the renewal of the site, where a net loss or gain of dwellings is identified. There is potential for adverse effects due to embodied carbon emissions associated within the demolition of existing housing and construction of new housing at these five sites; on the other hand, renewing old housing stock has the potential to ensure new housing is more energy efficient and utilises more sustainable materials. The proposed development at these five sites could potentially have a negative impact on Wolverhampton's carbon emissions to some extent especially in the short term, however without site specific details on the materials and methods used in construction, the net change in carbon emissions at these sites is uncertain.

Table F.5.1: Sites impact matrix for SA Objective 4 – Climate change mitigation

Site use	Site reference	Potential increase in carbon footprint
Residential	H1	-
Residential	H2	0
Residential	H3	-
Residential	H4	-
Residential	H5	0
Residential	H7	+/-
Residential	H8	-
Residential	H11	0
Residential	H12	0
Residential	H13	0
Residential	H14	0
Residential	H15	-
Residential	H16	0
Residential	H17	0
Residential	H18	0
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	+/-
Residential	H24b	+/-
Residential	H24c	+/-
Residential	H24d	+/-
Residential	SA-0054-WOL	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

F.6 SA Objective 5: Climate Change Adaptation

F.6.1 Flood Zones

- F.6.1.1 Flood Zones 2, 3a and 3b within Wolverhampton occur alongside the Smestow Brook in the west, the Waterhead Brook in the north and also a significant area in the south east of the city covering some existing residential areas, close to the River Tame and Walsall Canal.
- F.6.1.2 Three reasonable alternative sites (E23, E25 and H24a) are located partially within Flood Zone 3a, and therefore, the proposed development at these sites could potentially have a major negative impact on flooding in the area and exacerbate existing issues of flooding in Wolverhampton. A small proportion of Sites H21 and H24b are located within Flood Zone 2, and therefore, the proposed development at these two sites could potentially have a minor negative impact on flooding. The remaining sites which are located wholly within Flood Zone 1 will be expected to have a minor positive impact on flooding, as the proposed development would be likely to locate site end users away from areas at risk of fluvial flooding.

F.6.2 Indicative Flood Zone 3b

- F.6.2.1 Indicative Flood Zone 3b is present in areas where flooding will potentially worsen due to climate change, areas of which have been identified in the north and the south east of Wolverhampton. Two sites (E23 and E25) partially coincide with Indicative Flood Zone 3b. Therefore, the proposed development at these sites could potentially have a major negative impact on flooding and may exacerbate existing issues of flooding in Wolverhampton. All remaining sites which do not coincide with Indicative Flood Zone 3b may have a negligible impact on contributing to flooding issues in the future, although further site-specific assessments and reference to emerging data would help to provide a more accurate picture of changing flood risk due to climate change.

F.6.3 Surface Water Flood Risk

- F.6.3.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) in relation to the probability of surface water flooding occurring in a given area. SWFR in Wolverhampton is prevalent, and in particular affects roads and pathways within the urban area. The proposed development at five reasonable alternative sites which coincide with areas of high SWFR (E21, E23, GT1, H1 and H15) could potentially have a major negative impact on flooding, as development would be likely to locate site end users in areas at high risk of surface water flooding as well as exacerbate surface water flood risk in surrounding locations. The proposed development at the further 24 reasonable alternative sites which coincide with areas of low and/or medium SWFR could potentially have a minor negative impact on surface water flooding. The remaining sites which do not coincide with any significant areas of SWFR are likely to have a negligible impact on surface water flooding.

Table F.6.1: Sites impact matrix for SA Objective 5 – Climate change adaptation

Site Use	Site Ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Residential	H1	+	0	--
Residential	H2	+	0	-
Residential	H3	+	0	-
Residential	H4	+	0	-
Residential	H5	+	0	-
Residential	H7	+	0	-
Residential	H8	+	0	-
Residential	H11	+	0	0
Residential	H12	+	0	0
Residential	H13	+	0	0
Residential	H14	+	0	-
Residential	H15	+	0	--
Residential	H16	+	0	0
Residential	H17	+	0	-
Residential	H18	+	0	0
Residential	H20	+	0	-
Residential	H21	-	0	-
Residential	H22	+	0	-
Residential	H23	+	0	-
Residential	H24a	--	0	0
Residential	H24b	-	0	-
Residential	H24c	+	0	0
Residential	H24d	+	0	-
Residential	SA-0054-WOL	+	0	-
Employment	E6	+	0	-
Employment	E7	+	0	-
Employment	E12	+	0	-
Employment	E13	+	0	0
Employment	E14	+	0	-
Employment	E15	+	0	-
Employment	E16	+	0	0
Employment	E17	+	0	-
Employment	E18	+	0	-
Employment	E20	+	0	0
Employment	E21	+	0	--
Employment	E22	+	0	-
Employment	E23	--	--	--
Employment	E24	+	0	0
Employment	E25	--	--	-
G&T	GT1	+	0	--

F.7 SA Objective 6: Natural Resources

F.7.1 Previously undeveloped land / land with environmental value

- F.7.1.1 Wolverhampton is predominately urban with pockets of undeveloped land and greenspace scattered throughout the communities, including areas of Green Belt in the south and north west of the city.
- F.7.1.2 Some 17 reasonable alternative sites wholly comprise previously developed land which would be likely to have little or no environmental value. This includes three housing renewal sites (H7, H24a and H24c) which coincide with residential gardens that CWC has confirmed will be retained/replaced alongside the proposed redevelopment. The proposed development at these sites is identified to have a minor positive impact on natural resources as development would be classed as an efficient use of land.
- F.7.1.3 The majority of reasonable alternative sites wholly or partially comprise undeveloped land, and/or contain areas likely to be of environmental value such as hedgerows, trees and scrub that may be lost or further fragmented if developed. The proposed development at these 23 sites could potentially have a minor negative impact on natural resources due to the loss of previously undeveloped land and/or land with potential environmental value.

F.7.2 Best and most versatile land

- F.7.2.1 Within Wolverhampton, the Agricultural Land Classification (ALC) indicates largely 'Urban' land, with some areas of Grade 2, 3 and 4 land found in the southern and northern sections of the city. ALC Grade 2, and potentially Grade 3, represents some of Wolverhampton's 'best and most versatile' (BMV) land.
- F.7.2.2 All 23 reasonable alternative sites which comprise or contain undeveloped areas are located on 'Urban' land, and therefore, the proposed development at these sites is identified have a minor positive impact on natural resources as development at these sites will help to prevent the loss of BMV land elsewhere across the Plan area.
- F.7.2.3 The proposed development at the 17 sites which are located wholly on previously developed land would be likely to have a negligible impact on agricultural land.

Table F.7.1: Sites impact matrix for SA Objective 6 – Natural resources

Site use	Site reference	Previously undeveloped land / land with environmental value	BMV land
Residential	H1	+	0
Residential	H2	-	+
Residential	H3	-	+
Residential	H4	+	0
Residential	H5	+	0
Residential	H7	+	0
Residential	H8	+	0
Residential	H11	+	0
Residential	H12	-	+
Residential	H13	+	0
Residential	H14	+	0
Residential	H15	+	0
Residential	H16	-	+
Residential	H17	-	+
Residential	H18	-	+
Residential	H20	-	+
Residential	H21	-	+
Residential	H22	-	+
Residential	H23	-	+
Residential	H24a	+	0
Residential	H24b	-	+
Residential	H24c	+	0
Residential	H24d	-	+
Residential	SA-0054-WOL	+	0
Employment	E6	-	+
Employment	E7	-	+
Employment	E12	-	+
Employment	E13	-	+
Employment	E14	-	+
Employment	E15	+	0
Employment	E16	+	0
Employment	E17	-	+
Employment	E18	+	0
Employment	E20	+	0
Employment	E21	-	+
Employment	E22	-	+
Employment	E23	-	+
Employment	E24	+	0
Employment	E25	-	+
G&T	GT1	-	+

F.8 SA Objective 7: Pollution

F.8.1 Air Quality Management Area

F.8.1.1 Wolverhampton City is wholly designated as ‘Wolverhampton Air Quality Management Area’ (AQMA). All of the reasonable alternative sites are located wholly within this AQMA. Several of the sites are also located within 200m of neighbouring AQMAs including ‘Walsall AQMA’ to the east, ‘Sandwell AQMA’ to the south east and ‘Dudley AQMA’ to the south. The proposed development at all sites would be likely to locate site end users in areas of existing poor air quality and have a minor negative impact on air pollution.

F.8.2 Main road

F.8.2.1 Wolverhampton contains many major roads, including a large ring road in the city centre, where several main roads meet such as the A41, A449 and A454. The M54 motorway passes adjacent to the city in the north. A total of 23 reasonable alternative sites are located partially or wholly within 200m of a major road, and therefore, the proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution. Traffic using these main roads will be expected to have a minor negative impact on air quality and noise at these sites. On the other hand, the proposed development at the remaining sites which are over 200m from a main road are likely to have a negligible impact on transport associated air and noise pollution associated with main roads.

F.8.3 Watercourse

F.8.3.1 Wolverhampton’s watercourse network largely comprises the canal system, with fewer rivers/streams. Notable watercourses include the Smestow Brook, Waterhead Brook and the River Tame, as well as sections of the Staffordshire and Worcestershire Canal and Birmingham to Wolverhampton Canal. Some 10 reasonable alternative sites coincide with or are located within 10m of various watercourses. The proposed development at these sites could potentially increase the risk of contamination of these watercourses, and therefore have a minor negative impact on water quality.

F.8.3.2 Sites which are located over 10m from watercourses are less likely to have a significant impact on the quality of watercourses, however each site would need to be evaluated according to land use type, size of development and exact location. At this stage, the potential effects of these 30 sites on water quality are uncertain and would depend upon implementation.

F.8.4 Groundwater Source Protection Zone

F.8.4.1 Source Protection Zones (SPZs) for groundwater within Wolverhampton are located to the west and covering a large area of the city. SPZs are grouped from 1 to 3 based on the level of protection that the groundwater requires. Six reasonable alternative sites are located wholly or partially within the total catchment (zone 3) of this SPZ. The proposed development at these sites could potentially increase the risk of groundwater contamination within the SPZ and have a minor negative impact on the quality or status of groundwater resources. The remaining sites do not coincide with the catchment of on any

SPZ, and therefore, the proposed development at these sites may have a negligible impact on groundwater quality.

F.8.5 Potential increase in air pollution

- F.8.5.1 Seven sites are proposed for the development of 100 or more dwellings. The proposed development at these sites could potentially result in a significant increase in local air pollution; therefore, a major negative impact is identified.
- F.8.5.2 A total of 12 reasonable alternative sites are proposed for the development of between ten and 99 dwellings, and six sites are proposed for employment-led end use and comprise between one and 10ha. Therefore, the proposed development at these 18 sites could potentially have a minor negative impact on air pollution in the local area.
- F.8.5.3 Some nine sites are proposed for employment-led end use and comprise less than 1ha. The proposed development at these sites will be expected to have a negligible impact on local air pollution.
- F.8.5.4 The nature and design of Gypsy and Traveller pitches which could be developed at each site is unknown at present. Therefore, potential increases in air pollution as a result of the construction and occupation of dwellings at Site GT1 is uncertain.
- F.8.5.5 Five residential sites (H7, H24a, H24b, H24c and H24d) include development that will involve the renewal of existing housing sites, where a net loss or gain of dwellings is identified. The proposed development at these five sites could potentially have a negative impact on air pollution to some extent, however without site specific details on the materials and methods used in construction, potential increases in air pollution at these sites is uncertain.

Table F.8.1: Sites impact matrix for SA Objective 7 – Pollution

Site use	Site reference	AQMA	Main road	Watercourse	Groundwater SPZ	Potential increase in air pollution
Residential	H1	-	-	+/-	0	--
Residential	H2	-	-	-	0	-
Residential	H3	-	0	-	0	--
Residential	H4	-	-	-	0	--
Residential	H5	-	-	-	0	-
Residential	H7	-	-	+/-	0	+/-
Residential	H8	-	-	+/-	0	--
Residential	H11	-	-	-	0	-
Residential	H12	-	-	+/-	0	-
Residential	H13	-	-	+/-	0	-
Residential	H14	-	0	+/-	0	-
Residential	H15	-	0	-	0	--
Residential	H16	-	-	+/-	0	--
Residential	H17	-	-	+/-	0	-
Residential	H18	-	-	+/-	0	-
Residential	H20	-	-	+/-	0	-
Residential	H21	-	0	+/-	0	-
Residential	H22	-	-	+/-	-	-
Residential	H23	-	0	+/-	-	-
Residential	H24a	-	0	+/-	0	+/-
Residential	H24b	-	0	+/-	0	+/-
Residential	H24c	-	0	+/-	0	+/-
Residential	H24d	-	0	+/-	-	+/-
Residential	SA-0054-WOL	-	-	+/-	0	--
Employment	E6	-	0	+/-	-	0
Employment	E7	-	-	-	-	0
Employment	E12	-	-	+/-	0	-
Employment	E13	-	-	+/-	0	-
Employment	E14	-	-	+/-	0	0
Employment	E15	-	-	-	0	0
Employment	E16	-	0	+/-	0	0
Employment	E17	-	0	-	0	-
Employment	E18	-	-	-	0	0
Employment	E20	-	0	+/-	0	-
Employment	E21	-	0	+/-	0	0
Employment	E22	-	0	+/-	0	0
Employment	E23	-	-	+/-	0	-
Employment	E24	-	0	+/-	0	0
Employment	E25	-	-	+/-	0	-
G&T	GT1	-	0	+/-	-	+/-

F.9 SA Objective 8: Waste

F.9.1 Potential increase in household waste generation

- F.9.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent. Of the 25 reasonable alternative sites identified for residential use, 16 sites have a capacity of less than 133 dwellings. The proposed development at these sites will be expected to have a negligible impact on household waste generation in comparison to current levels.
- F.9.1.2 Four sites (H3, H4, H8 and H15) have a capacity of 133 dwellings or more. The proposed development at these sites will have potential to increase household waste generation by more than 0.1% in comparison to current levels. A minor negative impact is identified for household waste generation.
- F.9.1.3 The housing capacity at Site SA-0054-WOL is identified as between 100-150, and therefore, the impact of the proposed development at the site is uncertain. However, the proposed development at this site will be likely to have a negative impact on household waste to some extent.
- F.9.1.4 The waste likely to be generated as a result of employment-led development is uncertain.
- F.9.1.5 The nature and design of Gypsy and Traveller pitches which could be developed at Site GT1 is unknown at present. Therefore, potential increases in household waste generation as a result of the construction and occupation of dwellings at Site GT1 is uncertain.
- F.9.1.6 Five residential sites (H7, H24a, H24b, H24c and H24d) include development that will involve the renewal of existing housing sites, where a net loss or gain of dwellings is identified. It should be noted that the proposed redevelopment of these sites may result in larger amounts of construction waste in comparison to the other reasonable alternatives, even if the change in household waste is negligible.

Table F.9.1: Sites impact matrix for SA Objective 8 – Waste

Site use	Site reference	Increase in household waste generation
Residential	H1	0
Residential	H2	0
Residential	H3	-
Residential	H4	-
Residential	H5	0
Residential	H7	0
Residential	H8	-
Residential	H11	0
Residential	H12	0
Residential	H13	0
Residential	H14	0
Residential	H15	-
Residential	H16	0
Residential	H17	0
Residential	H18	0
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	0
Residential	H24b	0
Residential	H24c	0
Residential	H24d	0
Residential	SA-0054-WOL	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

F.10 SA Objective 9: Transport and Accessibility

F.10.1 Bus stop

F.10.1.1 Throughout Wolverhampton, there are many bus routes which provide good public transport access to the local and wider community, especially throughout the city centre. Site E22 is located wholly outside of the sustainable distance of 400m from a bus stop providing regular services, and therefore, the proposed development at this site could potentially have a minor negative impact on site end users' access to sustainable transport. The remaining 39 sites are largely located amongst existing settlements and are all situated within 400m of a bus stop; therefore, the proposed development at these sites will be expected to have a minor positive impact on access to sustainable transport.

F.10.2 Railway station

F.10.2.1 Wolverhampton Station is located in the city centre, providing access to rail services as well as the West Midlands Metro Line, of which there are six stations located in the south eastern area providing tram services towards Birmingham. Access to rail and metro services in the outer areas of the city is likely to be more restricted. Four sites (GT1, H22, H24c and H24d) are situated wholly or partially outside of the sustainable distance of 2km from a station, and therefore, the proposed development at these sites could potentially have a minor negative impact on site end users' access to rail services. The remaining 36 sites are located within 2km of a railway station and are therefore identified as having a minor positive impact on access to rail services.

F.10.3 Pedestrian access

F.10.3.1 Sites with good pedestrian access can be described as those with connections to existing pavements or pathways which are segregated from traffic use in the area, which is likely to be the case for most of the built-up areas of Wolverhampton. All of the reasonable alternative sites are well connected to the existing footpath network, and therefore, the proposed development at these 40 sites would be likely to have a minor positive impact on local transport and accessibility, by encouraging travel by foot and reducing the requirement for new pedestrian access to be created.

F.10.4 Road access

F.10.4.1 There are many major and minor roads which run through Wolverhampton allowing for good access for road traffic in the local area and nationally. All of the reasonable alternative sites are adjacent to existing roads, and therefore the proposed development at all sites will be likely to provide site end users with good access to the existing road network, resulting in a minor positive impact on transport and accessibility.

F.10.5 Pedestrian access to local services

F.10.5.1 Sustainable pedestrian access to local fresh food and services in Wolverhampton can be attributed to being within a 15-minute walking distance, according to accessibility modelling

data. Within Wolverhampton, a total of 45 local services have been identified. The areas with the best pedestrian access to services are generally found towards the north west, with somewhat restricted access in the south east and in the outskirts of the city.

- F.10.5.2 Some 15 reasonable alternative sites are located outside of a 15-minute walking distance to these services, and therefore, the proposed development at these sites could potentially have a minor negative impact on the access of site end users to local services, based on current infrastructure. Whereas, 14 sites are identified to be within 10-minute walking distance and therefore, the proposed development at these sites will be expected to have a major positive impact on sustainable access to local services. The remaining 11 sites are identified to be within 15-minute walking distance and therefore, the proposed development at these sites will be likely to have a minor positive impact on sustainable access to local services.

F.10.6 Public transport access to local services

- F.10.6.1 Accessibility modelling data shows that almost the entirety of Wolverhampton is located within a sustainable travel time of 15 minutes via public transport to local fresh food and services. The majority of sites meet these criteria. The proposed development at 25 sites which are located within a sustainable travel time of 10 minutes via public transport will be expected to have a major positive impact on the access of site end users to local services, based on existing infrastructure. Some 14 sites are located within a sustainable travel time of 15 minutes via public transport, and will be expected to have a minor positive impact on the access of site end users to local services.
- F.10.6.2 However, Site H21 is located outside of this sustainable travel time via public transport to these local services, and therefore, the proposed development at this site could potentially have a minor negative impact on transport and accessibility.

Table F.10.1: Sites impact matrix for SA Objective 9 – Transport and accessibility

Site use	Site reference	Bus stop	Railway station	Pedestrian access	Road access	Pedestrian access to local services	Public transport access to local services
Residential	H1	+	+	+	+	+	++
Residential	H2	+	+	+	+	++	++
Residential	H3	+	+	+	+	++	+
Residential	H4	+	+	+	+	++	+
Residential	H5	+	+	+	+	+	+
Residential	H7	+	+	+	+	+	++
Residential	H8	+	+	+	+	++	++
Residential	H11	+	+	+	+	-	++
Residential	H12	+	+	+	+	++	++
Residential	H13	+	+	+	+	++	++
Residential	H14	+	+	+	+	-	+
Residential	H15	+	+	+	+	+	++
Residential	H16	+	+	+	+	+	++
Residential	H17	+	+	+	+	+	++
Residential	H18	+	+	+	+	++	++
Residential	H20	+	+	+	+	-	+
Residential	H21	+	+	+	+	-	-
Residential	H22	+	-	+	+	++	++
Residential	H23	+	+	+	+	++	++
Residential	H24a	+	+	+	+	+	++
Residential	H24b	+	+	+	+	++	++
Residential	H24c	+	-	+	+	++	++
Residential	H24d	+	-	+	+	++	++
Residential	SA-0054-WOL	+	+	+	+	-	+
Employment	E6	+	+	+	+	-	++
Employment	E7	+	+	+	+	+	++
Employment	E12	+	+	+	+	-	+
Employment	E13	+	+	+	+	+	++
Employment	E14	+	+	+	+	-	+
Employment	E15	+	+	+	+	+	++
Employment	E16	+	+	+	+	-	+
Employment	E17	+	+	+	+	-	+
Employment	E18	+	+	+	+	-	++
Employment	E20	+	+	+	+	-	+
Employment	E21	+	+	+	+	-	+
Employment	E22	-	+	+	+	-	+
Employment	E23	+	+	+	+	++	++
Employment	E24	+	+	+	+	+	++
Employment	E25	+	+	+	+	++	+
G&T	GT1	+	-	+	+	-	++

F.11 SA Objective 10: Housing

F.11.1 Housing provision

- F.11.1.1 Residential-led development is likely to result in a net gain in housing. Sites which have been identified as having capacity for 100 or more dwellings are likely to make a significant contribution towards meeting housing needs if developed, and as such, result in a major positive impact on housing provision. Sites which have been identified as having capacity for 99 dwellings or less are identified to result in a minor positive impact on housing provision.
- F.11.1.2 Five residential sites (H7, H24a, H24b, H24c and H24d) include development that will involve the renewal of existing housing developments. Overall, Sites H24a, H24b, H24c and H24d will result in a net gain in dwellings and are likely to result in a minor positive impact on housing provision. However, Site H7 will result in a net loss of 10 dwellings, leading to the potential for a minor negative impact on housing provision.
- F.11.1.3 Site GT1 is proposed for the development of 12 Gypsy and Traveller pitches. The proposed development at this site will contribute towards meeting the accommodation needs of Gypsies and Travellers, and result in a minor positive impact on housing provision.
- F.11.1.4 Employment-led sites would not be expected to result in a net change in housing provision and therefore a negligible impact has been identified for these sites.

Table F.11.1: Sites impact matrix for SA Objective 10 – Housing

Site use	Site reference	Housing provision
Residential	H1	++
Residential	H2	+
Residential	H3	++
Residential	H4	++
Residential	H5	+
Residential	H7	-
Residential	H8	++
Residential	H11	+
Residential	H12	+
Residential	H13	+
Residential	H14	+
Residential	H15	++
Residential	H16	++
Residential	H17	+
Residential	H18	+
Residential	H20	+
Residential	H21	+
Residential	H22	+
Residential	H23	+
Residential	H24a	+
Residential	H24b	+
Residential	H24c	+
Residential	H24d	+
Residential	SA-0054-WOL	++
Employment	E6	0
Employment	E7	0
Employment	E12	0
Employment	E13	0
Employment	E14	0
Employment	E15	0
Employment	E16	0
Employment	E17	0
Employment	E18	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	0
Employment	E24	0
Employment	E25	0
G&T	GT1	+

F.12 SA Objective 11: Equality

F.12.1 Index of Multiple Deprivation

- F.12.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England⁵. Out of 317 local authorities in England, Wolverhampton is ranked as the 24th most deprived⁶. Overall deprivation is relatively high, with 33 of the LSOAs in Wolverhampton ranked among the 10% most deprived in England. In general, the most deprived areas of Wolverhampton are those surrounding the city centre and particularly towards the north around Bushbury South and Low Hill.
- F.12.1.2 Some 23 reasonable alternative sites are located wholly or partially within the 10% most deprived LSOAs, and therefore development at these sites could potentially have a minor negative impact on equality by exacerbating existing social pressures faced by current residents and place increased pressure on local services. The remaining sites are located outside of the most deprived 10% LSOAs, and therefore, the proposed development at the majority of sites may have a negligible impact on equality.
- F.12.1.3 It should be noted that there is a degree of uncertainty in regard to the impacts of each site on equality, which will be dependent on site-specific circumstances that are unknown at the time of writing.

⁵ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date accessed: 02/08/24]

⁶ Black Country Consortium (2019) The English Indices of Deprivation 2019. Available at: <https://www.activeblackcountry.co.uk/insight-hub/data/communities/indices-of-multiple-deprivation-2019/> [Date accessed: 02/08/24]

Table F.12.1: Sites impact matrix for SA Objective 11 – Equality

Site use	Site reference	IMD 10% most deprived
Residential	H1	-
Residential	H2	-
Residential	H3	-
Residential	H4	-
Residential	H5	-
Residential	H7	-
Residential	H8	-
Residential	H11	0
Residential	H12	-
Residential	H13	-
Residential	H14	-
Residential	H15	-
Residential	H16	-
Residential	H17	0
Residential	H18	-
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	0
Residential	H24b	-
Residential	H24c	0
Residential	H24d	-
Residential	SA-0054-WOL	0
Employment	E6	0
Employment	E7	0
Employment	E12	0
Employment	E13	0
Employment	E14	-
Employment	E15	-
Employment	E16	-
Employment	E17	0
Employment	E18	-
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	-
Employment	E24	-
Employment	E25	-
G&T	GT1	-

F.13 SA Objective 12: Health

F.13.1 NHS hospital with accident & emergency department

F.13.1.1 New Cross Hospital is located within Wolverhampton, to the north east, and provides an Accident and Emergency (A&E) department. Other nearby hospitals with A&E departments include Manor Hospital, situated approximately 3.7km to the east of the city, in Walsall. Some 38 reasonable alternative sites are located within 5km of these hospitals and could therefore potentially have a minor positive impact on access to emergency healthcare due to being within a sustainable distance to the services. However, two sites (H14 and H20) are located over 5km from a hospital, and therefore the proposed development at these sites could potentially have a minor negative effect on access to emergency healthcare.

F.13.2 Pedestrian access to GP surgery

F.13.2.1 There are 72 GP surgeries within Wolverhampton serving the local communities, although certain areas of the city (such as Finchfield and Wergs, in the west) have less coverage, and as such these areas could potentially have somewhat restricted access to healthcare. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of GP surgeries and areas within a sustainable travel time to these facilities for pedestrians. Sustainable pedestrian access to these services is considered to be under a 15-minute travel time.

F.13.2.2 Nine sites are located outside of this travel time to a GP and are therefore identified as potentially having a minor negative impact on sustainable access to healthcare. On the other hand, 13 sites are located within a 10-minute walking distance to a GP surgery; therefore, the proposed development at these sites will be expected to have a major positive impact on access to healthcare, based on existing infrastructure. The remaining 18 sites are within a 15-minute walking distance to a GP surgery; therefore, the proposed development at these sites is identified to have a minor positive impact on access to healthcare.

F.13.3 Public transport access to GP surgery

F.13.3.1 Sustainable public transport access to a local GP surgery is identified to be within a 15-minute journey, and according to accessibility modelling data, there are only small pockets of the city where these criteria would not be met. All of the reasonable alternative sites are located in areas within this travel time to a GP surgery via public transport. A total of 31 sites are located within a 10-minute journey and will therefore be expected to have a major positive impact on sustainable access to healthcare. The remaining nine sites are located within a 15-minute journey and are identified to have a minor positive impact on sustainable access to healthcare.

F.13.4 Access to greenspace

F.13.4.1 Greenspaces are distributed throughout the city, including parks, allotments, playing fields and sports facilities. All reasonable alternative sites are located within 600m of one or more greenspaces. Therefore, a minor positive impact will be expected at all of the sites,

as the proposed development would be likely to provide site end users with good access to outdoor space and a diverse range of natural habitats, which is known to have physical and mental health benefits.

F.13.5 Net loss of greenspace

F.13.5.1 This assessment has considered net loss of greenspace according to OS Open Greenspace⁷ data, as well as information provided by CWC.

F.13.5.2 Site E12 wholly coincides with 'Neachells Lane Open Space', Site H3 coincides with 'Inkerman Street Open Space', Site H7 contains small play spaces known as 'Ellerton Walk Play Area', Site H24b coincides with a section of 'Alamein Road Open Space' and Site H24d coincides with 'Lincoln Green Open Space'. CWC has confirmed that Site E14 also coincides with 'Willenhall Road Open Space'. The proposed development at these six sites could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

F.13.6 Public Right of Way/cycle path

F.13.6.1 The majority of reasonable alternative sites are located within 600m of the PRow and/or cycle network. The proposed development at these 39 sites would be likely to provide site end users with good pedestrian and/or cycle access and encourage physical activity, and therefore, have a minor positive impact on the health and wellbeing of local residents.

F.13.6.2 Conversely, Site E22 is located wholly over 600m from the cycle network and the majority of the site is located outside 600m from the PRow network. Therefore, the proposed development at the site could potentially have a minor negative impact on pedestrian and cycle access.

⁷ Ordnance Survey (2023) OS Open Greenspace. Available at: <https://www.ordnancesurvey.co.uk/business-government/products/open-map-greenspace> [Date accessed: 01/12/23]

Table F.13.1: Sites impact matrix for SA Objective 12 – Health

Site use	Site ref	NHS hospital with A&E	Pedestrian access to GP surgery	Public transport access to GP surgery	Access to greenspace	Net loss of greenspace	PRoW/ cycle path
Residential	H1	+	+	++	+	0	+
Residential	H2	+	++	++	+	0	+
Residential	H3	+	+	++	+	-	+
Residential	H4	+	+	+	+	0	+
Residential	H5	+	+	++	+	0	+
Residential	H7	+	+	++	+	-	+
Residential	H8	+	++	++	+	0	+
Residential	H11	+	++	+	+	0	+
Residential	H12	+	++	++	+	0	+
Residential	H13	+	++	++	+	0	+
Residential	H14	-	++	++	+	0	+
Residential	H15	+	+	++	+	0	+
Residential	H16	+	+	++	+	0	+
Residential	H17	+	+	++	+	0	+
Residential	H18	+	++	++	+	0	+
Residential	H20	-	++	++	+	0	+
Residential	H21	+	+	++	+	0	+
Residential	H22	+	++	++	+	0	+
Residential	H23	+	++	++	+	0	+
Residential	H24a	+	-	++	+	0	+
Residential	H24b	+	-	+	+	-	+
Residential	H24c	+	+	++	+	0	+
Residential	H24d	+	++	++	+	-	+
Residential	SA-0054-WOL	+	+	+	+	0	+
Employment	E6	+	-	++	+	0	+
Employment	E7	+	-	++	+	0	+
Employment	E12	+	+	++	+	-	+
Employment	E13	+	-	++	+	0	+
Employment	E14	+	+	++	+	-	+
Employment	E15	+	+	++	+	0	+
Employment	E16	+	+	+	+	0	+
Employment	E17	+	++	++	+	0	+
Employment	E18	+	+	++	+	0	+
Employment	E20	+	+	+	+	0	+
Employment	E21	+	-	+	+	0	+
Employment	E22	+	-	++	+	0	-
Employment	E23	+	++	++	+	0	+
Employment	E24	+	-	++	+	0	+
Employment	E25	+	-	+	+	0	+
G&T	GT1	+	+	+	+	0	+

F.14 SA Objective 13: Economy

F.14.1 Employment floorspace provision

- F.14.1.1 Employment floorspace provision has been assessed with consideration of current land use and the proposed development at each site.
- F.14.1.2 There are 15 reasonable alternative sites proposed for employment use, 14 of which currently comprise areas of undeveloped land. Therefore, the proposed development at these 14 sites will be expected to result in a net gain in employment floorspace and have a major positive impact on providing local employment opportunities. Site E15 currently coincides with various employment sites including 'The Power House Auto Spares International' and 'Bew Recycling'. It is uncertain whether the proposed development at this site would result in a net change in employment floorspace.
- F.14.1.3 Of the 25 reasonable alternative sites proposed for residential use, nine sites coincide with existing employment areas, and therefore, development at these sites could potentially result in a net loss of employment floorspace. The proposed development at two of these sites (H16 and H21) could potentially have a minor negative impact on employment floorspace provision due to the possible loss of small areas of employment land or small businesses, whereas the proposed development at eight of these sites (H1, H5, H8, H11, H14, H15 and SA-0054-WOL) could potentially have a major negative impact due to the possible loss of a large area of employment land.
- F.14.1.4 Site H4 coincides with warehouses, Site H17 coincides with a scrapyard area, Site H23 with Probert Court Nursing Home; however, it is unknown whether these land uses are currently active employment land. It is uncertain whether the proposed development at these three sites would result in a net change in employment floorspace.
- F.14.1.5 The remaining residential sites and Gypsy and Traveller site are located on previously undeveloped land and would not be expected to result in a net change in employment floorspace; therefore, the proposed development at these sites would be likely to have a negligible impact on the provision of employment opportunities.

F.14.2 Pedestrian access to employment opportunities

- F.14.2.1 Wolverhampton City provides a range of employment opportunities for new and current residents. Accessibility modelling data shows the distribution of employment locations, with a total of 136 mapped locations, generally clustered within the city centre and the large industrial/retail estates in the south, north and east of the city. According to the data, sustainable pedestrian access to employment opportunities (within a 30-minute walk) can be expected throughout the city, with the exception of a small proportion close to the western boundary. The majority of residential sites and the singular Gypsy and Traveller site are located within 20-minute walk to employment locations and will therefore be expected to have a major positive impact on pedestrian access to employment opportunities. Site H24c is located within a 25-minute walk to employment locations and is identified to have a minor positive impact on pedestrian access to employment opportunities.

F.14.3 Public transport access to employment opportunities

- F.14.3.1 Accessibility modelling data indicates that the whole of Wolverhampton is located within a sustainable travel time via public transport to employment opportunities, identified as being within a 30-minute journey. All reasonable alternative residential / Gypsy and Traveller sites are wholly within a 20-minute journey; the proposed development at these sites will be likely to have a major positive impact on sustainable access to employment opportunities.

Table F.14.1: Sites impact matrix for SA Objective 13 – Economy

Site use	Site ref	Employment floorspace provision	Pedestrian access to employment opportunities	Public transport access to employment opportunities
Residential	H1	--	++	++
Residential	H2	0	++	++
Residential	H3	0	++	++
Residential	H4	+/-	++	++
Residential	H5	--	++	++
Residential	H7	0	++	++
Residential	H8	--	++	++
Residential	H11	--	++	++
Residential	H12	0	++	++
Residential	H13	0	++	++
Residential	H14	--	++	++
Residential	H15	--	++	++
Residential	H16	-	++	++
Residential	H17	+/-	++	++
Residential	H18	0	++	++
Residential	H20	0	++	++
Residential	H21	-	++	++
Residential	H22	+/-	++	++
Residential	H23	0	++	++
Residential	H24a	0	++	++
Residential	H24b	0	++	++
Residential	H24c	0	+	++
Residential	H24d	0	++	++
Residential	SA-0054-WOL	--	++	++
Employment	E6	++	0	0
Employment	E7	++	0	0
Employment	E12	++	0	0
Employment	E13	++	0	0
Employment	E14	++	0	0
Employment	E15	+/-	0	0
Employment	E16	++	0	0
Employment	E17	++	0	0
Employment	E18	++	0	0
Employment	E20	++	0	0
Employment	E21	++	0	0
Employment	E22	++	0	0
Employment	E23	++	0	0
Employment	E24	++	0	0
Employment	E25	++	0	0
G&T	GT1	0	++	++

F.15 SA Objective 14: Education, Skills and Training

F.15.1 Pedestrian access to primary school

- F.15.1.1 There are 94 primary schools distributed throughout Wolverhampton. Accessibility modelling data has been provided to Lepus by the Council, mapping the location of primary schools and areas within a sustainable travel time to these schools for pedestrians. Some small areas of the city lie outside of the sustainable 15-minute walk to a primary school, whereas the majority of the city will be expected to meet these criteria.
- F.15.1.2 Of the 25 reasonable alternative sites proposed for residential / Gypsy and Traveller use, all are located within a 15-minute walking distance to a primary school. Of these 25 sites, the majority (21 sites) are located within a 10-minute walking distance to a primary school, therefore, the proposed development at these 21 sites will be expected to have a major positive impact on pedestrian access to primary schools. The remaining four sites are located within a 15-minute walking distance to a primary school; therefore, the proposed development at these five sites could potentially have a minor positive impact on pedestrian access to primary schools.

F.15.2 Pedestrian access to secondary school

- F.15.2.1 There are 22 secondary schools in Wolverhampton, and similarly to primary schools, almost the entirety of the city is identified to be within a sustainable travel time for pedestrians.
- F.15.2.2 Two residential sites (H11 and SA-0054-WOL) are situated in the areas of the city outside of a 25-minute walk to a secondary school, and as such, the proposed development at these sites could potentially have a minor negative impact on sustainable access to education. Conversely, 23 residential / Gypsy and Traveller sites are within a 25-minute walk to a secondary school; 18 of these sites are located within a 20-minute walk to a secondary school, and will therefore be expected to encourage pedestrian access to secondary schools and have a major positive impact on education, skills and training. The remaining five sites are located within a 25-minute walk to a secondary school, and have been identified to result in a minor positive impact on sustainable access to education, skills and training.

F.15.3 Public transport access to secondary school

- F.15.3.1 Existing public transport within Wolverhampton is widespread and would be likely to provide current and future residents in most areas with suitable access to secondary schools in the local and surrounding area, according to the accessibility modelling data.
- F.15.3.2 The majority of proposed residential / Gypsy and Traveller sites (24) are located within a 25-minute public transport journey to a secondary school, and of these 24 sites 21 are located within a 20-minute public transport journey to a secondary schools; therefore, the proposed development at these 21 sites will be likely to have a major positive impact on sustainable access to education, based on current infrastructure. The remaining three sites are located within a 25-minute public transport journey to secondary schools;

therefore, the proposed development at these sites will be expected to have a minor positive impact on sustainable access to education, based on current infrastructure.

- F.15.3.3 However, Site H20 is located outside of this sustainable travel time to a secondary school, and therefore, the proposed development at the site could potentially have a minor negative impact on new residents' access to education, based on current infrastructure.

Table F.15.1: Sites impact matrix for SA Objective 14 – Education, skills and training

Site use	Site ref	Pedestrian access to primary school	Pedestrian access to secondary school	Public transport access to secondary school
Residential	H1	++	++	++
Residential	H2	++	++	++
Residential	H3	++	++	++
Residential	H4	++	++	++
Residential	H5	++	+	++
Residential	H7	++	++	++
Residential	H8	++	++	+
Residential	H11	+	-	++
Residential	H12	++	++	++
Residential	H13	++	++	++
Residential	H14	++	++	+
Residential	H15	++	++	+
Residential	H16	+	+	++
Residential	H17	++	+	++
Residential	H18	++	++	++
Residential	H20	++	+	-
Residential	H21	++	++	++
Residential	H22	++	++	++
Residential	H23	++	++	++
Residential	H24a	++	++	++
Residential	H24b	++	++	++
Residential	H24c	++	++	++
Residential	H24d	++	++	++
Residential	SA-0054-WOL	+	-	++
Employment	E6	0	0	0
Employment	E7	0	0	0
Employment	E12	0	0	0
Employment	E13	0	0	0
Employment	E14	0	0	0
Employment	E15	0	0	0
Employment	E16	0	0	0
Employment	E17	0	0	0
Employment	E18	0	0	0
Employment	E20	0	0	0
Employment	E21	0	0	0
Employment	E22	0	0	0
Employment	E23	0	0	0
Employment	E24	0	0	0
Employment	E25	0	0	0
G&T	GT1	+	+	++

Appendix G: Policy Assessments

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G.1 Overview

G.1.1 Introduction

- G.1.1.1 This appendix provides an assessment of the proposed policies as set out within the Regulation 19 version of the Wolverhampton Local Plan (WLP).
- G.1.1.2 Many policies are derived from the ceased Black Country Plan (BCP). A total of 63 policies were set out in the draft BCP and were consulted on as part of the BCP process, before the decision was made to end work on the BCP in October 2022.
- G.1.1.3 The City of Wolverhampton Council (CWC) have considered the extent to which each of the 63 draft BCP policies remains relevant and applicable to the WLP area, in light of consultation responses received during the BCP Regulation 18 consultation, the WLP Regulation 18 Issues and Preferred Options consultation where draft policy areas were presented, and the smaller geographic area considered within the WLP compared to the former BCP.
- G.1.1.4 A total of 55 policies are presented within the Regulation 19 WLP. Site-specific policies have also been prepared and presented in the WLP; these have been evaluated in the SA process as set out in **Appendix J**.
- G.1.1.5 The SA Framework (see **Appendix B**) has been used to evaluate the sustainability performance of each policy, in accordance with the methodology as set out in **Chapter 4** of the main Regulation 19 SA Report (see **Volume 2**). For ease of reference the scoring system is summarised in **Table G.1.1**.

