

WOLVERHAMPTON LOCAL PLAN STAGE 1 EXAMINATION HEARINGS

AGENDA – DAY 1 (afternoon)

Tuesday 22 September 2026 at 2pm

Venue: Committee Room 3 at the Civic Centre, St Peter's Square,
Wolverhampton WV1 1SH

MATTER 2 – Spatial strategy and site selection methodology

Please note:

- All participants are encouraged to familiarise themselves with the hearing statements (and any additional evidence) produced by the Council and other parties in respect of the matters addressed at this session. These are available on the examination website.
- Most references to questions refer to those posed by the Inspectors in their Schedule of Matters, Issues and Questions (already circulated).
- This session will not consider detailed site-specific representations.
- The hearing will run until around 5pm, with a mid-afternoon break.

Matter 2: Spatial strategy and site selection methodology

Issue 2.1

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

Questions

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

Vision and objectives

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

23. Are the thirteen strategic priorities listed in Table 2 of the Plan justified and are they consistent with the overall vision and priorities facing the city? What does the 'Further Work Required' column mean when it lists policies within the Plan? Is the Plan clear on what is proposed to be achieved through the policies in the Plan as regards meeting the strategic priorities?

Spatial strategy

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

24. Was consideration given to including the area currently covered by the Wolverhampton City Centre AAP as part of a spatial option? If not, why not?
25. Was consideration given to testing a spatial option that included some Green Belt release? If not, why not?
26. The Plan states that the spatial strategy was one of seven spatial options that were considered. Are the reasons as to why this pattern of development was selected sufficiently clear? Does it promote a sustainable pattern of development within the Plan area, in accordance with paragraph 11 of the NPPF?
27. Has the need for any strategic infrastructure requirements, particularly those relating to transport and utilities been robustly assessed as part of the spatial strategy decision-making process and are such requirements clearly set out in policy? Is the Plan clear on how such strategic infrastructure will be delivered and are the assumptions in terms of funding and timescales realistic? Is this evidence up to date?
28. Does the spatial strategy make effective use of previously developed land and is this based on a robust and up-to-date evidence base?
29. Will the spatial strategy promote the vitality of town centres in the area as required by national policy?
30. Has it been clearly demonstrated how the SA, HRA, infrastructure, viability and other relevant evidence have influenced the location of development and the overall strategy during plan-making?
31. Overall, is it clear how the spatial strategy will meet the overarching strategic objectives and achieve the Council's vision?

Policy CSP1

32. Part 1 c) of Policy CSP1 will 'Ensure that sufficient physical, social, and environmental infrastructure is delivered to meet identified needs.' The Plan is not proposing to meet all the identified housing, employment and gypsy and

traveller needs for the Plan area, so is this part of the policy clear and effective, recognising what is stated in part 3 of the policy?

33. Part 2 of Policy CSP1 appears to set out statements on how the spatial strategy will be delivered. Is the policy wording clear and effective? Is it consistent with national policy, such as in relation to Green Belt, heritage assets and open space, as well as other policies within the Plan?
34. Part 3 of Policy CSP1 states that 'Those development needs that cannot be accommodated within the Wolverhampton administrative area will be exported to sustainable locations in neighbouring local authority areas through the Duty to Cooperate'.
 - a. In accordance with national planning policy a development plan is required to set out policies for the development and use of land within its area. Is the policy wording requiring development to be exported outside the Plan area consistent with this?
 - b. How will the Council ensure that unmet needs will be delivered by neighbouring authorities during the plan period, considering the evidence submitted regarding the ability of such authorities to take any unmet needs?
 - c. Are statements of common ground with neighbouring authorities up to date? If not, why not?
35. Parts 4, 5 and 6 of Policy CSP1 describe the Growth Network (comprising Wolverhampton City Centre and the three Core Regeneration Areas of Stafford Road, Wednesfield and Bilston) and state that this will be the primary focus for new development, regeneration and infrastructure investment.
 - a. Does this adequately reflect the strategic priorities set out in Table 2 of the Plan?
 - b. Table 3 in the Plan indicates that the city centre will be the focus for housing development, whereas the Core Regeneration Areas will be the focus for employment development. Is the policy clear as to the different roles and functions of these areas and why different levels and types of growth will be directed towards them?
 - c. Table 3 of the Plan has no employment land allocations within the city centre area. How will the Plan ensure that sustainable economic growth is achieved in this area? Is this approach consistent with the Plan's strategic priorities (specifically number 8) and para. 3.18 which states that the city centre is the engine of the city economy?
36. Parts 7 and 8 of Policy CSP1 set out the approach to development in Neighbourhood Areas and the Green Belt, stating that the Neighbourhood Areas will meet 28% of the Plan's housing supply and 0% of employment land supply.