Table G.1.1: Presenting likely impacts

Likely impact	Description	Impact symbol
Major Positive Impact	The proposed policy contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed policy contributes to the achievement of the SA Objective to some extent.	+
Negligible/ Neutral Impact	The proposed policy has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed policy has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	+/-
Minor Negative Impact	The proposed policy prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed policy prevents the achievement of the SA Objective to a significant extent.	--

- G.1.1.6 Each appraisal in the following sections of this report includes an SA impact matrix that provides an indication of the nature and magnitude of effects. All impact matrices are accompanied by an assessment narrative which describes the findings of the appraisal and provides the rationale for the recorded impact values.

G.1.2 Overview of policy assessments

G.1.2.1 The impact matrices for all proposed policy area assessments are presented in **Table G.1.2** below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.

G.1.2.2 Where relevant, recommendations have been made within the policy assessment text in this appendix. Further information regarding recommendations made to CWC throughout the Plan making process can be found within **Chapter 18** of the main Regulation 19 SA Report (see **Volume 2**).

Table G.1.2: Summary of policy assessments

Policy Ref	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
CSP1	+	+	+	+	+	0	-	-	++	++	+	+	++	+
CSP2	++	++	+	+	+	0	+	0	+	+	+	+	+	0
DEL1	0	+	+	+	+	0	+	+	+	+	+	+	+	+
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0
HW1	0	+	0	0	0	0	0	0	0	0	+	++	0	0
HW2	0	0	0	0	0	0	0	0	0	0	+	++	0	0
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0
HOU1	0	0	0	-	0	+	-	-	0	++	+	0	0	0
HOU2	0	0	0	+	0	+	+	0	+	+	+	+	0	0
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0
HOU4	0	0	0	0	0	0	0	0	+	+	+	+	0	0
HOU5	0	+	+/-	+/-	+/-	+	-	-	+	+	+	+/-	+/-	+
HOU6	+	0	0	+	0	0	+	0	+	0	+	0	+	++
HOU7	0	0	0	0	0	0	0	0	+	+	+	+	0	0
EMP1	+/-	0	+/-	0	+/-	+	-	-	0	0	+	0	++	+
EMP2	+/-	0	0	-	0	+	-	-	+	0	+	-	+	+
EMP3	+/-	0	+/-	+/-	+/-	+	-	+	+	0	+	0	+	+
EMP4	+/-	0	+/-	-	+/-	+	-	-	+	+	+	0	+	+
EMP5	0	0	0	0	0	0	0	0	+	0	+	+	+	+
EMP6	+	+	+	0	0	0	0	0	+	0	+	0	+	+
CEN1	0	0	+/-	+/-	+/-	+	+/-	+/-	+	+	+	+	+	0
CEN2	+	+	+	+	+	+	+	0	++	+	+	+	++	+
CEN3	0	0	0	+	0	0	+	0	+	0	+	+	+	+
CEN4	0	0	0	+	0	0	+	0	+	0	0	+	+	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0
TRAN3	0	0	0	+	0	0	+	0	+	0	0	0	0	0
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	0	0
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN6	0	0	0	+	0	0	+	0	+	0	0	+	0	0
TRAN7	0	0	0	+	0	0	+	0	+	0	0	+	+	0
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV2	0	0	++	0	0	0	0	0	0	0	0	+	+	0
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0
ENV4	+	+	++	+	++	+	+	0	0	0	0	+	0	0
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0
ENV8	0	+	+	+	+	+	+	0	+	0	+	++	0	0
ENV9	0	+	+	+	+	0	+	0	+	0	+	+	0	0
ENV10	+	++	+	+	+	+	+	0	+	0	+	+	0	0
ENV11	0	0	+	+	0	0	++	0	+	0	0	+	+	0
ENV12	0	0	+	0	++	+	+	0	0	0	0	+	0	0
ENV13	0	+	+	+	++	+	+	0	0	0	0	0	0	0
ENV14	0	0	0	+	+	+	+	0	0	0	+	+	0	0
W1	0	0	0	0	0	+	0	++	0	0	0	0	+	0
W2	0	0	0	0	0	+	0	+	0	0	0	0	0	0
W3	+/-	+/-	+/-	-	+/-	+	-	+	+	0	0	+/-	+	0
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0
MIN3	0	0	0	0	0	0	0	0	0	0	0	0	0	0

G.2 Strategic Priorities

G.2.1 Strategic Priorities

Strategic Priorities
<p>Healthy, inclusive communities</p> <ol style="list-style-type: none">1) Strategic Priority 1: 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 behaviours2) Strategic Priority 2: 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 travel3) Strategic Priority 3: 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 infrastructure4) Strategic Priority 4: 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
<p>Good homes in well-connected neighbourhoods</p> <ol style="list-style-type: none">5) Strategic Priority 5: 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 offer6) Strategic Priority 6: To prioritise sustainable and active travel and improve transport infrastructure to ensure safe, efficient and sustainable accessibility within an integrated transport network
<p>More local people into good jobs and training</p> <ol style="list-style-type: none">7) Strategic Priority 7: To enable communities to share the benefits of economic growth by securing access to new job opportunities and enhanced skills and training programmes
<p>Thriving economy in all parts of the city</p> <ol style="list-style-type: none">8) Strategic Priority 8: 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 expand9) Strategic Priority 9: 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 visit10) Strategic Priority 10: To protect, sustain and enhance the quality of the built and historic environment whilst ensuring the delivery of distinctive and attractive places11) Strategic Priority 11: To ensure that Wolverhampton has the infrastructure in place to support its existing and future growth and prosperity12) Strategic Priority 12: To manage waste as a resource and minimise the amount produced and sent to landfill13) Strategic Priority 13: To safeguard and make the most sustainable use of Wolverhampton's mineral resources without compromising environmental quality

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Strategic Priority	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
1	0	0	0	0	0	0	0	0	+	0	+	+	0	0
2	0	0	0	+	0	0	+	0	+	+	0	+	0	0
3	0	+	+	++	++	0	+	0	0	0	0	+	0	0
4	0	++	++	+	+	++	+	0	0	0	0	+	0	0
5	0	0	0	0	0	0	0	0	0	++	+	0	0	0
6	0	0	0	+	0	0	+	0	++	0	0	+	0	0
7	0	0	0	0	0	0	0	0	0	0	+	0	+	+
8	0	0	0	0	0	0	0	0	0	0	0	0	++	0
9	0	0	0	0	0	0	0	0	+	0	+	0	+	0
10	+	+	0	0	0	0	0	0	0	0	0	0	0	0
11	0	0	0	0	0	+	0	+	+	+	0	0	+	0
12	0	0	0	0	0	+	0	+	0	0	0	0	0	0
13	0	0	0	0	0	+	0	0	0	0	0	0	0	0

G.2.1.1 Strategic Priority 1 seeks to provide built and natural environments which promote active and healthy lifestyles for Wolverhampton’s residents which foster social inclusion, through interaction and discouragement of behaviour which could be harmful to the community. Active travel is also encouraged, which will be likely to lead to subsequent benefits for local accessibility. As such, minor positive impacts have been identified for transport, equality and health (SA Objectives 9, 11 and 12).

G.2.1.2 Strategic Priority 2 sets out the Council’s desire to protect the wellbeing of residents through ensuring access to healthy homes, minimising levels of pollution and reducing potential negative health effects from the impact of climate change and accommodating low emission and active travel. To this end, a minor positive impact can be observed for housing and health (SA Objectives 10 and 12). Through encouraging the use of low emission vehicles and active travel, Strategic Priority 2 has the potential to reduce the levels of car and transport related greenhouse gas (GHG) emissions and harmful pollutants and improve travel choice. This will then be expected to have a minor positive impact on pollution (SA Objective 7) and transport (SA Objective 9), but also a minor positive impact on climate change mitigation (SA Objective 4) as reduced emissions will potentially reduce Wolverhampton’s contribution to anthropogenic climate change.

G.2.1.3 Strategic Priority 3 promotes the mitigation and adaptation to climate change which would protect the people, environment and the economy. Through enhancing green and blue infrastructure this will be expected to further the extent of functioning ecosystem services across the Plan area including air filtration and carbon sequestration, as well as providing natural means through which flood risk can be reduced. This will also be expected to improve ecological networks and habitat provision across Wolverhampton. Enhancing green infrastructure (GI) will also have the potential to maintain the townscape and landscape character of Wolverhampton. Encouraging the use of low carbon energy solutions will be likely to reduce reliance on fossil fuels and their associated GHG emissions. To this end, major positive impacts have been identified with regard to climate change mitigation and adaptation (SA Objectives 4 and 5) and minor positive impacts for landscape, biodiversity, pollution and health (SA Objectives 2, 3, 7 and 12).

- G.2.1.4 Strategic Priority 4 seeks to protect and enhance the natural environment and ensure residents have good access to a high-quality network of GI. This will be likely to improve ecological networks and habitat provision for wildlife across Wolverhampton, as well as continuing and expanding the function of ecosystem services, such as air filtration and carbon sequestration as well as reducing flood risk and the impacts of anthropogenic climate change. Improvements to the quality of air will also be expected improve the health and wellbeing of residents. The Strategic Priority also seeks to protect and enhance Wolverhampton’s geological resources and landscape. Therefore, major positive impacts have been identified with regards to landscape, biodiversity and natural resources and minor positive impacts have been identified for climate change mitigation and adaptation, natural resources, pollution and health (SA Objectives 2, 3, 4, 5, 6, 7 and 12).
- G.2.1.5 Strategic Priority 5 seeks to provide a range of homes with a variety of types and tenures which will meet the identified need. As a result, a major positive impact for housing and a minor positive impact on equality (SA Objectives 10 and 11) have been identified.
- G.2.1.6 Strategic Priority 6 seeks to ensure residents have access to sustainable and active modes of travel. This will be expected to reduce the reliance on private car use, which will contribute to an overall reduction in car related GHG emissions such as carbon dioxide (CO₂), as well as other harmful pollutants such as nitrogen dioxide (NO₂). Encouraging active transport will be anticipated to encourage healthier and active lifestyles. As such, a major positive impact has been identified with regard to transport and accessibility (SA Objective 9), and minor positive impacts for pollution, climate change mitigation and health (SA Objectives 4, 7 and 12).
- G.2.1.7 Strategic Priority 7 seeks to ensure Wolverhampton residents have access to new job opportunities and training programmes and are then able to enhance their skills. This is expected to have a minor positive impact with relation to economy and education (SA Objectives 13 and 14) and may also help to promote equal access to skills and training opportunities leading to a minor positive impact on equality (SA Objective 11).
- G.2.1.8 Strategic Priority 8 seeks to protect and enhance employment areas and ensure a variety of employment sites are available to support the development of different sectors and industries within the city. A major positive impact on economy (SA Objective 13) has been identified as it will be expected to improve the range of job opportunities available to Wolverhampton’s residents.
- G.2.1.9 Strategic Priority 9 seeks to enhance the vitality of centres whilst ensuring they are safe and high-quality places to live and work. This will be expected to foster inclusive communities, ensuring people have access key services and facilities required to meet their needs, such as healthcare access, as well as providing jobs. As such, minor positive impacts have been identified with regard to accessibility, equality and the economy (SA Objectives 9, 11 and 13).
- G.2.1.10 Strategic Priority 10 supports the protection and enhancement of the quality of Wolverhampton’s built and historic environment. This will be anticipated to ensure the character and setting of the townscape, including distinctive features and heritage assets are conserved. As such, a minor positive impact has been identified regarding cultural heritage and landscape and townscape (SA Objectives 1 and 2). It is recommended that the strategic priorities could be strengthened through incorporating reference to regeneration of the urban areas and ensure opportunities are sought for heritage-led regeneration to reinforce local character and appreciation of the historic environment.

-
- G.2.1.11 Strategic Priority 11 seeks to ensure that Wolverhampton is equipped with the infrastructure required to support existing and future growth. This could potentially lead to a minor positive impact across several SA Objectives, including for natural resources, waste, transport, housing and the economy (SA Objectives 6, 8, 9, 10 and 13).
- G.2.1.12 Strategic Priority 12 seeks to manage Wolverhampton’s waste as a resource, minimising both the amount of waste produced, and the volume of waste sent to landfill. This has the potential to reduce the demand for landfill sites within and around the Plan area and as such could result in a reduction in the demand for land. Therefore, a minor positive impact will be expected with regard to natural resources and waste (SA Objectives 6 and 8). The strategic priorities could be enhanced through ensuring reference to the waste hierarchy, encouraging the recycling and re-use of materials, including both construction and household waste.
- G.2.1.13 Strategic Priority 13 will encourage the best and most sustainable use of mineral resources within Wolverhampton. This will be expected to have a minor positive impact on natural resources (SA Objective 6). The Strategic Priority states that environmental quality will not be compromised, and as such negligible impacts have been identified with regards to landscape and biodiversity (SA Objectives 2 and 3).

G.3 Spatial Strategy

G.3.1 Policy CSP1 – Spatial Strategy

Policy CSP1 – 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;
 - 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;

Policy CSP1 – Spatial Strategy

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 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); and
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP1	+	+	+	+	+	0	-	-	++	++	+	+	++	+

G.3.1.1 Policy CSP1 will provide the overarching spatial strategy for Wolverhampton, setting out the scale and distribution of development for the Plan period to 2042. The spatial strategy has been formed by CWC, following consideration of a number of reasonable alternatives evaluated in the SA process, as discussed in **Chapter 5** of **Volume 2**, and originally assessed in the Regulation 18 SA¹.

G.3.1.2 The spatial strategy as set out in Policy CSP1 will include the delivery of at least 9,330 homes which will contribute towards meeting the identified housing need within the Plan area, ensuring that there is the provision of a range of housing of different types and tenures available to support the local community. With regard to employment growth, Policy CSP1 sets out the provision of 42.9ha to be met predominantly in the Core Regeneration Areas. This will be expected to provide employment opportunities for residents as well as supporting and facilitating the growth of manufacturing, industrial and logistics activity, supporting the success of Wolverhampton’s economy for the duration of the Plan period to 2042 and beyond. The policy will ensure that any housing or economic needs that cannot be met within Wolverhampton itself are secured through Duty to Cooperate (DtC) contributions in sustainable locations. Overall, a major positive impact is identified in relation to housing and the economy (SA Objectives 10 and 13).

G.3.1.3 The policy emphasises that the housing delivered throughout the Plan area, including Wolverhampton City Centre, the Core Regeneration and Neighbourhood Areas, will be well located and in proximity to key local services and amenities which is likely to include grocery shops, healthcare facilities, retail and leisure facilities and education and employment opportunities. Additionally, Policy CSP1 seeks to ensure residential developments are well supported by “*excellent public transport links*” which will include sustainable transport links to the city centre, as well as active travel networks which will ensure all residents are able to meet their needs locally. Therefore, minor positive impacts have been identified for equality, health and education (SA Objectives 11, 12 and 14), with a major positive effect identified for transport (SA Objective 9).

G.3.1.4 Under Policy CSP1, the majority of development will likely be located within the existing urban areas. This will support the redevelopment of brownfield and previously developed sites which represents an efficient use of land in accordance with the National Planning Policy Framework (NPPF) by locating the majority of housing within the existing urban areas, and supporting urban regeneration. Although, the policy does highlight that a proportion of growth will be exported to neighbouring authorities under the DtC, which has potential to include some development on previously undeveloped land, along with some

¹ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan. Regulation 18: Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Sustainability%20Appraisal%20WLP%20IPO%202024.pdf> [Date accessed: 16/09/24]

small-scale loss of previously undeveloped land within Wolverhampton's urban area. On balance, Policy CSP1 will be likely to have a negligible impact on natural resources (SA Objective 6).

- G.3.1.5 Development and regeneration across the Plan area will be expected to incorporate networks of high-quality green infrastructure (GI) which will be integrated within local communities. This will help to support the restoration of ecological networks within Wolverhampton through effective integration within the urban setting. Strengthened networks of GI across Wolverhampton will also be anticipated to have valuable secondary effects through their functioning and provision of ecosystem services including flood alleviation and water filtration helping to protect and improve water quality, as well as air filtration and carbon sequestration. Development in the urban areas will help to minimise the overall vegetation cover lost to development. Adhering to biodiversity net gain (BNG) principles could also deliver positive effects in the longer term. Additionally, Policy CSP1 sets out the prevention of development on the Green Belt. This will be beneficial to Wolverhampton in preserving key green and open areas which will preserve the integrity of the landscape and ensure local residents have easy access to the countryside. As a result, minor positive impacts have been identified for biodiversity and climate change adaptation (SA Objective 3 and 5). The spatial strategy could be improved through more specific reference to the water environment, including the ecological benefits of the canal and river network present in Wolverhampton as well as the protection of these assets from adverse effects, such as water pollution from industrial and domestic activities.
- G.3.1.6 Policy CPS1 seeks to protect and enhance *“the quality of existing towns and Neighbourhood Areas”* and will deliver development predominantly through the use of brownfield sites and previously developed land. Furthermore, the policy states that sustainable development will be delivered through *“protecting and enhancing Wolverhampton’s character...including heritage assets”*. As such, this policy will be expected to ensure the character and setting of the landscape, townscape and heritage assets of Wolverhampton are protected alongside the planned growth. To this end, minor positive impacts have been identified for cultural heritage and landscape and townscape (SA Objectives 1 and 2).
- G.3.1.7 With the addition of 9,330 homes, this policy will be expected to lead to increased waste generation across the Plan area, as would be expected with any increase in population. Overall, a minor negative impact on waste will be expected (SA Objective 8). Moreover, the addition of this number of new homes and 42.9ha of employment land will likely increase carbon and other GHG emissions during construction and operation. The construction, occupation and operation of development is also likely to exacerbate air pollution, including NO₂ emissions and particulate matter (PM). However, as drawn out above, by directing development towards the Strategic Centres and Towns, Policy CSP1 will help to facilitate more sustainable communities, by locating residents in close proximity to services, facilities and public transport. This could potentially help to improve the sustainability of development (in terms of carbon footprint) in some locations through reducing the need to travel by private car. On the whole, a minor positive impact on climate change mitigation (SA Objective 4) could be achieved. However, an overall minor negative impact is identified in terms of air and water pollution (SA Objective 7), taking the balance of these considerations into account. As mentioned in the above assessments, Policy CSP1 could be strengthened through reference to the protection of blue infrastructure, particularly with regard to potential adverse impacts for water pollution from industry and development.

G.3.2 Policy CSP2 – Placemaking: achieving well designed places

Policy CSP2 – 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CSP2	++	++	+	+	+	0	+	0	+	+	+	+	+	0

G.3.2.1 Policy CSP2 will help to ensure that all new developments within the Plan area are of high-quality design and have regard for the natural, built and historic environment present in Wolverhampton.

G.3.2.2 Policy CSP2 will seek to ensure development protects and enhances the historic character and local distinctiveness within Wolverhampton. The implementation of high-quality design will help to ensure that new development does not have an adverse impact on, and where possible enhances, any surrounding heritage assets and recognises their historic significance. Therefore, a major positive impact on cultural heritage is identified (SA Objective 1). The policy also seeks to ensure Wolverhampton is equipped with buildings which are designed to integrate into the surrounding neighbourhoods and support the diverse range of needs of Wolverhampton’s residents. Therefore, a minor positive impact on housing (SA Objective 10) has been identified.

G.3.2.3 This policy will help to ensure that building design is carefully considered to provide appropriate size, scale and type of development depending on the local characteristics, which will help to reduce potential adverse impacts of new development and ensure development is in keeping with the existing landscape character. Moreover, Policy CSP2 seeks to protect and enhance the historic canal network and natural waterways present across Wolverhampton with the intention that this will act as a “unifying characteristic within Wolverhampton’s urban structure and landscape”. A major positive impact in relation to landscape has been identified (SA Objective 2).

G.3.2.4 Policy CSP2 emphasises the importance of maintaining and incorporating a network of multifunctional open spaces which will support a strengthened natural environment and ecological network across the Plan area, able to support the restoration of ecosystems and habitats, along with other benefits associated with ecosystem services such as air filtration and carbon sequestration. Although, this policy could be further enhanced through specific reference to aiding the delivery of the Nature Recovery Network in order to support the ecological network and habitat provision in the Plan area. The policy also highlights the importance of well-designed places in helping to mitigate flood risk. Development will also be expected to reduce associated carbon emissions by promoting efficient design and the use of low carbon materials, as well as modern and sustainable related technologies. Overall, minor positive impacts have been identified for biodiversity and climate change mitigation and adaptation (SA Objectives 3, 4 and 5).

G.3.2.5 The policy will support the provision of pedestrian and cycling routes within developments, to facilitate active travel and provide open space for outdoor exercise and personal reflection. This also has the potential for a minor positive impact in relation to equality, whereby all residents will be expected to have improved access to key services and amenities, ensuring residents with differing needs are able to access what they require. Furthermore, the policy’s focus on providing high quality design could potentially result in

improved living conditions with benefits to human health. Policy CSP2 will help to encourage residents to live healthy lifestyles with access to facilities and services which meet their needs, and therefore, a minor positive impact on equality and health is identified (SA Objectives 11 and 12).

- G.3.2.6 Furthermore, under this policy, well-connected layouts will be encouraged, including public transport provisions and the incorporation of active travel infrastructure, which will help to reduce private car use and lead to benefits in terms of carbon emissions, air pollution and congestion. This will be expected to further support climate resilience and result in minor positive impacts for pollution and (SA Objectives 7) as well as major positive impacts on transport and accessibility. Whilst Policy CSP2 seeks to ensure that growth and regeneration in proximity to the watercourse network are supported, the policy could be enhanced through ensuring that water quality is also conserved and enhanced with the aims of minimising water pollution across the Plan area and into the wider Black Country.
- G.3.2.7 Through improving “*safe and accessible pedestrian and cycle infrastructure*” within and around Wolverhampton’s centres, and seeking to ensure “*active frontages*”, Policy CSP2 will be likely to create a more attractive public realm which could potentially increase footfall within centres and boost the local economy, leading to a minor positive impact on the local economy (SA Objective 13).
- G.3.2.8 The policy is unlikely to directly affect natural resources, waste or education, and as such negligible impacts have been recorded for SA Objectives 6, 8 and 14.

G.4 Infrastructure and Delivery

G.4.1 Policy DEL1 – Infrastructure provision

Policy DEL1 – 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: <ol style="list-style-type: none"> The infrastructure that is to be provided or supported; The prioritisation of and resources for infrastructure provision; The scale and form of obligation to be applied to each type of infrastructure; Guidance for integration with adjoining local authority areas, where appropriate; The procedure for maintenance payments and charges for preparing agreements; 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL1	0	+	+	+	+	0	+	+	+	+	+	+	+	+

G.4.1.1 Policy DEL1 sets out the requirements to ensure that all new developments are supported by necessary infrastructure, both on and off site, to promote sustainable development.

G.4.1.2 The policy supporting text in the WLP states that “*infrastructure investment will be required to support development, including: recreation open space, transport provision, school places, health facilities, affordable housing, sustainable drainage systems, wastewater treatment, waste management*”. As such, the policy has the potential to result in minor impacts with regard to landscape, biodiversity, climate change mitigation and adaptation, pollution, waste, transport, housing, equality, health, economy and education (SA Objectives 2, 3, 4, 5, 7, 8, 9, 10, 11, 12, 13 and 14).

G.4.1.3 The policy will not be expected to significantly affect cultural heritage or natural resources (SA Objectives 1 and 6), although there may be elements of the policy which may help to reduce the potential adverse effects on these objectives.

G.4.2 Policy DEL2 – Balance between employment land and housing

Policy DEL2 – 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: <ol style="list-style-type: none"> They are in sustainable locations that are suitable for the proposed use; They demonstrate a comprehensive approach, by making best use of available land and infrastructure; Incremental development will only be allowed where it would not prejudice the master-planning of the wider area; 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL2	0	0	0	0	0	+	0	0	+	+	0	0	+	0

G.4.2.1 Policy DEL2 aims to support ‘windfall’ housing and employment development on previously developed land, subject to meeting certain criteria. By supporting windfall development, this policy will be expected to have a minor positive impact on the provision of housing and employment land within Wolverhampton (SA Objectives 10 and 13).

G.4.2.2 Development directed toward brownfield land will be classed as an efficient use of land and help to prevent the unnecessary loss of soil within the WLP area. Therefore, Policy DEL2 will be expected to have a minor positive impact on natural resources (SA Objective 6).

G.4.2.3 In accordance with Policy DEL2, windfall development will be permitted in sustainable locations, and therefore, this will be expected to ensure site end users have good access to sustainable transport options. A minor positive impact on transport and accessibility (SA Objective 9) has been identified.

G.4.2.4 Mitigating the potential impact of “noise and other potential nuisances” will be expected to prevent adverse impacts relating to pollution (SA Objective 7), and as such a negligible impact has been identified.

G.4.3 Policy DEL3 – Promotion of Fibre to the Premise and 5G Networks

Policy DEL3 – 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
DEL3	0	0	0	+	0	0	0	0	+	0	+	0	+	0

G.4.3.1 Policy DEL3 will support the provision of Fibre to the Premise (FTTP) for developments of ten or more dwellings or 1,000sqm of non-residential floorspace and 5G networks in principle. The promotion of such infrastructure will be likely to help ensure that development proposals can meet the needs of the current and future population.

G.4.3.2 With the development of FTTP and roll-out of 5G within Wolverhampton promoted under this policy, residents will be likely to have greater access to essential services from home and workplaces. This will provide increased opportunities to work from home and access to a wider range of employment opportunities, resulting in a minor positive impact on the local community and economy (SA Objective 13). By increasing coverage of high-speed internet and improving online employment opportunities, the policy will also lead to a minor positive impact on equality (SA Objective 11).

- G.4.3.3 In addition, with improved access to online facilities and home working, this policy could potentially help to reduce reliance on private car use for commuting to workplaces, and in turn, reduce local congestion. Policy DEL3 therefore has potential to lead to an indirect minor positive impact on climate change mitigation and transport, due to reduced emissions and congestion associated with less traffic (SA Objectives 4 and 9).

G.5 Health and Wellbeing

G.5.1 Policy HW1 – Health and wellbeing

Policy HW1 – 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: <ul style="list-style-type: none"> a. Hot food takeaways (sui generis) or of 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. 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW1	0	+	0	0	0	0	0	0	0	0	+	++	0	0

- G.5.1.1 Policy HW1 outlines the strategic approach to promoting health and wellbeing across all new development proposed within the WLP. The policy sets out the requirement for applicants to demonstrate that proposals have a positive effect on health and wellbeing in line with other WLP policies.
- G.5.1.2 Policy HW1 seeks to protect the health and wellbeing of residents in Wolverhampton through ensuring that new development contributes to a reduction in health inequalities and seeks to improve the mental and physical wellbeing of residents, visitors and those who visit the Plan area. The policy also sets out requirements for a health impact assessment (HIA) where necessary to ensure the good health and wellbeing of those in Wolverhampton is not impeded and relevant mitigation is carried out where necessary. Furthermore, Policy HW1 will help to reduce obesity and child obesity within Wolverhampton, ensuring developments that could contribute to obesity such as hot food takeaways are suitable to the area and are proven to not contribute to negative health and wellbeing impacts. Overall, a major positive impact has been identified for health and wellbeing (SA Objective 12).
- G.5.1.3 The policy sets out detail on development which will be likely to result in a negative impact on the health and wellbeing of residents, including hot food takeaways, off-licences, public houses, other drinking/smoking related establishments and arcades, betting shops and payday loan outlets. Permitting these establishments only in certain locations and where they are expected to avoid significant adverse effects on health and wellbeing will be expected to help encourage healthier lifestyles, and could also help to avoid developments that harm the local townscape character. To this end, a minor positive impact has been identified for landscape and townscape and equality (SA Objectives 2 and 11).
- G.5.1.4 For some developments, seeking some controls of their operation, such as opening hours, may be expected to reduce the potential for negative impacts on the health and wellbeing of the local community through minimising forms of pollution, such as noise pollution which may be associated with developments and/or their construction. As such a negligible impact has been identified for SA Objective 7. Policy HW1 could be strengthened through specific wording regarding noise and air pollution associated with the operation of developments to ensure health of people within neighbouring residential and commercial areas are not adversely affected.
- G.5.1.5 This policy could be strengthened through reference to the natural environment, considering the multifunctional benefits for physical and mental health from improved and expanded GI and ecological networks throughout the urban environment.

G.5.2 Policy HW2 – Health Impact Assessments

Policy HW2 – 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.

Policy HW2 – Health Impact Assessments

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW2	0	0	0	0	0	0	0	0	0	0	+	++	0	0

G.5.2.1 Policy HW2 sets out the requirement for development proposals to undertake a Health Impact Assessment (HIA) to help to ensure that opportunities for promoting healthy lifestyles are maximised. The policy requires new developments which will provide an excess of 150 homes or 10,000sqm of new non-residential floorspace to produce a comprehensive or rapid HIA; developments of 20-150 homes or 1,000-10,000sqm of new non-residential floorspace to submit a rapid or desktop HIA; and for any other development CWC considers to have a potential negative impact on the health and wellbeing of local residents they will be required to carry out a rapid or desktop HIA.

G.5.2.2 By requiring some developments to submit an HIA, this policy will help to ensure development proposals do not have direct adverse impacts on: residents’ physical or mental health; social, economic and environmental living conditions; demand for or access to health and social care services; or an individual’s ability to improve their own health and wellbeing. Therefore, this policy will be likely to have a minor positive impact in relation to equality (SA Objective 11), as well as a potential major positive impact on health (SA Objective 12).

G.5.3 Policy HW3 – Healthcare facilities

Policy HW3 – 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.

Policy HW3 – 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HW3	0	0	0	+	0	0	+	0	+	0	+	++	0	0

G.5.3.1 Policy HW3 will seek to ensure that all new healthcare facilities are well designed and accessible, and that sufficient healthcare infrastructure is in place to support the existing population and future growth in Wolverhampton.

G.5.3.2 By protecting existing health facilities, and ensuring residential developments are assessed against the capacity of surrounding facilities and new facilities, the policy will help to ensure both current and future residents have good access to healthcare facilities, and as such, a major positive on health is likely (SA Objective 12).

G.5.3.3 By identifying and addressing accessibility gaps, this policy will also promote equal access to healthcare and could potentially help to reduce health inequalities; therefore, a minor positive impact on equality is identified (SA Objective 11).

G.5.3.4 Through ensuring that new healthcare facilities are located centrally in accordance with the role and scale of the proposed development and are well connected by public and active modes of transport, Policy HW3 will be expected to reduce the need to travel and reduce the volume of visitors arriving at facilities via private car, with subsequent benefits in terms of reducing local congestion and transport-associated emissions. Therefore, a

minor positive impact on climate change mitigation, pollution and transport could potentially be achieved (SA Objectives 4, 7 and 9).

G.6 Housing

G.6.1 Policy HOU1 – Delivering sustainable housing growth

Policy HOU1 – 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU1	0	0	0	-	0	+	-	-	0	++	+	0	0	0

G.6.1.1 Policy HOU1 sets out the housing need and supply figures for Wolverhampton over the Plan period to 2042. The policy sets out that the Council will deliver 9,330 new homes, which will contribute to the total need of 19,728 homes in Wolverhampton for the Plan period as identified in the Strategic Housing Land Availability Assessment (SHLAA)². A major positive impact has therefore been identified for housing (SA Objective 10). The delivery of at least 9,330 new homes over the Plan period would be expected to ensure Wolverhampton’s residents have access to accommodation which meets their needs and as such a minor positive impact on equality (SA Objective 11) has been identified.

G.6.1.2 Whilst it is necessary that the WLP delivers housing growth to support local needs, this will result in an increased population for the Plan area. As such, an increase in waste produced from new households, as well as from the construction and development process, will be inevitable. Additionally, this will also be likely to result in an increase in private vehicles, which would subsequently result in increased outputs of transport related

² City of Wolverhampton Council (2024) Strategic Housing Land Availability Assessment: Update as of April 2024. Draft, August 2024.

emissions. Therefore, minor negative impacts have been identified for climate change mitigation, pollution and waste (SA Objectives 4, 7 and 8).

- G.6.1.3 Policy HOU1 will promote housing growth in areas with good accessibility to various modes of transport including sustainable and active travel options, although the increase in local population is likely to put pressure on transport infrastructure as well as the strategic road networks. On balance, a negligible impact has been identified for transport and accessibility (SA Objective 9).
- G.6.1.4 Policy HOU1 states that development sites should seek to make the best use of available land which is likely to ensure greater use of previously developed land and brownfield sites, before developing previously undeveloped land. This will be expected to have a minor positive impact on natural resources (SA Objective 6).
- G.6.1.5 The policy seeks to maintain high quality design for allocations which may be developed incrementally and so will not be expected to impede the character of the historic townscape and landscape setting. As such, this will be expected to reduce potential for adverse impacts in relation to cultural heritage and landscape and townscape (SA Objectives 1 and 2), hence negligible effects have been identified overall.

G.6.2 Policy HOU2 – Housing density, type and accessibility

Policy HOU2 – 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:
 - 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU2	0	0	0	+	0	+	+	0	+	+	+	+	0	0

- G.6.2.1 An appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met. In particular, this may include an increased number of smaller homes with one or two bedrooms, as identified in the Housing Market Assessment Update³ which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market. Policy HOU2 aims to ensure that residential developments meet the local housing need, supporting the current and future requirements of the population in terms of housing type and size.
- G.6.2.2 The policy sets out criteria for accessibility standards, which will be expected to ensure housing is provided in sustainable locations which results in a reduced need to travel, encourages local shopping, and promotes social inclusion in the community. This will be likely to have a minor positive impact on local accessibility, housing provision and equality (SA Objectives 9, 10 and 11).
- G.6.2.3 Due to the requirement to ensure that the density and type of housing development is informed by the level of accessibility via sustainable transport, this policy will be likely to reduce emissions of road transport associated GHGs and air pollutants. Therefore, a minor positive impact has been identified for climate change mitigation and pollution (SA Objectives 4 and 7).
- G.6.2.4 By providing a suitable mix of housing types and tenure, this policy will be expected to meet the varying needs of residents, and as such, have a minor positive impact on health and wellbeing (SA Objective 12).
- G.6.2.5 High density development, particularly in centres, can be valuable where it provides greater opportunity for the re-use of previously developed land and more effective use of existing infrastructure which is accessible via public and active transport, and as such a minor positive impact has been identified for natural resources (SA Objective 6). However, high density development may also result in taller buildings which may have adverse impacts on the views and skyline across the Plan area. On balance, a negligible impact on cultural heritage (SA Objective 1) and landscape (SA Objective 2) is identified; however, it is recommended that this policy includes detail to ensure the design and layout of new development, particularly with regard to tall buildings, is informed by a Landscape and Visual Impact Assessment or Landscape and Visual Appraisal (LVIA/LVA).

³ HDH Planning and Development (2024) Wolverhampton Housing Market Assessment Update. Draft, August 2024.

G.6.3 Policy HOU3 – Delivering affordable, wheelchair accessible and self build / custom build housing

Policy HOU3 – 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;
 - 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 a 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.

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.

Policy HOU3 – Delivering affordable, accessible and self build / custom build housing

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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU3	0	0	0	0	0	0	0	0	0	+	+	+	0	0

- G.6.3.1 Policy HOU3 seeks to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy also sets out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable, in which case the developers will be required to submit a financial viability assessment to demonstrate that the highest possible proportions of such housing has been sought.
- G.6.3.2 The policy will help to ensure that, throughout the Plan area, the WLP delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents. This policy will set out the requirements for affordable housing delivery, to contribute towards meeting the social and economic needs of the population.
- G.6.3.3 Future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs, to ensure safe and appropriate living conditions are provided.
- G.6.3.4 This policy also addresses the needs of those wishing to build their own homes by setting out self-build housing requirements. This will help to ensure that new housing delivered across the Plan area can accommodate the diverse requirements of residents.
- G.6.3.5 Overall, minor positive impacts have been identified for Policy HOU3 in relation to housing, equality and human health (SA Objectives 10, 11 and 12).
- G.6.3.6 It is recommended that Policy HOU3 could be enhanced by ensuring that affordable housing created will remain affordable in perpetuity.

G.6.4 Policy HOU4 – Housing for people with specific needs

Policy HOU4 – 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:

Policy HOU4 – Housing for people with specific needs

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU4	0	0	0	0	0	0	0	0	+	+	+	+	0	0

G.6.4.1 Policy HOU4 seeks to ensure that the housing needs of current and future residents of Wolverhampton are met and that there is sufficient supply of different accommodation types to meet the required need.

G.6.4.2 It is important for accessibility requirements for the elderly, houses with young children and those with specific needs to be considered. Policy HOU4 sets out the need for developments of specific forms of housing to have access to public transport links and residential services, and to ensure there is appropriate support in relation to parking and highway safety. This will facilitate a more inclusive environment in which Wolverhampton’s residents are able to access key local services and facilities which meet their needs. As such, minor positive impacts have been identified in relation to transport, housing, equality, health and education (SA Objectives 9, 10, 11 and 12). By ensuring developments are in keeping with the surrounding local character, the policy could help to minimise potential adverse effects on the local landscape, resulting in a negligible impact on landscape character (SA Objective 2).

G.6.5 Policy HOU5 – Accommodation for Gypsies and Travellers and Travelling Showpeople

Policy HOU5 – 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. Wolverhampton City 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:

Policy HOU5 – Accommodation for Gypsies and Travellers and Travelling Showpeople

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU5	0	+	+/-	+/-	+/-	+	-	-	+	+	+	+/-	+/-	+

G.6.5.1 Policy HOU5 sets out the Gypsy and Traveller and Travelling Showpeople accommodation need and supply figures for Wolverhampton over the Plan period to 2042 in accordance with the Black Country Gypsy and Traveller Accommodation Assessment (GTAA) (2022)⁴, subsequent revised figures (2023)⁵, and any future updates.

G.6.5.2 The current Gypsy and Traveller pitch need up to 2032 is 56 pitches and the current supply figure for Wolverhampton is 14 pitches. It has been identified that DtC contributions from neighbouring authorities will not be able to contribute towards meeting the unmet need of 19 pitches. As such, to meet the remaining needs up to 2032 and beyond proposals within the “*broad location*” of the urban area will be sought. This policy will meet some of the identified need for pitches for Gypsies and Travellers, and plots for Travelling Showpeople. Therefore, this policy will be likely to have a minor positive impact on housing (SA Objective 10).

⁴ RRR Consultancy (2022) Black Country Gypsy and Traveller Accommodation Assessment. Final Report, April 2022.

⁵ RRR Consultancy (2023) Wolverhampton Accommodation Needs 2021-2042 – revised October 2023. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Wolverhampton%20Gypsy%20and%20Traveller%20Accommodation%20Need%20figures%20to%202042.pdf> [Date accessed: 27/09/24]

- G.6.5.3 The supporting text details that any remaining need will be met through the “*broad location*” of the urban area and as such is likely to make use of brownfield sites and previously developed land in order to meet this need up to 2032 and beyond. This could potentially encourage more efficient use of land and therefore a minor positive impact has been identified for natural resources (SA Objective 6).
- G.6.5.4 The policy is also likely to have a minor positive impact on equality, as the provision of Gypsy and Traveller pitches will help to ensure that a diverse range of residents in the WLP area have access to appropriate accommodation to suit their needs (SA Objective 11).
- G.6.5.5 Policy HOU5 sets out criteria which will require all development proposals for pitches and plots to have good access in accordance with Policy HOU2, integrate with neighbouring communities, include play areas and access roads. These requirements will be likely to result in minor positive impacts in regard to transport and accessibility (SA Objectives 9).
- G.6.5.6 With increased numbers of pitches and plots to meet Gypsy, Traveller and Travelling Showpeople need in Wolverhampton, there will be an increase in the volume of waste produced. Additionally, this would also likely result in increased use of private vehicles, including larger vehicles, such as heavy goods vehicles (HGVs), which are often associated with Travelling Showpeople. Although the policy seeks to ensure pitches and plots have adequate access to on-site services including drainage, sewage and waste disposal, overall there is potential for minor negative impacts in relation to pollution and waste (SA Objectives 7 and 8).
- G.6.5.7 The policy seeks to ensure sites are well designed which will be expected to ensure they are considerate of the character of the surrounding landscape and setting and do not present adverse impacts to the setting and integrity of the historic environment including heritage assets. As such, a minor positive impact could be achieved with regard to the local landscape character (SA Objective 2), and a negligible impact on cultural heritage (SA Objective 1).
- G.6.5.8 It is recommended that the policy includes greater clarity regarding “*integration with neighbouring communities*” where it is unclear if this would provide greater access to local services and facilities, schools or employment opportunities.
- G.6.5.9 The impact on the remaining SA Objectives is uncertain (SA Objectives 3, 4, 5, 12 and 13), as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. One reasonable alternative Gypsy and Traveller site has been identified by CWC and assessed in the SA process (see **Appendix F**).

G.6.6 Policy HOU6 – Education facilities

Policy HOU6 – 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.

Policy HOU6 – Education facilities

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU6	+	0	0	+	0	0	+	0	+	0	+	0	+	++

G.6.6.1 Policy HOU6 sets out the protection of existing education facilities, as well as support for an enhanced network of education facilities across the Plan area, particularly where there is a greater demand in line with the development of new housing, to meet the needs of residents in Wolverhampton. As such, a major positive impact has been identified for Policy HOU6 in relation to education (SA Objective 14).

G.6.6.2 The policy seeks to ensure that new education facilities including nurseries, schools and higher and further education facilities, are well-designed, complementing local services and amenities, as well as being well connected to public transport and active travel infrastructure, seeking to ensure journey times and numbers to access these facilities are minimised. As a result, this will be expected to reduce private car use necessary to reach education facilities meaning there is likely to be less congestion during peak travelling times, whilst also having the potential to reduce emissions leading to fewer harmful pollutants and GHGs released. Overall, minor positive effects have been identified in relation to cultural heritage, climate change mitigation, pollution and transport (SA Objectives 1, 4, 7 and 9).

G.6.6.3 Improved access to education facilities, particularly further and higher education, will also have benefits to the local economy, by ensuring a greater proportion of residents have skills desirable to be able to access employment opportunities and create a skilled local workforce. The policy addresses accessibility gaps and seeks to ensure all residents have good access to educational facilities in line with new developments, as set out in Policy HOU2. Therefore, this policy will be likely to have a minor positive impact on equality and the local economy (SA Objectives 11 and 13).

G.6.7 Policy HOU7 – Houses in Multiple Occupation

Policy HOU7 – 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: <ol style="list-style-type: none"> 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; 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
HOU7	0	0	0	0	0	0	0	0	+	+	+	+	0	0

-
- G.6.7.1 A dwelling is classed as a house in multiple occupation (HMO) if at least three tenants live there and share a toilet, bathroom or kitchen. Policy HOU7 sets out support for the development of HMOs, providing the proposal is in accordance with the criteria set out in the policy.
- G.6.7.2 This policy will support the provision of a range of housing options to residents of Wolverhampton, and therefore, is expected to have a minor positive impact on housing and equality (SA Objectives 10 and 11). In addition, the policy seeks to ensure the development of any HMOs will not significantly impact cultural heritage, landscape or biodiversity features and that they will not indirectly lead to any cumulative impacts on security and crime or anti-social behaviour. Negligible impacts are therefore identified for cultural heritage, landscape and biodiversity (SA Objectives 1, 2 and 3).
- G.6.7.3 This policy will help to ensure that development proposals for the creation of HMOs are located in areas with good access to public transport and active travel infrastructure. This will be expected to have a minor positive impact on transport and accessibility (SA Objective 9) and could potentially encourage outdoor exercise and active travel, with a minor positive impact identified for health and wellbeing (SA Objective 12).

G.7 Economy

G.7.1 Policy EMP1 – Providing for economic growth and jobs

Policy EMP1 – 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: <ul style="list-style-type: none"> 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: <ul style="list-style-type: none"> 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; 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP1	+/-	0	+/-	0	+/-	+	-	-	0	0	+	0	++	+

G.7.1.1 CWC seeks to allocate 42.9ha of employment land for the WLP period to 2042 to contribute towards meeting the residual employment land need for Wolverhampton of 126.4ha, which has been calculated based on the identified needs in the Black Country EDNA update

(2024)⁶ and drawing on completions during 2020-2024. Policy EMP1 sets out to deliver a range of employment sites in Use Classes E(g)(ii), E(g)(iii), B2 and B8 (research and development, industrial processes, and storage and distribution) in line with identified needs. A major positive impact on the economy (SA Objective 13) will be expected, by ensuring that employment land is provided to support economic growth and the diversification of Wolverhampton's economy.

- G.7.1.2 The development of new employment land will be expected to result in increased vehicle use (including private cars for employees, and HGVs associated with industrial and storage/distribution uses) which will consequently increase the emission of transport-associated GHGs, as well as potentially further operational GHG emissions depending on the specific uses proposed. However, the policy sets out aims to ensure that the regeneration of Strategic and Local Employment Areas and Other Employment Areas is supported through the provision of environmental enhancements, improved access via active transport networks, as well as the incorporation of renewable energy measures across sites. On balance, these factors are likely to ensure there are no significant adverse impacts with regard to climate change and transport, as such negligible impacts have been identified for SA Objectives 4 and 9. It is recommended that more specific wording regarding “*environmental enhancements*” is included in this policy, such as the conservation and/or enhancement of multi-functional GI and to ensure regeneration of employment areas considers thorough expansion of the ecological network throughout the Plan area.
- G.7.1.3 The increase in employment land within Wolverhampton, and associated industry and employees, is likely to lead to an increased volume of waste produced in relation to employment sites and employees themselves, as well as byproducts from industry processes. As such, minor negative impacts can be expected for waste, as well as pollution from potential harmful impacts on water and air quality (SA Objectives 7 and 8).
- G.7.1.4 Redevelopment and intensification within existing employment areas will have a minor positive impact with relation to natural resources (SA Objective 6), as this will be expected to minimise the need for land elsewhere within the Plan area and also reduce the use of previously undeveloped land, or land which could be utilised to meet other identified needs. This may also have the potential to maintain the setting of the surrounding landscape, leading to a negligible impact SA Objective 2.
- G.7.1.5 Policy EMP1 also has the potential for a minor positive impact on education and equality (SA Objectives 11 and 14), as it will work to ensure the provision of jobs and training opportunities within Wolverhampton for residents with a variety of employment needs, including for young people coming out of education.
- G.7.1.6 This policy is not anticipated to result in any significant impacts on housing and health (SA Objectives 10 and 12). Therefore, negligible effects have been identified.
- G.7.1.7 The impact on the remaining SA Objectives is uncertain (SA Objectives 1, 3 and 5), as the extent of both positive and negative impacts on these objectives are dependent on the development location, scale of development and contextual factors relating to site specific characteristics. Reasonable alternative employment sites identified by CWC have been assessed in the SA process, as documented in this SA report (see **Appendix F**).

⁶ Warwick Economics and Development (2024) Black Country Economic Development Needs Assessment

G.7.2 Policy EMP2 – Strategic Employment Areas

Policy EMP2 – 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.
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: <ol style="list-style-type: none"> can be shown to solely strongly support, maintain or enhance the business and employment function and attractiveness of the area; are of an appropriate scale (up to 280 sqm gross) and use; and meet the requirements of Policy CEN3.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP2	+/-	0	0	-	0	+	-	-	+	0	+	-	+	+

G.7.2.1 Policy EMP2 relates to Strategic Employment Areas within the WLP area, which correspond to areas of highest market demand and as such development or redevelopment within these areas will be likely have benefits to the local economy, as employment land would be located in desirable areas and will provide technology to enable businesses to thrive.

G.7.2.2 The policy will help to ensure that Strategic Employment Areas are highly accessible to ensure residents of all abilities have good access to a range of employment opportunities and surrounding services via sustainable transport modes. Therefore, a minor positive impact in relation to transport and accessibility and equality is identified (SA Objectives 9 and 11).

G.7.2.3 The redevelopment of sites in Strategic Employment Areas will be likely to result in a minor positive impact for natural resources (SA Objective 6), as it will result in the efficient use of land and minimise the need for development on previously undeveloped land.

G.7.2.4 The increased development in Strategic Employment Areas within Wolverhampton, and associated industry and employees, is likely to result in an increased volume of waste produced in relation to offices and employees themselves, as well as biproducts from industry processes. As such, there is potential for minor negative impacts for waste, as well as pollution from potential harmful impacts on water and air quality from pollutants (SA Objectives 7 and 8). As a result of this, there is also the potential for a minor negative

impact in relation to climate change mitigation (SA Objective 4), owing to potential increases in GHG emissions, and health as a consequence of reduced air quality (SA Objective 12). Unlike Policy EMP1, this policy lacks wording relating to promoting the uptake of public transport and active travel and the use of renewable energy technologies more specifically which would have otherwise worked to mitigate some of the harmful impacts associated with climate change mitigation and health. It is recommended these aspects are integrated into the policy or cross-references are incorporated, to strengthen the policy.

- G.7.2.5 Encouraging growth within Strategic Employment Areas will be expected to provide an increased number of jobs across a variety of sectors. This will ensure Wolverhampton’s residents have access to a range of employment opportunities and as such a minor positive impact has been identified for employment (SA Objective 13). Moreover, this will also be expected to provide a greater number of training opportunities to ensure the residents of Wolverhampton have the ability to develop further their professional skillsets. A minor positive impact on education (SA Objective 14) has also been identified.
- G.7.2.6 The policy states that the Strategic Employment Areas will be maintained as “*high quality environments*” which could be expected to ensure there are no adverse impacts associated with landscape, biodiversity and climate change adaptation (SA Objectives 2, 3 and 5). The policy could however benefit from more specific wording regarding “*high quality environments*” such as ensuring their design is in keeping with the surrounding character of the area and the sites incorporate multifunctional GI to integrate with the wider GI network and provide key ecosystem service functions such as flood alleviation.
- G.7.2.7 There is not anticipated to be any significant effect on the provision of housing (SA Objective 10) as a result of Policy EMP2 and as such a negligible impact has been identified.
- G.7.2.8 At present, the impact on the integrity and setting of heritage assets is not clear and would depend on site-specific characteristics and proposals; as such, an uncertain impact is identified for SA Objective 1.

G.7.3 Policy EMP3 – Local Employment Areas

Policy EMP3 – Local Employment Areas
<p>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.</p> <p>2) These areas will provide for the needs of locally-based investment and will be safeguarded for the following uses:</p> <ul style="list-style-type: none"> 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. <p>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:</p>

Policy EMP3 – Local Employment Areas

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP3	+/-	0	+/-	+/-	+/-	+	-	+	+	0	+	0	+	+

- G.7.3.1 Policy EMP3 will seek to allocate Local Employment Areas to support the provision of industrial, warehousing and service activities which will be expected to result in benefits for the local economy and provision of local employment opportunities. A minor positive impact on the economy will be likely (SA Objective 13).
- G.7.3.2 The policy aims to support for the provision of a range of industries including waste collection, transfer and recycling, which could lead to a minor positive impact on waste (SA Objective 8).
- G.7.3.3 There is the potential for a minor negative impact in relation to pollution (SA Objective 7) as Local Employment Areas are likely to have associated increases in private vehicle use to and from the sites, as well as potential pollutants from industrial activities themselves which could have damaging effects to water and air quality. This could also have a subsequent indirect negative impact in relation to climate change mitigation.
- G.7.3.4 The WLP policies map indicates the placement of Local Employment Areas on land alongside the strategic road and rail network as well as central locations. This will ensure that employment opportunities are easily accessible for Wolverhampton residents via active and sustainable transport, as well as for members of the neighbouring authorities who are employed in Wolverhampton. To this end, a minor positive impact has been identified in relation to transport and accessibility (SA Objective 9).
- G.7.3.5 Local Employment Areas are likely to provide greater opportunities in a range of sectors for a diverse mix of Wolverhampton’s residents. As such, a minor positive impact has been identified with regards to equality (SA Objective 11). This will also be anticipated to offer opportunities through which Wolverhampton’s residents are able to access training and professional skills development. A minor positive impact has also been identified for education (SA Objective 14).
- G.7.3.6 The policy sets out that Local Employment Areas consist of a plethora of industrial warehousing and service activity. It is likely there will be opportunities for utilising previously developed land to reduce the demand for previously undeveloped land and as such limit harm to the surrounding landscape and townscape. Therefore, a minor positive impact is expected for natural resources (SA Objective 6) and a negligible impact has been identified for landscape (SA Objective 2).

- G.7.3.7 The policy could benefit from more specific wording regarding the integration of multifunctional GI as well as the functioning of ecosystem services associated with GI, including for biodiversity and boosting climate resilience. This would support the identification of more positive impacts relating to biodiversity and climate change mitigation and adaptation. As a result, the extent of adverse effects on biodiversity, climate change mitigation and climate change adaptation (SA Objectives 3, 4 and 5) is uncertain.
- G.7.3.8 The extent of both positive and negative impacts on cultural heritage (SA Objective 1) will be dependent on the scale of development and contextual factors relating to the site-specific characteristics for new employment sites or redevelopment which come forward in the Local Employment Areas as a result of this policy.
- G.7.3.9 The policy is unlikely to directly affect housing provision or health, and as such negligible effects are identified for SA Objectives 10 and 12.

G.7.4 Policy EMP4 – Other Employment Sites

Policy EMP4 – Other Employment Sites

- 1) For employment areas that are not designated as either Strategic Employment Areas or Local Employment Areas on the Policies Map, 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;
 - 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP4	+/-	0	+/-	-	+/-	+	-	-	+	+	+	0	+	+

- G.7.4.1 Policy EMP4 regards employment sites that are not designated as either Strategic Employment Areas or Local Employment Areas but comprise existing occupied employment land. The policy will support new employment uses or extensions within these sites.
- G.7.4.2 The policy will be likely to increase the provision of employment floorspace across the WLP area, and as a result a minor positive impact on employment opportunities and the economy (SA Objective 13) has been identified.
- G.7.4.3 This policy will support the redevelopment of some employment sites to housing or other non-employment uses, where the employment site is no longer required for employment purposes. Therefore, this could potentially result in a minor positive impact on local housing provision (SA Objective 10). There is also potential for a minor positive impact on natural resources (SA Objective 6) as it will be expected that this will minimise the need for development on other sites, including the use of previously undeveloped land. This will be anticipated to avoid the potential for adverse impacts on the landscape as it would reduce the loss of greenfield land for development and as such maintain the character of the townscape. Therefore, a negligible impact has been identified for SA Objective 2.
- G.7.4.4 Policy EMP4 will be expected to increase the number of employment sites present within Wolverhampton, and as such would be expected to lead to an increase in waste production. There will also be an expected increase in traffic, possibly including larger HGVs and other vehicles, which could exacerbate congestion in the area as well as increased vehicle associated emissions and pollutants. To this end, minor negative impacts have been identified with regard to climate change mitigation, pollution and waste (SA Objectives 4, 7 and 8).
- G.7.4.5 As seen on the WLP Policies map, Policy EMP4 is likely to locate allocated employment sites within sustainable distances of public transport links and the wider road network. As a result, a minor positive impact has been identified for transport and accessibility (SA Objective 9).
- G.7.4.6 Through improving the provision of employment in the Plan area, Policy EMP4 will be expected to provide a greater number of job opportunities in different sectors to a diverse range of residents in Wolverhampton. As such, this will be anticipated to have minor positive impacts in relation to equality (SA Objective 11). The provision of a greater variety of job opportunities will also be expected to provide more opportunities for training and professional skills development for those who live and work in Wolverhampton. Therefore, a minor positive impact has been identified for education (SA Objective 14).
- G.7.4.7 The policy is not anticipated to have any significant impacts regarding health (SA Objective 12) and hence a negligible impact has been identified.

G.7.4.8 The policy could be enhanced through more specific wording relating to the conservation of the existing landscape and townscape character and appropriate design to ensure the setting and integrity of the historic environment is not compromised. The policy could also set out detail regarding the incorporation of GI and ecological networks throughout the sites to contribute to the extension of the ecological network throughout the Plan area with their associated ecosystem service functions such as flood alleviation. This would support the identification of more positive impacts and the avoidance of adverse effects in relation to cultural heritage, landscape, biodiversity and climate change adaptation (SA Objectives 1, 2, 3 and 5). These factors will also depend on the scale of development and contextual factors relating to site specific characteristics for new employment sites or redevelopments which come forward as a result of this policy. Based on the current wording, uncertain impacts are identified for SA Objectives 1, 3 and 5.

G.7.5 Policy EMP5 – Improving access to the labour market

Policy EMP5 – 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: <ul style="list-style-type: none"> 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; e. Measures to assist those with physical or mental health disabilities to access employment opportunities.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP5	0	0	0	0	0	0	0	0	+	0	+	+	+	+

G.7.5.1 Policy EMP5 will aim to support proposals for new employment development, where these employment opportunities are accessible, in particular for disadvantaged people and residents in the most deprived areas of the WLP area. The development of new employment sites is expected to have a minor positive impact on the economy (SA Objective 13). Ensuring the associated employment opportunities are available for all residents, particularly those in priority groups, the most deprived parts and those with physical and mental disabilities of the Plan area will be likely to have a minor positive impact in relation to equality (SA Objective 11) and health and wellbeing (SA Objective 12).

- G.7.5.2 The policy also seeks to enhance accessibility to developments for residents through ensuring there is a range of public sustainable and active transport options available to residents in the local area. As such, a minor positive impact has been identified for transport and accessibility (SA Objective 9).
- G.7.5.3 Furthermore, this policy will be likely to have benefits to education, by ensuring a diverse range of residents have access to training opportunities to increase their skills and employability. A minor positive impact on education is identified (SA Objective 14).
- G.7.5.4 There are not anticipated to be any significant impacts on the remaining SA Objectives and as such negligible impacts have been identified.

G.7.6 Policy EMP6 – Cultural facilities and the visitor economy

Policy EMP6 - 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.
- 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

Policy EMP6 - Cultural facilities and 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
EMP6	+	+	+	0	0	0	0	0	+	0	+	0	+	+

- G.7.6.1 Policy EMP6 seeks to support the development of cultural facilities and promote the visitor economy in Wolverhampton, through which a greater number of tourists and visitors will be drawn to enjoy the rich history of Wolverhampton. Therefore, a minor positive impact has been identified in relation to the economy (SA Objective 13).
- G.7.6.2 The policy seeks to support new facilities and the expansion of existing facilities which will be high accessible, well designed, able to support the use for potential other community needs and will be supported by the provision of appropriate facilities and amenities should the attraction be expected to draw a large number of tourists. Therefore, minor positive impacts have been identified in relation to transport and accessibility (SA Objective 9). Furthermore, the promotion of spaces for cultural facilities and events will be expected to have a minor positive impact in relation to the community by facilitating social cohesion and ensuring the equality of all residents through the celebration of cultural and ethnic diversity throughout the Plan area (SA Objective 11).
- G.7.6.3 The policy sets out support for heritage-related tourism, where this “*does not adversely impact on the heritage assets themselves or their environment*”. The support for high quality design, and accordance with other local and national policies, will potentially provide opportunities to achieve a minor positive impact on cultural heritage and the landscape/townscape character (SA Objectives 1 and 2). However, it is recommended this wording is strengthened to ensure that heritage assets and their settings are conserved and enhanced alongside any such proposals, in line with their significance.
- G.7.6.4 Heritage related attractions, including the historic canal network which runs through Wolverhampton, will be expected to provide educational opportunities which inform tourists and local people of the history of the area. As such, a minor positive impact has been identified in relation to education (SA Objective 14). Furthermore, supporting and maintaining the canal network as part of the historic environment will be anticipated to have secondary impacts for biodiversity in protecting and encouraging the expansion of ecological networks throughout Wolverhampton and as such a minor positive impact has been identified for biodiversity (SA Objective 3).

G.8 The Wolverhampton Centres

G.8.1 Policy CEN1 – Centres and centre uses

Policy CEN1 – 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 8.8) 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 8.8) 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.
 - 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 8.13.
- 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)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN1	0	0	+/-	+/-	+/-	+	+/-	+/-	+	+	+	+	+	0

- G.8.1.1 Policy CEN1 sets out the hierarchy of centres in Wolverhampton and relevant development types within each. The accompanying table to the policy as presented in the WLP sets out the guidance, thresholds and test requirements for each centre in line with their role in the hierarchy. The policy will aim to ensure centres in the WLP area provide residents with services and facilities that meet the local needs in regard to retail, leisure, commercial, residential, community and civic services. The strategic centre (Tier One) for the WLP area is Wolverhampton City Centre. There are two town centres (Tier Two): Bilston and Wednesfield, and several district and local centres (Tier Three).
- G.8.1.2 The hierarchy as set out under this policy will be likely to ensure a range of facilities are provided at appropriate locations to meet the local need. The policy supports *“enhancing the vitality, accessibility and sustainability of centres, and supporting the evening economy”* and as such, is expected to have benefits to the local community, ensuring all residents have access to essential services, and the local economy, through encouraging economic regeneration. Therefore, Policy CEN1 will be likely to have minor positive impacts in relation to equality and the economy (SA Objectives 11 and 13).
- G.8.1.3 Policy CEN1 sets out support for residential uses in centres which will support the provision of accommodation to meet Wolverhampton’s identified need. As such, a minor positive impact has been identified for housing (SA Objective 10).
- G.8.1.4 The policy supports development proposals which enhance the accessibility of centres, which will be anticipated to ensure centres are well served by sustainable and active modes of travel. This policy will be likely to encourage residents to live healthy lifestyles by supporting active travel. As such, minor positive impacts have been identified for transport and accessibility and health and wellbeing (SA Objectives 9 and 12).
- G.8.1.5 Policy CEN1 seeks to repurpose parts of Wolverhampton’s centres. This will be expected to make use of existing development and brownfield sites in order to meet the commercial, business and service functions of the Plan area, consequently helping to avoid the use of previously undeveloped land elsewhere. Therefore, a minor positive impact has been identified in relation to natural resources (SA Objective 6).
- G.8.1.6 The supporting text associated with the policy recognises the importance natural and cultural heritage features in providing an enhanced and unique sense of place when visiting Wolverhampton. As such, the policy could potentially help to prevent any adverse impacts on the natural and historic environment. Based on the current policy wording, negligible impacts have been identified in relation to cultural heritage and landscape (SA Objectives 1 and 2); however, positive effects could be secured through incorporating stronger wording to the policy itself regarding conserving and enhancing the landscape and cultural heritage features.

G.8.1.7 The policy could be enhanced through including specific wording relating to the incorporation of GI, green space and recognising the multi-functional benefits associated with open space within Wolverhampton’s centres which could provide benefits for the ecological and habitat networks throughout the Plan area, access to local greenspaces, as well as the various ecosystem service functions associated with them, such as air and water filtration, carbon sequestration and flood alleviation. This would support the identification of more positive effects in relation to biodiversity, climate change mitigation and adaptation and pollution (SA Objectives 3, 4, 5 and 7).

G.8.1.8 The type, scale and quantity of development that may be directed to each of the identified centres under this policy is currently not known as this policy sets out the strategic context, priorities and approach to centres. There is also uncertainty about the impact and recovery of centres in the light of the COVID-19 pandemic. The overall impact development proposals may have on the remaining SA Objectives is unknown. At present, the likely impact is recorded as uncertain (SA Objectives 3, 5, 7 and 8).

G.8.2 Policy CEN2 – Wolverhampton’s Centres

Policy CEN2 – 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:
 - 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 (7)); 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 8.26, 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 8.25, Policies CEN1 (6) (c) and EMP6; and Wolverhampton City Centre AAP Policy CC3);

Policy CEN2 – Wolverhampton’s Centres

- d. Complementary uses - particularly community, health and education uses (see para 8.8; 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 8.27); 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.
- ii. For ‘in-centre’ locations (Policy CEN1 Table 7) support will be given to the protection and provision of appropriate uses (para 8.8 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:
 - 1. 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 (7)).
 - 2. 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 8.8) 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)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN2	+	+	+	+	+	+	+	0	++	+	+	+	++	+

G.8.2.1 Policy CEN2 will support development and diversification within Wolverhampton’s Centres, including the Strategic Centre of Wolverhampton City Centre, and Bilston and Wednesfield Town Centres. Development proposals which would increase retail provision, services, housing and employment growth will be supported under this policy. Policy CEN2 will seek to ensure that development within centres includes a balanced mix of uses to support different industries.

G.8.2.2 Policy CEN2 will provide improved employment opportunities and community and retail developments to boost the local economy as well as human health and equality, by helping to ensure all residents have good access to a range of services and facilities, including education, leisure and healthcare. Overall, this policy will be expected to have minor positive impacts in relation to equality, health and education (SA Objectives 11, 12, and 14) and a major positive impact on the local economy (SA Objective 13).

G.8.2.3 Policy CEN2 sets out the priority for Wolverhampton’s centres to have a “*high quality public realm including greenspace and a built environment (particularly heritage and culture)*”, this will be expected to result in the protection of the landscape and townscape character as well as heritage assets. The provision of high-quality greenspace will contribute to the ecological network present throughout Wolverhampton and support greater levels of biodiversity. This will also be expected to support the functioning of important ecosystem services such as carbon storage and sequestration, air and water filtration and flood alleviation. Although, the policy could benefit from more specific detail regarding blue and green infrastructure. This will be expected to result in minor positive impacts in relation to cultural heritage, landscape and townscape, biodiversity and climate change adaptation (SA Objectives 1, 2, 3 and 5).

G.8.2.4 Whilst development in centres could result in a small loss of previously undeveloped land it will be expected that the predominant forms of development will protect large areas of greenfield and undeveloped land through the utilisation of brownfield sites and previously developed land. Overall, a minor positive impact has been identified for natural resources (SA Objective 6).

G.8.2.5 This policy will support the protection and provision of public and active modes of transport, to increase sustainable access to new development and local facilities for residents of the WLP area. This will provide more of the local community with easy and fast access to meet their needs, as well as contributing to reduced use of private vehicles. Overall, a major positive impact on transport and accessibility could be achieved (SA Objective 9), with a potential minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the focus on sustainable travel, which will help to encourage a modal shift away from private car use and consequently a reduction in transport-associated emissions.

G.8.2.6 Policy CEN2 emphasises the importance of maximising housing provision for Wolverhampton City Centre in order to meet the identified need for the Plan period up to 2042. A minor positive impact on housing provision (SA Objective 10) has therefore been identified.

G.8.3 Policy CEN3 – Provision of local facilities

Policy CEN3 – Provision of local facilities	
1)	Proposals subject to planning control for small-scale local facilities (centre uses and complementary uses (para 8.8) 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: <ol style="list-style-type: none"> The proposal does not unduly impact on the health and wellbeing of the community it will serve; 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; Local provision could not be better met by investment in a nearby centre (which for centre uses (para 8.8) is subject to the sequential test as set out in national guidance); Existing facilities that meet day-to-day needs will not be undermined; and 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.
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) and para 7.48.
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 8.13).
5)	Proposals where total floorspace exceeds 280sqm (gross) will also have to meet the requirements of Policy CEN4 (see paras 8.35-37).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN3	0	0	0	+	0	0	+	0	+	0	+	+	+	+

G.8.3.1 Policy CEN3 seeks to ensure the provision of local facilities across Wolverhampton to meet the needs of the communities and ensure proposed development does not adversely affect residents’ access to local facilities.

- G.8.3.2 The policy seeks to ensure that local facilities are accessible by means other than cars. As such this will encourage and support the use of sustainable and active modes of transport, leading to a minor positive impact on transport and accessibility (SA Objective 9).
- G.8.3.3 Policy CEN3 seeks to ensure that development proposals do not adversely impact the health and wellbeing of the community as well as ensuring that access is provided to facilities which meet the day-to-day needs of the community, which is likely to include healthcare, schools and community facilities. This will be anticipated to have a minor positive impact on equality, health and education (SA Objectives 11, 12 and 14).
- G.8.3.4 The provision of local facilities will also be expected to enhance the vitality of community centres and support the provision of local employment opportunities. As such, a minor positive impact has also been identified for the local economy (SA Objective 13).
- G.8.3.5 Developments for new local facilities will be required to demonstrate accessibility via means other than car use and should be within “*safe walking distance of the community it will serve*”, and as such will be likely to reduce private car required to access these key everyday services. Not only will this benefit transport and accessibility, but it will also be expected to reduce GHG emissions and harmful pollutants associated with private vehicle use. Therefore, minor positive impacts have been identified with regard to climate change mitigation and pollution (SA Objectives 4 and 7).

G.8.4 Policy CEN4 – Edge-of-Centre and Out-of-Centre Development

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

- 1) There is a clear presumption in favour of focusing appropriate uses (para 8.8) 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 8.30) for centre uses (para 8.8) 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 8.12 and 8.48).

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 3.17-24 and 3.32-41), CEN1 (particularly parts 1 and 4) and CEN2 (particularly parts 2 - Aii, Bii and Ci).
- 6) Proposals should be informed by the latest available evidence (para 8.11 and 8.50).

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

- 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 8.13 and 8.51).
- 9) Proposals that include unit sizes under 280sqm (gross) will also have to meet the requirements of Policy CEN3 (paras 8.46-47).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
CEN4	0	0	0	+	0	0	+	0	+	0	0	+	+	0

G.8.4.1 Policy CEN4 sets out criteria for the development of edge-of-centre and out-of-centre proposals for centre uses. This policy is expected to have benefits to the local economy, by encouraging development in centres which are highly sustainable locations, rather than on the edges or outside of centres, in the first instance. A minor positive impact on the economy is identified (SA Objective 13).

G.8.4.2 This policy will require all development proposals outside of centres to be assessed for accessibility via public transport, walking and cycling. These measures will be expected to ensure all residents and visitors have safe and sustainable access to these facilities. By supporting access via walking and cycling, this policy could potentially encourage active travel and facilitate healthy lifestyles. By providing adequate access via public transport, this could lead to a reduction in car use, with benefits to the climate, air pollution and congestion.

G.8.4.3 Therefore, as the policy will prioritise development in centres, and seek to ensure sustainable access to out-of-centre developments is prioritised and out-of-centre developments are integrated with the provisions already existing in the centres, this policy will be likely to have minor positive impacts in relation to climate change, air quality, transport and health (SA Objectives 4, 7, 9 and 12).

G.9 Transport

G.9.1 Policy TRAN1 – Priorities for the development of the Transport Network

Policy TRAN1 – 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: <ul style="list-style-type: none"> c. Motorways: <ul style="list-style-type: none"> i. M54 - M6 / M6 (Toll) Link Road d. Rail: <ul style="list-style-type: none"> i. Wolverhampton - Walsall – Willenhall – Aldridge Rail Link ii. Midlands Rail Hub iii. Wolverhampton – Shrewsbury Line Improvements iv. New Stations – including Brinsford Parkway e. Rapid Transit: <ul style="list-style-type: none"> i. Wolverhampton – New Cross Hospital - Wednesfield f. Key Road Corridors (schemes to improve general reliability, public transport, cycling and walking): <ul style="list-style-type: none"> i. A454 Wolverhampton – Walsall Corridor Improvement ii. A4123 Walk Cycle and Bus Corridor iii. A449 Stafford Road Walk Cycle and Bus Corridor iv. City Centre Ring Road

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN1	0	0	0	+	0	0	+	0	++	0	0	+	0	0

G.9.1.1 Policy TRAN1 outlines the priorities for Wolverhampton’s transport network during the Plan period, covering a wide range of transport modes including the strategic road network, rail and rapid transit. The policy draws out specific priorities for projects and transport networks which CWC seek to improve during the Plan period up to 2042, including the development of new railway stations, such as Brinsford Park, and development of public and active travel corridors, such as the A4123 Walk Cycle and Bus Corridor.

G.9.1.2 Policy TRAN1 sets out the requirement for new developments to provide access to public and active modes of travel, ensuring residents are able to meet their needs in a sustainable way. The transport projects identified within this policy will be expected to contribute towards improving the delivery of sustainable transport options, improving the integration of different modes of transport, reducing issues with congestion, and improving traffic flows. The policy could potentially encourage coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a major positive impact on transport is likely (SA Objective 9).

G.9.1.3 The policy will ensure all modes of travel are promoted including walking, cycling and public transport. The promotion of active travel and public transport improvements within key transport corridors will be expected to encourage the uptake of sustainable transport and could potentially help to reduce reliance on travel via car. A modal shift away from private car use towards public transport and active travel will be expected to result in a reduction in transport-associated emission of GHGs and other air pollutants. Therefore, Policy TRAN1 will be expected to result in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

G.9.1.4 Furthermore, by encouraging the uptake of active travel and ensuring development is accessible via walking and cycling, Policy TRAN1 could potentially improve the physical and mental wellbeing of residents. Under the policy, rapid transit to New Cross Hospital will also be improved, which will be likely to improve travel times and access to emergency healthcare. A minor positive impact on health is therefore anticipated (SA Objective 12).

G.9.2 Policy TRAN2 – Safeguarding the development of the Key Route Network

Policy TRAN2 – 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.														
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.														

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN2	0	0	0	0	0	0	0	0	+	0	0	0	0	0

G.9.2.1 New development within Wolverhampton as proposed within the WLP, as well as growth within neighbouring authorities in the West Midlands, will be expected to result in an increased number of vehicles on the local road network, adding more pressure to road infrastructure and travel corridors. An increased volume of traffic can have implications for a variety of issues such as congestion, road safety and air quality as well as resulting in longer journey times. Policy TRAN2 will seek to ensure that the West Midlands Key Route Network (KRN) is effectively managed in order to support the level of growth proposed in the WLP over the Plan period.

G.9.2.2 The policy sets out the requirement for appropriate measures of mitigation where there may be any potential adverse impacts on the road network. Policy TRAN2 will help to ensure that transport connectivity is improved, through requiring liaison between CWC and Transport for West Midlands (TfWM), with the aim of meeting and serving the “*main strategic demand flows of people and freight across the metropolitan area*”. As a result, the policy will be expected to encourage better coordination and streamlining of transport systems including public transport such as rapid transit and bus routes. Overall, a minor positive impact on transport is likely (SA Objective 9).

G.9.3 Policy TRAN3 – Managing transport impacts of new development

Policy TRAN3 – 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN3	0	0	0	+	0	0	+	0	+	0	0	0	0	0

G.9.3.1 Policy TRAN3 sets out the requirement for any development proposals which are likely to have adverse effects regarding transport to be accompanied by mitigation schemes to address accessibility and safety, in accordance with an agreed Transport Assessment. The policy specifies that mitigation schemes must address any adverse impact to active and more sustainable modes of travel, including walking and cycling. A minor positive impact on transport is anticipated (SA Objective 9). Supporting the use of more sustainable and active modes of travel will also be expected to reduce the emission of harmful pollutants which could worsen air quality in Wolverhampton, as well as reducing GHG emissions which would support the mitigation of climate change. Therefore, minor

positive impacts have been identified in relation to climate change mitigation and pollution (SA Objectives 4 and 7).

G.9.4 Policy TRAN4 – The efficient movement of freight

Policy TRAN4 – 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, as shown on the Transport Key Diagram and Policies Map, 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN4	0	0	-	0	0	0	0	0	+	0	0	0	0	0

G.9.4.1 Policy TRAN4 sets out guidelines for the movement of freight, and the prioritisation of sustainable modes of transport to be used where possible, making particular use of the KRN.

G.9.4.2 Road transport is a major source of air pollution and GHG emissions in the UK⁷. Transporting freight via rail and waterways will be expected to result in lower emissions and higher energy efficiency compared to road transport using HGVs⁸. By encouraging the movement of freight via rail and waterways, Policy TRAN4 could potentially help to relieve road congestion issues and result in more sustainable freight transport across the Plan area. Therefore, a minor positive impact on transport is identified (SA Objective 9).

G.9.4.3 The policy will also support the use of waterways and existing and disused railway lines for freight transport. In Wolverhampton and the wider Black Country, canals and disused railway lines often form part of the ecological network in an otherwise heavily urbanised area, for example, the ‘Wyrley and Essington Canal’ and ‘Staffordshire and Worcestershire

⁷ ONS (2019) Road transport and air emissions. Available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/roadtransportandairemissions/2019-09-16> [Date accessed: 06/09/24]

⁸ Government Office for Science (2019) Understanding the UK freight transport system. Available at: <https://www.gov.uk/government/publications/future-of-mobility-the-uk-freight-transport-system> [Date accessed: 06/09/24]

Canal’ Sites of Importance for Nature Conservation (SINCs), ‘Shropshire Union Canal’ Site of Local Importance for Nature Conservation (SLINC) and the ‘Dudley to Priestfield Disused Railway’ SLINC, amongst others. The conversion of these routes back into regular use for freight transport will have potential to result in a minor negative impact on biodiversity through the increased disturbance of important wildlife corridors (SA Objective 3).

G.9.5 Policy TRAN5 – Creating coherent networks for cycling and for walking

Policy TRAN5 - Creating coherent networks for cycling and for walking	
1)	Joint working between Wolverhampton City 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.
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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN5	0	0	0	+	0	0	+	0	+	0	0	+	0	0

G.9.5.1 Policy TRAN5 will seek to ensure that walking and cycling infrastructure networks are developed and maintained across the WLP area to encourage sustainable travel choices.

G.9.5.2 The policy requires the development of safe cycle and walking links and necessary associated infrastructure such as cycle parking. These factors will be likely to encourage more people to consider cycling and walking as alternative forms of travel, reducing reliance on private car use. Therefore, a minor positive impact on transport is expected (SA Objective 9). This will also contribute towards a reduction in GHG emissions and other air pollutants such as NO₂, with benefits for local air quality, and as such, minor positive impacts have been identified for climate change mitigation and pollution (SA Objectives 4 and 7).

G.9.5.3 Furthermore, through facilitating active travel, this policy could potentially encourage outdoor exercise and result in benefits to mental and physical wellbeing. A minor positive impact on health will be likely (SA Objective 12).

G.9.6 Policy TRAN6 – Influencing the demand for travel and travel choices

Policy TRAN6 - Influencing the demand for travel and travel choices	
1)	Wolverhampton City 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: <ol style="list-style-type: none"> identifying appropriate strategic and local Park and Ride sites on current public transport routes to ease traffic flows into centres; 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; 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).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN6	0	0	0	+	0	0	+	0	+	0	0	+	0	0

G.9.6.1 Policy TRAN6 will promote the holistic management of traffic across Wolverhampton and the wider area and seek to encourage a modal shift towards more sustainable travel options, in accordance with the Traffic Management Act 2004 (TMA). The aim of the TMA is to “*tackle congestion and disruption on the road network ... [and] places a duty on local authorities to make sure traffic moves freely and quickly*”⁹.

G.9.6.2 This policy seeks to promote the use of sustainable and active modes of travel through Smarter Choices measures, including walking and cycling opportunities as well as developing further park and ride schemes which will be expected to help reduce congestion into the centres. A reduction in congestion will be expected to reduce the release of vehicle related GHG emissions and harmful pollutants. Furthermore, the reduction in harmful pollutants coupled with the encouragement of active travel will be expected to support healthier and more active lives of local residents. As such, minor positive impacts have been identified for climate change mitigation, pollution, transport and health and wellbeing (SA Objectives 4, 7, 9 and 12).

⁹ Department for Transport (2022) Traffic management Act 2004 overview. Available at: <https://www.gov.uk/government/collections/traffic-management-act-2004-overview> [Date accessed: 06/09/24]

G.9.7 Policy TRAN7 – Parking management

Policy TRAN7 - 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 some or all of the following measures as appropriate: <ol style="list-style-type: none"> the management and control of parking - ensuring that it is not used as a tool for competition between centres; 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; maximum parking standards – ensuring that a consistent approach to maximum parking standards is enforced in new developments as set out in supplementary planning documents; residential parking – ensuring that new residential developments in urban centres are designed to minimise space allocated for resident parking and maximise accessibility by active travel and public transport; 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 urban centres is as efficient as possible.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN7	0	0	0	+	0	0	+	0	+	0	0	+	+	0

G.9.7.1 By regulating the types of parking available in different locations, and ensuring these standards are applied consistently across the Plan area, Policy TRAN7 will be expected to encourage people to choose more sustainable travel modes where possible. The policy will also aim to ensure that the efficiency of traffic flows in and around town centres is improved. Overall, a minor positive impact on transport is anticipated (SA Objective 9).

G.9.7.2 The policy will promote short-term parking in town centres which will ensure sufficient provision for retail and leisure customers. This will be expected to help to support local shops and businesses and result in a minor positive impact on the economy (SA Objective 13).