- a. The policy refers to Neighbourhood Areas but the explanatory text, such as at paragraphs 3.12 and 3.36, refers to Neighbourhoods Area. Is it singular or plural? Can the Council confirm which is correct please and explain what the term means in the context of the Plan? Is the role of Neighbourhood Areas in meeting the needs of local communities and businesses clear? How will housing and employment growth needs be met in these areas given that the spatial strategy directs only some small-scale development to these areas?
 - b. The policy states that regeneration benefits will spread from the city centre and Core Regeneration Areas to Neighbourhood Areas via access and design improvements. What does this mean and how will it be achieved?
 - c. Does the Spatial Strategy strike the right balance between seeking to protect the openness, integrity and function of the Green Belt whilst at the same time ensuring that sufficient economic and housing growth is delivered to meet the needs of local communities and businesses within the Green Belt area?
 - d. A shortfall in both housing and employment land was identified at an early stage of the plan making process. A decision was taken not to review the Green Belt in line with paragraph 145 of the 2023 NPPF in place at the time. Nevertheless, given the substantial extent of the shortfall identified, did the Council consider whether this constituted the exceptional circumstances required to review Green Belt boundaries?
 - e. Policy CSP1 refers to Green Belt landscapes and enhancing the value of the Green Belt. Are these references justified and consistent with national Green Belt policy?
37. Will the Growth Network and Neighbourhood Areas taken together ensure that growth is sustainably achieved?

Policy CSP2

38. In relation to Policy CSP2 on placemaking:
- a. How does this policy specifically relate to the spatial strategy?
 - b. Does it mainly set out Council statements rather than policy requirements which are covered by other policies?
 - c. Are all relevant policies listed? If not, what is the reason for this and is it effective?
 - d. In accordance with paragraph 16 f) of the NPPF does the policy serve a clear purpose and does it avoid unnecessary duplication of national and other local policies?

Issue 2.2

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

Questions

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

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

39. Is the site selection methodology justified, and does it accord with national planning policy and guidance? In particular:
 - a. Has it been suitably informed by relevant studies/assessments and site constraints, and has it included a sufficiently robust assessment of potential development impacts including in relation to heritage, flooding, water quality and the effect on biodiversity?
 - b. Has the sequential test, and exception test, where necessary, been correctly applied in the assessment of flood risk (including surface water flooding) for the selection of potential development sites? Is this adequately evidenced for all sites as part of the site selection process? Do any of the sites in the Plan fall within, wholly or partially, Flood Zones 2 or 3?
 - c. Does the methodology include clear and robust processes to show how decisions on sites have been made to determine whether they should be taken forward through the Plan process or discounted?
40. The site assessment methodology applied at Issues and Options stage (February 2024) was largely based on that developed during the development of the Draft Black Country Plan (2021). Why was this methodology determined to be the most appropriate for the Wolverhampton area?
41. As part of the methodology, sites with 'gateway constraints' (including biodiversity; flooding and heritage designations; existing residential and operational sites; and the willingness of landowners to develop the site), were screened out at an early stage of the process. How was this list of constraints defined, is it comprehensive and is it justified?
42. The site assessment and selection process has not been applied to the City Centre area (as defined). The Site Assessment Report states that 'Instead, broad targets for housing, retail and office floorspace have been provided' and

that this approach is robust 'due to the recently adopted detailed Area Action Plan' that covers that area, and an up-to-date Strategic Housing Land Availability Assessment (SHLAA). Notwithstanding this, we note that the Plan does not propose retail, leisure and office space in the City Centre area, but this issue will be considered under later matters. Nevertheless, is the approach to the City Centre area in terms of the site selection methodology justified, particularly since the Plan was adopted around 10 years ago? Does this have any effect on the robustness of the site selection methodology for the submitted Plan?

43. The Site Assessment Report proposes (at paragraph 2.2) to bring forward a supplementary plan for the City Centre should any further housing sites require allocation in the future. Is this approach effective and justified? Is this still the intention bearing in mind the emergence of the new planning system?
44. In seeking to identify sites, the methodology has adopted a minimum size criterion of 0.4 ha for employment sites and 10 dwellings for housing sites without planning permission and 50 dwellings for housing sites with planning permission. Are these thresholds appropriate and justified by the evidence?
45. Is it clear how the methodology has considered any relevant findings from the SA and HRA processes?
46. The Heritage Impact Assessment (HIA) (CD EN19) was published in February 2025 and, so after the publication of the Plan. Are there any findings in the HIA that affect any of the outcomes of the site selection process?
47. Sites were assessed against a variety of different criteria across the broader economic, social and environmental themes. Each site was then given a RAG rating (Red, Amber, Green) for each individual criterion. How was the list of criteria identified and is it comprehensive and justified?
48. Overall, is the site selection methodology robust and consistent with national policy and guidance?