G.9.7.3 Through reducing the amount of long-stay parking in the centres, this policy encourages the use of sustainable and active transport methods and as such will be expected to contribute to reduced congestion and traffic flows into the centres, which will minimise vehicle related GHG emissions and harmful pollutants. Therefore, minor positive impacts have been identified in relation to climate change mitigation and pollution (SA Objectives 4 and 7). Furthermore, the reduction in harmful pollutants coupled with the encouragement of active travel will be expected to facilitate healthier and more active lives of local residents, and as such a minor positive effect has also been identified for health (SA Objective 12).

G.9.8 Policy TRAN8 – Planning for low emission vehicles

Policy TRAN8 - Planning for low emission vehicles	
1)	Wolverhampton City Council will promote the increased use of low emission vehicles by: <ol style="list-style-type: none"> 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; Where appropriate, facilitating the introduction of electric vehicle charging points in public locations; and 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
TRAN8	0	0	0	+	0	0	+	0	+	0	0	0	0	0

G.9.8.1 Policy TRAN8 will promote development proposals which support low emission vehicles (LEV). The term LEV can be used to refer to motorised vehicles which emit lower levels of emissions than traditional petrol- or diesel-powered cars or use low carbon technologies, including pure electric vehicles and plug-in hybrid vehicles¹⁰.

G.9.8.2 This policy will help to encourage the use of LEVs within the WLP area, by ensuring the appropriate infrastructure such as electric vehicle charging points are incorporated within new developments and appropriate public locations. The policy will also encourage the exploration of alternative low emission vehicle technologies. Overall, these measures will be likely to result in a minor positive impact on sustainable transport (SA Objective 9). Furthermore, encouraging the use of LEVs could potentially help to reduce the emission of GHGs and other air pollutants, resulting in a minor positive impact on climate change mitigation and pollution (SA Objectives 4 and 7).

¹⁰ SMMT (2020) Ultra Low Emission Vehicles (ULEVs). Available at: <https://www.smmmt.co.uk/industry-topics/technology-innovation/ultra-low-emission-vehicles-ulevs/> [Date accessed: 04/09/24]

G.10 Environment and Climate Change

G.10.1 Policy ENV1 – Nature conservation

Policy ENV1 – 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 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 Wolverhampton City 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;

Policy ENV1 – Nature conservation

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV1	0	+	++	+	+	0	+	0	0	0	0	+	0	0

G.10.1.1 Policy ENV1 aims to protect, conserve and enhance biodiversity assets, from internationally designated to locally protected sites.

G.10.1.2 The policy specifies that development should not harm species which are legally protected, in decline, rare or identified in Biodiversity Action Plans. Furthermore, the policy requires that where planning applications may affect any designated site or any important habitat, species or geological feature, they must include a data search from the Local Records Centre, and for a Local Sites Assessment to be submitted to the Local Sites Partnership where development is likely to impact upon a Site of Importance for Nature Conservation (SINC) or a Site of Local Importance for Nature Conservation (SLINC). The policy seeks to ensure that designated sites and important species and habitats are protected and will require all future development to positively contribute to the local natural environment including the emerging Nature Recovery Network. Therefore, a major positive impact on biodiversity is expected (SA Objective 3).

G.10.1.3 Biodiversity assets, such as Local Nature Reserves (LNRs) and SINCs, are often key features of local landscapes. By protecting and potentially enhancing biodiversity assets, it is likely that some key landscape features would also be protected and potentially enhanced, with benefits to local character and visual amenity. Therefore, a minor positive impact has been identified with regard to the local landscape (SA Objective 2).

G.10.1.4 Vegetation provides several ecosystem services to the Plan area, including carbon storage and sequestration, the reduction of flood risk, and filtration of air and water. The protection and enhancement of biodiversity features provided by this policy, including for watercourses and the canal network, will be likely to help protect and enhance the provision of these essential ecosystem services. Furthermore, protecting nature conservation sites and supporting nature recovery will be likely to help species adapt to changing climates. As such, minor positive impacts have been identified with regard to

climate change mitigation, climate change adaptation and pollution (SA Objectives 4, 5 and 7).

G.10.1.5 The protection and enhancement of the natural environment will be likely to result in benefits to the health of local residents. Access to natural and diverse outdoor spaces is known to have benefits for mental wellbeing, whilst also encouraging physical activity and providing opportunities for community cohesion. These measures will therefore be expected to have a minor positive impact on health and wellbeing (SA Objective 12).

G.10.1.6 It is recommended that Policy ENV1 could be enhanced through ensuring that canal / waterside developments will include measures to protect and where possible improve the ecological and chemical status of waterbodies.

G.10.2 Policy ENV2 – Development affecting Cannock Chase Special Area of Conservation

Policy ENV2 – 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV2	0	0	++	0	0	0	0	0	0	0	0	+	+	0

G.10.2.1 Policy ENV2 sets out CWC’s approach to the protection of the Cannock Chase Special Area of Conservation (SAC), against future development. Any development within 15km of Cannock Chase SAC boundary which would result in a net increase in residential units will be required to undertake an appropriate assessment under this policy. The appropriate assessment will indicate if the development would be likely to result in an adverse impact on the integrity of the SAC, and if so, the developer will be required to ensure sufficient measures are in place to avoid or mitigate the identified impact, the policy emphasises an appropriate mitigation measure to include “*proportionate financial contributions towards the current agreed Cannock Chase SAC Partnership*”.

G.10.2.2 The requirements set out in Policy ENV2 will be expected to protect Cannock Chase SAC from inappropriate development, and therefore, a major positive impact on biodiversity has been identified (SA Objective 3).

G.10.2.3 Cannock Chase SAC is a popular tourist destination, with activities including mountain biking, camping and ‘Go Ape’ adventure park. Although the SAC itself is located some 11.5km to the north east of the Wolverhampton boundary, protecting the SAC from inappropriate development could potentially have benefits in relation to tourism in the wider area and have a minor positive impact on the local economy (SA Objective 13). Cannock Chase SAC forms part of the wider GI network, providing space for outdoor recreation and exercise for residents and visitors. By preserving and enhancing these sites, the policy could potentially have a minor positive impact on physical and mental health (SA Objective 12).

G.10.3 Policy ENV3 – Nature Recovery Network and Biodiversity Net Gain

Policy ENV3 – 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: <ul style="list-style-type: none"> 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.
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: <ul style="list-style-type: none"> a. Implementation of this hierarchy: <ul style="list-style-type: none"> 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; 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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV3	0	+	++	+	+	0	+	0	0	0	0	+	0	0

- G.10.3.1 Paragraph 174 of the NPPF¹¹ states that “*planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*”. Mandatory requirements for delivering at least 10% biodiversity net gain (BNG), maintained for at least 30 years, came into force in February 2024.
- G.10.3.2 Policy ENV3 will require all development to deliver a minimum of 10% BNG as part of development proposals and is expected to ensure that all developments consider their contributions to the delivery of the emerging Local Nature Recovery Strategy (LNRS). Consequently, this policy provides opportunities to enhance the quality and quantity of habitats and improve connectivity for flora and fauna, and as such, improve the biodiversity value of the Plan area. Therefore, this policy is expected to have a major positive impact on biodiversity (SA Objective 3).
- G.10.3.3 Well planned BNG could potentially contribute towards improved air quality due to the increased uptake of carbon dioxide and filtration of pollutants associated with road transport, which could potentially help to reduce residents’ exposure to air pollution. Furthermore, due to this enhanced carbon storage capacity, this policy could potentially help to mitigate anthropogenic climate change. Therefore, a minor positive impact on climate change mitigation and pollution has been identified (SA Objectives 4 and 7).
- G.10.3.4 Increased biodiversity and green cover are likely to help reduce water runoff rates and as such, reduce the risk of both fluvial and surface water flooding. Improvements to the quality and quantity of the green network will also be likely to enhance natural water storage and flow functions. Connectivity between habitats, including stepping-stone habitats, is particularly important when considering global climatic trends as they provide opportunities for the movement of species and adaptation to climate change. Overall, a minor positive impact on water and flooding has been identified (SA Objective 5).
- G.10.3.5 Enhanced biodiversity and green cover across the WLP area will be likely to have positive impact on residents’ wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. Therefore, a minor positive impact on human health and wellbeing is identified (SA Objective 12).
- G.10.3.6 Furthermore, the enhancement of the ecological and GI network could potentially provide opportunities to safeguard and improve the character and appearance of local landscapes and townscapes and create more pleasant outdoor spaces for both people and wildlife. A minor positive impact on the local landscape (SA Objective 2) has been identified.

G.10.4 Policy ENV4 – Trees and hedgerows

Policy ENV4 – 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

¹¹ DLUHC (2023) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 06/09/24]

Policy ENV4 – Trees and hedgerows

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.
- 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

Policy ENV4 – Trees and hedgerows

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.

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.
- 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.

Policy ENV4 – Trees and hedgerows

- 19) All new trees should be planted in accordance with arboricultural best practice, including the use of suitably sized planting pits¹², 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV4	+	+	++	+	++	+	+	0	0	0	0	+	0	0

G.10.4.1 Policy ENV4 aims to create, retain and protect trees, woodland and hedgerows, including ancient trees ancient woodland, and veteran trees across the Plan area.

G.10.4.2 Where the loss of a tree is unavoidable, this policy will require the planting of three appropriate native trees in replacement of every tree lost. This policy encourages an arboricultural survey to be carried out prior to removal of any vegetation or site groundworks. Ecological surveys should also be carried out to identify species rich hedgerows which are present on previously undeveloped land, and as such this policy requires there to be a presumption against the removal of hedgerows. These measures will be expected to help prevent the inappropriate loss of vegetation. Trees, woodlands and hedgerows support a vast array of important flora and fauna and can serve as useful connecting habitats to facilitate the movement of species particularly in the urbanity of Wolverhampton. To this end, Policy ENV4 states the Council’s aim of increasing the tree

¹² 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

canopy extent in Wolverhampton by 20% to 2035. Overall, this policy will be likely to result in a major positive impact on biodiversity (SA Objective 3).

G.10.4.3 The retention and enhancement of trees and woodland supported under this policy will be likely to boost the natural carbon sink and air filtration ecosystem services provided by trees and vegetation. This will be expected to help reduce residents' exposure to air pollution, for example through the filtration or buffering of emissions associated with road transport. Furthermore, due to the enhanced carbon storage capacity tree planting would provide, this policy will likely also help to mitigate anthropogenic climate change. A minor positive impact on the climate change mitigation and pollution objectives area therefore identified (SA Objectives 4 and 7). These measures could also help to improve the respiratory health of residents and provide opportunities for integrating green spaces amongst development for recreation. Access to a diverse range of natural habitats will also provide benefits to mental wellbeing. Therefore, a minor positive impact is also expected in terms of human health (SA Objective 12).

G.10.4.4 Trees serve an important role in protecting soil from erosion as a result of rainfall and surface water runoff, due to the stabilisation provided by roots and interception of rainfall by foliage. Through conserving and enhancing tree coverage across the Plan area, this policy will be likely to help preserve soils and have a minor positive impact on natural resources (SA Objective 6). By reducing water runoff rates this will also be expected to enhance natural water storage and help to reduce the risk of fluvial and surface water flooding. Trees and increased canopy cover within Wolverhampton will also be likely to help combat the Urban Heat Island effect and provide natural shade and cooling in the urban areas, which is likely to boost the Plan area's resilience to the effects of climate change. Therefore, a major positive impact on climate change adaptation is identified (SA Objective 5).

G.10.4.5 Furthermore, trees, woodlands and hedgerows can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest. Additionally, the protection of ancient and veteran trees, hedgerow and woodland will likely help to protect and enhance historic character. Therefore, this policy could also result in a minor positive impact to cultural heritage and the local landscape (SA Objectives 1 and 2).

G.10.5 Policy ENV5 – Historic character and local distinctiveness

Policy ENV5 - 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.
- 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.

Policy ENV5 - Historic character and local distinctiveness

- 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 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):

Policy ENV5 - Historic character and local distinctiveness

- a. Areas of High Historic Townscape Value (AHTTV) 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;
 - 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV5	++	+	+	0	0	0	0	0	0	0	+	0	+	0

G.10.5.1 Policy ENV5 will help ensure that heritage assets, whether designated or non-designated, are conserved and enhanced in a manner appropriate to their significance, in line with national policy, and that the setting and special character of heritage assets are enhanced and not adversely impacted by development.

G.10.5.2 Where development proposals could potentially affect the significance of a heritage asset, this policy may require developers to produce an accompanying statement such as a

Heritage Impact Statement, and/or an Archaeological Desk-based Assessment / Field Evaluation, to ensure that the impact can be adequately assessed. The policy will seek to enrich the historic environment, by requiring development proposals to enhance local distinctiveness, retain and enhance built assets and their settings, historic townscape value and archaeological potential. Overall, this policy will be likely to have a major positive impact on cultural heritage (SA Objective 1).

G.10.5.3 Policy ENV5 will ensure the scale and design of new development is informed by consideration of the local character and distinctiveness and specific settlement pattern, which will be expected to benefit the character, appearance and distinctiveness of local landscapes and townscapes. This policy will help to protect and enhance urban landscape features and therefore result in a minor positive impact on the local landscape (SA Objective 2).

G.10.5.4 Through maintaining and enhancing the distinctive features and character of Wolverhampton, the community will be expected to benefit through encouraging a sense of belonging and pride in the place in which they live. This may in turn promote social inclusion between residents in Wolverhampton and therefore, a minor positive impact on equality is expected (SA Objective 11). Furthermore, the conservation and enhancement of heritage assets and historic townscapes can have benefits to the economy including through encouraging tourism and attracting investment¹³. The policy could therefore potentially result in a minor positive impact on the economy (SA Objective 13).

G.10.5.5 Policy ENV5 will also be expected to promote the conservation and enhancement of geologically significant sites within the UNESCO Black Country Geopark; therefore, a minor positive impact on biodiversity and geodiversity could be expected (SA Objective 3).

G.10.6 Policy ENV6 – Geodiversity and the Black Country UNESCO Global Geopark

Policy ENV6 - 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.

¹³ Historic England (2020) Heritage and the Economy 2020. Available at: <https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/> [Date accessed: 06/09/24]

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV6	+	+	+	0	0	0	0	0	0	0	0	0	+	+

G.10.6.1 Policy ENV6 will help to protect and enhance geodiversity sites across the WLP area, in particular the Black Country UNESCO Global Geopark. Development proposals which could potentially result in an adverse impact on geodiversity sites of international or national importance will be resisted. This policy has therefore been identified to have a minor positive impact on local geodiversity (SA Objective 3).

G.10.6.2 Sites of geological importance are often strongly linked to the surrounding local landscape and historic features, including Wolverhampton’s, and the wider Black Country’s, industrial heritage. By protecting the local geodiversity, this policy will also be expected to have a minor positive impact on cultural heritage and the local landscape (SA Objectives 1 and 2).

G.10.6.3 The protection and enhancement of geologically important sites including the UNESCO Global Geopark is likely to have benefits to tourism in the area, and therefore, have a minor positive impact on the local economy (SA Objective 13). Furthermore, sustainable tourism, outdoor learning and education are major themes of the Geopark¹⁴. As such, a minor positive impact on education (SA Objective 14) has also been identified.

G.10.7 Policy ENV7 – Canal network

Policy ENV7 – Canal network
<p>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.</p> <p>2) All development proposals likely to affect the canal network must:</p> <ol style="list-style-type: none"> 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; ensure that any proposals for reinstatement or reuse would not adversely impact on locations of significant environmental value where canals are not currently navigable; protect and enhance its special historic, architectural, archaeological, and cultural significance and their setting, including the potential to record, preserve and restore such features; protect and enhance its nature conservation value including habitat creation and restoration along the waterway and its surrounding environs;

¹⁴ Black Country Geopark (2021) Black Country Geopark – Education, Events & Sustainable Tourism. Available at: <https://blackcountrygeopark.dudley.gov.uk/education/> [Date accessed: 06/09/24]

Policy ENV7 – Canal network

- 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV7	+	+	+	0	0	0	+	0	+	+	0	+	+	0

G.10.7.1 Policy ENV7 will aim to protect and enhance Wolverhampton’s canal network. The policy will require all development proposals to safeguard the functional waterways and encourage reinstating and/or upgrading towpaths and link them into high-quality, wider pedestrian and cycle networks. This will ensure the canal network remains functional across the Plan area, with minor positive impacts in regard to transport and accessibility (SA Objective 9) identified. Furthermore, enhancing the canal towpath network for use by pedestrians and cyclists could potentially encourage outdoor exercise and active travel, resulting in a minor positive impact on physical and mental health (SA Objective 12).

G.10.7.2 Policy ENV7 will also require development proposals to protect and enhance the special historic, architectural, archaeological and cultural significance of the canal network. Furthermore, development proposals will be required to consider the visual amenity of developments in proximity to the canal network. Under the policy, water quality of the canal network will be protected and enhanced. These requirements are likely to result in minor positive impacts in relation to cultural heritage, landscape and water pollution (SA Objectives 1, 2 and 7).

G.10.7.3 The canal network within Wolverhampton, and in the wider Black Country, forms a key aspect of the ecological network within the urban environment, providing key green and blue infrastructure as well as corridors for local wildlife. The policy recognises the nature conservation value of the canal network and seeks to protect and enhance these features. As such, a minor positive impact on biodiversity (SA Objective 3) has been identified.

G.10.7.4 The policy will also seek to ensure that where the opportunity exists, future development should aim to improve leisure, recreation and tourism activities. This will be likely to have a minor positive impact on the local economy (SA Objective 13).

G.10.7.5 This policy will support the development of residential moorings within the WLP area, which will help to increase the provision of a diverse range of housing opportunities. As such, a minor positive impact on the overall provision of accommodation (SA Objective 10) has been identified.

G.10.8 Policy ENV8 – Open space and recreation

Policy ENV8 – 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: <ol style="list-style-type: none"> a. improving the image, visual amenity and environmental quality of Wolverhampton, in accordance with Policy CSP2;

Policy ENV8 – Open space and recreation

- 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV8	0	+	+	+	+	+	+	0	+	0	+	++	0	0

G.10.8.1 Policy ENV8 will seek to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents.

G.10.8.2 Open space has multiple benefits within an area. This includes physical and mental health benefits associated with residents’ access to a diverse range of natural habitats, alongside the facilitation of outdoor recreation. Access to open space, recreation and leisure facilities is essential for residents to be able to pursue healthy and active lifestyles. This policy will support the development of multifunctional open spaces within the Plan area and ensure current open space and recreational facilities are retained. The policy supports the provision of allotments which would encourage residents to grow their own food and would foster positive relationships with the land which would support mental and physical health benefits, as well as conservation of the underlying soil resources for food production. Therefore, this policy will be likely to have a major positive impact on the health and wellbeing of residents (SA Objective 12) and a minor positive impact on natural resources (SA Objective 6). This policy also encourages the developments to ensure links are provided to public transport infrastructure, footpaths and cycle networks. As a result, a minor positive impact is identified for transport and accessibility (SA Objective 9).

G.10.8.3 Policy ENV8 seeks to ensure that access to open space and recreation facilities increase for all members of Wolverhampton, including those with disabilities and groups with limited access. This would be expected to foster positive community relations and increase social inclusion, addressing accessibility gaps. Therefore, a minor positive impact has been identified in relation to equality (SA Objective 11).

G.10.8.4 Open space is beneficial to the local biodiversity network by providing an increased number of natural habitats and the opportunity to create green links within urban areas. This could also benefit the local landscape by creating attractive open spaces within the area. This policy aims to improve the public realm and incorporate high quality landscaping, which has potential to contribute towards the preservation and enhancement of local distinctiveness and diversity in the natural and built environment. As a result, it is expected that this policy will have a minor positive impact on the local landscape and biodiversity (SA Objectives 2 and 3).

G.10.8.5 Potential new or enhanced open spaces, and associated GI, will be expected to contribute towards improved air quality due to the increased uptake of carbon dioxide. Due to this enhanced carbon storage capacity, this policy will be expected to contribute towards the mitigation of anthropogenic climate change. Well planned GI could also provide natural filtration to reduce residents’ exposure to air pollution, for example from emissions associated with road transport. A minor positive impact on climate change and pollution will therefore be expected (SA Objectives 4 and 7). Enhanced open space and GI could

also potentially help to reduce water runoff rates, leading to benefits for reducing flood risk, and provide natural cooling in the urban areas; as such, a minor positive impact on climate change adaptation will also be likely (SA Objective 5).

G.10.9 Policy ENV9 – Playing fields and sports facilities

Policy ENV9 – Playing fields and sports facilities	
1)	Existing playing fields and built sports facilities should be retained unless: <ol style="list-style-type: none"> 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 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: <ol style="list-style-type: none"> 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).

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV9	0	+	+	+	+	0	+	0	+	0	+	+	0	0

- G.10.9.1 Policy ENV9 seeks to ensure that sports facilities and playing fields throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for all existing and future residents.
- G.10.9.2 Through ensuring new built sports facilities have good access, and are “*well-designed, including through the provision of high quality landscaping and public realm enhancements, and well-related to neighbourhood services and amenities*” this policy is expected to help to fill gaps in accessibility for vulnerable or disadvantaged groups. Therefore, a minor positive impact on equality is identified (SA Objective 11). Furthermore, this emphasis on ensuring sports facilities and playing fields are well-designed will be expected to result in green spaces which are situated well within the character setting of Wolverhampton more widely and as such will contribute to an improved local landscape. As such, a minor positive impact has been identified in relation to landscape (SA Objective 2).
- G.10.9.3 The provision of playing fields and sports facilities for communities within Wolverhampton will be anticipated to encourage healthier and more active lifestyles, particularly among children and young people. As such a minor positive impact for health (SA Objective 12) has been identified. Furthermore, potential new and enhanced playing fields and sports facilities will bring increases in GI and also various ecosystem service functions associated with this, such as air filtration and carbon sequestration. An increased capacity for carbon storage functions will be anticipated to contribute to the mitigation of anthropogenic climate change. Therefore, minor positive impacts have been identified for biodiversity, climate change mitigation and pollution (SA Objectives 3, 4 and 7). Enhanced open space and GI could also potentially help to reduce water runoff rates, leading to benefits for reducing flood risk, and provide natural cooling in the urban areas; as such, a minor positive impact on climate change adaptation will also be likely (SA Objective 5).
- G.10.9.4 New facilities will be expected to be well connected via public and active modes of transport which will further contribute to the encouragement of active lifestyles as well as reducing the need for private car use. This will ensure as many residents as possible have easy access to these facilities. Therefore, a minor positive effect has been identified with regard to transport and accessibility (SA Objective 9).

G.10.10 Policy ENV10 – High quality design

Policy ENV10 – High quality design
<p>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:</p> <ul style="list-style-type: none">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;

Policy ENV10 – 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;
 - 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;

Policy ENV10 – High quality design

- g. smell;
- h. noise;
- i. crime and safety; and
- j. wind, where the proposals involve new development of more than eight storeys.

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Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV10	+	++	+	+	+	+	+	0	+	0	+	+	0	0

- G.10.10.1 Policy ENV10 focusses on ensuring high design quality, including implementation of the National Design Guide, and incorporation of various criteria including the ‘Building for a Healthy Life’ and ‘Manual for Streets’ principles, amongst others, to help ensure that new development is designed and constructed in a sustainable way.
- G.10.10.2 Effective design codes can help to ensure new developments are integrated effectively into the local landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance the quality of life for residents, strengthen the sense of place, improve the attractiveness of a location and create safer places to live and work.
- G.10.10.3 Encouraging new development to pursue high-quality design will help to ensure that new development does not have an adverse impact on any surrounding heritage assets, and possibly lead to benefits in the character and appearance of these assets. This policy sets out criteria to help ensure future development proposals protect Wolverhampton’s townscapes and heritage assets. Therefore, a minor positive impact on the historic environment has been identified (SA Objective 1). It is recommended that Policy ENV10 could be enhanced to recognise the need to conserve and where possible enhance the historic environment and heritage assets, in line with Policy ENV5. Opportunities for heritage-led design schemes could also be encouraged particularly in the historic centres.
- G.10.10.4 The policy requires development proposals to create a strong sense of place and take the landscape and townscape of Wolverhampton into consideration during the design process. This has therefore identified a major positive impact on the local landscape (SA Objective 2), by helping to ensure that future development supports the existing landscape character and where appropriate, enhances visual amenity and sense of place.
- G.10.10.5 This policy requires new development to be designed to mitigate and provide adaptations to climate change. Through enhanced provision and protection of green and blue infrastructure this will be likely to deliver additional habitats for wildlife and present opportunities to better connect biodiversity features, with potential to have a minor positive impact on biodiversity (SA Objective 3). GI can also have benefits such as enhancing natural water storage and flow functions. In addition, this policy will be expected to promote the use of flood management, including natural sustainable drainage systems (SuDS), with benefits for local surface water flooding issues. GI will also contribute

towards various ecosystem service functions such as urban cooling, helping to combat the Urban Heat Island effect. This will be likely to have a minor positive impact on climate change mitigation and adaptation (SA Objectives 4 and 5).

- G.10.10.6 The policy seeks to capitalise on opportunities for natural heating and cooling in the design of new developments. Encouraging an efficient use of energy will be expected to have a minor positive impact on natural resources (SA Objective 6).
- G.10.10.7 The policy will also help to ensure that future development does not result in detrimental impacts on the living environment in regard to artificial lighting, vibrations, dust, fumes, smell and noise. Urban greening encouraged within this policy will also be expected to help to buffer developments against these pollutants. These measures will be likely to have a minor positive impact in relation to pollution (SA Objective 7).
- G.10.10.8 By ensuring that development proposals follow the ‘Manual for Streets’, the policy will be expected to provide an attractive, safe and permeable movement network, leading to a minor positive impact for local accessibility (SA Objective 9).
- G.10.10.9 Consideration of Active Design Guide principles will be expected to improve the quality of life of local residents through increasing opportunities for physical exercise and encouraging more active lifestyles for all residents. Furthermore, the incorporation of suicide-prevention measures into the design of public buildings will benefit Wolverhampton’s residents through supporting those with mental health struggles. To this end, a minor positive impact has been identified with regard to equality and health and wellbeing (SA Objectives 11 and 12).

G.10.11 Policy ENV11 – Air quality

Policy ENV11 – 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 and Development

Policy ENV11 – Air quality

- 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.
- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV11	0	0	+	+	0	0	++	0	+	0	0	+	+	0

- G.10.11.1 Air pollution is a significant concern internationally and locally. The City of Wolverhampton is designated as an Air Quality Management Area (AQMA). Without careful planning, development within an AQMA will make it more difficult to meet national air quality objectives within the AQMA, whilst also exposing new residents to existing poor air quality.
- G.10.11.2 Policy ENV11 will require development proposals to promote the use of pedestrian and cycle routes, access to rail, the metro and bus transport networks, plus provide electric car charging points. These measures will be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of air quality, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. By discouraging the use of the private car, this policy will be expected to help reduce transport-associated emissions and have a positive impact on local air quality.
- G.10.11.3 Where a development proposal is situated in a location that does not currently meet national objectives, the policy will require an appropriate Air Quality Assessment (AQA) to be carried out to demonstrate that the proposed development will meet air quality objectives once the development is completed. Overall, the policy will be expected to have a major positive impact on air pollution (SA Objective 7).
- G.10.11.4 The requirements set out in Policy ENV11 could potentially help to minimise the Plan area’s contributions to climate change by offering alternative, lower emission and more sustainable means of transport. A minor positive impact is therefore also be expected for climate change mitigation (SA Objective 4).
- G.10.11.5 Policy ENV11 aims to encourage active travel by integrating pedestrian and cycle routes into development proposals. In addition, the policy will seek to increase the provision of green and open spaces across the WLP area. This will help facilitate healthy lifestyles, through promoting outdoor exercise and benefiting mental wellbeing of residents. Overall, a minor positive impact has been identified for this policy in regard to human health (SA Objective 12).
- G.10.11.6 As well as contributing towards the improvement of local air quality, encouraging the provision of sustainable transport methods including active travel and electric car charging points will be likely to have a minor positive impact on transport and accessibility (SA Objective 9).
- G.10.11.7 Some habitats are sensitive to air pollution in the form of atmospheric nitrogen deposition. Policy ENV11 seeks to protect the sensitive habitats and species at designated sites through ensuring that permission for any proposed development which will result in a deterioration of the local air quality will be refused to ensure that there are no adverse

impacts as a result of the development. Therefore, a minor positive impact has been identified for this policy on biodiversity (SA Objective 3).

- G.10.11.8 In addition, by seeking to ensure that development proposals are situated in a sustainable location to minimise commuter distance and time, this policy will be likely to situate residents in closer proximity to a range of job opportunities, and therefore, a minor positive impact on the local economy (SA Objective 13) has been identified.

G.10.12 Policy ENV12 – Flood risk and water quality

Policy ENV12 – 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 250m²); 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.
- 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 other than essential infrastructure (subject to the Exception Test) and water compatible development, will be refused (including extensions and intensification of use and changes of use) 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;

Policy ENV12 – Flood risk and water quality

- 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.
- 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 the 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 and River Trust.

Groundwater Source Protection Zones

Policy ENV12 – Flood risk and water quality

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 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;
- 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 the sewerage system, and ensuring necessary wastewater infrastructure upgrades are in place and aligned to development timescales.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV12	0	0	+	0	++	+	+	0	0	0	0	+	0	0

G.10.12.1 Policy ENV12 will seek to manage the risk of flooding throughout the Plan area and ensure that measures are in place within new developments to promote resilience to flooding.

G.10.12.2 The policy sets out criteria requiring development proposals to carry out a Flood Risk Assessment and Surface Water Drainage Strategy. The Sequential Test will be applied to all development proposals to ensure that development takes place in areas with the lowest flood risk. This policy will be expected to ensure that all future development proposals are resilient to the risk of flooding and do not exacerbate flood risk in areas surrounding the development. In accordance with the policy, development proposals should incorporate additional storage including SuDS and natural flood management measures to help reduce the risk of surface water flooding and seek to provide wider flood risk betterment. Overall, a major positive impact on climate change adaption is anticipated (SA Objective 5).

G.10.12.3 Flooding can pose a number of risks to human health and wellbeing, including physical and mental trauma, disease and disruption to power and water supplies¹⁵. Providing new development which is flood resilient and results in flood risk betterment in surrounding areas will therefore be expected to have benefits to human health and wellbeing (SA Objective 12).

G.10.12.4 Surface water run-off can lead to flooding and a decrease in water quality. The incorporation of SuDS into developments can benefit water quality, biodiversity and amenity interest through integration into the wider green and blue infrastructure networks and promoting natural management of flood water. In accordance with the policy, developments should, where possible, naturalise urban watercourses and open underground culverts, with likely benefits to biodiversity in terms of improving habitat connectivity and allowing natural filtration of pollutants. Policy ENV12 sets out requirements for development to be designed to protect and enhance water quality within Wolverhampton and beyond in meeting the measures set out in the relevant River Basin Management Plan and in accordance with the objectives of the Water Framework Directive. Development should also be compliant with advice from water companies to ensure that adequate wastewater infrastructure is available, which may help to avoid adverse effects on water quality associated with sewer overflow events. As such, the ecological and chemical status of the waterbodies in Wolverhampton will be expected to be enhanced and maintained. Therefore, minor positive impacts have been identified in relation to biodiversity and water pollution (SA Objectives 3 and 7).

¹⁵ Public Health England (2014) Flooding and the public’s health: looking beyond the short-term. Available at: <https://publichealthmatters.blog.gov.uk/2014/01/06/flooding-and-the-publics-health-looking-beyond-the-short-term/> [Date accessed: 05/09/24]

G.10.12.5 The policy seeks to ensure development is not permitted within groundwater Source Protection Zones (SPZs) in order to protect aquifers from physical disturbance, as well as a risk assessment to ensure development does not have an adverse impact on water resources. This will be expected to ensure access to a safe and reliable supply of water for domestic, commercial and industrial use across the Plan area. As such, a minor positive impact has been identified with regard to natural resources (SA Objective 6).

G.10.13 Policy ENV13 – Sustainable drainage and surface water management

Policy ENV13 - 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, as follows: <ul style="list-style-type: none"> 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; 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.

Policy Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV13	0	+	+	+	++	+	+	0	0	0	0	0	0	0

G.10.13.1 Policy ENV13 sets out guidelines for future development with respect to sustainable drainage and surface water management.

- G.10.13.2 The policy requires all developments to incorporate SuDS designed in line with the Lead Local Flood Authority standards which will be anticipated to help reduce the risk of surface water flooding. The policy will further require surface water drainage strategies to be prepared for all major developments including the reduction of surface water flows to equivalent greenfield rates, to take all sources of flooding into account. This policy is expected to have a major positive impact on climate change adaptation (SA Objective 5).
- G.10.13.3 The policy seeks to encourage the re-use of water under the surface water discharge hierarchy. This will promote an efficient use of water resources across the Plan area and as such will be expected to have a minor positive impact on natural resources (SA Objective 6).
- G.10.13.4 Policy ENV13 details the requirement for improving water quality in the design of SuDS and their incorporation into all development across the Plan area. As such, this will be expected to reduce harmful pollutants reaching watercourses and enhance the chemical and ecological status of waterbodies. Therefore, a minor positive impact has been identified in relation to water pollution (SA Objective 7).
- G.10.13.5 The policy also seeks to the “*conservation and enhancement of biodiversity and green infrastructure*”. This will be expected to support the ecological network throughout Wolverhampton through greater habitat provision, with secondary benefits for the various ecosystem service functions associated with increased GI, such as air and water filtration, carbon storage and sequestration and flood alleviation. Enhanced GI has the potential to support the natural environment and improve the character and appearance of the local landscape. Although, the policy could be enhanced through encouraging SuDS to be linked to wider GI schemes in order to make the best and most efficient use of their multifunctional benefits. Overall, minor positive impacts have been identified with regards to landscape, biodiversity and climate change mitigation (SA Objectives 2, 3 and 4).

G.10.14 Policy ENV14 – Energy and sustainable design

Policy ENV14 – 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:
 - 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

Policy ENV14 – Energy and sustainable design

- 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.
- 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.

Policy ENV14 – Energy and sustainable design

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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
ENV14	0	0	0	+	+	+	+	0	0	0	+	+	0	0

G.10.14.1 Policy ENV14 will promote on-site renewable or low carbon technologies incorporated within new development in Wolverhampton, which would help to decrease reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of GHGs emitted into the atmosphere. This in turn will reduce the Plan area’s contribution towards the causes of climate change.

G.10.14.2 The policy also requires all non-residential development of 1,000 sqm gross or more to be in accordance with the BREEAM New Construction Technical Standards¹⁶. The policy is expected to ensure that development proposals achieve full credits for category Wat 01 (water efficiency). Increasing water efficiency will be expected to maximise the efficient use of Wolverhampton’s water resources and as such, a minor positive impact has been identified with regard to natural resources (SA Objective 6).

G.10.14.3 More efficient energy infrastructure will lead to a decrease in the amount of energy needed, and consequently, a likely decrease in GHG emissions released through energy generation. This policy will be likely to have a minor positive impact on climate change mitigation by helping to ensure development proposals are more energy efficient and seek opportunities to utilise renewable and low carbon energy sources (SA Objective 4). By identifying and improving energy and heat networks and considering future requirements, this policy could also potentially result in a minor positive impact on climate change adaptation (SA Objective 5). More efficient energy infrastructure has further potential to benefit households in terms of reducing energy bills; a minor positive impact has also been identified for equality (SA Objective 11).

G.10.14.4 In addition, through improved energy efficiency and consequent reduction in emission of harmful pollutants including particulate matter, this policy will be likely to result in health benefits. The encouragement within the policy for developments to include heating and cooling networks will also help to ensure safe and comfortable living environments. Therefore, a minor positive impact regarding pollution and human health (SA Objectives 7 and 12) has been identified for this policy.

¹⁶ BREEAM (2018) New Construction Technical Standards. Available at: <https://breeam.com/standards> [Date accessed: 05/09/24]

- G.10.14.5 This policy could be strengthened through reference to quantifying and reducing embodied carbon associated with developments and the re-use of existing development and construction materials. Additionally, the policy could refer to reducing operational carbon which will support the creation of a more sustainable Wolverhampton for current and future residents.

G.11 Waste

G.11.1 Policy W1 – Waste infrastructure - future requirements

Policy W1 – 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 net zero carbon economy.
3)	Proposals for waste management facilities will be supported based upon the following principles: <ol style="list-style-type: none"> 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; 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; 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; 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; 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; 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; 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W1	0	0	0	0	0	+	0	++	0	0	0	0	+	0

G.11.1.1 Policy W1 sets out the strategy for waste management within the Plan area, as well as the levels of new waste management capacity likely to be needed to support the proposed growth across the Plan period.

- G.11.1.2 Policy W1 will support the minimisation of waste production and re-use and recovery of waste materials, in accordance with the waste hierarchy, and help to ensure that there is sufficient capacity to accommodate the waste capacity for Wolverhampton throughout the Plan period up to 2042. Overall, the policy will be expected to help reduce the volume of waste generated in the WLP area and improve the management and disposal of waste, including opportunities for recycling and composting of waste. Therefore, a major positive impact on waste is identified (SA Objective 8).
- G.11.1.3 The policy also seeks to increase the recycling capacity and development of recycling facilities within the Plan area. This will likely increase the re-use of materials and as a result contribute to the circular economy. There is also as a result the potential for the development of new waste markets within Wolverhampton and in the wider Black Country area. As such, there is a potential for a minor positive impact for the local economy (SA Objective 13), as well as a potential benefit for the efficient re-use of materials leading to a minor positive impact for natural resources (SA Objective 6).

G.11.2 Policy W2 – Safeguarding waste sites

Policy W2 – 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
 - 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W2	0	0	0	0	0	+	0	+	0	0	0	0	0	0

G.11.2.1 The aim of Policy W2 is to safeguard and retain capacity of the existing waste facilities in Wolverhampton for the duration of the Plan period up to 2042.

G.11.2.2 The policy will be expected to ensure that housing proposals or sensitive land uses are not permitted in the vicinity of waste management sites where this could lead to conflicts. The policy will be likely to help ensure appropriate waste management continues in the WLP area and the wider Black Country and that capacity at these facilities does not decrease. Overall, a minor positive impact on waste (SA Objective 8) is likely.

G.11.2.3 The policy also requires development applications to identify any legacy issues which might have been left behind as a result of former waste uses. This has the potential to help address any ground contamination issues and will encourage the safe re-use of previously developed land. A minor positive impact has therefore been identified in relation to natural resources (SA Objective 6).

G.11.3 Policy W3 – Locational considerations for new waste facilities

Policy W3 – Locational requirements for new waste facilities														
1) New waste management facilities should, as far as possible, be located within Local Employment Areas, as defined in Policy EMP3.														
2) The preferred areas for new waste management facilities are listed in Table 10 and shown on the Policies map.														

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W3	+/-	+/-	+/-	-	+/-	+	-	+	+	0	0	+/-	+	0

G.11.3.1 Policy W3 sets out that new waste management facilities should be located in Local Employment Areas, where possible.

G.11.3.2 Waste management facilities will be supported where there is an identified need for the facility. This will be likely to help fill any gaps in infrastructure and meet the locally identified waste management needs. A minor positive impact on waste is therefore expected (SA Objective 8).

- G.11.3.3 As seen on the WLP Policies map, the location of new waste sites is likely to be near to key road networks. Whilst this will make potential sites highly accessible, hence a minor positive impact in relation to transport and accessibility (SA Objective 9), this will result in a likely increase in the number of HGVs and other vehicles to these sites which will result in more harmful pollutants and GHGs being emitted. Therefore, minor negative impacts have been identified in relation to climate change mitigation and pollution (SA Objectives 4 and 7).
- G.11.3.4 The provision of new waste sites in the Plan area has the potential for a minor positive impact in relation to the economy (SA Objective 13) as it would provide various employment opportunities for Wolverhampton’s residents and boost productivity in the waste sector.
- G.11.3.5 The placement of new waste sites within Local Employment Areas has the potential to reduce the need for previously undeveloped land, as this will be expected to make use of brownfield and previously developed sites, making the most efficient use of land. Therefore, a minor positive impact has been identified in relation to natural resources (SA Objective 6).
- G.11.3.6 The policy is not anticipated to have any significant effects on housing, equality and education (SA Objectives 10, 11 and 14), therefore negligible impacts have been identified.
- G.11.3.7 Given that the exact location and scale of potential new waste facilities is unknown, uncertain impacts have been identified in relation to cultural heritage, landscape and townscape, biodiversity, climate change adaptation and health (SA Objectives 1, 2, 3, 5 and 12) as the extent of both positive and negative impacts will depend on contextual and site-specific characteristics of new waste facilities which arise from Policy W3.

G.11.4 Policy W4 – Key considerations for waste developments

Policy W4 – 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
 - g. proposals should demonstrate compatibility with the uses already present within / adjacent to the area; and
 - h. where necessary, mitigation measures should be identified to reduce any adverse effects to an acceptable level.

Policy W4 – Key considerations for waste developments

Supporting Information

- 2) 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, 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

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W4	0	0	0	0	0	0	0	+	0	0	0	0	0	0

G.11.4.1 Policy W4 sets out criteria for the key considerations in relation to waste developments for Wolverhampton for the duration of the Plan period up to 2042.

G.11.4.2 This policy seeks to ensure that waste developments are carried out in the most sustainable way in order to meet the necessary provision for the WLP area. As a result, a minor positive impact on waste (SA Objective 8) has been identified.

G.11.4.3 The policy will ensure that consideration is given to potential impacts of the development on visual amenity, environmental and public health, noise and other disturbances when allocating waste management facilities. These criteria will be expected to help prevent adverse impacts on a number of SA Objectives, and therefore, negligible impacts are

identified in relation to landscape, biodiversity, human health, transport, flood risk and pollution (SA Objectives 2, 3, 5, 7, 9 and 12). The policy is unlikely to significantly affect the remaining SA Objectives.

G.11.5 Policy W5 – Resource management and new development

Policy W5 – Resource management and new development	
1)	All new developments should; <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
W5	0	0	0	0	0	+	0	++	0	0	0	0	0	0

G.11.5.1 Policy W5 will set out criteria for the sustainable management of waste and resources associated with new developments, during both construction and occupation.

G.11.5.2 The policy will require all new developments to minimise waste and maximise the use of secondary and recycled materials and locally sourced products wherever possible. This policy will be expected to promote sustainable and efficient waste management and use of materials across all new development in the WLP area and limit the generation of waste as much as is feasible. Furthermore, Policy W5 will help to ensure that development design considers the need for waste management, when occupied. Overall, a major positive impact on waste is expected (SA Objective 8).

- G.11.5.3 Additionally, through encouraging the efficient use of resources and reducing the need for extraction of primary aggregates, Policy W5 will result in a minor positive impact on natural resources (SA Objective 6).
- G.11.5.4 Policy W5 will also be expected to ensure that environmental impacts as a result of resource management and new development are minimised. The policy will encourage the use of materials with low environmental impacts and the management of waste either on-site or as close as possible to the source. These factors will be expected to minimise the potential for, and scale of, adverse impacts on the environment by reducing the distances travelled by waste management vehicles such as HGVs. Therefore, negligible impacts have been identified for landscape, biodiversity, pollution and transport (SA Objectives 2, 3, 7 and 9).

G.12 Minerals

G.12.1 Policy MIN1 – Minerals production

Policy MIN1 - 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
2)	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
3)	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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN1	0	0	0	0	0	+	0	0	0	0	0	0	+	0

G.12.1.1 Policy MIN1 sets out requirements for the production of construction aggregate and industrial minerals in the WLP area, in accordance with the Wolverhampton Minerals Study¹⁷.

G.12.1.2 The policy will help to ensure the efficient use of mineral resources in the WLP area and promote use of recycled products to help reduce reliance on quarried products. A minor positive impact on natural resources (SA Objective 6) has been identified for this policy. This policy will also be expected to have a minor positive impact on the local economy, by supporting local construction and industrial businesses (SA Objective 13).

G.12.2 Policy MIN2 – Safeguarding minerals

Policy MIN2 - 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

¹⁷ WSP (2024) Black Country Minerals Study Update: Updated evidence base for minerals to support preparation of emerging local plans for each Black Country Authority- Wolverhampton. Draft, August 2024.

Policy MIN2 - Safeguarding minerals

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.

- 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN2	0	0	0	0	0	+	0	0	0	0	0	0	0	0

G.12.2.1 Policy MIN2 sets out requirements for the safeguarding of mineral deposits from sterilisation which may become or are identified as economically important. This policy will also help to ensure that the operation of mineral resource production will not be affected by development. As a result, this policy will protect mineral resources for use by current and future residents of Wolverhampton and as such, a minor positive impact on natural resources (SA Objective 6) has been identified.

G.12.3 Policy MIN3 – Key considerations for mineral development

Policy MIN3 – 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.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Ref	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
MIN3	0	0	0	0	0	0	0	0	0	0	0	0	0	0

G.12.3.1 Policy MIN3 sets out requirements for the reduction and minimisation of potential adverse impacts which may arise from mineral-related infrastructure. The policy draws out potential impacts on the natural, built and historic environment, effects on public health, transport networks, noise, light and dust pollution, the condition and stability of associated and surrounding land, and effects on air and water quality. The policy also states that where adverse effects may be likely, sufficient mitigation measures should be put in place to “*reduce any adverse effects to an acceptable level*”.

G.12.3.2 As a result, Policy MIN3 is expected to ensure that potential adverse effects are minimised. Therefore, negligible impacts have been identified across all of the SA Objectives.

Appendix H: Reasonable Alternative Site Assessments (Post-Mitigation)

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H.1 Introduction

H.1.1 Preface

- H.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through emerging Wolverhampton Local Plan (WLP) policies.
- H.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as Local Plan policy. The purpose of this stage is to identify the impacts that will need to be overcome for development to optimise sustainability performance.
- H.1.1.3 The post-mitigation assessment considers how mitigating factors, including Local Plan policy and other guidance, will help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- H.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred option in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.
- H.1.1.5 **Chapter H.2** summarises out the pre-mitigation impacts of all reasonable alternative sites considered throughout the SA process alongside the WLP preparation (see **Appendix F** for the full pre-mitigation assessments set out per receptor within each SA Objective), **Chapter H.3** provides detail on the mitigation within the WLP, and **Chapter H.4** discusses the post-mitigation impacts for these reasonable alternative sites against each SA Objective.

H.2 Pre-mitigation assessment

H.2.1 Introduction

H.2.1.1 A total of 40 reasonable alternative sites have been identified and assessed as part of this Regulation 19 SA, as follows:

- 24 residential-led sites;
- 15 employment-led sites; and
- One Gypsy, Traveller and Travelling Showperson site.

H.2.1.2 All 40 reasonable alternative sites have been evaluated pre-mitigation, and presented in full within **Appendix F**, with impacts discussed by receptor within each SA Objective.

H.2.1.3 **Table H.2.1** presents the pre-mitigation impact matrix for all 40 reasonable alternative sites considered throughout the preparation of the WLP, summarising the impacts per SA Objective, and supersedes the comparable table (Table 9.1) presented in the Regulation 18 Draft Plan SA Report (2024)¹.

¹ Lepus Consulting (2024) Sustainability Appraisal of the Wolverhampton Local Plan. Regulation 18: Issues and Preferred Options, January 2024. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2024-02/Sustainability%20Appraisal%20WLP%20IPO%202024.pdf> [Date accessed: 26/09/24]

Table H.2.1: Impact matrix of all reasonable alternative site assessments pre-mitigation

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC adaptation	Natural resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	-	+/-	+/-	-	--	+	--	0	++	++	-	++	--	++
H2	0	-	-	0	-	-	-	0	++	+	-	++	++	++
H3	-	-	-	-	-	-	--	-	++	++	-	-	++	++
H4	-	+/-	-	-	-	+	--	-	++	++	-	+	+/-	++
H5	-	+/-	-	0	-	+	-	0	+	+	-	++	--	++
H7	0	+/-	+/-	+/-	-	+	-	0	++	-	-	-	++	++
H8	-	+/-	+/-	-	-	+	--	-	++	++	-	++	--	++
H11	-	+/-	-	0	+	+	-	0	-	+	0	++	--	-
H12	--	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
H13	--	+/-	+/-	0	+	+	-	0	++	+	-	++	++	++
H14	--	+/-	-	0	-	+	-	0	-	+	-	-	--	++
H15	-	+/-	-	-	--	+	--	-	++	++	-	++	--	++
H16	0	-	+/-	0	+	-	--	0	++	++	-	++	-	++
H17	0	+/-	+/-	0	-	-	-	0	++	+	0	++	+/-	++
H18	0	+/-	+/-	0	+	-	-	0	++	+	-	++	++	++
H20	0	-	+/-	0	-	-	-	0	-	+	0	-	++	-
H21	0	-	+/-	0	-	-	-	0	-	+	0	++	-	++
H22	0	-	-	0	-	-	-	0	-	+	0	++	+/-	++
H23	0	-	+/-	0	-	-	-	0	++	+	0	++	++	++
H24a	0	+/-	+/-	+/-	--	+	-	0	++	+	0	-	++	++
H24b	0	+/-	+/-	+/-	-	-	-	0	++	+	-	-	++	++
H24c	0	+/-	-	+/-	+	+	-	0	-	+	0	++	++	++
H24d	-	+/-	-	+/-	-	-	-	0	-	+	-	-	++	++
SA-0054-WOL	0	+/-	--	+/-	-	+	--	+/-	-	++	0	+	--	-
E6	-	+/-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E7	-	+/-	-	+/-	-	-	-	+/-	++	0	0	-	++	0
E12	0	-	-	+/-	-	-	-	+/-	-	0	0	-	++	0
E13	0	-	+/-	+/-	+	-	-	+/-	++	0	0	-	++	0
E14	0	-	+/-	+/-	-	-	-	+/-	-	0	-	-	++	0
E15	--	+/-	-	+/-	-	+	-	+/-	++	0	-	++	+/-	0
E16	-	+/-	+/-	+/-	+	+	-	+/-	-	0	-	+	++	0
E17	-	-	-	+/-	-	-	-	+/-	-	0	0	++	++	0
E18	-	+/-	-	+/-	-	+	-	+/-	-	0	-	++	++	0
E20	0	+/-	-	+/-	+	+	-	+/-	-	0	0	+	++	0
E21	0	+/-	-	+/-	--	-	-	+/-	-	0	0	-	++	0
E22	0	-	+/-	+/-	-	-	-	+/-	-	0	0	-	++	0
E23	-	-	-	+/-	--	-	-	+/-	++	0	-	++	++	0
E24	0	+/-	+/-	+/-	+	+	-	+/-	++	0	-	-	++	0
E25	0	-	-	+/-	--	-	-	+/-	++	0	-	-	++	0
GT1	0	-	+/-	+/-	--	-	-	+/-	-	+	-	+	++	++

H.3 Mitigating effects of WLP policies

H.3.1 Introduction

- H.3.1.1 A total of 55 strategic planning policies are proposed within the Regulation 19 version of the WLP (see **Appendix G** for the full evaluation of the policies). The WLP policies are anticipated to improve the sustainability performance of many of the reasonable alternative sites through the elimination or minimisation of adverse effects and optimising positive effects.
- H.3.1.2 **Tables H.3.1 to H.3.14** below set out the potential adverse impacts that have been identified through the assessment of sites pre-mitigation for each SA Objective (as summarised in **Table H.2.1** and discussed in full within **Appendix F**), and indicate which of the emerging WLP policies will be likely to mitigate or reduce these effects.
- H.3.1.3 The assessment of the sustainability performance of sites post-mitigation, taking into account the mitigating effects of the WLP policies, is discussed in **Chapter H.4** and summarised in the matrix in **Table H.4.1**.
- H.3.1.4 It should be noted that the 44 site allocation policies presented in the WLP have not informed the post-mitigation assessments as they do not relate to all reasonable alternative sites.

Table H.3.1: Identified adverse effects and policy mitigation for SA1: Cultural Heritage

Identified adverse effect	WLP policy mitigation for cultural heritage
<p>Alteration of character or setting of a heritage asset (listed buildings, conservation areas, archaeological priority areas and historic landscape designations)</p>	<p>Policy CSP2 ‘Placemaking: achieving well designed places’ seeks to ensure development protects and enhances historic character and local distinctiveness. The policy will ensure high quality design is implemented throughout Wolverhampton which will help to ensure new development does not result in adverse impacts on surrounding heritage assets.</p> <p>Policy ENV5 ‘Historic character and local distinctiveness’ requires all development to conserve and enhance heritage assets, including designated and non-designated assets. Furthermore, the policy requires that the scale and design of development is informed by the local character and distinctiveness of the area to enhance local distinctiveness and the settings of heritage assets.</p> <p>Policy ENV6 ‘Geodiversity and the Black Country UNESCO Global Geopark’ will protect and enhance local geodiversity and geologically significant sites which are strongly linked to the historic environment.</p> <p>Policy ENV7 ‘Canal network’ will require development proposals to protect and enhance the historic features of the canal network which could lead to benefits to the surrounding character and appearance of historic assets.</p> <p>Policy ENV10 ‘High quality design’ encourages new development to pursue high quality design which will prevent development from having an adverse impact on surrounding heritage assets and could potentially lead to benefits in the character and appearance of heritage assets and the wider historic environment.</p> <p>Policy EMP6 ‘Cultural facilities and the visitor economy’ will protect, enhance and potentially expand cultural facilities within Wolverhampton. The policy will support heritage-related tourism and support high quality design, providing potential for benefits to local heritage assets.</p> <p>Policy CEN2 ‘Wolverhampton’s Centres’ sets out the priority for creating a “<i>high quality public realm including greenspace and a built environment (particularly heritage and culture)</i>”, which will be expected to result in the protection of the townscape character as well as heritage assets.</p>

Table H.3.2: Identified adverse effects and policy mitigation for SA2: Landscape

Identified adverse effect	WLP policy mitigation for landscape
<p>Threaten or result in the loss of sensitive or locally distinctive landscapes</p>	<p>Policy CSP2 ‘Placemaking: achieving well designed places’ ensures high quality design for new development throughout Wolverhampton, making sure development is of appropriate size, scale and type to reflect and respond to local characteristics. Furthermore, the policy recognises the importance of the canal network to urban structure and the landscape.</p> <p>Policy CEN2 ‘Wolverhampton’s Centres’ sets out the priority for creating a “<i>high quality public realm including greenspace and a built environment</i>”, which will be expected to result in the protection and enhancement of the landscape and townscape character.</p> <p>Policy ENV10 ‘High quality design’ encourages new development to pursue high quality design which will prevent development from having an adverse impact on the surrounding landscape.</p> <p>Policy ENV4 ‘Trees and hedgerows’ aims to create, retain and protect trees, woodland and hedgerows, which can be a useful tool to help integrate new development into the existing landscape character, for example, in terms of protecting or enhancing views, or providing visual interest.</p> <p>Policy ENV5 ‘Historic character and local distinctiveness’ requires all development to conserve and enhance heritage assets which can contribute to the local landscape character. Furthermore, the policy will ensure that the scale and design of development will be informed by consideration of local character and distinctiveness.</p> <p>Policy ENV7 ‘Canal network’ will require development proposals to protect and enhance the historic, architectural, archaeological and cultural significance of the canal network which could lead to benefits to the surrounding landscape character.</p> <p>Policy ENV8 ‘Open space and recreation’ and Policy ENV9 ‘Playing fields and sports facilities’ will both contribute to the enhancement of the green infrastructure (GI) network which will contribute to the preservation and enhancement of local character by creating attractive open spaces within the urban area.</p>
<p>Change in views experienced by local residents and users of the Public Rights of Way (PRoW) network</p>	<p>Policy ENV4 ‘Trees and hedgerows’ seeks to protect visual amenity through minimising the loss of trees and GI, and encouraging new planting and landscaping schemes.</p> <p>Policy ENV5 ‘Historic character and local distinctiveness’ will ensure that development makes a positive contribution to local character and distinctiveness, including views into, from and within the development sites.</p> <p>Policy ENV7 ‘Canal network’ seeks to protect and enhance the canal network as well as surrounding landscape corridors, visual amenity, settings and key views.</p> <p>Policy ENV8 ‘Open space and recreation’ seeks to ensure new development recognises and strengthens GI and the greenway network, including footpaths and the PRoW network, and improves visual amenity.</p> <p>Policy ENV10 ‘High quality design’ requires that development proposals address “<i>the need to maintain strategic gaps and views</i>”.</p>

Table H.3.3: Identified adverse effects and policy mitigation for SA3: Biodiversity, Flora, Fauna and Geodiversity

Identified adverse effect	WLP policy mitigation for biodiversity, flora and fauna
<p>Threats or pressures to international or European sites (SACs)</p>	<p>Policy ENV2 ‘Development affecting Cannock Chase Special Area of Conservation’ requires any development leading to a net increase in homes or creates visitor accommodation within a 15km boundary of Cannock Chase SAC to carry out an appropriate assessment. Where an adverse impact is identified under the appropriate assessment sufficient measures to avoid the identified impact are required.</p> <p>Policy ENV1 ‘Nature Conservation’ will ensure that development within Wolverhampton will safeguard nature conservation designations, including SACs.</p> <p>Policy ENV3 ‘Nature Recovery and Biodiversity Net Gain’ requires at least 10% biodiversity net gain (BNG) in line with national requirements which will be expected to improve habitat connectivity including for supporting habitats to European sites.</p>
<p>Threats or pressures to nationally designated sites (SSSIs)</p>	<p>Policy ENV1 ‘Nature Conservation’ will ensure that development within Wolverhampton will safeguard nature conservation, including NNRs and SSSIs, where it states <i>“development is not permitted where it would harm...Sites of Special Scientific Interest and National Nature Reserves”</i>.</p> <p>Policy ENV3 ‘Nature Recovery and Biodiversity Net Gain’ requires BNG enhancement in line with national requirements which will help to improve habitat connectivity and including for supporting habitats to SSSIs.</p>
<p>Threats or pressures to locally designated / non-statutory biodiversity sites (SINCs and SLINCs), and priority habitats</p>	<p>Policy ENV1 ‘Nature Conservation’ will ensure that development within Wolverhampton will safeguard nature conservation designations, including locally designated and non-statutory biodiversity assets, where it states <i>“development is not permitted where it would harm... Local Nature Reserves and Sites of Importance for Nature Conservation... Sites of Local Importance for Nature Conservation... and geological features”</i>.</p> <p>Policy ENV6 ‘Geodiversity and the Black Country UNESCO Global Geopark’ ensures that development proposals will protect locally significant geological sites designated as SLINC and SINCs.</p> <p>Policy ENV3 ‘Nature Recovery and Biodiversity Net Gain’ will require development to protect and enhance priority habitats identified at national, regional or local level.</p>

Table H.3.4: Identified adverse effects and policy mitigation for SA4: Climate change mitigation

Identified adverse effect	WLP policy mitigation for climate change mitigation
<p>Increased greenhouse gas (GHG) emissions</p>	<p>Policy ENV11 ‘Air quality’ will require development proposals to promote the use of pedestrian and cycle routes, access to rail, the metro and bus transport networks, and provide electric car charging points. These measures will be expected to support a modal shift to the use of public transport and more sustainable travel options. In terms of GHG emissions, electric vehicles are an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants including CO₂. By discouraging the use of the private car, this policy will be expected to help reduce transport-associated emissions and decrease overall GHG emissions.</p> <p>Policy ENV14 ‘Energy and sustainable design’ will promote on-site renewable or low carbon technologies to be incorporated within new development in Wolverhampton. This will help to decrease reliance on energy generated from unsustainable sources, such as fossil fuels, consequentially reducing GHG emissions in the WLP area.</p> <p>Policy TRAN1 ‘Priorities for the development of the Transport Network’ will help to facilitate a modal shift away from private car use to public transport use and active travel. The policy will therefore be expected to help in the reduction of transport-associated emissions of GHGs.</p> <p>Underpinning Policy TRAN1, Policies TRAN5 ‘Creating coherent networks for cycling and for walking’, TRAN6 ‘Influencing the demand for travel and travel choices’ and TRAN7 ‘Parking management’ will help promote sustainable modes of transport and active transport that will help in the reduction of transport-associated emissions of GHGs. Furthermore, Policy TRAN8 ‘Planning for low emission vehicles’ will encourage the exploration of alternative low emission vehicle technologies and ensure appropriate infrastructure is within the WLP area to encourage low emission vehicle uptake, in turn reducing the emission of GHGs.</p> <p>Several policies including Policies CSP1 ‘Spatial Strategy’, ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI network within the WLP area, that provides ecosystem services such as carbon sequestration and storage.</p> <p>Policy CSP2 ‘Placemaking and well designed places’ encourages new developments to incorporate 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.</p>

Table H.3.5: Identified adverse effects and policy mitigation for SA5: Climate change adaptation

Identified adverse effect	WLP policy mitigation for climate change adaptation
<p>Risk of surface water flooding</p>	<p>Policy ENV13 ‘Sustainable drainage systems and surface water management’ promotes sustainable flood management and achievement of surface water flows to equivalent greenfield rates, including through the use of sustainable drainage systems (SuDS), and requires surface water drainage strategies to be prepared for all major developments including the reduction of surface water flows to equivalent greenfield rates. This is supported by Policy ENV12 ‘Flood risk and water quality’ which additionally requires the Sequential Test to be applied to ensure development is in areas of the lowest flood risk. Furthermore, development proposals are to incorporate natural flood management measures to reduce the risk of surface water flooding under this policy.</p> <p>Several policies including Policies CSP1 ‘Spatial Strategy’, ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI and BI network within the WLP area, that provides multifunctional benefits including for reducing flood risk and managing surface water run-off.</p>
<p>Risk of fluvial flooding (current and future)</p>	<p>Policy ENV12 ‘Flood risk and water quality’ requires the Sequential Test to be applied to ensure development is in areas of the lowest flood risk. Furthermore, development proposals are to incorporate natural flood management measures to reduce the risk of flooding within the WLP area. Policy ENV12 and other WLP policies such as ENV13 also require development proposals to incorporate sustainable water drainage strategies that include SuDS, and additionally requires enhancement of the green and blue infrastructure network that acts as natural flood management methods.</p> <p>Several policies including Policies CSP1 ‘Spatial Strategy’, ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI and BI network within the WLP area, that provides multifunctional benefits including for alleviating flood risk and storage of water.</p> <p>Policy CPS2 ‘Placemaking: achieving well designed places’ encourages well designed places, including open spaces, where the policy states “<i>properly designed and well-located open spaces will mitigate flood risk</i>”.</p>

Table H.3.6: Identified adverse effects and policy mitigation for SA6: Natural resources

Identified adverse effect	WLP policy mitigation for natural resources
<p>Loss of previously undeveloped land or land with environmental value</p>	<p>Policies HOU1 ‘Delivering sustainable housing growth’, EMP1 ‘Providing for economic growth and jobs’ and other policies including Policies EMP2 ‘Strategic Employment Areas’ and EMP4 ‘Other Employment Sites’ encourage development proposals to make the best use of available land which will be anticipated to ensure greater use of previously developed and brownfield land, protecting the Plan area’s supply of undeveloped land.</p> <p>Under Policy CSP1 ‘Spatial Strategy’ the majority of development will be located within the existing urban areas. This will support the redevelopment of brownfield and previously developed sites which represents an efficient use of land in accordance with the NPPF by locating the majority of housing within the existing urban areas, and supporting urban regeneration.</p> <p>Several policies including Policies ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI network within the WLP area, that will provide multi-functional benefits including for conservation of soils.</p> <p>Policy ENV4 ‘Trees and hedgerows’ through the protection of trees, woodland and hedgerows could lead to benefits in terms of preventing soil erosion and promoting soil stability.</p>

Table H.3.7: Identified adverse effects and policy mitigation for SA7: Pollution

Identified adverse effect	WLP policy mitigation for pollution
<p>Increase in, and exposure to, air pollution (from main roads or AQMA)</p>	<p>Policy ENV11 ‘Air quality’ will require development proposals that do not currently meet the national objectives to prepare an Air Quality Assessment (AQA) and mitigation plan to ensure objectives can be met when completed. The policy also seeks to improve active travel routes, public transport and promotes electric vehicles as an effective alternative to petrol or diesel-powered vehicles as they emit fewer, or zero, air pollutants. Supporting this, Policy TRAN8 ‘Planning for low emission vehicles’ will support the integration of electric vehicles and low emission vehicles, encouraging the exploration of alternative low emission vehicle technologies and ensuring appropriate infrastructure is within the WLP area to encourage low emission vehicle uptake.</p> <p>Policy ENV14 ‘Energy and sustainable design’ will promote on-site renewable or low carbon technologies to be incorporated within new development in Wolverhampton. This will help to decrease reliance on energy generated from unsustainable sources, such as fossil fuels, consequentially reducing particulate emissions in the WLP area and overall air quality.</p> <p>Policy TRAN1 ‘Priorities for the development of the Transport Network’ will help to facilitate a modal shift away from private car use to public transport use and active travel. Underpinning Policy TRAN1 are Policies TRAN5 ‘Creating coherent networks for cycling and for walking’, TRAN6 ‘Influencing the demand for travel and travel choices and TRAN7 ‘Parking management’. Together, these policies will help promote sustainable</p>

Identified adverse effect	WLP policy mitigation for pollution
	<p>modes of transport and active transport that will help in the reduction of transport-associated emissions of NO₂ and particulate matter, improving air quality within the WLP area.</p> <p>Several policies including Policies ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI network within the WLP area, and Policies ENV2 ‘Nature Conservation’, ENV3 ‘Nature Recovery Network and Biodiversity Net Gain’ and ENV4 ‘Trees and hedgerows’ will retain and enhance biodiversity assets throughout the WLP area. These policies will be likely to boost air filtration ecosystem services provided by trees and vegetation.</p>
<p>Risk of contamination of groundwater Source Protection Zones</p>	<p>Policy ENV12 ‘Flood risk and water quality’ states that <i>“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”</i></p> <p>Policy ENV13 ‘Sustainable drainage systems and surface water management’ identifies the importance of integrating SuDS into developments, that can provide wider benefits to water quality.</p> <p>Policy ENV14 ‘Energy and sustainable design’ will ensure that new residential development meets water efficiency standards of 110 litres per person per day, as set out in the Building Regulations, which will help to protect water resources in general.</p>
<p>Risk of contamination of watercourses</p>	<p>Policy ENV7 ‘Canal network’ will aim to protect and enhance Wolverhampton’s canal network and will ensure water quality of the canal network is protected and enhanced.</p> <p>Policy ENV12 ‘Flood risk and water quality’ states that <i>“all development should be designed to protect and enhance water quality”</i> and deliver the measures and objectives set out in River Basin Management Plans (RBMPs) and the Water Framework Directive.</p> <p>Policy ENV13 ‘Sustainable drainage systems and surface water management’ identifies the importance of integrating SuDS into developments and managing run-off, that can provide wider benefits to water quality.</p> <p>Several policies including Policies CSP1 ‘Spatial Strategy’, ENV8 ‘Open Space, Sport and Recreation’, ENV9 ‘Playing Fields and Sports Facilities’ and ENV10 ‘High quality design’, will protect and enhance the GI and BI network within the WLP area, that provides ecosystem services such as filtration of pollutants and improved water quality.</p>

Table H.3.8: Identified adverse effects and policy mitigation for SA8: Waste

Identified adverse effect	WLP policy mitigation for waste
Increase in waste generation	<p>Policy W1 'Waste infrastructure – future requirements' will support the minimisation of waste production and re-use and recovery of waste materials, including via recycling, composting and energy from waste, and will ensure there is sufficient capacity to accommodate the waste capacity for Wolverhampton throughout the Plan period.</p> <p>Policy W2 'Safeguarding waste sites' will safeguard and retain the capacity of existing waste facilities in the WLP area for the duration of the Plan period.</p> <p>Policy W3 'Locational requirements for new waste facilities' sets out that new waste management facilities should be located in Local Employment Areas and waste management facilities will be supported where there is an identified need for the facility.</p> <p>Policy W4 'Key considerations for waste developments' seeks to ensure that waste developments are carried out in the most sustainable way in order to meet the necessary provision for the WLP area.</p>

Table H.3.9: Identified adverse effects and policy mitigation for SA9: Transport and accessibility

Identified adverse effect	WLP policy mitigation for transport and accessibility
Limited access to public transport (bus services and railway/metro stations)	<p>Policy CSP1 'Spatial Strategy' ensures that residential developments are well supported by "excellent public transport links".</p> <p>Policy CSP2 'Placemaking: achieving well designed places' ensures that transport proposals include connections to and between transport hubs, improving access to the local bus network and railway routes.</p> <p>Policy TRAN1 'Priorities for the development of the Transport Network' sets out the requirement for new developments to provide access to public and active modes of travel, including the local bus and rail network. The policy identifies key transport priorities that includes several active travel and bus corridors, as well as rail links and new stations such as Brinsford Park and also identifies improvements to the Rapid Transit network.</p> <p>Policy TRAN2 'Safeguarding the development of the Key Route Network' and Policy TRAN3 'Managing transport impacts of new development' will ensure transport connectivity and accessibility is improved within the WLP area, which will be expected to benefit public transport including bus routes and the railway network.</p> <p>Policy TRAN6 'Influencing the demand for travel and travel choices' promotes holistic management of traffic across Wolverhampton and includes "identifying appropriate strategic and local Park and Ride sites on current public transport routes" which will increase access to bus services.</p> <p>Policy DEL1 'Infrastructure provision' sets out the requirements to ensure that all new developments are supported by necessary infrastructure, including public transport.</p>
Limited access to local services and facilities	<p>Several WLP policies will increase access to public transport which will help to increase accessibility to local services and facilities, including Policy CSP1 'Spatial Strategy', Policies CSP2 'Placemaking: achieving well designed places', TRAN1 'Priorities for the</p>

Identified adverse effect	WLP policy mitigation for transport and accessibility
	<p>development of the Transport Network’, TRAN2 ‘Safeguarding the development of the Key Route Network’ and TRAN3 ‘Managing transport impacts of new development’.</p> <p>Policy CSP1 ‘Spatial Strategy’ sets out the intention to deliver new homes, jobs and local services in sustainable locations for use by the community.</p> <p>Policy HOU2 ‘Housing density, type and accessibility’ requires residential development to be accessible to sustainable transport and residential services.</p> <p>Policy CEN1 ‘Centres and centre uses’ supports uses that will meet the day-to-day needs of local communities, including convenience stores and food shopping, in line with the settlement hierarchy.</p> <p>Policy CEN2 ‘Wolverhampton’s Centres’ ensures that centres within Wolverhampton retain and enhance local facilities, including retail within Primary Shopping Areas and convenience stores in District and Local Centres.</p> <p>Policy CEN3 ‘Provision of local facilities’ ensures the protection and enhancement of local facilities throughout Wolverhampton, including convenience shops, pharmacies, post offices and community facilities, to meet residents’ needs.</p>

Table H.3.10: Identified adverse effects and policy mitigation for SA10: Housing

Identified adverse effect	WLP policy mitigation for housing
<p>Net loss of housing</p>	<p>Policy HOU1 ‘Delivering sustainable housing growth’ sets out the housing supply for the WLP period and will be expected to ensure Wolverhampton’s residents have access to accommodation which meets their needs.</p> <p>Policy CSP1 ‘Spatial Strategy’ sets out the housing supply to be delivered over the Plan period of at least 9,330 net new homes that “<i>create sustainable mixed communities including a range and choice of new homes that are supported by adequate infrastructure</i>”.</p> <p>Policy HOU2 ‘Housing density, type and accessibility’ will ensure an appropriate mix of housing is required across the Plan area to help to ensure that the varied needs of current and future residents are met.</p> <p>Policy HOU3 ‘Delivering affordable accessible and self-build / custom build housing’ seeks to ensure an appropriate mix of affordable and accessible homes are delivered across the Plan area, as well as the opportunity for self-build homes. The policy also sets out requirements for developments where the criteria for affordable, accessible and self-build homes on site are not viable, in which case the developers will be required to submit a financial viability assessment to ensure the maximum proportions are delivered.</p> <p>Policy DEL2 ‘Balance between employment land and housing’ aims to support ‘windfall’ housing and developments that will accord with the surrounding area.</p>

Table H.3.11: Identified adverse effects and policy mitigation for SA11: Equality

Identified adverse effect	WLP policy mitigation for equality
<p>Residents located in deprived areas</p>	<p>Several WLP policies will reduce the need to travel and increase access to public transport and active travel routes which will help to increase accessibility to local services and facilities, including Policies CSP1 ‘Spatial Strategy’, CSP2 ‘Placemaking: achieving well designed places’, TRAN1 ‘Priorities for the development of the Transport Network’ and TRAN2 ‘Safeguarding the development of the Key Route Network’.</p> <p>Policy HOU1 ‘Delivering sustainable housing growth’ sets out the housing supply for the WLP period and will be expected to ensure Wolverhampton’s residents have access to accommodation which meets their needs, supported by various other policies including Policy HOU3 ‘Delivering affordable, wheelchair accessible and self/custom build housing’ and Policy HOU4 ‘Housing for people with specific needs’.</p> <p>Policy EMP5 ‘Improving access to the labour market’ supports proposals for new employment development and sets out how these can be accessible to Wolverhampton residents, particularly those in deprived areas.</p> <p>Policy CEN4 ‘Edge-of-Centre and Out-of-Centre Development’ states that all edge-of-centre proposals should support “<i>both social inclusion and cohesion</i>”.</p> <p>Policy HOU6 ‘Education facilities’ supports an enhanced network of education facilities across Wolverhampton, addressing accessibility gaps to education across Wolverhampton.</p> <p>Policy HW3 ‘Healthcare facilities’ seeks to ensure that all new healthcare facilities are well designed and accessible, helping to address accessibility gaps to healthcare facilities across Wolverhampton.</p> <p>Policy HW1 ‘Health and wellbeing’ states that “<i>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</i>”.</p>

Table H.3.12: Identified adverse effects and policy mitigation for SA12: Health

Identified adverse effect	WLP policy mitigation for health
<p>Limited access to healthcare</p>	<p>Policy HW3 ‘Healthcare facilities’ will seek to ensure that all new healthcare facilities are well designed and accessible, and that sufficient healthcare infrastructure is in place to support the existing population and future growth in Wolverhampton.</p> <p>Policy HW1 ‘Health and wellbeing’ outlines the strategic approach to promoting health and wellbeing across all new development proposed within the WLP, seeking to combat local health issues and promote healthy lifestyles.</p> <p>Policy TRAN1 ‘Priorities for the development of the Transport Network’ will provide improved transport infrastructure that will enable improved and more sustainable access to healthcare including hospitals and GP surgeries.</p> <p>Policy HW2 ‘Health Impact Assessments’ sets out the requirement for development proposals to undertake a Health Impact Assessment (HIA) which will be likely to ensure</p>

Identified adverse effect	WLP policy mitigation for health
	<p>that developments do not adversely impact access to healthcare facilities, helping to ensure that demands can be met and ensuring development promotes healthy lifestyles.</p> <p>Policy HOU4 ‘Housing for people with specific needs’ supports the development of care homes and facilities which could help to relieve pressure on healthcare facilities.</p>
<p>Net loss of public greenspace</p>	<p>Policies ENV8 ‘Open Space, Sport and Recreation’ and ENV9 ‘Playing Fields and Sports Facilities’ will seek to ensure that open space, sport and recreation facilities throughout the Plan area will be protected, managed and enhanced, in order to provide safe and accessible community facilities for existing and future residents.</p> <p>Policy ENV10 ‘High quality design’, will protect and enhance the GI and BI network within the WLP area including formal and informal open spaces.</p> <p>Policy CSP2 ‘Placemaking: achieving well designed places’ emphasises the importance of maintaining and incorporating a network of multifunctional open spaces.</p> <p>Policy CEN2 ‘Wolverhampton Centres’ supports the development and diversification within Wolverhampton’s Centres, including the retention and enhancement of greenspace and the wider public realm.</p> <p>Policy HOU10 ‘Housing density, type and accessibility’ recognises the need to provide sufficient good quality amenity and play space for residents.</p>

Table H.3.13: Identified adverse effects and policy mitigation for SA13: Economy

Identified adverse effect	WLP policy mitigation for economy
<p>Net loss of employment floorspace</p>	<p>Policy CSP1 ‘Spatial Strategy’ sets out the employment growth to be delivered over the course of the WLP period, including a provision of 42.9ha to be met predominantly in the Core Regeneration Areas (as further detailed in Policy EMP1 ‘Providing for economic growth and jobs’), to ensure that a mix of employment land and associated job opportunities are provided to contribute towards the identified needs.</p> <p>Policies EMP2 ‘Strategic Employment Areas’, EMP3 ‘Local Employment Areas’ and EMP4 ‘Other Employment Sites’ set out how various employment floorspace across Wolverhampton will be safeguarded and new employment uses supported in appropriate locations.</p> <p>Policy EMP5 ‘Improving access to the labour market’ supports proposals for new employment development and sets out how these can be accessible to Wolverhampton residents, particularly those in deprived areas.</p> <p>Policy EMP6 ‘Cultural facilities and the visitor economy’ supports the development of cultural facilities and promotes the visitor economy in Wolverhampton, increasing employment floorspace and access to jobs for Wolverhampton residents.</p> <p>Policy CEN2 ‘Wolverhampton’s Centres’ sets out the development and diversification within Wolverhampton’s Centres which includes the retention of various employment uses.</p>

Table H.3.14: Identified adverse effects and policy mitigation for SA14: Education, skills and training

Identified adverse effect	WLP policy mitigation for education, skills and training
<p>Limited access to education opportunities</p>	<p>Policy HOU6 ‘Education facilities’ supports an enhanced network of education facilities across Wolverhampton, addressing accessibility gaps to education across Wolverhampton.</p> <p>Policy CSP1 ‘Spatial Strategy’ promotes a sustainable development pattern with the majority of new growth situated in centres that are well supported by key local services, including educational facilities. Policy CSP1, as well as several WLP policies will also increase access to public transport which will be likely to increase accessibility to educational facilities, including Policy TRAN1 ‘Priorities for the development of the Transport Network’, Policy TRAN2 ‘Safeguarding the development of the Key Route Network’ and Policy TRAN3 ‘Managing transport impacts of new development’.</p> <p>Policy DEL1 ‘Infrastructure provision’ sets out the requirement to ensure all new developments are supported by necessary infrastructure, both on and off site, including schools.</p> <p>Policy CEN2 ‘Wolverhampton’s Centres’ sets out the development that will be supported within Wolverhampton, which will include ensuring residents have access to a range of local services and facilities, including education.</p> <p>Various employment policies, such as Policy EMP1 ‘Providing for economic growth and jobs’ and Policy EMP5 ‘Improving access to the labour market’ will support increased access to training opportunities, to improve skills and employability including for disadvantaged groups.</p>

H.4 Post mitigation site assessments

H.4.1 Overview

H.4.1.1 The post-mitigation impact matrices for all reasonable alternative sites per receptor within each of the SA Objectives are presented in **Tables H.4.1 to H.4.14**. The overall impact matrix of all reasonable alternative site assessments post-mitigation is presented within **Table H.4.15**. These impacts have been identified following consideration of the likely mitigation effects of the WLP policies as discussed in **Tables H.3.1 to H.3.14**.

H.4.2 SA Objective 1: Cultural Heritage

Alteration of character or setting of heritage assets

H.4.2.1 The WLP policies will be expected to mitigate the identified adverse effects on the local historic environment associated with development proposals, including impacts on the character and/or setting of listed buildings, conservation areas, Areas of High Historic Landscape Value (AHHLV), Areas of High Historic Townscape Value (AHHTV) and Archaeological Priority Areas (APAs).

H.4.2.2 Depending on the site-specific characteristics and the nature/significance of local heritage assets, the details of which will not be known until the planning application stage, the WLP policies could potentially provide enhancements to heritage assets, which could lead to more positive effects on the receptors as listed in **Table H.4.1** or the historic environment in general.

Table H.4.1: Post-mitigation sites impact matrix for SA Objective 1 – Cultural heritage

Site use	Site ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Residential	H1	0	0	0	0	0	0	0	0
Residential	H2	0	0	0	0	0	0	0	0
Residential	H3	0	0	0	0	0	0	0	0
Residential	H4	0	0	0	0	0	0	0	0
Residential	H5	0	0	0	0	0	0	0	0
Residential	H7	0	0	0	0	0	0	0	0
Residential	H8	0	0	0	0	0	0	0	0
Residential	H11	0	0	0	0	0	0	0	0
Residential	H12	0	0	0	0	0	0	0	0
Residential	H13	0	0	0	0	0	0	0	0
Residential	H14	0	0	0	0	0	0	0	0
Residential	H15	0	0	0	0	0	0	0	0
Residential	H16	0	0	0	0	0	0	0	0
Residential	H17	0	0	0	0	0	0	0	0
Residential	H18	0	0	0	0	0	0	0	0
Residential	H20	0	0	0	0	0	0	0	0
Residential	H21	0	0	0	0	0	0	0	0
Residential	H22	0	0	0	0	0	0	0	0

Site use	Site ref	Grade I Listed Building	Grade II* Listed Building	Grade II Listed Building	Conservation Area	Scheduled Monument	Registered Park and Garden	Archaeological Priority Area	Historic Landscape Characterisation
Residential	H23	0	0	0	0	0	0	0	0
Residential	H24a	0	0	0	0	0	0	0	0
Residential	H24b	0	0	0	0	0	0	0	0
Residential	H24c	0	0	0	0	0	0	0	0
Residential	H24d	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	0	0	0	0	0	0	0	0
Employment	E6	0	0	0	0	0	0	0	0
Employment	E7	0	0	0	0	0	0	0	0
Employment	E12	0	0	0	0	0	0	0	0
Employment	E13	0	0	0	0	0	0	0	0
Employment	E14	0	0	0	0	0	0	0	0
Employment	E15	0	0	0	0	0	0	0	0
Employment	E16	0	0	0	0	0	0	0	0
Employment	E17	0	0	0	0	0	0	0	0
Employment	E18	0	0	0	0	0	0	0	0
Employment	E20	0	0	0	0	0	0	0	0
Employment	E21	0	0	0	0	0	0	0	0
Employment	E22	0	0	0	0	0	0	0	0
Employment	E23	0	0	0	0	0	0	0	0
Employment	E24	0	0	0	0	0	0	0	0
Employment	E25	0	0	0	0	0	0	0	0
G&T	GT1	0	0	0	0	0	0	0	0

H.4.3 SA Objective 2: Landscape

Threaten or result in the loss of sensitive or locally distinctive landscapes

H.4.3.1 The WLP policies will be expected to ensure that potential adverse impacts on the landscape / townscape are avoided and will encourage new developments within Wolverhampton to pursue high quality design. Minor positive impacts are identified for local character and distinctiveness at sites that are located on previously developed land where the potential to result in the loss of sensitive or locally distinctive landscapes is low, and opportunities for urban regeneration are likely to be greater, in comparison to sites that contain undeveloped / greenfield land.

Change of views experienced by local residents and users of the PRow network

H.4.3.2 The WLP policies will be expected to ensure that potential adverse impacts on views from local residents and the PRow network will be avoided, and developments will be encouraged to pursue high quality design which could result in the protection and enhancement of views from the PRow network, as well as visual amenity and other key views across the city.

Table H.4.2: Post-mitigation sites impact matrix for SA Objective 2 – Landscape

Site use	Site reference	Landscape sensitivity	Views from the PRow network	Views experienced by local residents
Residential	H1	+	0	0

Site use	Site reference	Landscape sensitivity	Views from the PRoW network	Views experienced by local residents
Residential	H2	+	0	0
Residential	H3	0	0	0
Residential	H4	+	0	0
Residential	H5	+	0	0
Residential	H7	+	0	0
Residential	H8	+	0	0
Residential	H11	+	0	0
Residential	H12	+	0	0
Residential	H13	+	0	0
Residential	H14	+	0	0
Residential	H15	+	0	0
Residential	H16	0	0	0
Residential	H17	+	0	0
Residential	H18	+	0	0
Residential	H20	+	0	0
Residential	H21	+	0	0
Residential	H22	+	0	0
Residential	H23	+	0	0
Residential	H24a	+	0	0
Residential	H24b	+	0	0
Residential	H24c	+	0	0
Residential	H24d	+	0	0
Residential	SA-0054-WOL	+	0	0
Employment	E6	0	0	0
Employment	E7	0	0	0
Employment	E12	+	0	0
Employment	E13	+	0	0
Employment	E14	+	0	0
Employment	E15	+	0	0
Employment	E16	+	0	0
Employment	E17	0	0	0
Employment	E18	+	0	0
Employment	E20	0	0	0
Employment	E21	+	0	0
Employment	E22	+	0	0
Employment	E23	+	0	0
Employment	E24	+	0	0
Employment	E25	0	0	0
G&T	GT1	0	0	0

H.4.4 SA Objective 3: Biodiversity

Threats or pressures to European sites

H.4.4.1 The WLP policies, in particular Policy ENV2 (Development affecting Cannock Chase SAC) and Policy ENV1 (Nature conservation), will be expected to mitigate potential adverse impacts on the integrity European sites either alone or in-combination, in accordance with the findings of the emerging HRA².

Threats or pressures to nationally designated sites

H.4.4.2 The WLP policies will prevent development that will harm NNRs or SSSIs, and through BNG enhancement will be likely to help improve habitat connectivity and support nature recovery across the Plan area, including for supporting habitats to nationally designated sites.

Threats or pressures to locally designated/non-statutory biodiversity sites and priority habitats

H.4.4.3 The policies discussed within **Table H.3.3** will help to mitigate potential adverse impacts identified on SINC, SLINC and priority habitats for the majority of proposed development sites. However, the policies **will not** be anticipated to fully mitigate adverse effects on sites which coincide with, or are directly adjacent to SLINC, or where the majority of the site area coincides with or is directly adjacent to a SINC.

Table H.4.3: Post-mitigation sites impact matrix for SA Objective 3 – Biodiversity, flora, fauna and geodiversity

Site use	Site ref	European Sites	SSSIs and IRZs	NNRs	Ancient woodland	LNRs	SINCs	SLINCs	Geological sites	Priority habitats
Residential	H1	0	0	0	0	0	0	0	0	0
Residential	H2	0	0	0	0	0	-	0	0	0
Residential	H3	0	0	0	0	0	-	0	0	0
Residential	H4	0	0	0	0	0	-	0	0	0
Residential	H5	0	0	0	0	0	-	0	0	0
Residential	H7	0	0	0	0	0	0	0	0	0
Residential	H8	0	0	0	0	0	0	0	0	0
Residential	H11	0	0	0	0	0	-	0	0	0
Residential	H12	0	0	0	0	0	0	0	0	0
Residential	H13	0	0	0	0	0	0	0	0	0
Residential	H14	0	0	0	0	0	0	-	0	0
Residential	H15	0	0	0	0	0	-	0	0	0
Residential	H16	0	0	0	0	0	0	0	0	0
Residential	H17	0	0	0	0	0	0	0	0	0
Residential	H18	0	0	0	0	0	0	0	0	0
Residential	H20	0	0	0	0	0	0	0	0	0
Residential	H21	0	0	0	0	0	0	0	0	0
Residential	H22	0	0	0	0	0	0	0	0	0
Residential	H23	0	0	0	0	0	0	0	0	0
Residential	H24a	0	0	0	0	0	0	0	0	0
Residential	H24b	0	0	0	0	0	0	0	0	0

² Lepus Consulting (2024) Wolverhampton Local Plan Regulation 19 Habitats Regulations Assessment

Site use	Site ref	European Sites	SSSIs and IRZs	NNRs	Ancient woodland	LNRs	SINCs	SLINCs	Geological sites	Priority habitats
Residential	H24c	0	0	0	0	0	0	0	0	0
Residential	H24d	0	0	0	0	0	0	0	0	0
Residential	SA-0054-WOL	0	0	0	0	0	-	0	0	0
Employment	E6	0	0	0	0	0	0	0	0	0
Employment	E7	0	0	0	0	0	-	-	0	0
Employment	E12	0	0	0	0	0	0	-	0	0
Employment	E13	0	0	0	0	0	0	0	0	0
Employment	E14	0	0	0	0	0	0	0	0	0
Employment	E15	0	0	0	0	0	-	0	0	0
Employment	E16	0	0	0	0	0	0	0	0	0
Employment	E17	0	0	0	0	0	-	0	0	0
Employment	E18	0	0	0	0	0	-	0	0	0
Employment	E20	0	0	0	0	0	0	-	0	0
Employment	E21	0	0	0	0	0	0	-	0	0
Employment	E22	0	0	0	0	0	0	0	0	0
Employment	E23	0	0	0	0	0	0	0	0	0
Employment	E24	0	0	0	0	0	0	0	0	0
Employment	E25	0	0	0	0	0	0	-	0	0
G&T	GT1	0	0	0	0	0	0	+/-	0	0

H.4.5 SA Objective 4: Climate change mitigation

Increased greenhouse gas emissions

H.4.5.1 The policies discussed within **Table H.3.4** strongly support a reduction in GHG emissions associated with development through the encouragement of sustainable transport, support of electric vehicles, low carbon technologies and enhanced GI coverage that will be likely to contribute to carbon storage functions. However, the policies **will not** be expected to fully mitigate GHG emissions arising from development proposed through the WLP, including from embodied carbon emissions associated with construction, the operation of development and potential loss of carbon stores, such as in soils. The potential effects of housing renewal schemes and employment-led development on GHG emissions where the specific end use is unknown remain uncertain.

Table H.4.4: Post-mitigation sites impact matrix for SA Objective 4 – Climate change mitigation

Site use	Site reference	Potential increase in carbon footprint
Residential	H1	-
Residential	H2	0
Residential	H3	-
Residential	H4	-
Residential	H5	0
Residential	H7	+/-
Residential	H8	-
Residential	H11	0
Residential	H12	0
Residential	H13	0

Site use	Site reference	Potential increase in carbon footprint
Residential	H14	0
Residential	H15	-
Residential	H16	0
Residential	H17	0
Residential	H18	0
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	+/-
Residential	H24b	+/-
Residential	H24c	+/-
Residential	H24d	+/-
Residential	SA-0054-WOL	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

H.4.6 SA Objective 5: Climate change adaptation

Risk of surface water flooding

H.4.6.1 The WLP policies discussed within **Table H.3.5** in particular Policies ENV12 (Flood risk and water quality) and ENV13 (Sustainable drainage systems and surface water management) will be expected to mitigate potential adverse impacts associated with development in areas at risk of surface water flooding through ensuring sustainable drainage systems and enhanced GI coverage are incorporated, which will be likely to help reduce flood risk and manage surface water run-off from sites.

Risk of fluvial flooding (current and future)

H.4.6.2 Assuming that the Sequential Test is passed, or the Exception Test is applied where required, in line with the guidance and recommendations of the emerging Level 1 and 2 Strategic Flood Risk Assessment (SFRA) (2024)³⁴, the WLP policies will be expected to

³ JBA (2024) City of Wolverhampton Council Level 1 Strategic Flood Risk Assessment. Draft, August 2024.

⁴ JBA (2024) City of Wolverhampton Council Level 2 Strategic Flood Risk Assessment. Draft, September 2024.

mitigate potential adverse impacts associated with development in areas at risk of fluvial flooding and will ensure that the impacts of climate change are considered over the lifetime of the development. The policies discussed within **Table H.3.5** will also ensure GI coverage is enhanced and protected which will provide multifunctional benefits that include alleviating flood risk and storage of water.

Table H.4.5: Post-mitigation sites impact matrix for SA Objective 5 – Climate change adaptation

Site use	Site ref	Flood Zones	Indicative Flood Zone 3b	Surface Water Flood Risk
Residential	H1	+	0	0
Residential	H2	+	0	0
Residential	H3	+	0	0
Residential	H4	+	0	0
Residential	H5	+	0	0
Residential	H7	+	0	0
Residential	H8	+	0	0
Residential	H11	+	0	0
Residential	H12	+	0	0
Residential	H13	+	0	0
Residential	H14	+	0	0
Residential	H15	+	0	0
Residential	H16	+	0	0
Residential	H17	+	0	0
Residential	H18	+	0	0
Residential	H20	+	0	0
Residential	H21	0	0	0
Residential	H22	+	0	0
Residential	H23	+	0	0
Residential	H24a	0	0	0
Residential	H24b	0	0	0
Residential	H24c	+	0	0
Residential	H24d	+	0	0
Residential	SA-0054-WOL	+	0	0
Employment	E6	+	0	0
Employment	E7	+	0	0
Employment	E12	+	0	0
Employment	E13	+	0	0
Employment	E14	+	0	0
Employment	E15	+	0	0
Employment	E16	+	0	0
Employment	E17	+	0	0
Employment	E18	+	0	0
Employment	E20	+	0	0
Employment	E21	+	0	0
Employment	E22	+	0	0
Employment	E23	0	0	0
Employment	E24	+	0	0
Employment	E25	0	0	0
G&T	GT1	+	0	0

H.4.7 SA Objective 6: Natural resources

Loss of previously undeveloped land or land with environmental value

H.4.7.1 The policies discussed within **Table H.3.6** will help to promote an efficient use of land and reduce the loss of undeveloped land and associated soil resources, utilising redevelopment of brownfield and previously developed sites and additionally enhancing green cover which may help to conserve soils. However, the policies **will not** be expected to fully mitigate these impacts, and some small-scale losses of soil will remain.

Table H.4.6: Post-mitigation sites impact matrix for SA Objective 6 – Natural resources

Site use	Site reference	Previously undeveloped land / land with environmental value	BMV land
Residential	H1	+	0
Residential	H2	-	+
Residential	H3	-	+
Residential	H4	+	0
Residential	H5	+	0
Residential	H7	+	0
Residential	H8	+	0
Residential	H11	+	0
Residential	H12	-	+
Residential	H13	+	0
Residential	H14	+	0
Residential	H15	+	0
Residential	H16	-	+
Residential	H17	-	+
Residential	H18	-	+
Residential	H20	-	+
Residential	H21	-	+
Residential	H22	-	+
Residential	H23	-	+
Residential	H24a	+	0
Residential	H24b	-	+
Residential	H24c	+	0
Residential	H24d	-	+
Residential	SA-0054-WOL	+	0
Employment	E6	-	+
Employment	E7	-	+
Employment	E12	-	+
Employment	E13	-	+
Employment	E14	-	+
Employment	E15	+	0
Employment	E16	+	0
Employment	E17	-	+
Employment	E18	+	0
Employment	E20	+	0
Employment	E21	-	+
Employment	E22	-	+
Employment	E23	-	+
Employment	E24	+	0
Employment	E25	-	+
G&T	GT1	-	+

H.4.8 SA Objective 7: Pollution

Exposure to air pollution from AQMAs and main roads

H.4.8.1 The policies discussed within **Table H.3.7** will help to minimise adverse impacts associated with the exposure of site end users to poor air quality. However, the policies alone **will not** be expected to fully mitigate adverse impacts, where all sites are located within the Wolverhampton AQMA, locating site end users within areas where air quality measures are not being met, and where development sites are within 200m of main roads and are likely to be exposed to higher levels of air pollutants.

Increased air pollution

H.4.8.2 The policies discussed within **Table H.3.7** will help to minimise adverse impacts associated with the exposure of site end users to poor air quality, however, these policies **will not** be expected to fully mitigate the adverse impacts on air pollution associated with the large scale of proposed development across the Plan area.

Risk of contamination of groundwater Source Protection Zones

H.4.8.3 The policies within **Table H.3.7** will prevent any development within a groundwater Source Protection Zone (SPZ) that would physically disturb an aquifer and will require risk assessments before granting any development to ensure no adverse effect on water quality is identified, which will be expected to ensure that any potential adverse effects will be mitigated.

Risk of contamination of watercourses

H.4.8.4 Various policies within the WLP will help to improve water quality, including conserving the canal network, implementing SuDS to reduce run-off and enhancing and protecting GI that provide ecosystem services such as improved water quality through filtration. Provided the policy criteria discussed within **Table H.3.7** are met and monitored effectively, the policies will be expected to mitigate potential adverse impacts on water quality and mitigate effects associated with run-off and drainage from new developments.

Table H.4.7: Post-mitigation sites impact matrix for SA Objective 7 – Pollution

Site use	Site reference	AQMA	Main road	Watercourse	Groundwater SPZ	Potential increase in air pollution
Residential	H1	-	-	0	0	-
Residential	H2	-	-	0	0	-
Residential	H3	-	0	0	0	-
Residential	H4	-	-	0	0	-
Residential	H5	-	-	0	0	-
Residential	H7	-	-	0	0	+/-
Residential	H8	-	-	0	0	-
Residential	H11	-	-	0	0	-
Residential	H12	-	-	0	0	-
Residential	H13	-	-	0	0	-
Residential	H14	-	0	0	0	-
Residential	H15	-	0	0	0	-
Residential	H16	-	-	0	0	-
Residential	H17	-	-	0	0	-
Residential	H18	-	-	0	0	-
Residential	H20	-	-	0	0	-

Site use	Site reference	AQMA	Main road	Watercourse	Groundwater SPZ	Potential increase in air pollution
Residential	H21	-	0	0	0	-
Residential	H22	-	-	0	0	-
Residential	H23	-	0	0	0	-
Residential	H24a	-	0	0	0	+/-
Residential	H24b	-	0	0	0	+/-
Residential	H24c	-	0	0	0	+/-
Residential	H24d	-	0	0	0	+/-
Residential	SA-0054-WOL	-	-	0	0	-
Employment	E6	-	0	0	0	0
Employment	E7	-	-	0	0	0
Employment	E12	-	-	0	0	-
Employment	E13	-	-	0	0	-
Employment	E14	-	-	0	0	0
Employment	E15	-	-	0	0	0
Employment	E16	-	0	0	0	0
Employment	E17	-	0	0	0	-
Employment	E18	-	-	0	0	0
Employment	E20	-	0	0	0	-
Employment	E21	-	0	0	0	0
Employment	E22	-	0	0	0	0
Employment	E23	-	-	0	0	-
Employment	E24	-	0	0	0	0
Employment	E25	-	-	0	0	-
G&T	GT1	-	0	0	0	+/-

H.4.9 SA Objective 8: Waste

Increase in waste generation

H.4.9.1 The policies discussed within **Table H.3.8** will be expected to encourage recycling and appropriate waste disposal within new developments; however, the policies **will not** be expected to fully mitigate the likely increase in household waste associated with the proposed growth through the WLP at sites proposing a larger amount of development. The effect of proposed employment sites on waste generation remains uncertain.

Table H.4.8: Post-mitigation sites impact matrix for SA Objective 8 – Waste

Site use	Site reference	Increase in household waste generation
Residential	H1	0
Residential	H2	0
Residential	H3	-
Residential	H4	-
Residential	H5	0
Residential	H7	0
Residential	H8	-
Residential	H11	0
Residential	H12	0
Residential	H13	0
Residential	H14	0

Site use	Site reference	Increase in household waste generation
Residential	H15	-
Residential	H16	0
Residential	H17	0
Residential	H18	0
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	0
Residential	H24b	0
Residential	H24c	0
Residential	H24d	0
Residential	SA-0054-WOL	+/-
Employment	E6	+/-
Employment	E7	+/-
Employment	E12	+/-
Employment	E13	+/-
Employment	E14	+/-
Employment	E15	+/-
Employment	E16	+/-
Employment	E17	+/-
Employment	E18	+/-
Employment	E20	+/-
Employment	E21	+/-
Employment	E22	+/-
Employment	E23	+/-
Employment	E24	+/-
Employment	E25	+/-
G&T	GT1	+/-

H.4.10 SA Objective 9: Transport and accessibility

Limited access to bus services

H.4.10.1 The proposed improvements to the transport network through the policies discussed within **Table H.3.9** will be expected to mitigate the restricted access to bus services within Wolverhampton, which only affects one reasonable alternative site. Furthermore, through emerging transport network enhancements and schemes that will encourage increased uptake in bus travel, such as new park and ride facilities, more significant positive impacts on access to bus services could be provided in the longer term.

Limited access to railway stations

H.4.10.2 The WLP policies encourage the use of the railway network within Wolverhampton and will be expected to improve railway services through new rail links and other improvements to public transport infrastructure, with benefits to connectivity of different transport modes. Furthermore, the addition of new railway stations to serve Wolverhampton including Brinsford Parkway (as recognised within Policy TRAN1: Priorities for the development of the transport network) and other potential new stations at Tettenhall, Willenhall and

Darlaston which form part of the West Midlands Rail Programme⁵ will be expected to further improve access to railway services and the wider railway network.

Limited access to railway local services and facilities

H.4.10.3 The WLP policies will be expected to improve sustainable access to local services and facilities across Wolverhampton, particularly the wide range of WLP policies that will improve sustainable and active transport infrastructure across Wolverhampton and more specifically Policy CEN3 ‘Provision of local facilities’ which will ensure that local facilities will be protected and enhanced to meet day-to-day needs of the community.

Table H.4.9: Post-mitigation sites impact matrix for SA Objective 9 – Transport and accessibility

Site use	Site reference	Bus stop	Railway station	Pedestrian access	Road access	Pedestrian access to local services	Public transport access to local services
Residential	H1	+	+	+	+	+	++
Residential	H2	+	+	+	+	++	++
Residential	H3	+	+	+	+	++	+
Residential	H4	+	+	+	+	++	+
Residential	H5	+	+	+	+	+	+
Residential	H7	+	+	+	+	+	++
Residential	H8	+	+	+	+	++	++
Residential	H11	+	+	+	+	0	++
Residential	H12	+	+	+	+	++	++
Residential	H13	+	+	+	+	++	++
Residential	H14	+	+	+	+	0	+
Residential	H15	+	+	+	+	+	++
Residential	H16	+	+	+	+	+	++
Residential	H17	+	+	+	+	+	++
Residential	H18	+	+	+	+	++	++
Residential	H20	+	+	+	+	0	+
Residential	H21	+	+	+	+	0	0
Residential	H22	+	0	+	+	++	++
Residential	H23	+	+	+	+	++	++
Residential	H24a	+	+	+	+	+	++
Residential	H24b	+	+	+	+	++	++
Residential	H24c	+	0	+	+	++	++
Residential	H24d	+	0	+	+	++	++
Residential	SA-0054-WOL	+	+	+	+	0	+
Employment	E6	+	+	+	+	0	++
Employment	E7	+	+	+	+	+	++
Employment	E12	+	+	+	+	0	+
Employment	E13	+	+	+	+	+	++
Employment	E14	+	+	+	+	0	+
Employment	E15	+	+	+	+	+	++
Employment	E16	+	+	+	+	0	+
Employment	E17	+	+	+	+	0	+

⁵ West Midlands Rail Executive (2024) Willenhall and Darlaston Stations. Available at: <https://wmre.org.uk/willenhall-and-darlaston-stations/> [Date accessed: 01/10/24]

Site use	Site reference	Bus stop	Railway station	Pedestrian access	Road access	Pedestrian access to local services	Public transport access to local services
Employment	E18	+	+	+	+	0	++
Employment	E20	+	+	+	+	0	+
Employment	E21	+	+	+	+	0	+
Employment	E22	0	+	+	+	0	+
Employment	E23	+	+	+	+	++	++
Employment	E24	+	+	+	+	+	++
Employment	E25	+	+	+	+	++	+
G&T	GT1	+	0	+	+	0	++

H.4.11 SA Objective 10: Housing

H.4.11.1 The WLP policies will be expected to ensure residents in Wolverhampton have access to accommodation which meets their needs. The policies will also ensure that an appropriate housing supply will be delivered to specific areas, balancing employment land and housing supply, ensuring any loss of homes will be accommodated for.

Table H.4.10: Post-mitigation sites impact matrix for SA Objective 10 – Housing

Site use	Site reference	Housing provision
Residential	H1	++
Residential	H2	+
Residential	H3	++
Residential	H4	++
Residential	H5	+
Residential	H7	0
Residential	H8	++
Residential	H11	+
Residential	H12	+
Residential	H13	+
Residential	H14	+
Residential	H15	++
Residential	H16	++
Residential	H17	+
Residential	H18	+
Residential	H20	+
Residential	H21	+
Residential	H22	+
Residential	H23	+
Residential	H24a	+
Residential	H24b	+
Residential	H24c	+
Residential	H24d	+
Residential	SA-0054-WOL	++
Employment	E6	0
Employment	E7	0
Employment	E12	0
Employment	E13	0

Site use	Site reference	Housing provision
Employment	E14	0
Employment	E15	0
Employment	E16	0
Employment	E17	0
Employment	E18	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	0
Employment	E24	0
Employment	E25	0
G&T	GT1	+

H.4.12 SA Objective 11: Equality

H.4.12.1 The policies discussed within **Table H.3.11** will be expected to provide increased opportunities and improved access to facilities and services within the borough, which will help to address inequalities throughout Wolverhampton and address accessibility gaps to key services.

Table H.4.11: Post-mitigation sites impact matrix for SA Objective 11 – Equality

Site use	Site reference	IMD 10% most deprived
Residential	H1	0
Residential	H2	0
Residential	H3	0
Residential	H4	0
Residential	H5	0
Residential	H7	0
Residential	H8	0
Residential	H11	0
Residential	H12	0
Residential	H13	0
Residential	H14	0
Residential	H15	0
Residential	H16	0
Residential	H17	0
Residential	H18	0
Residential	H20	0
Residential	H21	0
Residential	H22	0
Residential	H23	0
Residential	H24a	0
Residential	H24b	0
Residential	H24c	0
Residential	H24d	0
Residential	SA-0054-WOL	0
Employment	E6	0
Employment	E7	0
Employment	E12	0

Site use	Site reference	IMD 10% most deprived
Employment	E13	0
Employment	E14	0
Employment	E15	0
Employment	E16	0
Employment	E17	0
Employment	E18	0
Employment	E20	0
Employment	E21	0
Employment	E22	0
Employment	E23	0
Employment	E24	0
Employment	E25	0
G&T	GT1	0

H.4.13 SA Objective 12: Health and wellbeing

Limited access to healthcare

H.4.13.1 The policies discussed within **Table H.3.12** will help to prevent the loss of existing facilities and will help to ensure that residents within Wolverhampton have reasonable access to healthcare facilities. The policies will ensure that healthcare facilities are well designed and accessible, and that sufficient infrastructure is in place to support the existing Wolverhampton population and anticipated future growth. Furthermore, the various WLP policies that will improve public transport and facilitate active travel will be expected to contribute towards improved access to healthcare services.

Net loss of public greenspace

H.4.13.2 The WLP policies will be expected to ensure that development proposals do not result in a loss of public greenspace across the WLP area, and will further improve accessibility to greenspaces and opportunities for recreation across Wolverhampton.

H.4.13.3 Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI provisions, dependent on more site-specific context and information.

Access to PRoW/cycle network

H.4.13.4 Various WLP policies seek to improve access via sustainable modes of travel including walking and cycling. Only one site was identified to lie outside of the recommended distance to existing footpaths and cycle routes, which will be likely to be mitigated through the WLP policy provisions.

Table H.4.12: Post-mitigation sites impact matrix for SA Objective 12 – Health and wellbeing

Site use	Site ref	NHS hospital with A&E	Pedestrian access to GP surgery	Public transport access to GP surgery	Access to greenspace	Net loss of greenspace	PRoW/cycle path
Residential	H1	+	+	++	+	0	+
Residential	H2	+	++	++	+	0	+
Residential	H3	+	+	++	+	0	+
Residential	H4	+	+	+	+	0	+

Site use	Site ref	NHS hospital with A&E	Pedestrian access to GP surgery	Public transport access to GP surgery	Access to greenspace	Net loss of greenspace	PRoW/ cycle path
Residential	H5	+	+	++	+	0	+
Residential	H7	+	+	++	+	0	+
Residential	H8	+	++	++	+	0	+
Residential	H11	+	++	+	+	0	+
Residential	H12	+	++	++	+	0	+
Residential	H13	+	++	++	+	0	+
Residential	H14	0	++	++	+	0	+
Residential	H15	+	+	++	+	0	+
Residential	H16	+	+	++	+	0	+
Residential	H17	+	+	++	+	0	+
Residential	H18	+	++	++	+	0	+
Residential	H20	0	++	++	+	0	+
Residential	H21	+	+	++	+	0	+
Residential	H22	+	++	++	+	0	+
Residential	H23	+	++	++	+	0	+
Residential	H24a	+	0	++	+	0	+
Residential	H24b	+	0	+	+	0	+
Residential	H24c	+	+	++	+	0	+
Residential	H24d	+	++	++	+	0	+
Residential	SA-0054-WOL	+	+	+	+	0	+
Employment	E6	+	0	++	+	0	+
Employment	E7	+	0	++	+	0	+
Employment	E12	+	+	++	+	0	+
Employment	E13	+	0	++	+	0	+
Employment	E14	+	+	++	+	0	+
Employment	E15	+	+	++	+	0	+
Employment	E16	+	+	+	+	0	+
Employment	E17	+	++	++	+	0	+
Employment	E18	+	+	++	+	0	+
Employment	E20	+	+	+	+	0	+
Employment	E21	+	0	+	+	0	+
Employment	E22	+	0	++	+	0	0
Employment	E23	+	++	++	+	0	+
Employment	E24	+	0	++	+	0	+
Employment	E25	+	0	+	+	0	+
G&T	GT1	+	+	+	+	0	+

H.4.14 SA Objective 13: Economy

Net loss of employment floorspace

H.4.14.1 The policies discussed within **Table H.3.13** will be expected to mitigate the potential adverse impacts associated with the loss of existing employment land across the WLP area, ensuring that current employment land is only lost where it is demonstrated to be a surplus to requirements.

Table H.4.13: Post-mitigation sites impact matrix for SA Objective 13 – Economy

Site use	Site ref	Employment floorspace provision	Pedestrian access to employment opportunities	Public transport access to employment opportunities
Residential	H1	0	++	++
Residential	H2	0	++	++
Residential	H3	0	++	++
Residential	H4	0	++	++
Residential	H5	0	++	++
Residential	H7	0	++	++
Residential	H8	0	++	++
Residential	H11	0	++	++
Residential	H12	0	++	++
Residential	H13	0	++	++
Residential	H14	0	++	++
Residential	H15	0	++	++
Residential	H16	0	++	++
Residential	H17	0	++	++
Residential	H18	0	++	++
Residential	H20	0	++	++
Residential	H21	0	++	++
Residential	H22	0	++	++
Residential	H23	0	++	++
Residential	H24a	0	++	++
Residential	H24b	0	++	++
Residential	H24c	0	+	++
Residential	H24d	0	++	++
Residential	SA-0054-WOL	0	++	++
Employment	E6	++	0	0
Employment	E7	++	0	0
Employment	E12	++	0	0
Employment	E13	++	0	0
Employment	E14	++	0	0
Employment	E15	0	0	0
Employment	E16	++	0	0
Employment	E17	++	0	0
Employment	E18	++	0	0
Employment	E20	++	0	0
Employment	E21	++	0	0
Employment	E22	++	0	0
Employment	E23	++	0	0
Employment	E24	++	0	0
Employment	E25	++	0	0
G&T	GT1	0	++	++

H.4.15 SA Objective 14: Education, skills and training

Limited access to education opportunities

H.4.15.1 The policies discussed within **Table H.3.14** will be expected to improve sustainable access to education opportunities across Wolverhampton. Various WLP policies will improve

access to public transport and facilitate active travel will improve access to education and address any accessibility gaps across the WLP area. Policy HOU6 ‘Education facilities’ supports an enhanced network of education facilities across Wolverhampton which may lead to further benefits for education and training, including access to higher education.

Table H.4.14: Post-mitigation sites impact matrix for SA Objective 14 (Education, skills and training)

Site use	Site ref	Pedestrian access to primary school	Pedestrian access to secondary school	Public transport access to secondary school
Residential	H1	++	++	++
Residential	H2	++	++	++
Residential	H3	++	++	++
Residential	H4	++	++	++
Residential	H5	++	+	++
Residential	H7	++	++	++
Residential	H8	++	++	+
Residential	H11	+	0	++
Residential	H12	++	++	++
Residential	H13	++	++	++
Residential	H14	++	++	+
Residential	H15	++	++	+
Residential	H16	+	+	++
Residential	H17	++	+	++
Residential	H18	++	++	++
Residential	H20	++	+	0
Residential	H21	++	++	++
Residential	H22	++	++	++
Residential	H23	++	++	++
Residential	H24a	++	++	++
Residential	H24b	++	++	++
Residential	H24c	++	++	++
Residential	H24d	++	++	++
Residential	SA-0054-WOL	+	0	++
Employment	E6	0	0	0
Employment	E7	0	0	0
Employment	E12	0	0	0
Employment	E13	0	0	0
Employment	E14	0	0	0
Employment	E15	0	0	0
Employment	E16	0	0	0
Employment	E17	0	0	0
Employment	E18	0	0	0
Employment	E20	0	0	0
Employment	E21	0	0	0
Employment	E22	0	0	0
Employment	E23	0	0	0
Employment	E24	0	0	0
Employment	E25	0	0	0
G&T	GT1	+	+	++

H.4.16 Overall post-mitigation assessment

H.4.16.1 The overall impact matrix of all reasonable alternative site assessments post-mitigation is presented within **Table H.4.15**. These impacts have been identified following consideration of the likely mitigation effects of the WLP policies as discussed in **sections H.4.2 to H.4.16** and summarised in **Tables H.3.1 to H.3.14**.

Table H.4.15: Impact matrix for all reasonable alternative site assessments post-mitigation

Site Reference	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC adaptation	6 Natural resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H1	0	+	0	-	+	+	-	0	++	++	0	++	++	++
H2	0	+	-	0	+	-	-	0	++	+	0	++	++	++
H3	0	0	-	-	+	-	-	-	++	++	0	++	++	++
H4	0	+	-	-	+	+	-	-	++	++	0	+	++	++
H5	0	+	-	0	+	+	-	0	+	+	0	++	++	++
H7	0	+	0	+/-	+	+	-	0	++	0	0	++	++	++
H8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H11	0	+	-	0	+	+	-	0	++	+	0	++	++	++
H12	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H13	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H14	0	+	-	0	+	+	-	0	+	+	0	++	++	++
H15	0	+	-	-	+	+	-	-	++	++	0	++	++	++
H16	0	0	0	0	+	-	-	0	++	++	0	++	++	++
H17	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H18	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H20	0	+	0	0	+	-	-	0	+	+	0	++	++	++
H21	0	+	0	0	0	-	-	0	+	+	0	++	++	++
H22	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H23	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H24a	0	+	0	+/-	0	+	-	0	++	+	0	++	++	++
H24b	0	+	0	+/-	0	-	-	0	++	+	0	+	++	++
H24c	0	+	0	+/-	+	+	-	0	++	+	0	++	++	++
H24d	0	+	0	+/-	+	-	-	0	++	+	0	++	++	++
SA-0054-WOL	0	+	--	+/-	+	+	-	+/-	+	++	0	+	++	++
E6	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E7	0	0	-	+/-	+	-	-	+/-	++	0	0	++	++	0
E12	0	+	-	+/-	+	-	-	+/-	+	0	0	++	++	0
E13	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E14	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E15	0	+	-	+/-	+	+	-	+/-	++	0	0	++	0	0
E16	0	+	0	+/-	+	+	-	+/-	+	0	0	+	++	0
E17	0	0	-	+/-	+	-	-	+/-	+	0	0	++	++	0
E18	0	+	-	+/-	+	+	-	+/-	++	0	0	++	++	0
E20	0	0	-	+/-	+	+	-	+/-	+	0	0	+	++	0
E21	0	+	-	+/-	+	-	-	+/-	+	0	0	+	++	0
E22	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E23	0	+	0	+/-	0	-	-	+/-	++	0	0	++	++	0

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Reference	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC adaptation	Natural resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
E24	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E25	0	0	-	+/-	0	-	-	+/-	++	0	0	+	++	0
GT1	0	0	+/-	+/-	+	-	-	+/-	++	+	0	+	++	++

Appendix I: Reasons for Selection and Rejection of Reasonable Alternative Sites

Appendix I Tables

Table I.1.1: Outline reasons for selection and rejection of reasonable alternative sites: Residential I-2
Table I.1.2: Outline reasons for selection and rejection of reasonable alternative sites: Employment I-4
Table I.1.3: Outline reasons for selection and rejection of reasonable alternative sites: Gypsy and Traveller I-4

I.1 Selected and rejected sites

I.1.1.1 **Table I.1.1** lists all reasonable alternative sites that have been evaluated throughout the SA process, and indicates which have been:

1. **Selected** – i.e. the reasonable alternative sites that have been chosen as preferred sites for allocation and are set out in the Regulation 19 version of the Wolverhampton Local Plan (WLP); or
2. **Rejected** – i.e. the reasonable alternative sites that have been considered as part of the SA process but are not preferred sites for allocation in the WLP.

I.1.1.2 The outline reasons for selecting or rejecting each of the reasonable alternative sites, as set out in **Tables I.1.1–I.1.3** below for each use (residential, employment and Gypsy and Traveller), have been provided by the City of Wolverhampton Council (CWC) and are reflective of the Council’s consideration of the iterative SA findings as well as other evidence base information.

I.1.1.3 CWC have identified that 14 sites which were assessed as reasonable alternatives in the Regulation 18 SA are no longer considered to be reasonable alternatives, and have since been removed from the SA and no longer feature in the below tables. This affects the following sites, listed by their former references from the Regulation 18 stage:

- Site E01 ‘Wolverhampton Business Park’ – site now has planning permission.
- Site E02 ‘Rear of IMI Marstons, Wobaston Road’ – site now has planning permission.
- Site E03 ‘Shaw Road’ – site is now built out.
- Site E04 ‘Former Strykers, Bushbury Lane’ – site now has planning permission.
- Site E05 ‘Gas Holder Site, Wolverhampton Science Park’ – site is now built out.
- Site E08 ‘Cross Street North / Crown Street’ – site now has planning permission.
- Site E09 ‘Bentley Bridge Business Park, Well Lane, Wednesfield’ – site is now built out.
- Site E10 ‘Tata Steel, Wednesfield’ – site is now built out.
- Site E11 ‘Phoenix Road, Wednesfield’ – site is now built out.
- Site E19 ‘Rolls Royce Playing Fields, Spring Road’ – site is now built out.
- Site H7 ‘Dudley Road / Bell Place, Blakenhall’ – site now has planning permission.
- Site H8 ‘Former Royal Hospital, All Saints’ – site now has planning permission.
- Site H16 ‘Former Northcote Secondary School, Northwood Park Road’ – site is now under construction.
- Site H17 ‘Beckminster House, Beckminster Road’ – site now has planning permission and is too small to allocate.

Table I.1.1: Outline reasons for selection and rejection of reasonable alternative sites: Residential

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
H1	Bluebird Industrial Estate and site to rear, Park Lane	Selected	Existing housing allocation in Stafford Road Corridor Area Action Plan. Not consulted on through Draft BCP due to delivery concerns - now considered deliverable.
H2	Former G & P Batteries, Grove Street, Heath Town	Selected	Existing allocation in Heathfield Park Neighbourhood Plan. Outline planning permission lapsed in 2024.
H3	East of Qualcast Road, Canalside South	Selected	Existing allocation in Bilston Corridor Area Action Plan.
H4	West of Qualcast Road, Canalside South	Selected	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H5	West of Colliery Road, Horseley Fields	Selected	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land. Additional 1 ha suitable for other commercial uses as part of mixed use scheme.
H7	New Park Village Housing Renewal (Ellerton Walk)	Selected	Council housing renewal scheme. Estimated 205 demolitions planned.
H8	Dobbs Street, Blakenhall	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Part occupied employment land.
H11	Delta Trading Estate, Bilston Road	Selected	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H12	Land at Hall Street / The Orchard, Bilston Town Centre	Selected	Existing allocation in Bilston Corridor Area Action Plan.
H13	Former Pipe Hall, The Orchard, Bilston Town Centre	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to retention and conversion of listed building.
H14	Lane Street / Highfields Road, Bradley	Selected	Operational industrial site adjoining residential and employment, promoted for housing through the call for sites. The employment land evidence indicates that this site is surplus to employment needs and could be released for housing, subject to re-location of the current land owners who occupy the site and operate a steel stockholding company. The sites falls within an Area of High Historic Townscape Value (AHHTV) in the HLC Study due to the cluster of late 19th and early 20th century industrial buildings surrounding the locally listed Highfield Works building, which also falls within the Bilston Canal Corridor Conservation Area. This building could be suitable for conversion, subject to viability. Carefully designed housing development on adjoining land would not necessarily harm the setting of the Conservation Area. The site is suitable for development for 72 homes, subject to subject to a design which: protects the operation of employment land to the east; retains the locally listed Highfield Works building; respects the setting of this building and the Bilston Canal Corridor Conservation Area within which it falls; and respects the Area of High Historic Townscape Value designation covering the whole site; provision of off-site improvements to local open space to meet recreational open space needs of new residents.
H15	Greenway Road, Bradley	Selected	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
H16	Former Loxdale Primary School, Chapel Street, Bradley	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H17	South of Oxford Street, Bilston	Selected	Existing allocation in Bilston Corridor Area Action Plan. Occupied employment land.
H18	Land at Railway Drive, Bilston	Selected	Outline planning permission lapsed in 2023.
H20	Former Rookery Lodge, Woodcross Lane	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Outline permission for care village in 2012.
H21	Former Stowheath centres. Stowheath Lane	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing.
H22	Former Probert Court / Health Centre, Probert Road	Selected	Identified in Wolverhampton SHLAA (2022) as suitable and deliverable for housing. Subject to relocation of existing GP surgery.
H23	Former Gym, Craddock Street	Selected	Existing housing allocation in Wolverhampton Unitary Development Plan. Not consulted on through Draft BCP as operational gym - now considered deliverable.
H24 (a, b, c and d)	Tarrans Housing Renewal (Portobello, Wood End, Lincoln Green)	Selected	Council housing renewal scheme. Estimated 126 demolitions planned.
SA-0054-WOL	Sites at Sutherland Avenue / Cooper Street	Rejected	Sites in employment use within an established industrial area, promoted for housing through the call for sites. The sites are unsuitable for residential development as they are surrounded by unregulated employment uses which are important to protect for employment in line with draft BCP evidence and policies. Development of the sites would cause significant harm to the residential amenity of new residents and prejudice the operational capacity of adjoining employment uses to operate.

Table I.1.2: Outline reasons for selection and rejection of reasonable alternative sites: Employment

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
E6	Mammoth Drive, Wolverhampton Science Park	Selected	Existing allocation in Stafford Road Corridor Area Action Plan.
E7	Stratosphere Site, Wolverhampton Science Park	Selected	Existing allocation in Stafford Road Corridor Area Action Plan.
E12	Land at Neachells Lane	Selected	Part of public open space with a SLINC designation. Site located adjoining high quality employment area with good access to the highways network, subject to junction improvements. There is a surplus in quantity of open space in this part of Wolverhampton, as set out in the current Wolverhampton Open Space Strategy and Action Plan, which can support the combined loss of open space at this site, subject to investment in local open space to improve quality. Site suitable for employment development subject to mitigation and enhancement for loss of recreational open space and SLINC / nature conservation value. Capacity may be constrained by highways access onto Neachells Lane. Planning application under consideration.
E13	Land rear of Key Line Builders, Neachells Lane / Noose Lane	Selected	Vacant land within industrial area, suitable for employment use.
E14	Chillington Fields	Selected	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Willenhall Road.
E15	Powerhouse, Commercial Road	Selected	Existing allocation in Bilston Corridor Area Action Plan.
E16	Hickman Avenue	Selected	Existing allocation in Bilston Corridor Area Action Plan. Subject to protecting and improving the environment along Hickman Avenue.
E17	Former MEB Site, Major Street / Dixon Street	Selected	Vacant land within industrial area, suitable for employment use, subject to remediation as appropriate to address known ground condition issues.
E18	Millfields Road, Ettingshall	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
E20	South of Inverclyde Drive	Selected	Existing allocation in Bilston Corridor Area Action Plan.
E21	Rear of Spring Road	Selected	Existing allocation in Bilston Corridor Area Action Plan.
E22	Springvale Avenue	Selected	Existing allocation in Bilston Corridor Area Action Plan.
E23	Bilston Urban Village, Bath Street	Selected	Existing allocation in Bilston Corridor Area Action Plan.
E24	Dale St, Bilston	Selected	Vacant land within industrial area, suitable for employment use, with no known constraints.
E25	South of Citadel Junction, Murdoch Road, Bilston	Selected	Existing allocation in Bilston Corridor Area Action Plan. Subject to remediation and mitigation for loss of nature conservation value.

Table I.1.3: Outline reasons for selection and rejection of reasonable alternative sites: Gypsy and Traveller

Site reference	Site address	Selected or rejected?	Outline reason for selection / rejection provided by CWC
GT1	Former Bushbury Reservoir, Showell Road	Selected	Existing allocation in Stafford Road Corridor Area Action Plan.

Appendix J: Site Policy Assessments

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J.1 Overview

J.1.1 Introduction

- J.1.1.1 This appendix provides an assessment of the proposed 44 site-specific policies as set out within the Regulation 19 version of the Wolverhampton Local Plan (WLP).
- J.1.1.2 The SA Framework (see **Appendix B**) has been used to evaluate the sustainability performance of each site policy, in accordance with the methodology as set out in **Chapter 4** of the main Regulation 19 SA Report (see **Volume 2**).
- J.1.1.3 Of the 44 site allocation policies, 36 policies relate to proposed development sites which have also been assessed as part of the reasonable alternative site assessments in the SA process, based on the site assessment methodology as presented in **Appendix E**. As such, the assessment of site policies has drawn on the findings from the post-mitigation evaluation of reasonable alternative sites (see **Appendix H**), but also takes into account the further site-specific information and mitigation proposed through the site policies for the 36 sites which have been selected for allocation.
- J.1.1.4 Site policies E1, E2, E4, E8, H6, H9, H10 and H19 relate to sites which have not been identified by CWC as reasonable alternative sites. These sites have not been assessed alongside the other 36 within the Regulation 19 SA in the reasonable alternative sites exercise, as these sites have already been granted planning permission. As part of the site policy assessment process the eight sites have been appraised against the same receptors as the reasonable alternative site assessments, to ensure these have been evaluated on a comparable basis.

J.1.2 Overview of site policy assessments

- J.1.2.1 The impact matrices for all proposed site policy assessments are presented in **Table J.1.1** below. These impacts should be read in conjunction with the assessment text narratives which follow in the subsequent sections of this appendix.
- J.1.2.2 Where relevant, recommendations have been made within the policy assessment text in this appendix. Further information regarding recommendations made to CWC throughout the Plan making process can be found within **Chapter 18** of the main Regulation 19 SA Report (see **Volume 2**).

Table J.1.1: Impact matrix summary of all site policy assessments

Site Policy	1 Cultural Heritage	2 Landscape	3 Biodiversity	4 CC Mitigation	5 CC Adaptation	6 Natural Resources	7 Pollution	8 Waste	9 Transport	10 Housing	11 Equality	12 Health	13 Economy	14 Education
H1	0	+	0	-	+	+	-	0	++	++	0	++	++	++
GT1	0	0	0	+/-	+	-	-	+/-	++	+	0	+	++	++
E1	0	0	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E2	0	0	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E4	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E6	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E7	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E8	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
H2	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H3	0	+	0	-	+	-	-	-	++	++	0	++	++	++
H4	0	+	0	-	+	+	-	-	++	++	0	+	++	++
H5	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H6	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H7	0	+	0	+/-	+	+	-	0	++	0	0	++	++	++
E12	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E13	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
H8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H9	0	+	0	0	+	+	-	0	++	++	0	++	++	++
H10	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H11	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H12	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H13	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H14	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H15	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H16	0	0	0	0	+	-	-	0	++	++	0	++	++	++
H17	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H18	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H19	0	+	0	0	+	-	-	0	++	+	0	++	++	++
E14	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E15	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
E16	0	0	0	0	0	0	0	0	0	0	0	0	0	0
E17	0	0	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E18	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E20	0	0	0	+/-	+	+	-	+/-	+	0	0	+	++	0
E21	0	+	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E22	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E23	0	+	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E24	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E25	0	0	0	+/-	0	-	-	+/-	++	0	0	+	++	0
H20	0	+	0	0	+	-	-	0	+	+	0	++	++	++
H21	0	+	0	0	0	-	-	0	+	+	0	++	++	++
H22	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H23	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H24	0	+	0	+/-	0	-	-	0	++	+	0	++	++	++

J.2 Stafford Road Core Regeneration Area

J.2.1 Overview

- J.2.1.1 CWC has identified eight site allocations (see **Table J.2.1** and **Figure J.2.1**) to contribute towards meeting the development requirements within the Stafford Road Core Regeneration Area in the WLP.
- J.2.1.2 Four of these sites (H1, GT1, E6 and E7) have been evaluated within the SA process as reasonable alternatives, and the post-mitigation assessment of these sites can be found within **Appendix H**.
- J.2.1.3 The remaining four sites (E1, E2, E4 and E8) have planning permission and therefore have not been identified by CWC as reasonable alternative sites. Consequently, these sites have not been assessed as part of the reasonable alternative sites exercise within the Regulation 19 SA Report.

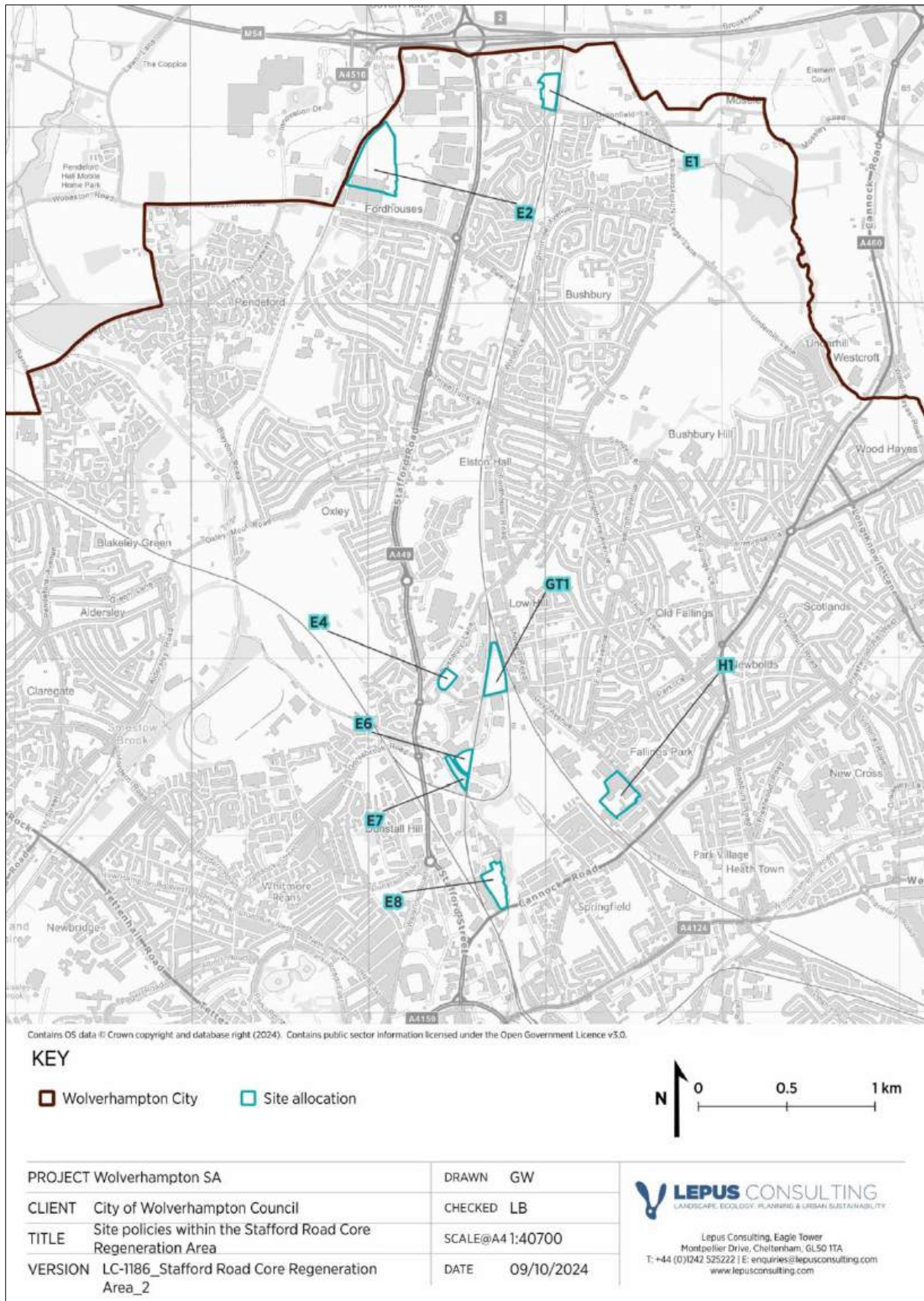


Figure J.2.1: Site policies within the Stafford Road Core Regeneration Area

J.2.2 Site policies

Table J.2.1: Site policies within the Stafford Road Core Regeneration Area in Wolverhampton

Site reference	Site name	Detailed information and policy requirements provided by CWC
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>Heritage Impact: 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>Flood Risk: 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>
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>Heritage Impact: 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>Flood Risk: 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>
E1	Wolverhampton Business Park	<p>Replaces Stafford Road Corridor Area Action Plan allocation EDO4. Site has Local Development Order and secured outline planning permission.</p> <p>Heritage Impact: 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>
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>Heritage Impact: 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>
E4	Former Strykers, Bushbury Lane	<p>Site has outline planning permission.</p> <p>Heritage Impact: 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>

Site reference	Site name	Detailed information and policy requirements provided by CWC
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>Heritage impact: 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>Flood Risk: 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>
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>Heritage impact: 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>Flood Risk: 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>
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>Heritage impact: 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>

Table J.2.2: Impact matrix assessment of site policies within the Stafford Road Core Regeneration Area

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Policy	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H1	0	+	0	-	+	+	-	0	++	++	0	++	++	++
GT1	0	0	0	+/-	+	-	-	+/-	++	+	0	+	++	++
E1	0	0	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E2	0	0	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E4	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E6	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E7	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0
E8	0	0	0	+/-	+	-	-	+/-	++	0	0	++	++	0

Site allocations assessed as reasonable alternatives within the Regulation 19 SA

J.2.2.1 Site Policy H1 states that a Heritage Impact Statement (HIS) is required to inform the proposed development, given the site’s location within an Area of High Historic Townscape Value (AHHTV), and to ensure that full consideration is given to other nearby designated and non-statutory heritage assets to confirm that any potential adverse effects can be fully mitigated. This requirement will complement the wider heritage policies of the WLP, and therefore it is expected that development at the site will not impact any surrounding heritage assets. The policy requires development to comply with the Level 2 SFRA Site Report requirements, to ensure that surface water flood risk at the site can be fully mitigated. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.2.2.2 Site Policy GT1 recognises that development at the site is unlikely to lead to significant effects on cultural heritage given its location away from heritage assets. The SA site assessment of Site GT1 (see **Appendix F**) identified uncertainty whether the Bushbury Reservoir Site of Local Importance for Nature Conservation (SLINC) that coincides with the site contains any environmental value, since it has been landfilled. The site policy requires mitigation for any loss of nature conservation value and therefore a negligible impact on biodiversity is identified (SA Objective 3). The policy also requires development to comply with the Level 2 SFRA Site Report requirements, to ensure that surface water flood risk at the site can be fully mitigated. The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.2.2.3 Site Policy E6 requires high quality design which will respect the adjoining canal, leading to likely benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. A minor positive impact is identified for landscape (SA Objective 2). The policy requires an HIS as a result of multiple surrounding heritage assets, including the ‘Wolverhampton Locks’ Conservation Area (CA) that is located adjacent to Site E6. This requirement will complement the wider heritage policies of the WLP, ensuring that any potential adverse effects can be fully mitigated; therefore, it is expected that development at the site will not impact any surrounding heritage assets. The policy requires development to comply with the Level 2 SFRA Site

Report requirements, to ensure that surface water flood risk at the site can be fully mitigated. The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

- J.2.2.4 Site Policy E7 requires high quality design which will respect the adjoining canal and biodiversity assets including the 'Birmingham Canal' Site of Importance for Nature Conservation (SINC) and 'Land at Wolverhampton Science Park' SLINC. High quality design will be likely to provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The policy requires an HIS to be prepared at the site to ensure that any potential adverse effects on the multiple surrounding heritage assets can be mitigated, including the 'Wolverhampton Locks' CA that is located adjacent to Site E7. Furthermore, the policy requires natural landscaping to be incorporated which will be likely to benefit the local landscape as well as provide wider ecosystem services such as creation of habitats, carbon storage, flood risk reduction and improved filtration of air pollutants. Overall, a minor positive impact is identified for landscape character (SA Objective 2). The policy requires development to comply with the Level 2 SFRA Site Report requirements, to ensure that surface water flood risk at the site can be fully mitigated. The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

Site allocations with planning permission

- J.2.2.5 The development at the four site allocations E1, E2, E4 and E8 which have been granted planning permission (and were therefore not identified as reasonable alternative sites by CWC) all will be likely to result in some increase in air pollution and small-scale loss of soil resources. Therefore, minor negative impacts are identified for pollution (SA Objective 7) and natural resources (SA Objective 6). The scale of GHG emissions and waste likely to be produced across the four employment sites is uncertain and will depend upon the specific end uses (SA Objectives 4 and 8). Site Policies E1 and E4 recognise that development at these sites is unlikely to lead to significant effects on cultural heritage given their location away from heritage assets. As discussed within **Appendix H** it is expected that wider WLP policies will ensure that smaller sites located within the urban area are unlikely to significantly affect cultural heritage (SA Objective 1), landscape character (SA Objective 2) or local biodiversity assets (SA Objective 3) and therefore a negligible impact can be identified against these SA Objectives.
- J.2.2.6 All sites are expected to have a positive impact on transport and accessibility, where the sites are located within sustainable distance to various forms of public transport. Site E1 is located within reasonably good public transport time to fresh food and services and overall, a minor positive impact is identified for transport (SA Objective 9). The remaining three employment allocations (E2, E4 and E8) are located within highly sustainable travel times to fresh food and services through public transport and overall, a major positive impact is identified for the three allocations.
- J.2.2.7 The proposed employment development at the four allocations is unlikely to significantly affect housing, equality or education (SA Objectives 10, 11 and 14), but will result in a major positive impact on the economy (SA Objective 13).
- J.2.2.8 Site E1 is located in a reasonably sustainable location with regard to healthcare facilities, whereas Site E4 is located in a highly sustainable location with regard to healthcare

facilities, justifying an identified major positive impact for Site Policy E4 and a minor positive impact for Site Policy E1 against health (SA Objective 12).

- J.2.2.9 Site Policy E2 requires high quality design which will respect the adjoining canal, which may provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The site adjoins to the Staffordshire / Worcestershire and Shropshire Union Canal Conservation Area (CA) and Waterhead Brook Archaeological Priority Area (APA); an HIS is required to ensure that full consideration is given to the nearby heritage assets to confirm that any potential adverse effects can be fully mitigated. A negligible impact is identified for landscape character and cultural heritage (SA Objectives 1 and 2). Overall, as a result of design that will “*respect*” the adjoining Staffordshire and Worcestershire Canal SINC, coupled with other WLP policies (see **Appendix H**) that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3).
- J.2.2.10 Site E2 is located partially within Flood Zones 2 and 3; through application of the Sequential Test and in accordance with various WLP policies, flood risk is expected to be avoided or mitigated, and therefore a negligible impact is identified for climate change adaptation (SA Objective 5). Sites E1, E4 and E8 are more likely to lead to an overall minor positive impact on SA Objective 5 given their location wholly in Flood Zone 1.
- J.2.2.11 Policy E8 requires high quality design that respects the adjoining Birmingham Canal, which will be likely to provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The site adjoins to the ‘Wolverhampton Locks’ CA and an HIS is required to ensure that full consideration is given to the nearby heritage assets to confirm that any potential adverse effects can be fully mitigated. A negligible impact is identified for landscape character and cultural heritage (SA Objectives 1 and 2). Overall, as a result of design that will “*respect*” the adjoining Birmingham Canal SINC, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3).

J.3 Wednesfield Core Regeneration Area

J.3.1 Overview

J.3.1.1 CWC has identified eight site allocations (see **Table J.3.1** and **Figure J.3.1**) to contribute towards meeting the development requirements within the Wednesfield Core Regeneration Area in the WLP.

J.3.1.2 Seven of these sites have been evaluated within the SA process as reasonable alternatives, and the post-mitigation assessment of these sites can be found within **Appendix H**.

J.3.1.3 Site H6 has planning permission and therefore has not been identified by CWC as a reasonable alternative site. Consequently, this site has not been assessed as part of the reasonable alternative sites exercise within the Regulation 19 SA Report.

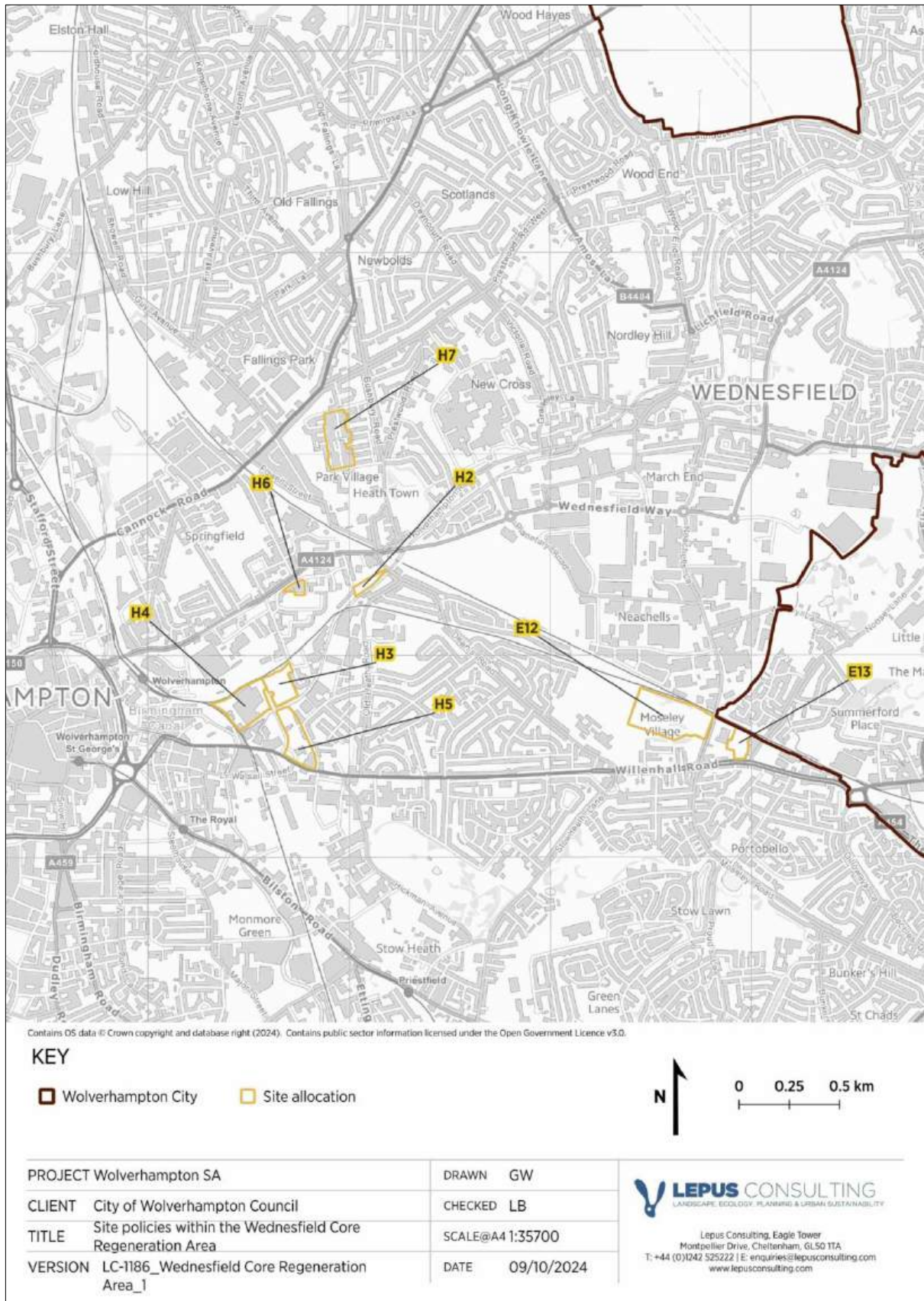


Figure J.3.1: Site policies within the Wednesfield Core Regeneration Area

J.3.2 Site policies

Table J.3.1: Site policies within the Wednesfield Core Regeneration Area in Wolverhampton

Site reference	Site name	Detailed information and policy requirements provided by CWC
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 & Essington Canal (LNR and SINC). Subject to biodiversity net gain.</p> <p>Heritage Impact: 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>
H3	East of Qualcast Road, Canalside 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 & Essington Canal (LNR and SINC).</p> <p>Heritage Impact: 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>
H4	West of Qualcast Road, Canalside 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 & Essington Canal (LNR and SINC).</p> <p>Heritage Impact: 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>Wastewater: 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>
H5	West of Colliery Road, Horseley Fields	<p>Together with H3 and H4, replaces Bilston Corridor Area Action Plan allocation H1. 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 & Essington Canal (LNR and SINC).</p> <p>Heritage Impact: 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</p>

Site reference	Site name	Detailed information and policy requirements provided by CWC
		dating of current industrial buildings and assessment of archaeological significance and potential.
H6	Heath Town Estate Masterplan – Chervil Rise	Council housing renewal site forming part of Heath Town Masterplan scheme. Cleared site with full planning permission. 70% flats. Heritage Impact: 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.
H7	New Park Village Housing Renewal (Ellerton Walk)	Council housing renewal scheme. Estimated 205 demolitions planned. Heritage Impact: 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.
E12	Land at Neachells Lane	Part of Neachells Lane Open Space and Site of Local Importance for Nature Conservation. Subject to satisfactory highways access being demonstrated and mitigation for loss of open 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. Heritage Impact: 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. Wastewater: 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.
E13	Land rear of Keyline Builders, Neachells Lane / Noose Lane	Subject to biodiversity net gain. Heritage Impact: 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.

Table J.3.2: Impact matrix assessment of site policies within the Wednesfield Core Regeneration Area

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Policy	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H2	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H3	0	+	0	-	+	-	-	-	++	++	0	++	++	++
H4	0	+	0	-	+	+	-	-	++	++	0	+	++	++
H5	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H6	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H7	0	+	0	+/-	+	+	-	0	++	0	0	++	++	++
E12	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E13	0	+	0	+/-	+	-	-	+/-	++	0	0	++	++	0

Site allocations assessed as reasonable alternatives within the Regulation 19 SA

J.3.2.1 Site Policy H2 requires high quality design which will respect the adjoining canal and biodiversity assets including the ‘Wyrley and Essington Canal’ (LNR and SINC). High quality design may provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The policy requires an HIS to ensure that any potential adverse effects on the multiple surrounding heritage assets, including the ‘Wyrley and Essington canal’ AHHTV that is located adjacent to Site H2, can be mitigated. This requirement will complement the wider heritage policies of the WLP and ensure that development at the site will not impact any surrounding heritage assets. Overall, as a result of design that will “respect” the adjoining canal, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3). The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.3.2.2 Site Policy H3 requires high quality design which will respect the adjoining canal and biodiversity assets including the ‘Wyrley and Essington Canal’ (LNR and SINC). High quality design will be likely to provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. A minor positive impact on the local landscape is identified (SA Objective 2). Furthermore, the policy will ensure that equivalent high quality recreational open space will be delivered as part of the development, ensuring that residents’ access to open space is retained and the loss of Inkerman Steet Open Space coincident with the site is mitigated. The policy also requires an HIS to be prepared to ensure that potential impacts on surrounding heritage assets which includes the ‘Bilston Canal Corridor’ and ‘Union Mill’ CAs can be fully mitigated, complementing the wider heritage policies of the WLP, and leading no significant impact on cultural heritage. Overall, as a result of design that will “respect” the adjoining canal, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3). The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

- J.3.2.3 Site Policy H4 requires high quality design which will respect the adjoining canal and biodiversity assets including the ‘Wyrley and Essington Canal’ (LNR and SINC). High quality design will be likely to provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The policy also requires an HIS to ensure that any potential impacts on the surrounding heritage assets which includes the adjacent ‘Bilston Canal Corridor’ and ‘Union Mill’ CAs can be mitigated, complementing the wider heritage policies of the WLP. Overall, as a result of design that will “*respect*” the adjoining canal, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3). The policy highlights the need to consult with Severn Trent Water to ensure adequate sewerage infrastructure can be provided to serve the development, which may help to reduce the potential for adverse effects on water quality; although, there may remain potential for air quality impacts and as such the assessments against SA Objective 7, and the other SA objectives, remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.3.2.4 Site Policy H5 requires high quality design which will respect the adjoining canal and biodiversity assets including the ‘Wyrley and Essington Canal’ (LNR and SINC), and may lead to benefits for the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding character. The policy will also provide benefits to the local economy by providing an additional 1ha of commercial land that will help to create jobs and retail opportunities. The policy also requires an HIS to ensure that any potential impacts on the surrounding heritage assets, including the adjacent ‘Bilston Canal Corridor’ and ‘Union Mill’ CAs, can be mitigated, and any archaeological potential explored prior to development, complementing the wider WLP heritage policies. Overall, as a result of design that will “*respect*” the adjoining canal, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3). The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.3.2.5 Site Policy H7 requires an HIS as a result of the surrounding heritage assets which includes ‘Heath Town’, ‘Park Village Estate’ and ‘Fallings Park Garden Suburb’ AHHTVs and various listed buildings. This requirement will complement the wider heritage policies of the WLP, ensuring that any potential adverse effects can be fully mitigated; therefore, it is expected that development at the site will not impact any surrounding heritage assets. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.3.2.6 Site Policy E12 sets out mitigation measures for the loss of open space and nature conservation value at the site, where the site wholly coincides with Neachells Lane SLINC. Mitigation includes a wildlife corridor alongside the railway line, use of buffers to the west to retain openness and retain the public right of way (PRoW) and to the south between existing residential boundaries and the proposed development to retain the existing PRoW, in order to prevent harm to nature conservation and open space value by the proposed development at the site. The mitigation through the policy is likely to enhance wildlife corridors and provide benefits to local biodiversity. However, the Neachells Lane SLINC is designated due to the provision of various habitats such as semi-improved neutral

grassland and broadleaved woodland¹ which act as a green corridor within Wolverhampton and further ecological investigations would be needed to confirm whether the mitigation measures will appropriately mitigate the loss of the valuable habitats within the SLINC, or whether biodiversity enhancements can be secured. On balance, a negligible impact on biodiversity is identified (SA Objective 3). Furthermore, the policy requires early consultation with Severn Trent Water to ensure adequate sewerage infrastructure can be provided to serve the development, which may help to reduce the potential for adverse effects on water quality; although, there may remain potential for air quality impacts and as such the assessments against SA Objective 7, and the other SA objectives, remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

- J.3.2.7 Site Policy E13 recognises that development at the site is unlikely to lead to significant effects on cultural heritage given its location away from heritage assets. No further specific requirements are set out, and as such the assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

Site allocations with planning permission

- J.3.2.8 Site allocation H6 has been granted planning permission (and therefore has not been identified by CWC as a reasonable alternative site). As discussed within **Appendix H** it is expected that wider WLP policies will ensure that smaller sites located within the urban area are unlikely to significantly affect local biodiversity assets (SA Objective 3). The site comprises previously developed land and is located wholly in Flood Zone 1, locating site end users in areas of low flood risk and helping to preserve undeveloped land within the area. Therefore, a minor positive impact is identified for climate change adaptation (SA Objective 5) and natural resources (SA Objective 6). Site Policy H6 recognises that the development is unlikely to lead to significant effects on cultural heritage given the location of the site away from heritage assets. A negligible impact is identified for cultural heritage (SA Objective 1). In line with the provisions regarding landscape from other WLP policies, the renewal scheme is expected to be in keeping with the surrounding area and could potentially lead to a minor positive impact on the local landscape character by upgrading existing housing stock and ensuring high quality design (SA Objective 2).
- J.3.2.9 Given the small-scale redevelopment, Site Policy H6 is unlikely to lead to significant effects on GHG emissions and waste (SA Objectives 4 and 8), although may lead to a minor negative impact on air pollution (SA Objective 7). The site is centrally located with good sustainable access to healthcare, employment and education, leading to major positive impacts on SA Objectives 9, 12, 13 and 14.

¹ City of Wolverhampton Council (2020) Birmingham and Black Country Local Sites Assessment Report: Neachells Lane Open Space, 2020. Available at: www.wolverhampton.gov.uk/sites/default/files/2021-08/Neachells%20Lane%20Open%20Space%20Local%20Site%20Assessment%20Report%20-%20Redacted.pdf [Date accessed: 07/10/24]

J.4 Bilston Core Regeneration Area

J.4.1 Overview

- J.4.1.1 CWC has identified 23 site allocations (see **Table J.4.1** and **Figure J.4.1**) to contribute towards meeting the development requirements within the Wednesfield Core Regeneration Area in the WLP.
- J.4.1.2 Of these, 20 sites have been evaluated within the SA process as reasonable alternatives, and the post-mitigation assessment of these sites can be found within **Appendix H**.
- J.4.1.3 Sites H9, H10 and H19 have planning permission and therefore have not been identified by CWC as reasonable alternative sites. Consequently, these sites have not been assessed as part of the reasonable alternative sites exercise within the Regulation 19 SA Report.

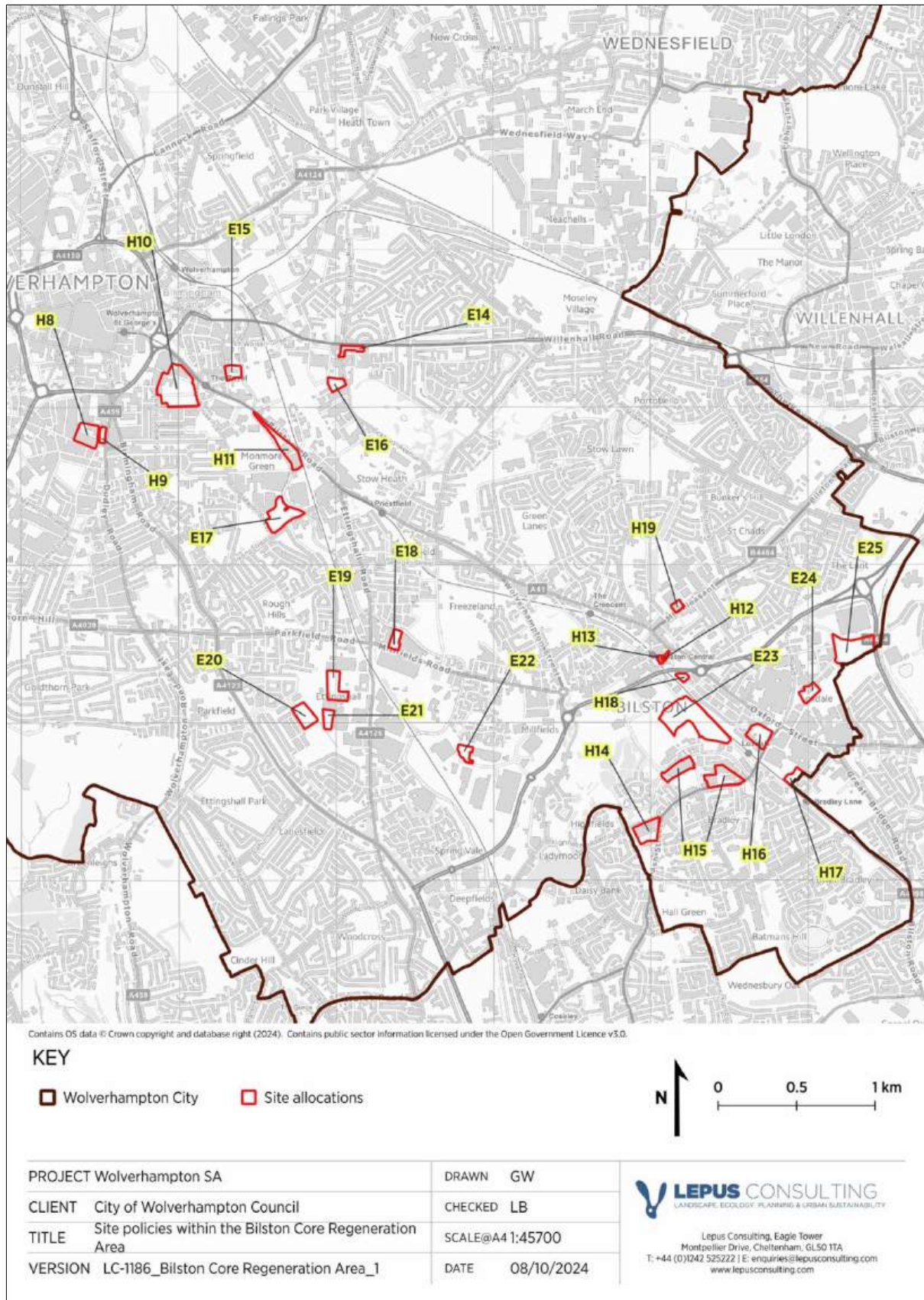


Figure J.4.1: Site policies within the Bilston Core Regeneration Area

J.4.2 Site policies

Table J.4.1: Site policies within the Bilston Core Regeneration Area in Wolverhampton

Site reference	Site name	Detailed information and policy requirements provided by CWC
H8	Dobbs Street, Blakenhall	<p>100% flats.</p> <p>Heritage Impact: 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>
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>Heritage Impact: 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>
H10	Royal Hospital Development Area, All Saints	<p>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.</p> <p>Heritage Impact: 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.</p>
H11	Delta Trading Estate, Bilston Road	<p>Replaces Bilston Corridor Area Action Plan allocation H2. Occupied employment land. High quality design required which respects adjoining Birmingham Canal (CA and SINC).</p> <p>Heritage Impact: 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.</p>
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</p>

Site reference	Site name	Detailed information and policy requirements provided by CWC
		<p>respects Bilston Town Centre Conservation Area (within which the site is located) and Grade II Listed Buildings which fall within the site.</p> <p>Heritage Impact: 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>
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>Heritage Impact: 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>
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>Heritage Impact: Site includes locally listed building, falls within Highfield Works AHHTV and adjoins Bilston Canal Corridor CA. Earlier building shown on title map. Within 500m of site are Coronation Park DLHHV 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>
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>Heritage Impact: 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>
H16	Former Loxdale Primary School, Chapel Street, Bradley	<p>100% flats. Conversion of building preferred. Subject to biodiversity net gain.</p> <p>Heritage Impact: 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</p>

Site reference	Site name	Detailed information and policy requirements provided by CWC
		(350m to northwest). HIS required, including assessment of archaeological significance and potential.
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>Heritage Impact: 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>Flood Risk: Parts of the site are at risk of surface water flooding affecting access / egress. Any development must comply with Level 2 SFRA Report requirements.</p>
H18	Land at Railway Drive, Bilston	<p>Outline permission lapsed in 2023. 100% flats. Subject to biodiversity net gain.</p> <p>Heritage Impact: 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>
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>Heritage Impact: 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>
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>Heritage Impact: 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>Flood Risk: 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>
E15	Powerhouse, Commercial Road	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

Site reference	Site name	Detailed information and policy requirements provided by CWC
		<p>Building within site, and the Birmingham Canal SINC. Subject to retention and appropriate conversion of Locally Listed Building.</p> <p>Heritage Impact: 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 LBs 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>
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>Heritage Impact: 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>
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>Heritage Impact: 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>Flood Risk: 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>
E18	Millfields Road, Ettingshall	<p>High quality design required which respects the adjoining Birmingham Canal (CA and SINC).</p> <p>Heritage Impact: Few small buildings shown on tithe 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>
E20	South of Inverclyde Drive	<p>Replaces Bilston Corridor Area Action Plan allocation EDO1. Subject to a design which protects the adjoining SLINC.</p> <p>Heritage Impact: 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.</p>

Site reference	Site name	Detailed information and policy requirements provided by CWC
E21	Rear of Spring Road	<p>Replaces Bilston Corridor Area Action Plan allocation EDO9. Subject to biodiversity net gain and a design which protects the adjoining SLINC.</p> <p>Heritage Impact: 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.</p>
E22	Springvale Avenue	<p>Replaces Bilston Corridor Area Action Plan allocation EDO11. Subject to biodiversity net gain.</p> <p>Heritage Impact: 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.</p> <p>Flood Risk: 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>
E23	Bilston Urban Village, Bath Street	<p>Replaces Bilston Corridor Area Action Plan allocation MU3. Subject to biodiversity net gain.</p> <p>Heritage Impact: 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>Flood Risk: 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>Wastewater: 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>
E24	Dale St, Bilston	<p>Subject to biodiversity net gain</p> <p>Heritage Impact: 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>
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>

Site reference	Site name	Detailed information and policy requirements provided by CWC
		<p>Heritage Impact: No built heritage assets within site. Site adjoins Walsall Canal AHHTV. 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>Flood Risk: 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>

Table J.4.2: Impact matrix assessment of site policies within the Bilston Core Regeneration Area

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Policy	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H8	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H9	0	+	0	0	+	+	-	0	++	++	0	++	++	++
H10	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H11	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H12	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H13	0	+	0	0	+	+	-	0	++	+	0	++	++	++
H14	0	+	0	0	+	+	-	0	+	+	0	++	++	++
H15	0	+	0	-	+	+	-	-	++	++	0	++	++	++
H16	0	0	0	0	+	-	-	0	++	++	0	++	++	++
H17	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H18	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H19	0	+	0	0	+	-	-	0	++	+	0	++	++	++
E14	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E15	0	+	0	+/-	+	+	-	+/-	++	0	0	++	0	0
E16	0	+	+	+/-	+	+	-	+/-	+	0	0	+	++	0
E17	0	0	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E18	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E20	0	0	0	+/-	+	+	-	+/-	+	0	0	+	++	0
E21	0	+	0	+/-	+	-	-	+/-	+	0	0	+	++	0
E22	0	+	0	+/-	+	-	-	+/-	+	0	0	++	++	0
E23	0	+	0	+/-	0	-	-	+/-	++	0	0	++	++	0
E24	0	+	0	+/-	+	+	-	+/-	++	0	0	++	++	0
E25	0	0	0	+/-	0	-	-	+/-	++	0	0	+	++	0

Site allocations assessed as reasonable alternatives within the Regulation 19 SA

J.4.2.1 Site Policy H8 states an HIS is required to inform the proposed development, given the site’s location in proximity to heritage assets, including ‘Moxley Foundry’ (Formerly Star Motors) Grade II Listed Building located north of the site. This requirement will complement the wider heritage policies of the WLP, and therefore it is expected that

development at the site will not impact any surrounding heritage assets, and any archaeological potential will be investigated prior to development. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.4.2.2 Site Policies H11, H15, E15, E17 and E18 all require high quality design which will respect the adjoining canal and biodiversity assets including the ‘Birmingham Canal’ CA and SINC. High quality design will be likely to provide benefits to the local landscape through ensuring development is in keeping with and potentially contributes to the surrounding landscape and historic character. The policies also require an HIS to be prepared to inform the development of each site, as a result of the surrounding heritage assets which includes the ‘Bilston Canal Corridor’ CA where Site E15 is located entirely within the CA and all the remaining sites are located adjacent to the CA, among other heritage assets in close proximity to the sites. Overall, as a result of design that will “*respect*” the adjoining canal, coupled with other WLP policies that will afford protection to biodiversity designations and ensure BNG is delivered, a negligible impact for biodiversity is identified (SA Objective 3). The assessments for the five policies against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.4.2.3 Site Policies H12 and H13 require high quality design which is expected to respect the ‘Bilston Town Centre’ CA which both sites are located within, and other Grade II Listed Buildings that are located within the sites. The proposed development at both sites will result in the conversion and retention of Grade II Listed Buildings. As a result, an HIS is required at both sites which will inform the development, complementing other WLP heritage policies, and ensuring that any potential adverse effects can be mitigated. The assessments for both policies against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.4.2.4 Site Policy H14 requires the proposed development to respect the historic value of the surrounding area, which includes the ‘Bilston Canal Corridor’ CA and ‘Highfield Works’ AHHTV that fall within the site boundary. As a result, an HIS is required, which will be expected to ensure the development and conversion of the locally listed Highfield Works building is informed by a thorough understanding of the heritage assets, and any adverse effects can be mitigated. Furthermore, the policy requires development to protect the ‘Dudley to Priestfield Disused Railway’ SLINC that is adjacent to the site and will provide off-site improvements to local recreational open space, providing health benefits to local residents and potentially benefits to wildlife by conserving ecological networks. On balance, a negligible impact is identified for biodiversity (SA Objective 3). The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.4.2.5 Site Policies H16 and H18 state that an HIS is required to ensure that any potential impact on the surrounding heritage assets can be mitigated, which at Site H16 includes locally listed buildings, the ‘Church of St Mary’ Grade II Listed Building and the ‘Bilston Canal Corridor’ CA, and at Site H18 includes the ‘Bilston Town Centre’ CA. These requirements will complement the wider heritage policies of the WLP, and therefore it is expected that development at these two sites will not impact any surrounding heritage assets. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

- J.4.2.6 Site Policy E14 will ensure that compensation is provided for the loss of recreational open space, where the current ‘Willenhall Road Open Space’ is located within the site. The policy will also require protection of and improvements to the environment along Willenhall Road. The policy requires development to comply with the Level 2 SFRA Site Report requirements, to ensure that surface water flood risk at the site can be fully mitigated. The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.4.2.7 Site Policy E16 requires protection and improvements to the environment along Hickman Avenue. The policy also requires an HIS to be prepared to ensure that any potential impact on the surrounding heritage assets which includes the ‘Bilston Canal Corridor’ CA can be mitigated, complementing the wider heritage policies of the WLP. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.4.2.8 Site Policies E20 and E21 will require design that protects the ‘Taylor Road’ SLINC adjacent to the sites. Development proposed at the two sites will therefore be expected to ensure there is no adverse impact on these sites, leading to an overall negligible impact on biodiversity (SA Objective 3). The assessments for both sites against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.4.2.9 Site Policy E25 requires mitigation for the loss of nature conservation value, where the site coincides with the ‘Land South of Citadel Junction’ SLINC. The SLINC is designated for the presence of uncommon / rare species to the area and an important assemblage of habitats which includes broadleaved woodland². Further ecological evaluations would be needed to confirm whether mitigation measures will appropriately mitigate the loss of the valuable habitats within the SLINC, or whether biodiversity enhancements can be secured. On balance, a negligible impact on biodiversity is identified (SA Objective 3). The policy also requires an HIS to be prepared as a result of the surrounding heritage assets which includes the ‘Walsall Canal’ AHHTV, to ensure that any potential adverse effects can be mitigated. Furthermore, the policy requires development to comply with the Level 2 SFRA Site Report requirements, as the site to ensure that fluvial flooding, surface water flooding and residual flood risk from the culverted Darlaston Brook can be fully mitigated. The assessments against the remaining SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.4.2.10 Site policies H17 and E22 recognise that development at the two sites is unlikely to lead to significant effects on cultural heritage given their location away from heritage assets. Both the site policies require development to comply with the Level 2 SFRA Site Report requirements, to ensure that surface water flood risk at the sites can be fully mitigated. Overall, the assessments of both site policies against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.
- J.4.2.11 Site Policy E23 recognises that development at the site is unlikely to lead to significant effects on cultural heritage given the location of the site away from heritage assets. The policy requires early consultation with Severn Trent Water to ensure adequate sewerage infrastructure can be provided to serve the development, which may help to reduce the

² City of Wolverhampton Council (2023). Birmingham and Black Country Local Sites Assessment Report: Land South of Citadel Junction, 2023. Available at: <https://www.wolverhampton.gov.uk/sites/default/files/2023-04/South-of-Citadel-Junction-Local-Sites-Assessment-2023.pdf> [Date accessed: 07/10/24]

potential for adverse effects on water quality; although, there may remain potential for air quality impacts and as such the assessments against SA Objective 7, and the other SA objectives, remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

- J.4.2.12 Site Policy E24 recognises that development at the site is unlikely to lead to significant effects on cultural heritage given the location of the site away from heritage assets. The assessments of the site policy against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

Site allocations with planning permission

- J.4.2.13 The development at the three site allocations H9, H10 and H19 which have been granted planning permission (and were therefore not identified as reasonable alternative sites by CWC) will be likely to positively contribute to the housing supply of the area, with a minor positive impact identified for Site H19, and a major positive impact for Sites H9 and H10 (SA Objective 10). However, the development of the three site allocations will likely result in some increase in air pollution, leading to a minor negative impact on SA Objective 7. The large quantity of development proposed at Site H10 has potential to lead to a minor negative impact on waste generation and climate change mitigation associated with increased GHG emissions, whereas a negligible impact is identified for Sites H9 and H19 due to their smaller scale (SA Objectives 4 and 8).

- J.4.2.14 Sites H9 and H10 are located on previously developed land and will help to protect the areas supply of undeveloped land, leading to a minor positive impact for natural resources; whereas, a minor negative impact is identified for site allocation H19 owing to the potential loss of undeveloped land with environmental value (SA Objective 6). In line with the provisions of other WLP policies, as discussed within **Appendix H**, it is expected that the three sites located within the urban area are unlikely to significantly affect local biodiversity assets (SA Objective 3).

- J.4.2.15 All three sites are located in Flood Zone 1, away from fluvial flood risk, and will be subject to the provisions of other WLP policies, leading to a minor positive impact on climate change adaptation (SA Objective 5). The sites are all centrally located with good sustainable access to healthcare, employment and education, leading to major positive impacts on SA Objectives 9, 12, 13 and 14.

- J.4.2.16 Site Policies H10 and H19 state that an HIS will be required to inform the proposed development at the sites, given their location in proximity to heritage assets, including Site H10 within the 'Cleveland Road' CA and H19 within 'Bilston Town Centre' CA, alongside various listed buildings and locally listed buildings. The policies require high quality design to respect these heritage assets which will be likely to provide benefits to the local landscape, ensuring development is in keeping with the surroundings and provides opportunity for positive contributions to landscape character. This requirement will complement the wider heritage policies of the WLP, and therefore it is expected that development at both sites will not impact any surrounding heritage assets. Site Policies H10 and H19 are therefore identified to lead to a negligible impact on cultural heritage (SA Objective 1) and a minor positive impact for landscape (SA Objective 2).

- J.4.2.17 Site Policy H9 recognises that development at the site is unlikely to lead to significant effects on cultural heritage given the location of the sites away from heritage assets. In line with the provisions of other WLP policies, as discussed within **Appendix H**, it is

expected that the development will not significantly affect the landscape, leading to a negligible impact on SA Objective 2.

J.5 Neighbourhoods Area

J.5.1 Overview

- J.5.1.1 CWC has identified five site allocations (see **Table J.5.1** and **Figure J.5.1**) to contribute towards meeting the development requirements within the Neighbourhoods Area in the WLP.
- J.5.1.2 All five sites have been evaluated within the SA process as reasonable alternatives (including Site H24 in four parts: H24a, b, c and d), and the post-mitigation assessment of these sites can be found within **Appendix H**.

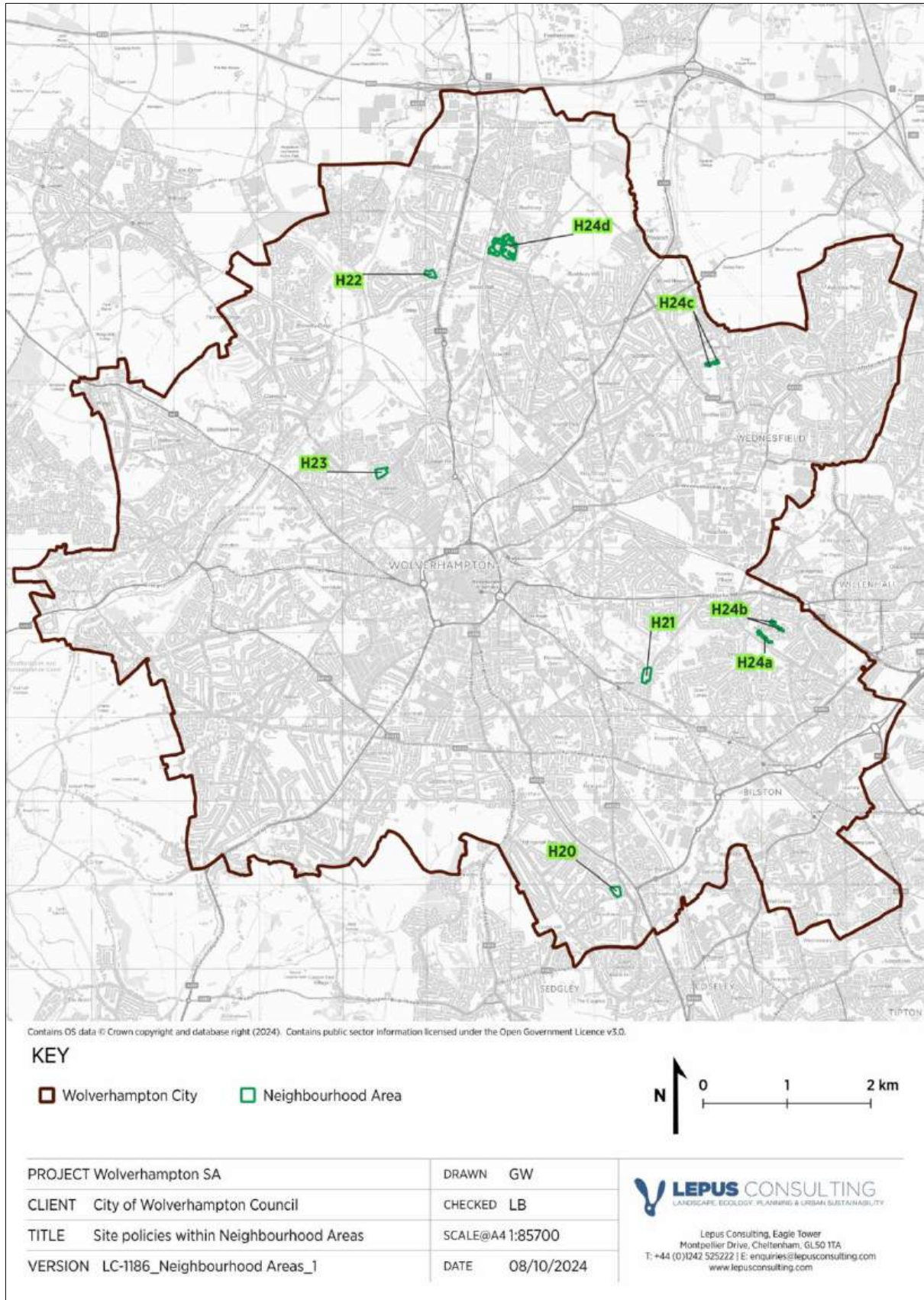


Figure J.5.1: Site policies within Neighbourhood Areas

J.5.2 Site policies

Table J.5.1: Site policies within the Neighbourhoods Area in Wolverhampton

Site reference	Site name	Detailed information and policy requirements provided by CWC
H20	Former Rookery Lodge, Woodcross Lane	<p>Subject to biodiversity net gain. Located in medium value zone (Policy HOU3).</p> <p>Heritage Impact: 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>
H21	Former Stowheath Centres, Stowheath Lane	<p>Subject to biodiversity net gain.</p> <p>Heritage Impact: 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 AHHLV (400m to northeast). No HIS necessary.</p> <p>Flood Risk: 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>
H22	Former Probert Court / Health Centre, Probert Road	<p>Subject to relocation of existing GP surgery. Located in medium value zone (Policy HOU3).</p> <p>Heritage Impact: 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>
H23	Former Gym, Craddock Street	<p>Replaces Wolverhampton Unitary Development Plan allocation H4.</p> <p>Heritage Impact: 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>Flood Risk: 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>
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>Heritage Impact:</p> <ul style="list-style-type: none"> a) Arnhem Road <p>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> <ul style="list-style-type: none"> b) Alamein Road

Site reference	Site name	Detailed information and policy requirements provided by CWC
		<p>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>c) Orchard Road</p> <p>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>d) Lincoln Green</p> <p>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>

Table J.5.2: Impact matrix assessment of site policies within the Neighbourhoods Area

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Site Policy	Cultural Heritage	Landscape	Biodiversity	CC Mitigation	CC Adaptation	Natural Resources	Pollution	Waste	Transport	Housing	Equality	Health	Economy	Education
H20	0	+	0	0	+	-	-	0	+	+	0	++	++	++
H21	0	+	0	0	0	-	-	0	+	+	0	++	++	++
H22	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H23	0	+	0	0	+	-	-	0	++	+	0	++	++	++
H24	0	+	0	+/-	0	-	-	0	++	+	0	++	++	++

Site allocations assessed as reasonable alternatives within the Regulation 19 SA

J.5.2.1 Site Policies H20 and H22 recognise that development at both the sites is unlikely to lead to significant effects on cultural heritage given their location away from heritage assets. No further specific requirements are set out for these sites; therefore, the assessments of both site policies against the SA objectives remains unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.5.2.2 The Site Policy H21 and H23 recognises that development at both the sites is unlikely to lead to significant effects on cultural heritage given the location of the sites away from heritage assets. Both the site policies require development to comply with Level 2 SFRA Site Report requirements, to ensure the risk of both fluvial and surface water flooding at Site H21 and surface water flooding at Site H23 can be fully mitigated. The assessments of both site policies against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.5.2.3 The Site Policy H24 relates to four site allocations that have been assessed separately within the SA as Sites H24a, H24b, H24c and H24d. The policy requires an HIS to ensure that the heritage assets in proximity to the ‘Lincoln Green’ site (H24d), including the ‘Prefabricated Estate, Lincoln Green’ AHHTV, are fully considered to confirm that any potential adverse impacts can be mitigated. This requirement will complement the wider heritage policies of the WLP, and therefore it is expected that development at the site will not impact any surrounding heritage assets. The assessments against the SA objectives remain unchanged from the post-mitigation assessments discussed and presented within **Appendix H**.

J.6 Site policy recommendations

J.6.1 Overview

J.6.1.1 The recommendations below set out measures that may help to mitigate some of the potential adverse effects that had been identified within **Chapters J.2 – J.5**. **Table J.6.1** presents the summary of site policy recommendations.

J.6.1.2 CWC’s response to the site policy recommendations, as well as SA recommendations to other WLP policies and general recommendations made throughout the SA process, are discussed within **Chapter 18** of the main Regulation 19 SA Report (**Volume 2**).

Table J.6.1: Summary of site policy recommendations made in the SA process

SA Objective	Recommendations
SA Objective 2: Landscape	<ul style="list-style-type: none"> Site policies relating to high density development including flats or apartment blocks, or wider WLP policies, should ensure that these developments are informed by an LVIA / LVA to identify and address any concerns regarding landscape character and views.
SA Objective 3: Biodiversity, flora, fauna and geodiversity	<ul style="list-style-type: none"> It is recommended that site policies could be enhanced by expanding on the existing statutory requirements for BNG, adding specific text to encourage well planned BNG that can provide multi-functional benefits to local biodiversity assets, for example the canal network which lies adjacent to several allocated sites and forms an important part of the ecological network. It is recommended that stronger wording is provided within the site policies to clearly indicate what measures will need to be included to ensure design will not harm biodiversity assets, particularly with respect to the canal network.
SA Objective 4: Climate change mitigation	<ul style="list-style-type: none"> The site policies that include housing renewal schemes (H6, H7, H24) would benefit from referencing how embodied carbon can be quantified and reduced.
SA Objective 6: Natural Resources	<ul style="list-style-type: none"> The site policies that include housing renewal schemes (H6, H7, H24) will benefit from providing wording to ensure that any loss of open space or gardens is retained or should ensure that an equivalent provision is made.
General	<ul style="list-style-type: none"> Where site policies refer to “<i>high quality design which respects the adjoining canal</i>” or similar requirements, it is recommended to make clear which characteristics or features are to be considered, for example cultural heritage and/or biodiversity designations, or the canal’s wider role as part of the green/blue infrastructure network. Site policies E14 and E16 should include more specific wording regarding “<i>protecting and improving the environment</i>” to clarify what aspect of the environment this relates to, including more specific detail on what developers will need to address.

Appendix K: Equality Impact Assessment (EqIA)

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K.1 Introduction

K.1.1 Overview

K.1.1.1 The aim of the Equality Act (2010)¹ is to strengthen current laws that prevent discrimination. The act applies to the provision of services and public functions and includes the development of local authority policies and plans. Equality Impact Assessment (EqIA) aims to improve the work of councils and ensure plans do not discriminate in the way they provide services and do all they can to promote equality.

K.1.1.2 The completion of EqIAs is a legal requirement under race, disability and gender equality legislation. EqIA is a systematic and evidence-based tool, which enables the City of Wolverhampton Council (CWC) to consider the likely impacts of the Plan on different groups of people who share a protected characteristic, identified in the Equality Act. Protected characteristics comprise:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race; religion or belief; and
- Sexual orientation.

¹ Equality Act (2010) Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Date accessed: 17/09/24]

K.2 Methodology

K.2.1 Summary methodology

K.2.1.1 Each policy of the Regulation 19 version of the Wolverhampton Local Plan (WLP) has been assessed for their potential positive, negative or negligible impact on potentially vulnerable equalities groups. This is in addition to the evaluation of each policy against the SA Framework, as set out in **Appendix G**.

K.2.1.2 The following questions or indicators were used to inform the assessment of potential impacts:

1. Is the policy likely to target or exclude a specific equality group or community?
2. Is the policy likely to affect some equality groups or communities differently and can this be justified?
3. Is the policy likely to be equally accessed by all equality groups and communities? If not, can this be justified?
4. Are there any barriers that might make access difficult or stop different groups or communities using the service?
5. Are any measures required to mitigate negative adverse impacts?
6. Could the policy promote equality and good relations between different groups? If so, how?

K.3 Assessment of policies by characteristic

Table K.3.1: Assessment of potential impacts of the WLP policies on the protected characteristics

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy CSP1: Spatial Strategy	+	+	0	0	0	0	0	0	0	The delivery of at least 9,330 net new homes under Policy CSP1 will be expected to positively impact isolated communities, including the growing elderly population and those with accessibility concerns. Furthermore, the provision of at least 42.9ha of employment land will be likely to provide greater job opportunities for young people.
Policy CSP2: Placemaking: Achieving Well Designed Places	+	+	+	+	+	+	+	+	0	Policy CSP2 will ensure that WLP area is well designed to be inclusive, accessible and safe to all residents, with likely positive effects on many protected groups.
Policy DEL1: Infrastructure Provision	+	+	+	+	+	0	+	0	0	Infrastructure provision likely to be provided through Policy DEL1 includes healthcare facilities, affordable housing, accessible and self-build housing, educational facilities, transport and provision of recreational open space, which will be expected to incorporate shared and accessible community spaces and inclusive bathroom facilities among others. Policy DEL1 could potentially have a positive impact on several protected characteristics as new development will provide access to a range of services and amenities for all members of the community.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy DEL2: Balance Between Employment Land and Housing	0	0	0	0	0	0	0	0	0	Policy DEL2 is not anticipated to have any significant effects on the protected characteristics.
Policy DEL3: Promotion of Fibre to the Premises and 5G Networks	+	0	0	0	0	0	0	0	0	Policy DEL3 increases coverage of high-speed internet could improve online employment opportunities to isolated communities, including the elderly population. A positive impact on the age protected characteristic.
Policy HW1: Health and Wellbeing	+	+	+	+	+	+	+	+	0	The provision of inclusive health and wellbeing services, infrastructure and facilities will help to reduce health inequalities. Policy HW1 will be likely to have a positive impact on the majority of the protected characteristics, ensuring more vulnerable members of the community have greater access to these public spaces and healthcare provisions.
Policy HW2: Health Impact Assessments	+	+	0	0	+	+	+	0	0	Policy HW2 is anticipated to have positive impacts on several of the protected characteristics. Carrying out a health impact assessment (HIA) will be expected to identify health and wellbeing issues most prevalent within the community and subsequently allowing them to be addressed. HIA may also help to identify opportunities to promote good access to social infrastructure, multi-purpose community buildings and encourage more cohesive communities.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy HW3: Healthcare Facilities	+	+	+	+	+	+	+	+	0	The provision of inclusive healthcare facilities and requirements to make new healthcare facilities accessible and appropriate to the intended catchment area will help to reduce health inequalities. Policy HW3 will be likely to have a positive impact on the majority of the protected characteristics, ensuring more vulnerable members of the community have greater access to wellbeing facilities and healthcare provisions.
Policy HOU1: Delivering Sustainable Housing Growth	+	0	0	0	0	0	0	0	0	The delivery of 9,330 net new homes over the course of the Plan period under Policy HOU1 will likely provide positive impacts on isolated communities and first-time buyers which are likely to be of a younger age.
Policy HOU2: Housing Density, Type and Accessibility	+	+	0	0	0	0	0	0	0	Policy HOU2 sets out consideration for specific housing needs for Wolverhampton residents, particularly providing positive impacts on the elderly and disabled communities who are likely to have more specialist needs, as well as for children and younger people through the provision of good quality amenity and play space alongside new development.
Policy HOU3: Delivering Affordable, Accessible and Self Build / Custom Build Housing	+	+	0	0	0	0	0	0	0	Policy HOU3 sets out criteria for accessible and adaptable homes that will particularly provide positive impacts on the elderly and disabled communities who are likely to have more specialist needs.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy HOU4: Housing for People with Specific Needs	+	+	0	0	0	0	0	0	0	Policy HOU4 sets out consideration for people with specific needs which includes children’s homes, care homes, nursing homes and extra care facilities. Positive impacts on the elderly community and disability protected characteristics are likely.
Policy HOU5: Accommodation for Gypsies and Travellers and Travelling Showpeople	0	0	0	0	0	+	0	0	0	Policy HOU5 seeks to meet the identified pitch/plot requirements for Gypsies, Travellers and Travelling Showpeople which will be likely to have a positive impact on meeting the accommodation needs of this ethnic group.
Policy HOU6: Education Facilities	+	0	0	0	0	0	0	0	0	Policy HOU6 will protect and enhance educational facilities within Wolverhampton and will ensure facilities are accessible and well served by sustainable and active modes of transport, complement and enhance neighbourhood services and address accessibility gaps to education. Policy HOU6 will be likely to have a positive impact on the younger population of Wolverhampton.
Policy HOU7: Houses in Multiple Occupation	0	0	0	0	0	0	0	0	0	Policy HOU7 is not anticipated to have any significant effects on the protected characteristics.
Policy EMP1: Providing for Economic Growth and Jobs	+	0	0	0	0	0	0	0	0	Policy EMP1 sets out details of the delivery of 42.9ha of employment land to be delivered, which is anticipated to have a positive impact on the age protected characteristic as it is likely to provide sustainable and accessible job opportunities for young people.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy EMP2: Strategic Employment Areas	0	0	0	0	0	0	0	0	0	Policy EMP2 is not anticipated to have any significant effects on the protected characteristics.
Policy EMP3: Local Employment Areas	0	0	0	0	0	0	0	0	0	Policy EMP3 is not anticipated to have any significant effects on the protected characteristics.
Policy EMP4: Other Employment Sites	0	0	0	0	0	0	0	0	0	Policy EMP4 is not anticipated to have any significant effects on the protected characteristics.
Policy EMP5: Improving Access to the Labour Market	+	+	0	0	+	0	0	0	0	Policy EMP5 requires major employment developments to demonstrate how the needs of Wolverhampton residents are met. Policy EMP5 will ensure that accessibility is considered within planning applications, including access to sustainable transport, child-care provision and measures to assist residents with physical or mental health disabilities. Positive impacts on the age and disability protected characteristics are likely.
Policy EMP6: Cultural Facilities and the Visitor Economy	+	+	0	0	0	+	+	0	0	Policy EMP6 supports the development of cultural facilities and will encourage the celebration of cultural and ethnic diversity through religious and community festivals. Furthermore, the policy will ensure that cultural facilities and events are highly accessible by public transport and design. Policy EMP6 will be likely to have a positive impact on several of the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy CEN1: Centres and Centre Uses	0	0	0	0	0	0	0	0	0	Policy CEN1 is not anticipated to have any significant effects on the protected characteristics.
Policy CEN2: Wolverhampton's Centres	+	0	0	0	0	0	0	0	0	Improved public transport to Wolverhampton's centres through Policy CEN2 is likely to result in greater levels of accessibility to those who are more isolated and vulnerable, including elderly residents who live outside of the main centres. Policy CEN2 is expected to have a positive impact on the age protected characteristics.
Policy CEN3: Provision of Local Facilities	+	+	+	+	+	+	+	+	0	Policy CEN3 will safeguard local facilities such as healthcare facilities, convenience shops and post offices. Therefore, it is likely to have a positive impact on several of the protected characteristics.
Policy CEN4: Edge-of-Centre and Out-of-Centre Development	0	0	0	0	0	0	0	0	0	Policy CEN4 is not anticipated to have any significant effects on the protected characteristics.
Policy TRAN1: Priorities for the Development of the Transport Network	+	+	+	+	+	+	+	+	0	Policy TRAN1 outlines the priorities for Wolverhampton's transport network and will expect to increase accessibility to local infrastructure, services and facilities across the Plan area for all members of the community. Policy TRAN1 is expected to have a positive impact on the majority of the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy TRAN2: Safeguarding the Development of the Key Route Network	+	0	0	0	0	0	0	0	0	The safeguarding of the key route network through Policy TRAN2 will provide members of the community with connections to the national strategic road network. This could potentially help to maintain and improve connections and travel opportunities among more isolated communities, which may include older more vulnerable people .
Policy TRAN3: Managing Transport Impacts of New Development	0	0	0	0	0	0	0	0	0	Policy TRAN3 is not anticipated to have any significant effects on the protected characteristics.
Policy TRAN4: The Efficient Movement of Freight	0	0	0	0	0	0	0	0	0	Policy TRAN4 is not anticipated to have any significant effects on the protected characteristics.
Policy TRAN5: Creating Coherent Networks for Cycling and for Walking	0	0	0	0	0	0	0	0	0	Policy TRAN5 is not anticipated to have any significant effects on the protected characteristics.
Policy TRAN6: Influencing the Demand for Travel and Travel Choices	+	0	0	0	0	0	0	0	0	Policy TRAN6 will enhance access to Wolverhampton centres through new strategic and local park and ride sites. This could potentially increase accessibility for isolated residents, such as the elderly population. Policy TRAN6 is likely to have a positive impact on the age protected characteristic.
Policy TRAN7: Parking Management	0	0	0	0	0	0	0	0	0	Policy TRAN7 is not anticipated to have any significant effects on the protected characteristics.
Policy TRAN8: Planning for Low Emission Vehicles	0	0	0	0	0	0	0	0	0	Policy TRAN8 is not anticipated to have any significant effects on the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy ENV1: Nature Conservation	0	0	0	0	0	0	0	0	0	Policy ENV1 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV2: Development Affecting Cannock Chase Special Area of Conservation	0	0	0	0	0	0	0	0	0	Policy ENV2 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV3: Nature Recovery and Biodiversity Net Gain	0	0	0	0	0	0	0	0	0	Policy ENV3 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV4: Trees and Hedgerows	0	0	0	0	0	0	0	0	0	Policy ENV4 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV5: Historic Character and Local Distinctiveness	0	0	0	0	0	0	0	0	0	Policy ENV5 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV6: Geodiversity and the Black Country UNESCO Global Geopark	0	0	0	0	0	0	0	0	0	Policy ENV6 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV7: Canal Network	0	0	0	0	0	0	0	0	0	Policy ENV7 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV8: Open Space and Recreation	+	+	+	+	+	+	+	+	0	Policy ENV8 is likely to ensure the provision of open and green spaces for residents in the area. This will ensure all members of society have access to outdoor recreation and leisure spaces.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy ENV9: Playing Fields and Sports Facilities	+	+	+	+	+	+	+	+	0	Policy ENV9 is likely to ensure the provision of playing fields and sports facilities for residents in the area. This will ensure all members of society have access to outdoor recreation and leisure spaces.
Policy ENV10: High Quality Design	+	+	+	+	+	+	+	+	0	Policy ENV10 sets out the requirements for high quality design of developments, for example through inclusivity, accessibility and safety. Policy ENV10 will ensure all members of the community are provided with accessible and safe development and is expected to have a positive impact on the majority of protected characteristics.
Policy ENV11: Air Quality	+	+	0	0	+	0	0	0	0	Policy ENV11 has the potential to reduce the likelihood of residents being exposed to unacceptable levels of air pollution. Lung health is particularly important for more vulnerable age groups such as the elderly, young people, people with disabilities and potentially also for people who are pregnant.
Policy ENV12: Flood Risk and Water Quality	0	0	0	0	0	0	0	0	0	Policy ENV12 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV13: Sustainable Drainage Systems and Surface Water Management	0	0	0	0	0	0	0	0	0	Policy ENV13 is not anticipated to have any significant effects on the protected characteristics.
Policy ENV14: Energy and Sustainable Design	0	0	0	0	0	0	0	0	0	Policy ENV14 is not anticipated to have any significant effects on the protected characteristics.

Policy	Protected characteristics identified in the Equality Act									Commentary
	Age: Older and younger age groups	Disability	Gender	Gender re-assignment	Pregnancy and maternity	Race	Religion or belief	Sexual orientation	Marriage/civil partnership	
Policy W1: Waste Infrastructure – Future Requirements	0	0	0	0	0	0	0	0	0	Policy W1 is not anticipated to have any significant effects on the protected characteristics.
Policy W2: Safeguarding Waste Sites	0	0	0	0	0	0	0	0	0	Policy W2 is not anticipated to have any significant effects on the protected characteristics.
Policy W3: Locational Requirements for New Waste Management Facilities	0	0	0	0	0	0	0	0	0	Policy W3 is not anticipated to have any significant effects on the protected characteristics.
Policy W4: Key Considerations for Waste Developments	0	0	0	0	0	0	0	0	0	Policy W4 is not anticipated to have any significant effects on the protected characteristics.
Policy W5: Resource Management and New Development	0	0	0	0	0	0	0	0	0	Policy W5 is not anticipated to have any significant effects on the protected characteristics.
Policy MIN1: Mineral Production	0	0	0	0	0	0	0	0	0	Policy MIN1 is not anticipated to have any significant effects on the protected characteristics.
Policy MIN2: Safeguarding Minerals	0	0	0	0	0	0	0	0	0	Policy MIN2 is not anticipated to have any significant effects on the protected characteristics.
Policy MIN3: Key Considerations for Mineral Developments	0	0	0	0	0	0	0	0	0	Policy MIN3 is not anticipated to have any significant effects on the protected characteristics.

K.4 Summary

K.4.1 Overview and analysis by characteristic

K.4.1.1 The WLP sets out a vision for the future development of the area, considering local opportunities and needs with regard to housing, employment, the economy, infrastructure and community facilities. Whilst doing so, the WLP will set out a means through which the natural and historic environment will be conserved and enhanced, adaptation and mitigation to climate change is supported, and places continue to be well designed.

K.4.1.2 Many of the WLP policies seek to deliver benefits for the whole community, not specifically those related to the protected characteristics. However, some of the policies will have the potential for direct or indirect impact on different groups. Each policy has been assessed for potential positive, negative or neutral impacts on potentially vulnerable groups.

K.4.2 Age

K.4.2.1 The 'age' protected characteristic includes the consideration of all ages and age ranges in the community. This assessment found that the impacts of the policies are generally positive for the people of all ages, particularly the potentially more vulnerable age groups such as the elderly and young people. In seeking to deliver a sustainable future for the area, the WLP aims to create communities which are within sustainable distances to services and facilities where possible, which are sufficient to meet day-to-day needs including employment and education opportunities, food stores and public and open spaces. Ensuring these services and amenities are accessible may benefit these groups where there may be increasing isolation in less central locations.

K.4.2.2 Specific policies may also benefit this characteristic, for example, Policy TRAN1 'Priorities for the Development of the Transport Network' and Policy TRAN2 'Safeguarding the Development of the Key Route Network' which sets out the provision for sustainable modes of transport which are accessible and integrated within the community, including active travel routes and access to the national strategic road network, ensuring more isolated members of the community (such as the elderly) can access necessary amenities and services. Policy TRAN6 'Influencing the Demand for Travel and Travel Choices' will also increase accessibility for isolated residents, such as the elderly population, by the provision of new strategic and local park and ride sites that will increase access to Wolverhampton centres.

K.4.2.3 Furthermore, Policy ENV8 'Open Space and Recreation' and Policy ENV9 'Playing Fields and Sports Facilities' seeks to safeguard open space, sports and leisure facilities and ensure these are provisioned for where new developments will occur, ensuring young people have access to active and green spaces, including play areas for children. Policy HOU1 'Delivering Sustainable Housing Growth' seeks to meet the identified local needs for the area, including for younger people more likely to be first-time buyers. Policy ENV11 'Air Quality' aims to ensure development proposals and growth in the WLP area does not result in significant increase in residents' exposure to air pollution, particularly in and around AQMAs, with likely benefits for respiratory health of children and the elderly.

K.4.2.4 Policy HOU6 ‘Education Facilities’ will protect and enhance educational facilities within Wolverhampton and will ensure facilities are accessible and well served by public transport and active modes of transport, whilst also addressing accessibility gaps in the WLP area. Policy HOU6 will therefore be likely to provide the younger population of Wolverhampton with greater access to education. Policy EMP1 ‘Providing for Economic Growth and Jobs’ sets out the delivery of employment floorspace throughout the WLP period. Policy EMP1 will be likely to increase younger people’s access to employment opportunities.

K.4.3 Disability

K.4.3.1 The policies within the WLP are written positively to benefit all members of the community. Some policies are identified as having positive impacts on people with disabilities. For example, Policies HOU2 ‘Housing Density, Type and Accessibility’, Policy HOU3 ‘Delivering Affordable, Accessible and Self Build / Custom Build Housing’ and Policy HOU4 ‘Housing for People with Specific Needs’ seeks to meet the needs of the local area, ensuring new care homes and extra care facilities are provided, and are accessible and connected to key facilities and designed to incorporate wheelchair access and access for people with specific needs. Policy ENV10 ‘High Quality Design’ seeks to ensure design is in keeping with the areas character and identity and is inclusive, accessible and safe for all residents.

K.4.4 Gender

K.4.4.1 The policies within the WLP are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having indirect positive impacts on the ‘gender’ characteristic. For example, ENV10 ‘High Quality Design’ seeks to ensure design is in keeping with the areas character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

K.4.5 Gender reassignment

K.4.5.1 The policies within the WLP are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having positive impacts on this group, similarly to the ‘gender’ characteristic above. For example, Policy ENV10 ‘High Quality Design’ seeks to ensure design is in keeping with the areas character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

K.4.6 Pregnancy and maternity

K.4.6.1 The policies within the WLP are identified to result in positive or neutral effects for all members of the community. Some policies are identified as having positive impacts on people who are pregnant or have young children. For example, Policy DEL1 'Infrastructure Provision' sets out CWC's support for infrastructure related development throughout the Plan area, including healthcare (see Policy HW1 'Health and Wellbeing' and Policy HW3 'Healthcare Facilities') and community facilities, among others. It is also likely that policies relating to accessibility, or which include improved access to shared facilities, such as Policy ENV8 'Open Space and Recreation', are likely to more widely benefit this group with pregnancy and maternity often resulting in more limited mobility and requiring access for and storage of pushchairs. Policy ENV11 'Air Quality' also has the potential to have positive impacts on people who are pregnant and people with newborns as they are likely to be vulnerable to harmful pollutants and poor air quality. Given the potential healthcare and community infrastructure needs of this protected characteristic group, some of the policies in the Plan have been identified as having a positive impact for this group.

K.4.7 Race

K.4.7.1 The policies within the WLP are likely to result in positive or neutral effects for all members of the community, although some policies are identified as having positive impacts on the 'race' characteristic. For example, Policy HOU5 'Accommodation for Gypsy, Travellers and Travelling Showpeople' seeks to ensure the provision accommodation for Gypsies, Travellers and Travelling Showpeople in the area, ensuring the needs of this group are met. Policy EMP6 'Cultural Facilities and the Visitor Economy' also supports the development of cultural facilities and will celebrate ethnic and cultural diversity which will be likely to encourage greater community tolerance and integration. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

K.4.8 Religion

K.4.8.1 The policies within the WLP are regarded as generally being positive for all members of the community. Some policies are identified as having positive impacts on this group. For example, Policy EMP6 'Cultural Facilities and the Visitor Economy' sets out the Council's support for opportunities for improving and enhancing the vitality of the town centre, including cultural and religious festivals and community facilities. Policy ENV10 'High Quality Design' seeks to ensure design is in keeping with the local character and identity, and available facilities are inclusive and accessible for all residents. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to greater community cohesion.

K.4.9 Sexual orientation

K.4.9.1 The policies within the WLP are regarded as generally leading to positive or neutral effects for all members of the community. Some policies are identified as having a positive impact on this group. For example, Policy HW1 'Health and Wellbeing' aims to foster safe, healthy, fulfilling and active lifestyles throughout the WLP area and Policy HW3 'Healthcare Infrastructure' ensures all different groups of people have access to necessary healthcare. Additionally, those policies which support opportunities for social interaction may lead to greater understanding between different groups in the community and lead to better community cohesion.

K.4.10 Marriage and civil partnership status

K.4.10.1 The policies within the WLP are regarded as generally leading to neutral effects for all members of the community and as having no differential impact on this group.



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